



## Vocational Rehabilitation Standardized Rate Implementation

### Question & Answer Manual

Q & A Manual Revision Log		
Manual Version #	Date	Revision Section
1	10/13/2022	Revised QA document to address external needs and update questions to reflect implementation of Phases 1-4 rates.
2	10/20/2022	Added additional questions and answers: Questions 54-60

This Question & Answer Manual was developed in partnership with MRS staff and our vendors. We have captured the questions posed to us via our email link and from our statewide meetings. **If you have a question**, please email [LEO-MRS-Rates@michigan.gov](mailto:LEO-MRS-Rates@michigan.gov). Note that this document will be updated regularly to include additional questions.

The [MRS website](#) is also a great resource for information regarding standardized rate implementation. Helpful links related to standardized rate implementation include:

- Link to the [MRS Fee Schedule](#)
- Link to the [MRS Rehabilitation Services Policy Manual](#)

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- Question:** What does standardized rate mean?

a. **Answer:** A standardized rate is a set rate developed for services using a statistical measure in a population. The standardized rates were developed using the process of a cost study, time study, and personnel study which involved extensive data gathering and a robust analysis to establish rates for services around the state that are uniform, valid, and reliable.
  - Question:** Will the established rates be reviewed annually?

a. **Answer:** MRS is considering options for future rate adjustments. More information will be available at a later date.
  - Question:** Must vendors complete the monthly progress report in addition to submitting an invoice for payment?

a. **Answer:** The vendor should submit the monthly progress report when a participant receives employment services. This form could be used for partial billings and then a vendor format final billing report will be needed. Monthly progress report is to share progress of services being provided and the final report should be comprehensive of all data, feedback, and information gained and requested by the referring counselor.
  - Question:** Is paperwork and documentation captured in Job Development or the 90-day Follow-up time? I complete a Placement Information sheet if the individual requires Job Coaching. This goes to the MRS Counselor and Job Coach with all pertinent information. I also complete an Employment Verification Form and arrange the Job Coach. Basically, I make sure everyone has everything they need to start. In most situations I have the Job Coach attend Orientation with the customer but sometimes I sit through it with them. I've done everything from 2 hours to a full day Orientation.

a. **Answer:** MRS is implementing universal referral and reporting forms to help ensure consistency across all service providers and that critical information we need in order to make decisions is captured. We have also defined several service categories including job development and placement to help MRS staff to gain clarity when it comes to authorizing for services.

5. **Question:** Are DocuSign signatures (which are authenticated/date/time stamped electronic signatures) an acceptable format to submit with the report if the signature is mandatory with submission?
  - a. **Answer:** Currently, forms from the RSM (OJE, OJT, Referral forms etc) cannot accept DocuSign/adobe. However, other forms with the capability of using electronic signatures are allowable.
  
6. **Question:** Is there a specific invoice form?
  - a. **Answer:** MRS will not have a universal invoice for all vendors to use. You can continue to use the invoice you have always used. Payments can be partial or final if you are an agency that has a set monthly billing schedule that you would like to continue with.
  
7. **Question:** Will there be training/guidance/advice for vendors filling out the placement report?
  - a. **Answer:** Video guidance is available on the MRS website to assist with completing forms.
  
8. **Question:** For supported employment placement and follow-up, will there be different rates since it is a much more intense service?
  - a. **Answer:** There are not separate rates for supported employment services, however, these services may need additional hours authorized based on a customer's needs.
  
9. What happens if the service goes from individual to group to group to individual or group to individual, etc.?
  - a. **Answer:** The final bill can reflect how many hours were individual and how many hours were in group. The counselor can adjust/amend the authorization accordingly.
  
10. **Question:** When submitting billing for job placement, can vendors bill for time spent scheduling customers for appointments, reminding them of upcoming appointments, brief conversations regarding services, leaving messages, and so on? Are these activities mentioned above billable or non-billable?
  - a. **Answer:** Billable activities are activities directly benefiting achievement of the service the customer is authorized to receive. Billable activities, that are necessary in providing the authorized service to the customer, would be documented, and invoiced accordingly. Billable time should be documented and tracked and rounded only at the final billing invoice. Please see **MRS Standardized Rate Implementation Q & A**, specifically section: *Billing, Invoicing and System (Aware) Questions* for additional clarification.
  
11. **Question:** Is the vendor allowed to bill for activities such as filling out forms, invoices, reports, etc.?
  - a. **Answer:** Activities such as reporting, invoicing and form completion are unbillable. These activities were factored into the hourly rates developed.
  
12. **Question:** Can you bill for indirect hours on behalf of a specific client?
  - a. **Answer:** Please see the below guidance on unbillable and billable activities.

**Unbillable Activities:**

Since unbillable time and administration costs to provide services were factored into the hourly rates developed, the below services are identified as 'unbillable'.

- i. Mileage and travel time
- ii. Public relations, community education, in-service/staff meetings, staff development and training, and other administrative duties.
- iii. Missed appointments
- iv. Report Writing

**Billable Activities:**

Billable activities are activities directly benefiting achievement of the service the customer is referred for. Some examples of billable activities include:

- v. Time spent at a customer's job site. This includes time spent working with customer, managers, supervisors, and coworkers; active observations; and other tasks performed at the job site to help the customer.

- vi. Time spent working for a particular customer, but not necessarily at their job site. Off-Job Site activities include customer-specific job development and worksite development activities, employment support activities, and customer-specific off-job site training.

Tracking billable hours: A breakdown of hours (detailed description of dates, time and services rendered) must be provided at the time of billing/invoicing. Billable time for hourly services should be tracked for each customer. Due to separate services, each hourly service should be totaled and rounded separately from other hourly services. The total number of minutes billed shall be added per service, and any fraction of the total may be rounded up to the nearest one-quarter hour total. If necessary, MRS may request additional information such as a comprehensive log of all billable activities during the billing period.

The following chart depicts the minutes of the hour that may be rounded to the nearest quarter unit/hour of billing:

Service Minutes	Round to nearest quarter hour/unit
:01 - :14	.25
:16 - :29	.50
:31 - :44	.75
:46 - :60	1

13. **Question:** Are intakes conducted by a vendor with the customer present a billable activity?

- a. **Answer:** The vendor may conduct their own version of an 'intake', this would consist of any administrative activities necessary to complete their agency required paperwork. Often vendors have to get their own versions of releases, permissions, collect signatures, etc. This is all part of their administrative process and even if they meet with the customer to complete this it is not billable to MRS. However, during the same meeting or any subsequent meetings, when the vendor shifts to delivery of the requested service itself, that time is billable. So, when they start the actual service delivery for what was requested/authorized, that is billable time. We request that the vendors submit invoices stating their time to verify service delivery.

14. **Question:** Is time spent trying to reach a customer billable time? Is trying to schedule on behalf of a customer billable time?

- a. **Answer:** Communicating or reaching out to communicate with a customer or on behalf of a customer is billable. These activities should be summarized in context with the billing invoice, for example "Called customer twice at phone # on 8/31/22 and left voicemail in attempt to schedule meeting".

Unbillable activities are noted in the policy, under Vendor Expenses. Vendor Expenses - Costs of conducting business not directly associated with delivery of the requested service. These include but are not limited to:

- Employee training and supervision activities
- Employee equipment
- ADA compliance
- Administrative activities including general staff meetings
- Meetings established for referral or review of services
- No-shows or missed appointment fees
- Report writing
- Travel time

15. **Question:** When will the vendors have access to the new rates?

- a. **Answer:** The new rates are posted to the MRS website.

16. **Question:** What concerns have been expressed by private vendors, CILS/CRO's, regarding standardized rates?

- a. **Answer:** Some vendors have expressed their understanding of the need for MRS to implement standardized rates for services to come into compliance with our federal funding source, RSA. Other vendors have expressed concern that our new rates for services won't cover all their costs. These vendors can be directed to review the Uniform Guidance (2 CFR Part 200) regulations which dictate what costs can be charged to a federal award such as our VR grant.

17. **Question:** Regarding reporting, what will be our reporting requirements under this restructure?

- a. **Answer:** Reporting requirements will be similar to existing requirements; however, additional forms have been created to assist in this process to be utilized:
  - i. Referral for Job Placement Services
  - ii. Authorization Request
  - iii. Monthly Progress Report
  - iv. Employment Notice

In addition, vendors should also include the vendor format final billing report.

18. **Question:** Documentation requirements could be time extensive and take away from serving customers.

- a. **Answer:** Expectations around this type of documentation are very common in many programs and in the private sector. These forms are not intended to add an extra layer of work. They are expected to provide guidance and standardization so that staff and vendors alike consistently know what form fields are required.

19. **Question:** With the hourly rate structure, are vendors required to provide any follow along once a customer is placed?

- a. **Answer:** Counselors can authorize for follow-up services on an hourly or incremental basis as needed. Follow-along services, like all VR services, are based on the needs of the customer.
  - i. **Example:** Counselor can authorize for 10.5 hours of follow up services.

20. **Question:** Is there a separate rate for Supported Employment?

- a. **Answer:** Supported employment has a separate service for job coaching-supported employment, however, there are not separate services/rates for supported employment job placement. Customer authorizations should be based on individual customer need. Therefore, an individual with supported employment needs may have more hours authorized for supports in job placement and job coaching, along with job readiness if appropriate. The additional hours authorized to provide extensive services would result in increased payments for an individual with supported employment.

**Example:**

1. Customer 1 (non-supported employment): 10 hours job placement, 10 hours job coaching non-supported employment.
2. Customer 2 (supported employment with higher needs): 5 hours job readiness training, 25 hours job placement, 30 hours job coaching supported employment.

21. **Question:** Our company has already been signed and put into play based on pricing that has been agreed upon with our local offices. Will these rates be honored given that we have based our staffing on that projected revenue?

- a. **Answer:** Rates will be implemented based on the identified implementation schedule for all vendors working with MRS. Further discussion within MRS regarding services not covered in the rate study are underway.

22. **Question:** Rates were established based on salary studies that were done prior to the pandemic. What will be done to realign these rates given the current labor and wage pressures nationally.

- a. **Answer:** The rate calculations presented in the MRS VR Rate Study in 2020 accounted for inflation through 2020. As such, MRS has applied an inflation rate of 3.18% to align rates with 2022 market adjustments and applied an additional 7.21% (CPI growth through April 2022) for a total inflation adjustment of a 10.62%. The inflation rate was calculated using the Consumer Price Index (CPI) Midwest region, which is made available by the Bureau of Labor Statistics.

23. **Question:** What happens with the placement fee rate following an OJT? It would appear that if OJT went positively and an employer wanted to hire, I would have no billable hours and therefore receive no payment for placement after developing this contact.
- a. **Answer:** Services will be paid based on hourly billable time spent. If additional time was needed for placement in addition to OJT (assisting customer with completing employer paperwork, talking with employer, etc.), this would be billable for the time spent providing job placement services.
24. **Question:** On the first day of Job Coaching, vendor meets the customer and the employer at the job site for introductions and to get them started. Vendor may have to travel quite a distance; vendor may spend 30-45 minutes on the road one-way, 1-1.50 hrs. total for that one person. Is this travel time billable and captured?
- a. **Answer:** Please see response above regarding billable and unbillable activities. Unbillable activities such as travel have been factored into the hourly rates developed to provide the service.
25. **Question:** How do MRS rates for job placement compare to BSBP and do you see any conflicts from RSA? BSBP had the same audit finding and uses a different methodology and rate for Employment Placement?
- a. **Answer:** BSBP is a separate entity within Michigan Department of Labor and Economic Opportunity (LEO) and they have their own methodology for payment. There are no conflicts.
26. **Question:** I'm afraid we are missing a very important piece in (Monthly) Follow-up. My 30-60-90-day reports have always been reviewed with the customer. Are we skipping this piece?
- a. **Answer:** The rates should not impact service delivery. However, there will no longer be millstone payments for service delivery beginning 2/1/2022.
27. **Question:** Do we continue to generate an invoice from our own company, or will it be a form given from MRS?
- a. **Answer:** Vendors should either use their company's own invoice form or complete the vendor section of the authorization.
28. **Question:** How are customers' tiers determined? It looks like it's an acuity scale, but is this a malleable determination? For example, if after the provider gets to know the customer better it seems that a tier is inaccurate, is this something that can be revisited?
- a. **Answer:** We are not offering tiered rates, please refer to the MRS Fee Schedule for the published/finalized rates.
29. **Question:** Will individual vendor referral forms no longer be used?
- a. **Answer:** A referral form for placement and follow up has been developed and will be used for these services. MRS is determining if other standardized referral forms will be necessary. Other standardized forms that have been created for vendor use are available on the MRS website. We also encourage you to contact the local office to obtain the most recent required forms if you are unable to access them online.
30. **Question:** Can a Vendor provide services to more than one county?
- a. **Answer:** Yes.
31. **Question:** Will the approval for the request of extra hours (as part of the new paperwork requirement) be standardized/ follow specific process or will approvals differ from counselor to counselor? Will reasons for the denial of extra hours be included in communication back to a vendor?
- a. **Answer:** Because services are individualized for each MRS customer, the approval for additional units will be determined by management after case review. We are required to document rationale for approval or denial of additional units.
32. **Question:** Vendor appreciates the need to have ethics drive decision-making and that there are uncertainties in predicting the outcomes of these decisions. Vendor is concerned that there may not have been enough attention to study the impact of youth services given the change in rates. Will MRS be doing an impact study on this?
- a. **Answer:** Please see the 2020 rate report for detailed information on the data collection methodology for Pre-ETS. MRS will monitor and analyze rates and their impact to services post-implementation of standardized rates.
33. **Question:** Why is there such a large disparity in individual rates for service and group rates for the same service?

- a. **Answer:** For group services, PCG developed group rates based on the hourly cost of two or more customers, then added 6.1% to group rates for additional documentation. Group rates are billable per customer serviced in the group hour.
34. **Question:** How will these rates impact already established ICTA agreements with your local office?  
a. **Answer:** The current ICTA agreements are still in place. Agreements may be modified in the future.
35. **Question:** What is the difference between an Independent Operator and a Corporate Entity?  
a. **Answer:** Two rates were set for the Personal Care Attendant: one for Care Attendants from a Corporate Structure, which factors in benefits and an overhead administration rate; and one rate for Independent Operators which does not include any ERE costs.
36. **Question:** Will Vendors continue to provide their own fee schedule now that there is an MRS fee schedule?  
a. **Answer:** Vendors will adhere to the MRS Fee Schedule for services that have an established standardized rate.
37. **Question:** What will the expectations be for documentation and billing with these new hourly rates?  
a. **Answer:** Vendors and MRS staff will be required to use MRS documentation forms. As noted above, Vendors should either use their company's own invoice form or complete the vendor section of the authorization.
38. **Question:** Will the qualifications to provide certain services change?  
a. **Answer:** Service delivery should not change.
39. **Question:** Has MRS drafted service descriptions to provide parameters of service delivery that are consistent statewide? If so, when will they be made available to providers?  
a. **Answer:** All parameters of rates have been established and defined in the fee schedule and policy. This is available on the MRS website.
40. **Question:** As a long-term job developer in this area for the last seven years, vendor has a lot of employer relationships. Often employers will call me asking me for a candidate. This is the goal of all job developers and how we are trained. This would mean as an independent vendor I would not get payment or would receive very minimal payment for a placement for this type of situation. This is my main source of income while I am providing the smaller hourly services. Regarding both of these situations I would have avoid doing OJT set ups and immediate placements to maintain a suitable income. This would have a negative impact on our customers, employers in my area and MRS counselors serving them.  
a. **Answer:** Services will be billed based on billable time providing the services. However, once placement is obtained, additional services to secure employment and support the customer in maintaining employment would be additional authorized services.
41. **Question:** Regarding Trial Work Experiences (TWE): (1) What forms and reports will be required with trial work experiences, (2) how often should they be submitted, (3) how is site development authorized and (4) will wages be covered?  
a. **Answer:** (1) MRS counselors will complete a TWE plan with the customer and send a TWE agreement form along with the authorization. A section of this form is to be completed by the vendor following proposal of the TWE in order to obtain approval prior to service delivery. (2) TWE forms should be completed prior and after every trial work experience. (3) MRS counselors will use the *Aware* category of *Trial Work Experience* to authorize for TWE services provided in community-based CIE settings and will authorize hours for site set up. (4) Employers may require wages for the time period that the customer is performing the same job duties as other employees. This is determined on a case-by-case basis. MRS manager approval is required for wages and payroll expenses paid to the Employer of Record (EOR). Authorizations are issued using the *Aware* category *Maintenance in Support of Any Service*.
42. **Question:** Will wages be covered during On-the-Job Evaluations (OJEs)?  
a. **Answer:** Employers may require wages for the time period that the customer is performing the same job duties as other employees. This is determined on a case-by-case basis. MRS manager approval is

required for wages and payroll expenses paid to the Employer of Record (EOR). Authorizations are issued using the *Aware* category *Maintenance in Support of Any Service*.

43. **Question:** Will vendors continue to request authorization prior to service and then submit an actual bill for services rendered?
- a. **Answer:** Yes, vendors continue to request authorization prior to service. This process has not changed.
44. **Question:** Do monthly progress reports take the place of a final report, and will the monthly reports need to be included with the final report for billing purposes?
- a. **Answer:** Vendors should use the monthly progress report form **at a minimum of monthly** to provide an update on the customer's progress, services provided in the time period, and follow-up/next steps. This form may or may not accompany the invoice, however, this monthly progress report is necessary to maintain communication on customer progress in employment services. This should not replace any full assessment reports. See response above for additional information.
45. **Question:** Are these forms available online? Or will counselors share these forms with vendors?
- a. **Answer:** MRS counselors will complete and send forms for Referral for Job Placement Services or referral for Trial Work Experiences. Additional forms for services are available on the [MRS website](#) along with short video clips providing additional instructions.
46. **Question:** What are Community Based Assessments (CBAs)?
- a. **Answer:** A Community Based Assessment (CBA) is an on-the-job evaluation that does not include wages for a customer. On-The-Job-Evaluation's (OJE's) are community-based evaluations completed in a Competitive Integrated Employment (CIE) setting to assess customer capabilities, or potential to acquire skills, knowledge, or experience in employment activities towards support of a potential IPE employment goal. OJE's may be structured in one of two ways:
- A situational assessment if the evaluation includes wages for the customer.
  - A Community Based Assessment (CBA) if the evaluation does not include wages for the customer.
47. **Question:** Does a Trial Work Experience include Community Based Assessments?
- a. **Answer:** A Trial Work Experience may be structured as a Community Based Assessment (CBA) if the evaluation does not include wages for a customer.
48. **Question:** Are unpaid internships included in the Trial Work Experience? If so, is the rate different?
- b. **Answer:** Trial Work Experience (TWE) services are evaluation services structured to assess areas of concern that bring to question a customer's abilities, capabilities, and capacity to perform in a CIE setting. TWE services are structured in community-based CIE settings to the maximum extent possible. Evaluation activities include analysis of ability to participate in supported employment or customized employment settings. This service does not include internships.
49. **Question:** The hourly fee for Pre-ETS Workplace Readiness Training groups differs from that of Training Job Readiness groups. Within our district, we refer for group programming where both VR and Pre-ETS counselors are referring to the same group programming. Have the vendors been advised on how to handle different rates between VR and Pre-ETS customers in the same programming? (ii) What happens if a customer drops out of the program or misses a day which then impacts the group rate?
- c. **Answer:** There is a clear distinction between a Pre-ETS service and that of a VR service identified in an IPE that is to serve to achieve an employment outcome. PreETS Workplace Readiness Training is an exploratory/introductory service for students to learn about employment opportunities in the community. This service will be time limited as it is designed to be an introduction. Quite different, Training Job Readiness Group is a VR service that prepares an adult for employment. Defined, Training in Job Readiness – Training structured to address characteristics and behaviors that are critical in presenting to a potential employer one's ability to perform and meet employment expectations. Classroom activities include guidance and development of personality traits, personal habits, and behaviors appropriate and necessary in the workplace. Training in Job Readiness is structured for adults in the VR program. These

are not the same service and would not be in a combined format. Vendors are required to organize and differentiate programming.

- v. Have the vendors been advised on how to handle different rates between VR and Pre-ETS customers in the same programming?
  1. As described, these are different programs. An adult VR customer (who is not Pre-ETS eligible) is not to attend a Pre-ETS service. Pre-ETS are only for students who qualify for Pre-ETS services, and the programming is unique/distinct from VR.

50. **Question:** The team is getting ready for the rate restructuring of benefits counseling, and we have received mixed feedback about what is billable and not billable. Are you able to give us insight on what we can bill and cannot bill for? For tasks such as:

- Requesting BPQY from SSA
- Contacting SSA AWIC with questions about case
- Developing a Comprehensive Benefits Counseling Assessment (CBCA) Summary Report

a. **Answer:** Billable activities are activities directly benefiting achievement of the service the customer is authorized to receive. Activities outside of unbillable activities, that are necessary in providing the authorized service to the customer, would be documented, and invoiced accordingly. Unbillable activities include administrative duties, mileage/travel time, public relations, in-service staff meetings, and development or trainings. Administrative and unbillable costs were built into the hourly rate and accounted for. Please see **MRS Standardized Rate Implementation Q & A**, specifically section: *Billing, Invoicing and System (Aware) Questions*, questions 8-10 for additional clarification.

51. **Question:** May vendors continue to provide Benefits Counseling services, or must counselor refer to the WIPA program 1st? RSM 5100 - Comparable Benefits Revised 2/2022 indicates that Benefits Counseling is a service that can be purchased if it is “not readily available”. What does “not readily available” mean?

- a. **Answer:** Benefit Counseling represents a service that is authorized for only when there are no readily available comparable services or benefits, or the comparable service or benefit that is available does not meet the vocational need of the customer.

Readily Available is defined in *RSM 5100 - Comparable Services and Benefits*:

*Readily available means a comparable service and benefit is either approved through the provider or identified as accessible at the time of scheduled delivery of the service as identified in the Individualized Plan for Employment (IPE).*

The MRS counselor is required to identify if there is a need for Benefit Counseling based on their assessment of the customers current knowledge of individual benefits, associated work incentives, and the potential impact of employment. This will inform the MRS counselor of specific areas of benefit planning that require further exploration.

Next, the counselor promotes independence of the customer by assisting them with taking lead in obtaining and seeking referral to comparable services and benefits that may be available to all individuals in Michigan. This includes federal, state, and local programs that offer free services. In the case of benefit planning this includes the Social Security Administration and the grant that funds WIPA services. There may be additional entities that offer benefit counseling as a free benefit or service.

The MRS counselor may only proceed with an authorized service if there is a need for benefit counseling services beyond what was provided by the readily available comparable service or benefit (example WIPA) or if the customer was unable to access free/available resources.

When authorizing for the service the MRS counselor will request the specific benefit counseling services that remain required by the customer and will note the number of approved hours/units of service that are necessary to complete the service.

52. **Question:** Is Peer Support considered to be ‘Training-Job Readiness’ (whether Individual or ‘group), or it is ‘VR Counseling & Guidance’? RSM 6125- Counseling & Guidance of the (May 2022) seems to point to the latter, and



RSM 6300: Independent Living Services notes that Peer Consultation is a service that may be purchased from Centers for Independent Living.

- a. **Answer:** Updated MRS policies correctly separate *Training-Job Readiness and Soft Skills Development* (RSM 6230) from *Peer Guidance and Mentoring Services* (RSM 6286). Job readiness and soft skills development are federally reported as training services while peer guidance and mentoring services are federally reported as a distinct service and are not defined as training.

*RSM 6125 Counseling and Guidance*, indicates that counseling and guidance may be provided by MRS staff or if determined necessary, purchase as a service. The procedure section outlines types of providers including peer counselors who work with a CIL or other organizations. However, it does not indicate if the service would be purchased as it may be identified as a comparable service/benefit.

RSM 6300 Independent Living Services, again provides a bit more information specific to CIL's. The policy notes that CILS may provide a host of services including peer consultants. This policy does not state that the IL services are necessarily purchased. The identified services are typically referred to as the CORE services of a CIL and would subsequently be viewed as a comparable service or benefit that would not have an additional cost associated with it. As an example, the Disability Network of Michigan indicates the following:

*CIL's direct services "empower" people with disabilities to take charge of their own lives, reach their personal goals and become more effective members of their families and communities. They include the IL core services of:*

- *Advocacy*
- *Information & Referral*
- *School to Work Transition\**
- *Peer Support*
- *IL Skills Support*
- *Transition to Community Based Living*

Since 'Peer Support' is identified as a CORE service of the CIL it would be referred to as a free comparable service/benefit if the customer and MRS believed that the service would meet the need of the customer. MRS would only purchase an additional service if it is identified as an expanded service beyond the parameter of the core services and the service was needed by the customer. It will be important for MRS to work with the CIL's to distinguish between the scope of a CORE service and a fee for service that falls within the same category.

**\*This does not include Vocational Rehabilitation Pre-employment Transition services.**

53. **Question:** Are unpaid OJE's allowable under DOL and for those, who carries the liability when it is unpaid?

- a. **Answer:** The department of labor allows for unpaid OJE's. Detailed information regarding when an unpaid OJE is appropriate can be found under Section 64c08 ***Students with disabilities and workers with disabilities who are enrolled in individual rehabilitation programs***. at: [www.dol.gov/whd/FOH/FOH\\_Ch64.pdf](http://www.dol.gov/whd/FOH/FOH_Ch64.pdf). It is rare that an OJE should include wages for the customer as it is not employment, but an opportunity to assess abilities towards formation and support of an employment goal.

Regarding liability insurance, vendors who are delivering the service are required to carry liability insurance that covers all services that they deliver. This is regardless of wages being involved. This is written directly in the MRS-6010a and is signed by all parties agreeing to the terms.

54. **Question:** The referral does not have demographic information on the form; will counselors need to send a separate referral for demographic information such as guardian then person's name and number?

- a. **Answer:** Confidentiality policies require that MRS will only provide necessary information that is relevant to provide the service. If additional information is needed beyond what MRS has provided, then the vendor will assume the costs for acquiring such information and should not bill MRS for the time spent to gather such information

55. **Question:** The monthly progress report is only mandatory if the service goes over a month, correct?
- Answer:** Yes, the monthly progress report is mandatory on a minimum of a monthly basis. A final billing report is also required for payment is also required. If a service takes less than one month, a monthly progress report is not required.
56. **Question:** Is there a direct contact person to discuss a summer program created years ago? The challenge is trying to determine what categories services fit into directly and how to request the hours from MRS for this program.
- Answer:** Please contact the District manager in the areas you want to serve and discuss your program and the needs of MRS directly with the manager.
57. **Question:** Can a vendor charge a fee if the staffing **includes the customer** as part of the staffing/debriefing/engagement -does that matter or make a difference if the customer is a participant in the debriefing (if that is appropriate)? That is the staffing further clarifies with the customer present and affords the customer additional contribution/input/feedback/engagement that help guide and direct next steps, is that perhaps considered a continuation of the service and thus billable because the customer was specifically included as a participant for planning purposes?
- Answer:** A “staffing” fee to meet and review assessment/evaluation reporting and information provided by MRS is part of a vendor intake process and is not viewed as service delivery.
- Vendors have an internal process that includes setting up the customer in their system. This includes things like inputting the referral information and setting up customers files, obtaining releases or other internal forms necessary to ‘open’ the customer within the vendors system. Often that customer may be required to participate in this process and may be required to sign forms. This is also the period where the vendor is organizing their approach to facilitating service delivery. This process is referred to as an intake and is not billable as part of service delivery.
- Vendors may have to track a great deal of customer information to support their non-profit status, for CARF accreditation, for insurance purposes, etc. This is their business requirement and is not a part of service delivery. Meeting with a customer to complete internal paperwork is not viewed as service delivery and is not billable.
58. **Question:** A group for Pre-ETS has been defined as two or more customers; does a group mean that all participants are receiving the same instruction in the same environment?
- Answer:** No. The instruction should accommodate the individual needs of each participant in the group.
59. **Question:** If multiple people are in the same room but receiving different and individualized instruction, is this considered under the individual rate?
- Answer:** No. Regardless of the instruction, if two or more customers are receiving the service at the same time with the same instructor, it would be authorized at the group rate.
60. **Question:** Is it allowable for a vendor to offer a service that does not fit into a category identified on the MRS Fee Schedule? I reviewed question (Will Vendors continue to provide their own fee schedule now that there is an MRS fee schedule)?
- Answer:** Vendors will adhere to the MRS Fee Schedule for services that have an established standardized rate.) Does this mean that all services must fit into a service category identified on the MRS Fee schedule?