Case File Review Report – 2021 Division of Rehabilitation Services

Introduction:

A case file review was conducted on the Division of Rehabilitation Services (DRS), Vocational Rehabilitation (VR) Program on May 3rd-7th, 2021. The purpose of the review was to identify areas we need to improve upon, detect training needs, recognize strengths, improve consistency between offices, and assure compliance with federal and state policies.

The case file review was completed virtually this year made possible by our electronic case file system-FileDirector and improved use/understanding of Microsoft Teams. Additionally, positive feedback from last year's case review, counselor preference, and on-going preference for social distancing lead to the decision to complete a remote review again this year. The review instrument used was the case file review questionnaire incorporated into DH96VRFACES.

Approximately nine cases from each caseload were randomly selected for the review, for a total of 354 cases. The cases were open and closed cases during the last review period from May 2020 to March 2021 with the attempt to review cases for staff who are still working with the division and excluding or minimizing review of cases by staff who have left their positions.

Of the 354 cases selected for review, 354 were reviewed (100%).

Reviewers:

Sixteen staff from DRS assisted with this review and each reviewed an average of 20 case files. The reviewers are identified below:

State Office – Eric Weiss, Bernie Grimme, Jordan Trumbo, Jessica Hovland

Aberdeen – Laura Stoltenburg, Carol Drayer

Brookings – Sylvia Buboltz, Kayla Kane

Rapid City – Ronda Lynch, Ruth Schlueter, Emily Champa

Sioux Falls – Vicki Nelson, Melissa Dahl, Laura Schmit

Yankton – Jennifer Trenhaile, Whitney Beiswanger

16 Reviewers Total

Review Instrument:

The case file review instrument had multiple revisions in the last review. The case file review instrument focuses on the main areas of the VR case process: application, eligibility, IPE, services provided, and case closure. In addition, during the review process, reviewers identified areas of inconsistency and areas of attention that the VR program needs to consider.

Case File Review Findings:

Percentages less than 90% are identified as needing improvement and are highlighted in yellow. Readers should also take into consideration the validity of the results when the percent is based on a total less than 50.

Application

All 354 cases were reviewed for application criteria. The questions in this section check to make sure that the signed application is retained in the case file and that the date of application is correctly recorded on the VR case management system. The ratings for this section were positive and did not raise concerns/needs for improvement.

	Question	Yes	No	N/A	Percent
1.01	FileDirector contains a completed and signed copy of the application.	351	3		99.2%
1.02	The application date on VRFACES matches the application date on the form or the date stamped by the VR office upon receipt.	343	11		96.9%
1.03	If the individual is receiving SS Benefits, verification of the benefits was received, and the correct benefit was documented on the Intake and Special Programs pages.	140	21	192	87.0%

Eligibility

All 354 cases were reviewed for eligibility and checked for the eligibility or ineligibility criteria. Out of the 354 cases, 354 were reviewed for eligibility criteria for VR services. Of those, 346 (97.7%) were determined in 60 days or less or an eligibility extension was approved by the client.

The average number of days from application to eligibility was 25.67 days. In the previous review, the average time from application to eligibility for all new eligibilities was 26.32 days.

	Question	Yes	No	N/A	Percent
2.01	All eligibility certificates (initial and revised) are signed and in FileDirector	314	40		88.7%
2.02	The eligibility date on VRFACES matches the date on the initial eligibility certificate in FileDirector.	345	9		97.5%
2.03	For cases determined eligible, the eligibility letter was sent to the individual.	353	1		99.7%
2.04	Upon receipt of evidence that the applicant received SSI or SSDI, presumptive eligibility was completed within 5 working days (or 14 days if the case does not reflect the actual date SSA verification was received).	158	1	195	99.4%
2.05	If the eligibility determination was not completed within 60 days of application, an eligibility extension was completed and agreed upon by both the individual and counselor.	51	8	295	86.4%
2.06	Does eligibility documentation meet required eligibility guidelines?	343	9	2	97.4%
2.07	The individual's primary and secondary impairment, if applicable, and cause code(s) are correctly recorded.	341	8	5	97.7%
2.08	The case record documents that the case was assigned the appropriate priority category based on the severity of the individual's disability.	347	5	2	98.6%

Individualized Plan for Employment

A total of 285 cases were reviewed for the development of the Individualized Plan for Employment (IPE). The average length of time between eligibility and IPE for the reviewed cases was 46.7 days. In the previous review, the average length of time between eligibility and initial plans completed that year was 47.41 days. Of the 285 cases reviewed, 280 (98.2%) were completed within 90 days or less. IPEs are to be done within 90 days or an extension is to be approved by the client.

Questions were added this year to begin reviewing counselors work on quarterly reporting documentation including MSG's and Credential Attainment. Due to the changes in policy over the last several years, the results of these questions were excluded from the review results, but this section will continue to be developed over time to ensure that we are appropriately monitoring the data required to report on client progress

	Question	Yes	No	N/A	Percent
3.01	A comprehensive assessment was adequately completed between eligibility and IPE to determine the client's rehabilitation needs.	278	7		97.5%
3.02	The IPE was completed within 90 days or an extension was agreed upon by the client and VR counselor.	280	5		98.2%
3.03	The client's employment goals are specific and justified by supporting documentation.	272	13		95.4%
3.04	All services planned on the IPE are consistent with achieving the employment goal listed on the plan.	285	0		100%
3.05	The IPE includes all services necessary to achieve the employment outcome.	282	3		98.9%
3.06	Comparable services and benefits were considered and used.	278	7		97.5%
3.07	The individual and a qualified VR counselor signed the completed, final plan(s).	266	19		93.3%
3.08	All IPE signature dates on VRFACES match the signature dates on the IPEs in FileDirector.	256	29		89.8%
3.09	Annual Reviews were completed in accordance with policy.	284	1		99.6%
3.10	For supported employment cases, the Identification of Extended Services section of the IPE was completed, and the supported employment checkbox marked.	65	11	209	85.5%
3.11	Were the Enrollment Dates of Secondary, Post- Secondary or Adult Education Reported correctly?	Not Included	Not Included		Not Included
3.12	Any measurable skill gain recorded has the correct date on VRFACES AND has the necessary supporting documentation in FileDirector.	Not Included	Not Included		Not Included
3.13	If enrollment dates and MSG's recorded and the client has completed a program per other documentation, the Date of Completed Education/Training Program was completed under Measurable Skill Gain on Quarterly Updates Page.	Not Included	Not Included		Not Included

Services Provided

A total of 231 cases were reviewed for the category of Services Provided. Only cases with dollars spent for services were reviewed in this section. Findings in this section are mostly related to documentation practices for maintenance, post-secondary, benefit services, and repossession agreements.

	Question	Yes	No	N/A	Percent
4.01	The services provided are listed on the IPE, or the cost of the service was less than \$200.00 and needed to complement an existing service.	226	5		97.8%
4.02	There are no significant differences between the units of services and timelines on the IPE and the actual services delivered.	229	2		99.1%
4.03	Services such as maintenance and transportation were well-documented, justified, and necessary to the employment goal if provided.	72	0	159	100%
4.04	All services are pre-authorized.	229	2		99.1%
4.05	Financial Needs was completed correctly if it was needed.	45	8	180	84.9%
4.06	If the individual was required to participate in the cost of services as identified from Financial Needs, their contribution was documented in the Planned Services section of the IPE.	9	0	222	100%
4.07	If the individual was attending postsecondary, VR form 336 was completed correctly and in the file.	22	3		88%
4.08	If the individual participated in Project Skills, the monthly reports were completed by the school as required.	27	1		96.4%
4.09	If the individual utilized an employment services provider, appropriate progress reports or feedback was provided.	171	2	58	98.8%
4.10	VR services were provided in a timely manner or delays were justified and well-documented.	229	1		99.1%
4.11	If equipment over \$500 was purchased that was not for medical restoration purposes, the Equipment Responsibility and Repossession Agreement) was completed, signed, and retained in the case file.	21	4	206	84%
4.12	If the client failed to complete a training program or left employment for which the equipment was obtained before successful case closure, the counselor retrieved the items or completed an AT referral to DakotaLink to pick up any electronic devices.	5	3	223	62.5%

Closure

A total of 267 cases were reviewed for the category of all case closures. Of these, 66 cases were successful closures and 201 were cases closed in other statuses.

	Question	Yes	No	N/A	Percent
5.01	The reason for closure is correct and appropriate.	258	14		94.9%
5.02	The individual was informed that their case was closed.	267	5		98.1%
5.03	The SSI and SSDI statuses were recorded correctly on the Closure page for SSA beneficiaries.	129	12	131	91.5%
5.04	The information on the closure page is recorded correctly and the case file has the correct closure information.	237	35		87%
5.05	The VR counselor or a benefits specialist offered or provided benefits counseling services for SSA beneficiaries.	111	7	153	94.1%
5.06	Were all FileDirector Documents given a case end date to "close out" the case in FileDirector?	253	18		93.4%
5.07	If determined ineligible, the case file documents the appropriate ineligibility reason and contains an ineligibility certificate.	No Data	No Data	No Data	No Data
5.08	If determined incapable of benefiting from VR services due to the severity of the individual's disability, the case file documentation and case notes contain clear and convincing evidence to support ineligibility.	No Data	No Data		No Data
5.09	For individuals closed before an eligibility determination (typically unable to contact or requested to have their case closed), the case file provides documentation of this closure and no eligibility decision.	No Data	No Data	No Data	No Data
5.10	The individual achieved the planned or a closely related employment outcome resulting in competitive, integrated employment.	66	0		100%
5.11	VR services provided substantially contributed to the individual's achievement of the employment outcome.	65	1		98.5%
5.12	The client and counselor knew of and jointly agreed to the case closure.	62	4		93.9%
5.13	The start date of employment, wages, and hours are verifiable through supporting documentation, such as a pay stub, provider verification from a monthly report, employment questionnaire, a detailed case note, or VRFACES Employment Report completed by the counselor or provider.	58	8	2	87.8%
5.14	A Plan for Sustaining Employment was offered or completed with a provide for Ticket to Work cases.	42	2	227	95.5%

Qualitative Feedback

The qualitative feedback section was revised this year to remove the rating that used to be given on the counselor's service record documentation; level of contact between counselor and clients; and the counselor's counseling and guidance services provided throughout the case. A comment box where qualitative feedback <u>only</u> with no ratings was provided instead. Because counselors were not able to dispute their rating due to the subjective nature of the questions and the intent of the section to be a training tool for the clients, it was felt that this approach would be more helpful. The questions reviewers were asked to respond to for each case were.

	Question
6.01	Overall, how would you describe the service record documentation?
6.02	Overall, how would you describe the level of contact initiated by the counselor?
6.03	Overall, how would you describe the individual's level of participation in the VR process?
6.04	Overall, how would you describe the counselor's counseling and guidance services throughout
0.04	the VR process?
6.05	What did the counselor do well that positively impacted the case that should be more common
	practice?
6.06	What did the counselor do well that positively impacted the case that should be more common
	practice?

We received mixed feedback on the changes to this section that will be shared in the recommendations below.

Recommendations:

Below is a summary of various recommendations and changes. It is important to understand that many cases selected for the review are older cases with documentation and services prior to trainings and policy changes.

- 1. Changes to Review Process for next year to improve process for reviewers.
 - Resources to Staff
 - A list of which staff are and aren't CRC certified when answering IPE questions
 - Date of what policies changed and when for the R911
 - Process
 - Increased cases to review during a remote review proved difficult for some reviewers with other daily tasks that they were traying to manage
 - BIT Tickets to Complete
 - Continue working on the Save Incomplete button-From 2020
 - Develop way for reviewed cases to be sorted by district in Case File Review Browse for Supervisor review
- 2. Edits to the case file review instrument are necessary, including
 - All Sections

- Provide more clarification on exactly how to answer questions in the event that something is in correct that should warrant a "no" for multiple questions.
 - Create guidance on common situations and which ones to mark no/yes for in those scenarios
- Combine questions where able to minimize double "no's" and to decrease review burden
- Give options when you aren't able to verify something and how to answer those questions

Section 1

• 1.03-Change wording from "If the individual is receiving SS Benefits" to "If the individual is **eligible for** SS Benefits."

Section 2

- None
- Changes to this section based on last year's review were helpful

Section 3

- 3.01-Define what is standard versus best practice in help or ask a clarifying question
- 3.11, 3.12, 3.13-Provide more training and standard guidance on expectations for MSG and Credential documentation

Section 4

None

Section 5

• 5.03-Change help text to remove the requirement of the amount of benefit being correct on closure page. Clarify that type of benefit, not amount is most important.

Section 6

- Develop way to be able to indicate if work was "above average" without rating people as was done in the past
- Add a question to get feedback on comprehensive assessment

3. Clarification in policy/training will be provided on

- Items with < 90% in report
 - Reporting Wages
 - Documentation on closure page
 - Repossession and Responsibility
 - Repossession Process
 - Financial Need
 - Consistency between dates/signatures/documentation in FACES versus
 FileDirector

- CFR Process
 - How to handle double "no's" for incorrect work on review
- Comprehensive Assessment
 - Standard versus best practice
 - List of services and which would be considered required for comprehensive assessment
- Quarterly Reporting
 - MSG's-What count and documentation
 - MSG's for Project Search
 - Credential Attainment
 - Supporting Documentation
 - Post-Exit Reporting
- Eligibility and IPE Extension
 - While signature is no longer needed, we MUST get client approval and have this documented
- Plan for Sustaining Employment
 - How important is it that the specific employer is noted
 - Process for these to standardize across districts
- Providers
 - Releases of information
 - Reporting concerns
- Documentation for Goal Rational Section of the IPE
- Client with criminal backgrounds/active warrants
 - Will also be a topic of on-going discussion
- Revisions versus amendments on an IPE
- Specifying functional limitations during eligibility
- 4. Other topics that arose during CFR that require additional conversation include
 - There were some Employment Status at Time of Closure and Referral Source that were still incorrect following R911 coding changes last summer.
 - Reports will be re-ran so that these can be updated appropriately.
 - FileDirector Organization
 - Adding a Social Security Document type for any benefit related information
 - Adding a column where staff can put a brief description of what scanned document is-creates ease in searching
 - Social Security Unique Situations

- Is there enough information available to staff to help them address unique situations that clients may have regarding benefits appropriately?
- MSG Reporting
 - Changes to the way this section looks/functions in FACES will be coming soon.
 Will be able to view all MSG's reported to review as a whole, not just most recent entry.
- AT for Students
 - When is the school versus VR responsible for purchasing?
- Clients with criminal backgrounds/active warrants
 - Processes and procedures
 - 25% of our clients this past year had some kind of criminal background and we want to make sure we are handling things in the best way possible.
- Closing a file successfully with reduced hours
 - Clarify standards on this
- Documenting text messages in case notes
- Eligibility practices of counselors