
DVR In-House Services & Comparable Benefits

March 2019

Purpose

To inform DVR staff about in-house services and comparable benefits, including when to include these services in a consumer's IPE and how to document the services in IRIS.

Rationale

All services that are necessary and appropriate for a consumer to achieve an IPE goal should be listed on the consumer's IPE. This includes services that will be provided in-house by DVR staff and comparable benefits. With the new RSA 911 reporting requirements, in-house services and comparable benefits must be tracked in IRIS as they are provided.

Background

The requirement to document comparable benefits and in-house services is not new, as these services have been tracked at the time of closure; however, documenting and tracking these services in real-time is now essential to accurate quarterly RSA 911 reporting.

Developing an IPE including Comparable Services and Benefits

When developing an IPE with a consumer, DVR staff and the consumer should determine what services are necessary and appropriate for the consumer to achieve their IPE goal. This should include services that DVR would provide directly (guidance and counseling, information and referral, etc.). Once the needed services are identified, the next step is to determine who is going to provide and fund those services, including if there are comparable benefits or services available to the consumer that would meet their need.

If there is something important for the consumer to do and it is not a service that DVR would provide, consider including it as a progress measure or responsibility on the IPE. Examples include continuing mental health counseling or taking medication.

Before providing DVR services to a consumer or members of a consumer's family, except for services exempt from comparable benefits, DVR staff must determine if comparable benefits or services are available to the consumer through agencies outside of DVR. These services may be available through federal, state, or local public agencies, health insurance, or employee benefits. DVR staff must also determine whether those benefits or services are available to the consumer at the time needed.

Services provided by a comparable benefit must be listed on the IPE, as these are services that DVR has determined are necessary for the consumer to achieve their IPE goal. In these cases, DVR staff must identify that another source is available to fund or provide the service. The provider of the comparable benefit must also be identified on the IPE, and the service should be case noted when provided. If DVR has not identified a service as one that is needed for a consumer to achieve an IPE goal, it should not be case noted as a comparable benefit service.

NOTE: Services and benefits provided by non-profits, including charities, churches, and clothing banks; consumer PASS Plans through the Social Security Administration; or awards and scholarships based on merit are **not** considered comparable services or benefits.

If available, comparable benefits and services shall be used in whole or in part to cover the cost of DVR services, unless such determination would interrupt or delay:

- A consumer's progress toward achieving the employment goal identified in their IPE.
- An immediate job placement.
- The provision of such service to any consumer at extreme medical risk.

The following services are **exempt** from the determination of comparable benefits:

- Assessment for eligibility and plan for employment needs
- DVR counseling and guidance
- Referral and other services to secure services from agencies outside of DVR
- Placement services
- Rehabilitation technology

Examples of comparable benefits include:

- Assistive technologies (hearing aids, wheelchairs, etc.)
- Medical services (dental care, glasses, medications, etc.)
- Childcare
- Transportation
- Training/school

Examples of sources for comparable benefits include:

- Health insurance
- W-2
- County programs
- Workers' Compensation
- VA
- Libraries
- Financial Aid

Documenting Comparable Benefits

Any service that is necessary for the achievement of a Consumer's employment goal should be included in the IPE, including services provided through comparable benefits. Comparable benefits can be documented from the following pages in IRIS:

- Authorization Casenote
- Draft & Amendment IPE
- Draft Closure
- General Casenote

NOTE: To determine if a service should be listed on the IPE, consider the following: ***If another entity did not provide the service, would DVR provide it?*** If the answer is yes, and the service is necessary to achieve the IPE goal, then it should be listed as a comparable benefit service in the IPE.

When comparable benefit services begin, DVR staff are required to enter a comparable benefit case note indicating the start and end date of the service and the provider of the service (up to three providers may be selected). Staff should not enter a comparable benefit case note until they are certain the service has started. This process will assist in ensuring we provide accurate reporting to RSA on when services are provided. Documenting a comparable benefit case note makes that consumer a participant for RSA 911 reporting purposes. If you do not know the actual end date, enter the anticipated end date and update when needed. The RSA 911 report pulls data directly from the comparable benefit case note.

NOTE: The start date of the comparable benefit may be before the date the case note is entered if the service began previously. For example, if a student tells you on February 20 that they began receiving self-advocacy training from their high school on January 20, the comparable benefit case note should be entered on February 20 with the comparable benefit start date noted as January 20.

It is critical that DVR staff enters the correct start and end dates for all services whether by entering a comparable benefit or in-house service case note or by including the start and end dates on a purchase order. These dates are used to report the provision of services on the RSA 911 report, and the reports must be accurate.

DVR In-House Services

DVR services provided in-house include all services that a DVR staff person provides themselves. While it is expected that in-house services be planned for and listed as appropriate in the IPE, there may be times that an unplanned in-house service must be provided. A common example is information and referral. In these cases, it is not necessary to go back and list information and referral in the IPE if not already amending or updating the IPE. These services should, however, be case noted when they occur.

The following are options for DVR in-house services:

- Vocational Guidance and Counseling: **Code 068**
- Pre-ETS Vocational Guidance and Counseling: **Code 220**
- General Assessment: **Code 021**
- Pre-ETS Assessment: **Code 201**
- Information and Referral: **Code 077**
- Pre-ETS Post-Secondary Counseling: **Code 221**
- General Job Development: **Code 024**
- Pre-ETS Student Work Based Learning: **Code 208**
- Job Referral: **Code 025**
- Pre-ETS Job Referral: **Code 209**

NOTE: For specific fiscal account code descriptions, please see the Fiscal Account Code document http://dwd.wisconsin.gov/dvr/pdf_files/fiscal_account_codes.pdf.

Documenting DVR In-House Services

Like comparable benefits, in-house services that are necessary and appropriate for the achievement of an employment goal should be listed on the IPE. In-house services can be documented from the following pages in IRIS:

- Authorization Casenote
- Draft & Amendment IPE
- Draft Closure
- General Casenote

When in-house services begin, DVR staff are required to enter an in-house services case note and indicate the start and end date of that service. Documenting an In-House Services case note makes that consumer a participant for RSA 911 reporting purposes. It is important that the dates entered are accurate as the provision of the service will be reported on the quarterly RSA 911 report. The RSA 911 report pulls data directly from the in-house service case note.

Comparable Benefits vs. Information and Referral

Comparable benefits are services DVR can provide if no other entity is providing the service. Information and referral, on the other hand, is the method by which referrals are made to agencies for services that DVR typically would not provide. Information and referral is also used to make referrals to agencies with which DVR has formal agreements (e.g., W-2, VA, etc.).

Example: If a DVR Counselor provides information and referral to the VA for assistance, it is considered an in-house provided information and referral service. If the consumer is accepted to the VA program and qualifies for assistance with training, the training service becomes a comparable benefit.