




Title:	<b>Programmatic Case Reviews Procedure</b>
Procedure #:	<b>30-QA-01-01</b>
Policy Reference:	30-QA-01 Case Reviews
Legal Reference:	ORC 3304.15; 34 CFR §361.29(c)(4)(iii); 34 CFR §361.39
Effective Date:	October 1, 2014
Approved:	Kevin L. Miller, Executive Director 
Origin:	Division of Performance and Innovation, Program Integrity & Evaluation
Supersedes:	30-QA-01 (1/15/12)
History:	70-QA-10 (12/13/10); VRP-1700 (9/15/08, 2/2/06); any policy, Internal memos (CW, MT), regarding case reviews that predate the effective date of this policy
Review date:	Annually on or before October 1 <sup>st</sup>

**I. PURPOSE**

The purpose of this procedure is to provide direction for Vocational Rehabilitation (VR) and Independent Living Older Blind (ILOB) staff and Vocational Rehabilitation Contractors (VR Contractors) for the process of completing case reviews in accordance with appropriate federal (e.g. Code of Federal Regulations [CFR]) and state law (i.e. Ohio Revised Code, Ohio Administrative Code), governor directives and executive orders, other governing agency (e.g. DAS, OBM) policy or guidance, and/or executive director expectations.

**II. APPLICABILITY**

This procedure applies to all Program Integrity and Evaluation (PIE) staff, VR and ILOB staff, and VR Contractors.

**III. DEFINITIONS**

AWARE (Accessible Web-Based Activity and Reporting Environment) - an electronic VR case management system which houses an individual's confidential information and data.

Compliance - mandatory requirements prescribed by the Ohio Revised Code, the Ohio Administrative Code, agency policy, and the Rehabilitation Services Administration (RSA) through the Rehabilitation Act of 1973 and its subsequent amendments as outlined in the Code of Federal Regulations. Per RSA standards, deviations below a 90 percent rating are considered non-compliant for reporting purposes, although some items may inherently require 100 percent compliance due to the impact it may have on a consumer.

Coordinator – an individual who works for a contractor or subcontractor and who performs case management activities (not including non-delegable functions that must be performed by OOD staff) pursuant to a contract.

Quality - a standard of providing the best possible vocational rehabilitation services to consumers that includes ensuring supporting documentation of such services.

Quality Assurance System Application (VRQA): the electronic system that stores and manages information related to case reviews and consumer surveys, and program monitoring.

Quality Assurance Record Retention – case review records and subsequent reports shall be maintained for two (2) years, including the current and the two previous Federal Fiscal Years (FFY).

Vocational Rehabilitation Contractors (VR Contractors) – entities or individuals that OOD has contracted with to provide specific services to VR applicants or eligible individuals.

Vocational Rehabilitation Contracts Unit (VR Contracts Unit) – OOD work unit responsible for the negotiation and management of case management activity and ILOB contracts.

Vocational Rehabilitation Staff (VR Staff) – for the purposes of this procedure, caseload assistants, counselors, and vocational rehabilitation supervisors from the Bureau of Vocational Rehabilitation and the Bureau of Services for the Visually Impaired.

#### **IV. PROCEDURES**

##### **A. General Overview**

1. All forms and attachments identified in 30-QA-01 “Programmatic Case Reviews” are to be utilized for the case review process detailed in this procedure. The “Case Review Guide” (30-QA-01.B [VR] and 30-QA-01.E [ILOB]) shall be utilized for reference and guidance to ensure consistency and fairness in terms of expectations for case work.

##### **B. “Case Review for VR” (30-QA-01.A) and “Case Review for ILOB” (30-QA-01.D ILOB)**

1. When conducting a case review, the reviewer shall select the type of case review being conducted at the top of the form to designate whether it is a VR or ILOB case review. Items for the review are then determined based on this selection.
2. The form includes ratings of Present (P), Partially Present (PP), Not Present (NP), and Not Applicable (N/A). The Partially Present category is to allow some credit to be calculated in the case review score for items that do not fully meet the criteria for full compliance, yet have a portion of the information present.
3. A helpful feature of the case review forms is that the fields at the top section of the form regarding case information, as well as the fields designating status dates, will auto-populate based on information stored in AWARE. If the pre-populated dates are not a true reflection of the case, it is up to the supervisor to work with staff to correct any data in AWARE so that it accurately reflects the case.
4. At the top of each section is a reference to the numbers for the Code of Federal Regulations (CFR) and the Ohio Administrative Code (OAC) pertaining to the compliance items in that section so staff can easily reference any of these items if further interpretation is necessary.
5. Each section has a designated space for comments which reviewers should use to reflect any item(s) in that section that were noteworthy (e.g. items needing improvement, items needing further discussion, items of high performance).

6. Although each section of the case review shall be scored and an overall score for the case shall be provided, scores will not be calculated until the review is submitted into the VRQA so answers cannot be changed to influence the scoring. N/A ratings will not be included in the calculation.
7. Scores will not be calculated for targeted case reviews.

#### C. Case Reviews by Supervisors

1. VR supervisors and VR Contracts Unit supervisors are to complete case reviews from a VR counselor or coordinator's caseload in order to evaluate compliance with OOD policy and procedure.
2. The VR supervisor case reviews are intended to be used for a VR counselor's performance evaluation, and are not intended to be used for program evaluation purposes.
3. Case reviews shall be used by the VR supervisors and VR Contracts Unit supervisors to provide feedback to VR counselors and coordinators and to identify office trends which may require additional exploration.
  - a. Supervisory case reviews may also be used to review challenging cases, to assess if cases contain adequate documentation to support programmatic decisions, and/or to identify trends within individual and team casework requiring potential attention.
4. VR Contractor supervisors are required to complete a minimum of five (5) case reviews per year for each coordinator.
5. VR Contracts Unit Supervisors shall complete one (1) case review each month for each of the Liaison Counselors. The purpose of these reviews are to ensure consistency in the non-delegable VR functions of eligibility, Individual Plans for Employment, and closure and to provide feedback and guidance to the Liaison Counselors and general oversight of the VR Contractors.
6. VR Supervisors are not required to complete a specified number of case reviews, but should do so with the understanding that case reviews should be completed for more difficult cases or when there is concern about adequate documentation being present in a case to support the programmatic decisions.
7. For ILOB cases, case reviews shall be conducted by the VR supervisors for those staff who are designated as ILOB counselors. The VR Contracts Unit supervisor for the ILOB program shall also complete case reviews for each ILOB contractor.

#### D. Completing Case Reviews Electronically

1. Case reviews are to be completed electronically in the VRQA.
2. The VRQA may be accessed via the following link: <https://casereview.ood.ohio.gov/VRQA>. After accessing this link, the "log in screen will be seen. The OOD log-in username (i.e. rsc\_XXX) and password are to be used.

3. The reviewer must enter the participant's Case ID # in the "Targeted Case Review" section and push the "Retrieve Review Form" button. (Note: PIE staff will typically utilize the random review list process as outlined in 30-QA-01 "Programmatic Case Reviews" unless they are completing a targeted case review.)
  - a. To access the Case ID#, the reviewer can use the "Caseload Open 1 Layout" for open cases.
  - b. For closed cases, create a Managed Layout using the Master List Layout in AWARE as follows:
    - i. click on the Participant button on the main screen in AWARE;
    - ii. click on the "Action" tab;
    - iii. click on "Managed Layouts";
    - iv. when the "Managed Layouts for Case Search" appears, click "New";
    - v. when the "New Layout for Case Search" appears, the reviewer shall name the new layout and then select "Case" in the "Layout Group";
    - vi. select "Master List" from the drop down menu of the "Layout Template";
    - vii. click the "Finish" button;
    - viii. the "Layout Options for User (your name) Master List Layout" page will appear, select the column headings that are preferred by using the drop down menus (note: be sure to select Case ID as one of the options on the drop down menu); and
    - ix. once the desired column headings have been selected, click "Finish" at the top of the screen to save the layout.
4. After selecting whether the case review is for a VR or an ILOB case, the reviewer shall complete the appropriate "Case Review Form" (30-QA-01.A [VR] or 30-QA-01.D [ILOB]) electronically for each case as the case review is being completed.
  - a. Identifying information at the top of the case review form which has been pre-populated from AWARE should be verified by the reviewer.
  - b. Each item is to be rated by clicking in the circle beneath the appropriate rating (P, PP, NP, N/A).
  - c. The appropriate "Case Review Guide" (30-QA-01.B [VR] or 30-QA-01.E [ILOB]) should be consulted throughout the review process to verify the meaning of each item, how to determine the rating, and where the information is typically documented in AWARE. Proceed through the case review process by completing all of the sections (or only those sections desired for targeted review). For convenience, a link to the case review guide appears at the top of the screen throughout the case review process.
  - d. If a new case review is commenced and the reviewer gets interrupted the "Save" button should be selected in order for the VRQA to save the portions of the review that have been completed. The system will then reflect that the case review is "In Process".
  - e. Once the review has been completed, the reviewer should hit the "Complete" button so the VRQA will save the review and forward notification to the appropriate counselor/coordinator. The system will then reflect that the case is in "Completed" status rather than "In Process".

5. All cases completed by a VR supervisor or VR Contracts Unit supervisor will default to the purpose of "Performance Evaluation" unless "Targeted Case Review" is checked at the top of the form.
6. If the reviewer chooses to complete a targeted case review, a partial case review may be completed to focus only on specifically-chosen items.
  - a. Supervisors shall follow the guidance from VR Administration regarding which sections/items are to be of primary focus for targeted case reviews and how frequently they are to occur.
  - b. Results of targeted case reviews can be compiled in a separate report and will reflect the individual items chosen for the case review.
7. Upon completion of the case review form in its entirety by an RPS, an email notification will automatically be sent to the VR supervisor or contract supervisor requesting they review the findings and enter any comment(s) on the electronic case review form. The email will contain links to current policies and to the appropriate "Case Review Guide".
  - a. In order to ensure the RPS case reviews are not connected in any way to a counselor or coordinator's performance, the supervisor is not to forward the case reviews completed by an RPS to the counselors or coordinators.
8. Once comments are submitted, an email will be sent to the reviewer notifying them that the case is ready for final review and finalization before submission into the VRQA.
9. If there is no response to the email within the established timeframe of three (3) weeks, the reviewer shall submit the review as final with a note in the Corrective Action section stating, "No comments received, therefore confirming agreement with the findings."
10. Due to reporting structure limitations in AWARE, the VRQA is only able to identify one supervisor per contract to receive emails. The VR contractor will need to develop a method to forward emails to the appropriate supervisor when multiple supervisors exist for one (1) contract.
11. When a supervisor completes a case review a similar process as described above will occur, except email notifications and responses will be sent between the supervisor and the VR coordinator or counselor.
12. Once comments are submitted by the VR counselor or coordinator, an email will be sent to the VR supervisor or contract supervisor notifying them that the case is ready for final review, finalization, and submission into the VRQA.
  - a. If the VR counselor or coordinator does not respond within the established timeframe of three (3) weeks, the VR supervisor or contract supervisor shall submit the report as final with a note in the Corrective Action section stating, "No comments received, therefore VR counselor or coordinator acknowledges agreement with the findings."
13. Results of the case reviews can be accessed in the VRQA by DPI staff, VR Deputy Directors, VR Assistant Deputy Directors, Area Managers, VR/VR Contracts Unit Supervisors and VR RPSs.

- a. Permissions for VR supervisors are granted on an area or a contractual level. Others listed will have statewide access to the case review results.

#### E. Additional Quality and Compliance Methods for the Case Review Process

1. Various quality and compliance methods will be implemented in conjunction with the case review process which include, but are not limited to, the following:
  - a. Master List Case Reviews are to occur on an on-going basis providing an opportunity for discussion regarding delivery of the best quality services to consumers.
    - i. The VR supervisor or contract supervisor shall review a master list along with the VR counselors or coordinators and discuss:
      - a) case service provision to identify barriers and solutions regarding progress in applicant and eligible individual cases including responsibilities and VR needs;
      - b) collaboration with other community partners; and
      - c) a review of fiscal considerations related to case service delivery.
2. VR counselors and coordinators are encouraged to discuss cases during team meetings with peers and supervisors.
  - a. Such discussions are intended to generate creative ideas, ensure consistency amongst service delivery decision making and documentation, and help solidify action steps for case development.
    - i. This process is not always formalized and it is up to local management to determine the structure of such meetings.

#### F. Action steps shall be developed by BVR and BSVI management and VR contractors for prioritized areas that are below 90 percent compliance on a statewide level.

1. The PIE Manager will work with staff from these bureaus to assist in developing action steps for priority areas identified as deficient within thirty (30) days following the end of the federal fiscal year.
2. A final copy of the VR action steps shall be forwarded to the PIE Manager to review and monitor progress.
3. Progress updates on the action steps will be included in subsequent trainings.

#### G. Violation

An employee who violates this procedure may be subject to discipline up to and including removal.

### **FORMS AND ATTACHMENTS**

- N/A

### **RESOURCES**

- N/A

## **REVIEW**

It is the responsibility of the Deputy Director, or designee, to annually review this procedure, on or before, the date listed in the header and if applicable, make any necessary revisions. The Deputy Director or designee shall document the annual review as required in OOD Policy 10-ADM-01 "Policy and Procedure Development, Review, Dissemination and Acknowledgement".