

SECOND INTEGRATED ACTION PROGRAM PLAN
BETWEEN
THE OHIO REHABILITATION SERVICES COMMISSION
AND
THE OHIO DEPARTMENT OF PUBLIC WELFARE

TABLE OF CONTENTS

	<u>PAGE</u>
INTRODUCTION.....	1
MEMORANDUM OF AGREEMENT.....	11
I - SELECTION CRITERIA.....	1
II - REFERRAL PROCEDURE.....	1
III - SERVICES TO BE PROVIDED BY VOCATIONAL REHABILITATION.....	1
IV - SPECIAL SERVICES FOR THE BLIND.....	1
V - SERVICES TO BE PROVIDED BY PUBLIC WELFARE.....	2
VI - SERVICE PLANNING AND MANAGEMENT.....	3
VII - COMMITMENT OF RESOURCES.....	4
VIII - SUPPORTIVE SERVICES FROM OTHER AGENCIES.....	4
IX - STAFF DEVELOPMENT.....	4
X - INTER-AGENCY REPORTING SYSTEM.....	4
XI - INTEGRATION OF EFFORTS.....	4
APPENDIX A - SPECIAL SERVICES FOR THE BLIND.....	6
APPENDIX B - ELIGIBILITY CATEGORIES FOR TITLE XX.....	9

MEMORANDUM OF AGREEMENT

THIS AGREEMENT, made and entered this 1st day of October, 1976, by and between the Ohio Rehabilitation Services Commission, with central offices located at 4656 Heaton Road in the City of Columbus, and the Ohio Department of Public Welfare, with central offices located at 30 East Broad Street in the City of Columbus.

WITNESSETH:

WHEREAS, the Ohio Department of Public Welfare is authorized and directed by Section 121.17 Revised Code and the Ohio Rehabilitation Services Commission is authorized by 3304.16 Revised Code to devise a practical and working basis for cooperation and coordination of work, specifically in the Employment of Services.

and

WHEREAS, a great need exists in the State of Ohio's 88 counties for coordination of programs to rehabilitate the disabled welfare recipient so that he may achieve maximum self-support.

NOW, THEREFORE, an agreement between the two parties has been entered into and is the attachment hereto, said attachment being styled as "Integrated Action Program Plan between the Ohio Rehabilitation Services Commission and the Ohio Department of Public Welfare", which is hereby incorporated by reference herein as fully as if set forth.

IN WITNESS WHEREOF, the Ohio Rehabilitation Services Commission and the Ohio Department of Public Welfare have executed this agreement as of the day and year first above written.

OHIO REHABILITATION SERVICES COMMISSION

Richard P. Oestreich
Richard P. Oestreich
Administrator

Sept 15, 1976
Date

OHIO DEPARTMENT OF PUBLIC WELFARE

Kwagyle Haggrey
Kwagyle Haggrey
Director

Sept 30, 1976
Date

INTEGRATED ACTION PROGRAM PLAN
BETWEEN
THE OHIO REHABILITATION SERVICES COMMISSION
AND
THE OHIO DEPARTMENT OF PUBLIC WELFARE

INTRODUCTION

The present agreement between the Ohio Department of Public Welfare (ODPW) and the Ohio Rehabilitation Services Commission (ORSC*) is revised to integrate the Social Services regulation of Title XX, public assistance and Medicaid policies and to reflect the changes in the Vocational Rehabilitation Act of 1973 and 1974 Amendments.

Since the Ohio Rehabilitation Services Commission's statewide caseload contains disabled public assistance recipients, it is appropriate for ODPW and ORSC to continue to work cooperatively for their mutual benefit in enabling this cross-section of Ohio's disabled population to become economically independent and to reduce the number of recipients on the public assistance rolls.

* It should be noted that the Bureau of Vocational Rehabilitation (BVR) and the Bureau of Services for the Blind (BSB) are bureaus of the Ohio Rehabilitation Services Commission (ORSC).

I Selection Criteria

The Ohio Department of Public Welfare will refer all appropriate mentally or physically disabled applicants and recipients of public assistance to the Ohio Rehabilitation Services Commission.

To be eligible for vocational rehabilitation services, the individual must have a physical or mental disability which for such individual constitutes or results in a substantial handicap to employment, and for whom vocational rehabilitation services may reasonably be expected to benefit the individual in terms of employability.

Eligibility for vocational rehabilitation services will be determined by the Ohio Rehabilitation Services Commission. These selection criteria shall be utilized:

- a. Severely disabled public assistance recipients.
- b. Recipients of SSI whose names appear on the State Data Exchange System.
- c. All recipients of ADC who are determined ineligible for WIN due to incapacity (receiving or pending ADCI). This is mandated by 45CFR224.20 entitled "Registration requirements for AFDC applicants and recipients; state plan requirements" (PAM 318).
- d. All other public assistance recipients (including GR and food stamps) who meet the eligibility requirements of ORSC.

II Referral Procedures

Referrals to the Ohio Rehabilitation Services Commission will be made by County Welfare Department Social Services staff. Many of these referrals will originate from the County Welfare Department Income Maintenance staff, who will refer to County Welfare Department Social Services. The referrals by the County Welfare Department will be directed to the appropriate Rehabilitation Services Commission field offices serving the area in which the recipient resides. A referral form ODPW 1506 (formerly 1201), with appropriate instructions, has been developed for this purpose, and is available to all 88 County Welfare Departments.

Conferences will be held between the staff of both local agencies to determine the progress of the client and to determine what additional services are needed.

In addition, the liaison officers for the Department of Public Welfare and the Rehabilitation Services Commission will meet periodically for planning, developing and monitoring the provision of rehabilitation services to the welfare recipient. This will include follow-up at the local level, as appropriate.

III Services to be Provided by Vocational Rehabilitation

The Rehabilitation Services Commission will provide or assist in coordinating vocational rehabilitation services which may reasonably be expected to benefit the individual in terms of employability.

The rehabilitation services provided by the Commission include, but are not limited to, evaluation, including diagnostic and related services; counseling; training, including personal and vocational adjustment; physical restoration; job placement and post-employment services.

IV Special Services for the Blind

Special Services may be available to blind or visually impaired individuals who meet BSB eligibility criteria. (See Appendix A.)

V Services to be Provided by Public Welfare

A. Social Services

According to the plan of the Ohio Department of Public Welfare, each County Welfare Department has income maintenance and social service functions administered by separate staff. In developing a vocational plan for the individual, RSC staff should consult the social services staff in each County Welfare Department for services under Title XX that are available for that individual. These services are listed in their county profiles which are available in each county office. (Please refer to Appendix B.)

B. Public Assistance Policies

1. Rehabilitation Allowances - ADC, GR, Medicaid

Allowance paid by ORSC to enable a client to participate in a rehabilitation plan are not considered as income in the Aid to Dependent Children (ADC), General Relief, (GR), or Medicaid Programs. This includes payments for items such as lunches, books, transportation, tuition and fees, and room and board at an out-of-town site located beyond reasonable commuting distances.

Specific Public Assistance Manual References are:

PAM 412.9 for ADC and GR - Income paid by public or private agencies, or community groups, which is either designated by law to be disregarded or given for a special purpose shall not be deducted from the ADC assistance payment. Such income includes "...payments made by a public or private agency for the purpose of supplementing standards, so long as there is no duplication of payment, e.g., Vocational Rehabilitation. ORSC payments are also exempt for the GR program."

PSM 374.1 (1) for Medicaid - "Excluded income is income that is exempt from consideration in the determination of financial eligibility for Medicaid." The following kinds of income meet the exclusion criteria and shall NOT BE included in the computation of maximum gross income: This excluded income includes "income defined as exempt in Sections 421 through 421.9..."

2. Earnings - ADC, GR, Medicaid

All of a client's earnings during or upon completion of the rehabilitation plan are subject to the disregard provisions applicable to the particular assistance category. Following is a brief description of the categorical disregard provisions:

- 1) ADC - the first \$30 of the combined gross earned income of all members of the assistance group plus 1/3 of the remainder.

A flat \$50 for each working member of the assistance group for work related expenses (including mandatory payroll deductions); or the actual amount of verified work-related expenses if in excess of \$50.

- 2) GR - the actual amount of verified work-related expenses.

- 3) Medicaid - the first \$65 plus 1/2 the remainder of earned income. This disregard is considered to cover all work-related expenses including mandatory deductions of income tax, union dues, OASDI, etc. Work-related expenses of the blind in excess of this disregard may be excluded, provided

(a) documented evidence is submitted on a monthly basis substantiating the amount in excess of the first \$65 and 1/2 of the remainder; and (b) medical coverage is extended for one month at a time unless there is ongoing eligibility for Medicaid without the consideration of extra work expenses.

C. Medical Assistance Policies

The Ohio Department of Public Welfare's State Plan for Medical Assistance provides for the financing of a wide range of medical care and services rendered to individuals eligible under the program. Federal regulations governing the program stipulate that the Title XIX agency (ODPW) is to provide for cooperative arrangements with the State vocational rehabilitation agency (ORSC) which are directed toward maximum utilization of such agency's services by the Title XIX agency. In accordance with requirements for arrangements between the concerned agencies, the following policies are applicable for services provided to individuals dually eligible under programs administered by the ORSC and under the ODPW's Medical Assistance Program.

Coverage

Payment for services provided to persons duly eligible as noted above will be made by the respective agencies as outlined below.

1. Medical Services Covered by ORSC - ORSC will provide those restorative medical services integral to an individual's vocational rehabilitation services plan. Refer to ORSC Section 250 - Casework Manual entitled Physical Restoration.
2. Medical Services Reimbursed by ODPW - Within the limitations described in its State Plan and Provider Handbooks, ODPW will reimburse providers for services not included in an eligible individual's vocational rehabilitation services program.

Procedures

Individuals determined to be duly eligible under the agency programs described above are to be advised by BVR or BSE staff that the Medical Assistance Identification Card issued to them by the ODPW is to be utilized only for services not included in the individual's vocational rehabilitation plan. The ODPW's Third Party Resources Section will periodically monitor invoices received for payments to ascertain the appropriateness of party(s) billed.

Questions regarding agency responsibility for payment in any unusual circumstances are to be directed through the following organization units of the agencies involved:

1. ODPW - (The Bureau of Medical Program Development)
2. ORSC - (The Division of Special Programs)

Referral Procedures

Since Medical Assistance eligibility determinations are made by Income Maintenance staff, referrals will be made according to provisions contained in Section I and Section II of this Agreement.

VI Service Planning and Management

Rehabilitation Services teams may be located in some county welfare departments. In most counties, Vocational Rehabilitation counselors have regularly scheduled visits for referral or follow-up purposes to the local welfare office or designated office site.

4

The social services staff of the county welfare department and the client will together initially determine a plan of Social Services.

This plan may include a referral to Vocational Rehabilitation, unless referral is mandatory as an alternative to work registration requirements.

In cases where referral to BVR or BSB is appropriate, the social services staff of the county welfare and the client will determine whether the initial plan of social services will be provided prior, during and/or after the rehabilitation process takes place. After a case has been referred to and accepted by BVR or BSB, BVR or BSB will have the primary responsibility for developing a comprehensive vocational rehabilitation plan.

VII Commitment of Resources

The Department of Public Welfare and the Rehabilitation Services Commission will commit, to the extent possible, resources of funds and manpower, and continue to explore methods of funding for the best utilization of Federal participation, in order to provide maximum services to the welfare recipients in a balanced social and rehabilitation program. The Department of Public Welfare will provide the usual assistance payments and social services which are provided directly by the county welfare departments or through purchase of service agreements.

VIII Supportive Services from other Agencies

The Department of Public Welfare and the Rehabilitation Services Commission will develop social services and rehabilitation plans which are designed to utilize other governmental programs and manpower planning in order to serve the recipient and applicant most effectively and efficiently.

IX Staff Development

A common understanding of goals must be achieved between all local operating staff. In order to accomplish this, all personnel should be carefully oriented, including not only familiarization with each participating agency's role, but also with goals and information relating to the joint ORSC/ODPW operating plan for the State of Ohio. The training program may include assigned reading materials, and/or instruction and on-the-job training.

X Inter-agency Reporting System

The Department of Public Welfare and the Rehabilitation Services Commission will maintain a continued joint assessment of this service and rehabilitation program and will determine the most effective and efficient methods of operation, as well as evaluating progress of the services.

The Department of Public Welfare and the Rehabilitation Services Commission will utilize their data processing and statistical analysis to chart and compare progress and trends in providing social services and rehabilitation services to welfare recipients. In regard to this, quarterly cross-checks are being completed by ORSC to locate BVR or BSB clients who may be ODPW recipients. ODPW will continue to provide ORSC with the information necessary to complete these cross-checks.

In addition, ORSC compiles quarterly statistical print-outs reporting welfare cases which have been closed by local BVR or BSB offices. These reports are mailed by ORSC to ODPW's liaison officer for forwarding to county welfare departments.

XI Integration of Efforts

The agencies are committed to continue, on an ongoing basis, efforts to make optimum use of available resources. Also, both agencies will move in the direction of

exploring and developing a mutually agreeable system of reporting services, coordinating data and preserving the confidentiality of the client. These functions will be coordinated by the designated liaison officers of the two agencies.

In addition, the two liaison officers will convene appropriate staff from each agency for periodic review of this "Integrated Action Program Plan". This would normally be accomplished at the ODPW District - ORSC Area levels, but on a local or county level when specific developments require.

APPENDIX A

SPECIAL SERVICES FOR THE BLIND

Special Services may be available to blind or visually impaired individuals who meet BSB Eligibility Criteria.

A. Children's Services

The Children's Services Program provides a variety of services to visually impaired children, their families, and those who work with or are concerned about them. Any child who meets the accepted definitions of visual impairment or legal blindness as established by the Bureau of Services for the Blind, is eligible. Verification of the visual problem by a licensed physician is desirable. Also, children must be between the ages of birth to sixteen years of age. Upon reaching sixteen, the children's program may continue or may terminate with referral to an appropriate agency. Because no case services funds, either state or federal are available, no financial eligibility need be determined.

The services offered are of a personal nature and are designed to meet the needs of a highly diversified population. As far as possible the children receive individualized attention with special emphasis being placed upon young children under six years of age. The services provided may be outlined under four distinct headings as follows:

1. For the child:
 - a. Individual interactions which includes direct counseling.
 - b. Assistance in the home in developmental areas such as body awareness and concept development.
 - c. Informational services such as aids and appliances, talking books, or camping.
2. Provision of direct services to the parents and the families of visually impaired children, including:
 - a. Interaction to help understand and adjust to the problem.
 - b. Instruction in working with the child in all areas necessary.
3. For other professions:
 - a. Assistance in working with visually impaired children.
 - b. Referral to appropriate individuals and agencies, and finally
4. For the community:
 - a. Consultation to groups or organizations with programs for children who may wish to assist visually impaired children.
 - b. Presentations about visually impaired children and their place in society.

B. Production and Sales

The Bureau's Production and Sales section provides opportunities for the legally blind to produce merchandise in their homes enabling them to earn some income depending on their skill level and motivation (productivity). This unit has three separate (yet

overlapping) functions - purchase and preparation of materials for production, sale of finished merchandise, and coordination with the Rehabilitation Section in evaluation and training of eligible blind clients for such homebound work.

State appropriation supports administrative costs with sales income sustaining the program by utilization of those funds for the purchase of materials, payment of workers and production costs. Workers who choose to sell some of their products through Production and Sales are paid on a sub-contract and/or piece-work basis.

To be eligible for consideration as a worker, the blind individual must meet the regular Vocational Rehabilitation eligibility requirements and receive training under the direction of field staff rehabilitation teachers. The Production and Sales unit aids in the training process through the provision of evaluation and training kits and guidelines and training seminars for the rehabilitation teachers.

Upon completion of the vocational rehabilitation process (including training), the blind client becomes a "worker" -- selling merchandise both locally and through the Production and Sales unit under the trademark "Maiden Ohio".

The staff of this unit must maintain a balanced inventory and ongoing control in such areas as cost analysis and market analysis in order to maintain realistic production of items depending upon market appeal and cost feasibility.

Ongoing contact is maintained with the homebound "workers" with work assignments being sent regularly according to their work patterns and skill levels. Work assignments generally include all prepared materials required to complete the items (in accordance with State and Federal standards - such as the requirement that 75% of labor be performed by blind persons). When items completed by worker are returned to the unit, inspection, labeling, etc. for sales is done by unit staff.

In contact with workers, unit staff are called upon for information relating to auxiliary needs of workers and thus must be knowledgeable of public and community services available to blind individuals. If the workers' work pattern or needs change, the unit determines how needs can be met and may make referral back to Vocational Rehabilitation unit and/or other state or community agencies.

C. Rehabilitation Teaching

The Bureau employs rehabilitation teachers whose primary function is to provide training in homemaking or home employment activity for clients eligible for vocational rehabilitation services. Where possible and feasible, such training may be obtained for the client by direct purchase of services from established rehabilitation facilities. Where this is not feasible or possible, the rehabilitation teacher evaluates need and works directly with the client in the home, providing instruction in homemaking skills, (such as cooking, household tasks, etc.), basic communication skills, limited mobility and safety techniques, etc.

The teacher is also involved in evaluating and training individuals in sewing and/or crafts activities leading to production of saleable items. Such items may be outletted through the Bureau's Production and Sales unit (limited to serving legally blind) or through local outlets such as gift shop, etc., thus generating income for the homebound worker. The teacher's assistance to the client ends when the defined vocational goal has been attained.

To a limited degree (since our staff of teachers is small and requires they serve many counties) rehabilitation teachers may provide consultive services to nursing homes, senior citizen housing complexes, etc., in terms of providing staff instruction and guidance in working with visually handicapped or blind clients.

D. Business Enterprises Program

This section of the Bureau establishes and provides ongoing management supervision of small businesses operated by blind persons, including some highly successful snack

bars and food services operations located in Federal, State, public and private buildings throughout Ohio.

Under the auspices of the Randolph-Sheppard Act and amendments, and Ohio Senate Bill 86, enacted into law August 19, 1976, State and Federal monies are utilized in establishing and equipping such business locations for legally blind persons who are eligible for vocational rehabilitation services. During the rehabilitation process, blind individuals who display basic skills, characteristics and interest are trained for such business operation and provided with necessary equipment and beginning inventory. Income for the operators of the business location is the generated net profit of the operation. Ongoing management supervision provided includes maintenance and/or replacement of equipment, inventory control, merchandizing instruction, day-to-day operational assessment, etc.

Blind persons operating businesses under this supervised program are assessed a service charge based on a graduated percentage of profit. Monies thus generated are utilized in ongoing supportive management services.

E. Talking Book Program

The Rehabilitation Services Commission, Division of Special Programs, Talking Book Program, provides talking book machines and cassette machines to visually and physically handicapped persons in Ohio who cannot read conventional type print, through a cooperative agreement with the Library of Congress and two regional libraries in Cleveland and Cincinnati. Applications for talking book machines are made to the Ohio Rehabilitation Services Commission, Talking Book Program. Upon receipt of a certified application, a talking book machine is sent immediately to the client, and his request is forwarded to the appropriate regional library serving his area. Most any book found in a local library and over 30 magazines are recorded on talking books, and are received through Cleveland or Cincinnati Regional Library.

This service is free including equipment, books, repairs and postage, and is available to any eligible person. Repairs of equipment is coordinated by the Rehabilitation Services Commission and are provided by the Telephone Pioneers of America.

This program presently services 14,600 severely handicapped clients.

(APPENDIX B - PAGE 1)

ELIGIBILITY CATEGORIES FOR TITLE XX

Eligible Ohio Residents Include:

- (1) Aid for Dependent Children (ADC) recipients.
- (2) Supplemental Security Income (SSI) recipients.
- (3) Medicaid only recipients whose gross family income is no more than the income of eligible persons in (4) or (6).
- (4) Income Eligible without a fee payment:
Example: Family of four with gross annual income not exceeding \$8,200.00
- (5) Persons in immediate danger needing protective services, and persons needing information and referral. Service as described in the Ohio Comprehensive Annual Services Program Plan may be provided without regard to family income.
- (6) Income eligible with a fee payment for day care services for adults, day care services for children, homemaker/home health aid, chore services, family planning, foster care for adults, and mental health/mental retardation related services, provided gross family income for a family of four is not over \$12,100 or under \$8,201.00.

MEMORANDUM OF AGREEMENT

The Ohio Department of Public Welfare and the Ohio Rehabilitation Services Commission have entered into this Memorandum of Agreement to coordinate programs in Ohio's eighty-eight counties for the rehabilitation of disabled welfare recipients so that they may achieve maximum self-support.

The "Integrated Action Program Plan between the Ohio Rehabilitation Services Commission and the Ohio Department of Public Welfare" contains the details of this Memorandum of Agreement. It is attached to this Memorandum of Agreement and is considered a part of it.

This Memorandum of Agreement will be reviewed annually.

This Memorandum of Agreement may be amended or extended as mutually agreed by the two parties. Any such amendment must be in writing and signed by both parties to be effective.

OHIO REHABILITATION SERVICES COMMISSION

Cooper Sontag
Cooper Sontag
Administrator

11-19-79
Date

OHIO DEPARTMENT OF PUBLIC WELFARE

Kenneth B. Creasy
Kenneth B. Creasy
Director

12/3/79
Date

19-39
12/28/79
JAN 18 1979

ARTICLE V

C. Medical Assistance Policies (Rev. 10/79)

If the recipient qualifies for coverage under both ODPW's Medical Assistance program and ORSC's reimbursement program, ODPW shall be the primary source of reimbursement for covered services provided. Deviations from this policy are to be explained in the ORSC client record. These deviations will apply only to situations in which no Medicaid reimbursement will be sought.

ODPW's payment constitutes payment in full for any covered service. This means that the provider may not bill the recipient and may not bill ORSC for any difference between ODPW's payment and the provider's charge.

TNS 79-39 EFFECTIVE DATE: 12/3/79
APPROVAL DATE: 2/6/80