

**TO:** Community Providers of Supported Employment Services  
OVR Staff

**FROM:** Shannon Austin, Executive Director  
Office of Vocational Rehabilitation

**RE:** To give guidance to providers about the provision of Supported Employment Services during a period of state-mandated mitigation strategies for slowing the spread of Coronavirus Disease - 2019 (COVID-19)

**ISSUED:** April 3, 2020; Amended April 13, 2020

**EFFECTIVE:** **Immediately**

**DISCUSSION:** The Pennsylvania Office of Vocational Rehabilitation (OVR) is committed to providing quality services to Pennsylvanians with disabilities. During this unprecedented time, the health and safety of our customers, staff and community partners remains our top priority. All Commonwealth businesses should follow the most recent guidance issued by the Governor's Office. Please reference the guide for [Responding to COVID-19 in Pennsylvania](#) for updated information. Please visit the [Department of Community & Economic Development's \(DCED's\) website](#) for resources for businesses affected by COVID-19, along with a current list of businesses allowed to operate and the waiver/exemption form (if applicable).

Vendors are responsible for ensuring that they are adhering to the Governor's direction, universal precautions and social distancing requirements. This information is intended to be a guide regarding the allowable services and service provision methodologies OVR will be adhering to during the COVID-19 mitigation response and does not apply to any other circumstance.

This document only applies to Supported Employment (SE) Services. Additional guidance regarding general services and Pre-Employment Transition Services will be issued separately. Supported Employment Services may not be provided virtually unless specified. Activities, both direct and indirect, that are billable for SE Services remain the same as outlined in the *Billable Activities Reference for OVR Supported Employment Services* section below. During this time, specific SE Services will be handled as follows:

1. **Community-Based Work Assessment (CBWA – SE100) and Discovery (SE110-SE113)**
  - a. CBWA (SE100) and Discovery (SE110) Services may not be conducted virtually and should be temporarily suspended.
  - b. For CBWAs that have been started but temporarily stopped, reports and invoices may be submitted for services already provided.
  - c. If Discovery (SE110) has not been completed, this service should be placed on hold until the service can be completed in person at a future date.
  - d. If there is enough information available to generate the Discovery Profile (SE111) and/or Visual Resume (SE113), they may be completed and invoiced.

- e. The Customized Employment Planning Meeting (SE112) may be conducted virtually *only* if all parties are willing to and have access to participate virtually.
2. **Supported Employment Supports Plan (SESP – SE000)**
    - a. SESP may be completed virtually (e.g., phone call, teleconferencing, videotelephony apps such as Facetime and Google Duo).
    - b. Normal documentation and billing requirements remain in effect.
  3. **Job Mentoring (SE009)**
    - a. Job Mentoring may be provided virtually (e.g., phone call, teleconferencing, videotelephony apps such as Facetime or Google Duo).
    - b. Normal documentation and billing requirements remain in effect.
  4. **Job Retention (SE010) and Intermittent SE (SE011)**
    - a. Job Retention and Intermittent Services will follow guidelines for Phase 2 (in 6 below).
  5. **Phase 1: Job Development (SE001, SE001E, SE101, SE101E)**
    - a. Customers who make the informed choice to seek employment during the COVID-19 pandemic may proceed with virtual and/or in-person job development services as identified in his or her IPE.
    - b. Customers who make the informed choice to suspend seeking employment during this time may continue with a limited number of job development hours for virtual resume development and/or interview practice (5-10 hrs.) for those customers who have not had this type of assistance. These job development activities should be virtually one-to-one and not done in virtual groups.
    - c. Normal documentation and billing requirements remain in effect.
  6. **Phase 2: Job Placement (first 40 hours of work) (SE002, SE102)**
    - a. Job Placement and other on-site activities may continue if the customer’s jobsite is still open and the job has not been put on hold. Supports that would typically be onsite should be rendered onsite by provider per customer need, following universal precautions and any additional precautions adopted by employer or provider agency.
    - b. If the provider agency is closed or restricting agency staff from working onsite with customers, but the customer continues to work, an alternate vendor should be authorized to provide Intermittent SE Services (SE011) to deliver the on-site supports as identified in the customer’s IPE.
    - c. If the customer’s job is *temporarily* on hold:
      - i. **In-person supports** should be suspended until the customer resumes employment. If employment interruption occurs during the customer’s first 40 hours of employment (i.e., during Phase 2), service hours provided to date may be reported and invoiced.
      - ii. **Virtual supports** may be provided through Job Mentoring (SE009) during the COVID-19 mitigation period up to the policy maximum of 3 months if warranted. This service may also be used to support customers who make the informed choice to seek alternative employment during this time while his or her primary job is on hold.

- d. If the employer will not allow a provider access to the workplace to render on-site supports during Phase 2, the provider may continue to support the customer offsite as needed until the phase ends. *After Phase 2 has concluded in this instance, services should transition to Job Mentoring rather than continuing with negotiated hours.* The employer's refusal of access must be documented by the VRC in CWDS.
  - e. Normal documentation and billing requirements remain in effect.
- 7. Phases 3-5: Job Maintenance, Job Stability and Closure (SE003-SE005 & SE103-SE105)**
- a. Job Maintenance, Stability and Closure will follow the guidelines given for Phase 2 (in 6 above). Phases 3-5 may not be partially billed as customers must meet the established phase milestones for payment to be issued.
  - b. Negotiated phases have defined timeframes as outlined in the SE policy. When a customer's job is temporarily on hold, the phase should be paused until they return to that job, at which time the phase may continue from where it left off.
  - c. If the employer will not allow a provider access to the workplace to render on-site supports during Phases 3-5, the provider may continue to support the customer offsite as needed. The employer's refusal of access must be documented by the VRC in CWDS.
  - d. Normal documentation and billing requirements remain in effect.
- 8. Extended Services (SE006, SE106)**
- a. Extended Services may continue using both on-site and virtual supports as needed based on the customer's situation.
  - b. If the customer's job is *temporarily* on hold, limited extended service hours may be used for virtual support, including contacts with customer and employer, referral to other community services, assistance with applying for unemployment benefits and other off-site supports.
  - c. Normal documentation and billing requirements remain in effect.

## **Billable Activities Reference for OVR Supported Employment Services**

### **Billable (Direct – customer must be present)**

- Job search activities (resumes, applications, interview prep)
- Researching/planning transportation to and from work
- Establishing natural supports and job accommodations
- Team meetings
- Instruction in self-advocacy
- Social skills training
- Behavior management
- Money management training
- Obtaining employment prerequisites (photo ID, replacement SS card, etc.)
- Orientation to the job
- Job skills instruction
- Job analysis
- Direct observation on the job

- Transporting the customer to job development activities (Overall time above 25% of the total hours requires prior VR Supervisor approval.)

**Billable (Indirect – cannot be used for calculating job stability in Phases 2-5)**

- Referral to other services (e.g., Benefits Counseling)
- Coordination of accommodations and/or assistive (rehabilitation) technology
- Employer contact on behalf of customer
- Phone calls to customer, employer or supports
- Identifying and negotiating essential job functions

**Not Billable**

- Transportation time (other than transporting customers noted above)
- Report writing
- Other administrative tasks