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Division of Disability and Rehabilitative Services
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To: Community Rehabilitation Program (CRP) registered as Employment Service Providers with Vocational Rehabilitation

From: Theresa Koleszar, Director, Bureau of Rehabilitation Services (BRS)
Kelly Mitchell, Director, Division of Disability and Rehabilitative Services (DDRS)

Re: Opportunity for Funding : RFF 24-003 Establishment Project

Date: October 25, 2024

Please see below for the Questions submitted in regard to the RFF 24-003 for the Establishment Project:

1. If we are a current provider, do we need to reapply?

If your agency is a current, non-probationary status VR provider as of July 1, 2024 and would like to be considered for the Establishment Project, your agency would need to respond to the RFF.

2. The title of the RFF says non-profit CRPs, as the status used to be required to contract with VR but is no longer required. We are approved VR providers and Federal funds don't require nonprofit status either. The actual RFF description says approved VR Employment service providers. I would like clarification please.

You reference public and private non-profits. Does this include For Profits? We work with VR employment (in fact its all we do). Can we submit?

Agencies are encouraged to review 34 CFR 361(16) (federal regulations) to determine if their agency falls into the definition of a non-profit for Establishment Projects. Per 34 CFR 361.5(c)(36) Nonprofit, with respect to a community rehabilitation program, means a community rehabilitation program carried out by a corporation or association, no part of the net earnings of which inures, or may lawfully inure, to the benefit of any private shareholder or individual and the income of which is exempt from taxation under section 501(c)(3) of the Internal Revenue Code of 1986. Additional information can be found in (34 CFR 361.49(a)(1) & 34 CFR 361.5(c)(16)(i)). Agencies may want to review these requirements to determine if submitting a response to the RFF is appropriate for your agency.

3. Does a job developer mean the person directly searching for employment for individual participants?

A job developer may be another term for an employment consultant or job coach if the job developer is providing direct, fee-for-service activities to eligible participants. For purposes of the Establishment



Project, a job developer hired for this project to provide direct services to a caseload that consists entirely of VR participants (100% VR caseload) could be considered allowable to charge to the project.

4. Can the Establishment project be used to hire staff for Pre-ETS?

No, this project is specifically for VR applicants or eligible individuals. If a participant is involved in VR and Pre-ETS, only the VR Employment Consultant(s) who carries a 100% VR caseload of applicants or eligible individuals is able to bill their time under this project.

5. Does the requirement apply to hiring Pre-ETS staff, or is it limited to Employment staff only?

No, this project is specifically for VR applicants or eligible individuals. It is for newly hired Employment Services staff. Pre-ETS staff can't charge time under the Establishment Project.

6. Once new staff is hired, is admin cost covered while training new staff?

No, admin cost cannot be incurred by another staff member while training the new staff members. In addition, travel, equipment, supplies (other than allowable supplies as defined under Allowable Supplies), cell phones, utilities, leasing, and other administrative costs (including administrative or support staff, and supervisory or other executive level staff who directly oversee employment service staff) cannot be charged to Establishment Project funds.

7. Once trained, is the new staff admin time able to be billed to the project?

Yes, allowable staffing costs include staff salaries and fringe benefits for direct VR employment service staff (i.e. employment consultants, job coaches), for the provision of employment services to VR applicants or eligible individuals. Staffing costs must be associated with the provision of VR employment services as outlined in the VR Manual of Employment Services.

8. Should we address wages as hourly or salary?

This is up to each agency and can be addressed at their discretion.

9. What happens if we don't hire for months after the contract effective date?

Agencies can hire at their discretion but be aware that the contract for the first year goes into effect from July 1, 2025-June 30, 2026. Once the time period has been met, year 2 will begin and staffing costs will be paid at the year 2 amount.

10. Many times, once a client closes their VR case, they move into Extended Services and that Employment Consultant continues to support that client. Are they able to keep that client on their caseload while billing on the Establishment Project?

Not for those staff charging time to the Establishment project. The Establishment Project is meant to only fund 100% VR clients. Individuals previously served by VR who have subsequently exited VR and have not reapplied, individuals who have exited and are now served through non-VR funding sources, or individuals who have never applied to VR, are not considered to have a current, open VR case. Once the client moves into Extended Services, they no longer receive funding from VR, but rather through BDS for example. An exception for this may be a youth receiving Youth Extended Services through VR. Individuals needing important services such as extended services through a home and community-based waiver, or

supports through Medicaid Rehabilitation Option, should receive follow along services through a CRP staff member whose position is not charged to the Establishment Project.

11. Does a BINS caseload count toward the 100% open VR caseload?

An employment services newly hired staff member who is certified to provide Benefits Counseling could count towards the 100% open VR caseload as long as the newly hired staff meets all allowable requirements and is providing direct services (e.g., employment consultant, job coach) to the VR applicant or eligible individual. Please note, employment services must be provided by the staff member, not solely BIN services.

12. If there were BINS clients on the caseload does that count in the total number of clients?

Generally, if a client is not receiving employment services in addition to BIN services, they would not be applicable to be on a newly created staff positions caseload who is providing direct services to 100% VR participants. These scenarios can be reviewed on a case-by-case basis with BRS during contract discussions.

13. If we don't get to the 10-client minimum for the new staff how does that affect the Establishment Project?

Please note, the RFF language states that it's an "overall average caseload ratio" not a 10-client minimum for new staff. If, during the course of the project, additional direct service staff are hired, and the population served later decreases, the provider must re-evaluate the forecasted staffing needs. Agencies are encouraged to be thoughtful in their plans for increasing staff capacity and program growth.

14. If an employee has to train before completing the job description, does the 1:10 or 1:20 direct support staff requirement count or is that initiated after training? (Thinking of BIN personnel.)

The 1:10-1:20 average caseload ratio is expected to be maintained once an employee is trained. We understand there will be a ramp up period with newly hired ES staff and that it will take time to reach a 1:10-1:20 average caseload, not per staff person minimum caseload. Please note, an individual who solely provides BIN services are not applicable positions that are eligible under this RFF.

15. Is there a certain timeframe to get the new staff to 10 VR clients on their caseload?

A caseload should be maintained once an employee is trained. We understand there will be a ramp up period with newly hired ES staff and that it will take time to reach a 1:10-1:20 caseload average for the ES unit. Please note this timeframe should be outlined in the agency's response to the RFF under the training section.

16. What happens if a caseload is not 1:20 or 1:10 ratio after year 2 because the CRP is not getting any new referrals from VR?

VR is not responsible for guaranteeing an agency a certain number of referrals. Agencies need to be thoughtful in their plans for growth and how to improve their service delivery or quality of services. Relying solely on additional VR referrals is not a sufficient plan for growth. For instance, a provider may want to consider their outreach strategies. In addition, data on average caseloads will be provided by the

CRP so BRS can assist with monitoring ratios and update the allowable number of new staff as applicable.

17. We currently have an incentive retention plan, are we able to use that for the required incentive retention plan for the establishment project?

Yes. If you have a current incentive retention plan that you believe meets the requirements as outlined, this may be submitted for review with the RFF in Attachment E.

18. What is the definition of “Fringe Benefits” under the Allowable Staffing Cost? What items are included?

Fringe benefits, for the purposes of the Establishment Project, refer to any benefits the agency routinely offers to all fulltime employees as compensation. Some examples traditionally include health/medical insurance and investing into a retirement plan.

19. Can you clarify what is meant by “retention plan”? Does this specifically refer to monetary retention, or must it include a "dollar-directed incentive" as mentioned in Attachment E, Section 2, Question C?

The CRP is responsible for improving staff retention which leads to higher quality services and increased employment placement outcomes. Since the Establishment Project will assist with staffing costs for newly hired staff, while simultaneously allowing fee-for-service reimbursement for direct service provision by those newly hired staff, it is expected that the CRP will have increased opportunity to direct available funds toward the implementation of an incentive retention plan.

Responses to this RFF must outline strategies for incentivizing staff retention, and awarded CRPs will be required to submit an incentive retention plan to BRS (see Evaluation Criteria, Attachment E). Awarded CRPs will also be responsible for meeting their incentive retention plan goals throughout the contract term and will be required to provide updates to BRS in accordance with contract deliverables and reporting.

20. Are there any examples of incentive retention plans?

No. These should be individualized to your agency.

21. Will the dollar incentives be covered by the Establishment Project funding, or is it the responsibility of the CRP to include incentives in their own budget?

The incentive retention plan/funds are the responsibility of the CRP and will not be provided directly through the Establishment Project. Since the Establishment Project will assist with staffing costs for newly hired staff, while simultaneously allowing fee-for-service reimbursement for direct service provision by those newly hired staff, it is expected that the CRP will have increased opportunity to direct available funds toward the implementation of an incentive retention plan.

22. What happens if we don't meet the required measurables?

The Contractor and BRS will jointly identify specific corrective action steps and timelines that the CRP must meet in order to improve performance. If the Contractor is unable to resolve corrective actions by the subsequent quarter, or by an agreed upon timeframe from BRS, or fails to achieve deliverables for

two consecutive quarters by the deadlines established by BRS, the contract may be terminated, not renewed, and/or the award amount may be decreased.

23. If we sign up for all 5 positions but only need to fill 3, what is the protocol? Are we required to fill all 5 spots?

A provider will not be required to fill all 5 spots; however, updated staffing strategies, contract deliverables, etc., will need to be submitted to BRS within specified contract timeframes.

24. If we have unfilled positions now – staffing shortage- can we use those positions for the purpose of this project to increase staff capacity? It says we need to increase staff capacity through the creation of a new position.

No, the positions funded through this project must be newly created positions and may not be an existing direct services staff, existing or new staff with blended caseloads, supervisory or clerical staff, or any other staff who are not hired for newly created positions for purposes of this Establishment Project.

25. We can't hire as it is, I am assuming this project is to help with staffing shortage so we can provide services to those VR participants not being served due to lack of staff?

The purpose for the Establishment Project is increase the capacity of CRPs, specifically those registered as VR employment service providers, to provide quality and timely employment services. An important aspect of the Establishment Project is to focus on effective strategies to support growth of CRPs to carry out employment services to VR participants, which will produce the desired outcome of increased capacity to provide quality and timely services to VR applicants and eligible individuals.

26. Can you send us the Cost proposal in Excel format? It downloads as a PDF.

The Cost Proposal has been updated to be able to be downloaded as an Excel. Please let us know if there are any issues with entering values by emailing us at FSSA Establishment Project

EstablishmentProject@fssa.IN.gov.