

Memo

Date: 4/3/2020

From: Shannon Austin, OVR Executive Director

Subject: Provision of General Vocational Rehabilitation Services During COVID 19 Mitigation

Audience: OVR Staff and Vendors

Effective: Immediately

Purpose: To give guidance on the provision of vocational rehabilitation services during a period of state mandated mitigation strategies for slowing the spread of the Coronavirus (COVID-19).

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) 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) at <https://dced.pa.gov/>.

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.

General Vocational Rehabilitation Services

Vocational Rehabilitation Services are considered an allowable business in accordance with the direction of the Governor's office and as referenced on the DCED website. The nature of vocational rehabilitation services normally requires activities to be performed in person. Accordingly, OVR will be working with its vendor community to implement alternative service provision to allow services to continue where possible. However, it is the responsibility of the vendor to direct their staff in accordance with the requirements outlined by the Governor, their governing agencies, boards, commissions, and/or executive leadership.

Services that are Unable to be Performed at this Time

1. If it is determined by your governing body, board, commission, and/or executive leadership that the services offered by your organization are unable to be performed under current restrictions, please notify your local OVR office so that a plan can be developed to:
 - a. communicate with customers;
 - b. develop a transition plan if the service is still necessary for the customer currently or in the immediate future; and
 - c. discuss long-term planning for services once mitigation restrictions have been reduced or lifted.

Services that can be Performed at this Time

1. If it is determined by your governing body, board, commission, and/or executive leadership that services offered by your organization may still be performed under current mitigation restriction, please notify your local district office to discuss what services your organization are currently able to offer and under what methodologies.
2. Vendors must seek and receive approval from OVR to proceed with service modality changes prior to continuing or beginning services utilizing an OVR Purchase Order.
 - a. OVR services must be approved in writing on an OVR Purchase Order **prior** to the start of services.
 - i. If a new or amended OVR Purchase Order is necessary OVR staff will issue one as soon as possible.
 - ii. OVR staff are not permitted to authorize services verbally.
 - b. OVR staff, in coordination with the vendor, must agree to how service can be authorized during the mitigation process which must be indicated on the OVR Purchase Order:
 - i. number of hours or sessions;
 - ii. timeframe for service provision; and
 - iii. portion of services that may need to be held until in person services can resume;
 - iv. other restrictions or limitations, etc.
 - c. Once the modality and service has been approved by OVR and authorized on a written OVR PO, services may then proceed and be billed as usual, unless other restrictions (number of hours, sessions, time, etc.) have been placed on the virtual service by OVR staff, vendor availability, customer availability, etc. or as indicated on the OVR Purchase Order.
 - d. All standard documentation requirements are required if a service is approved by the OVR to proceed virtually.
 - e. If you have specific questions, direct them to your local OVR District Office Administrator and they will seek guidance from OVR Central Office as necessary.
 - f. OVR strongly encourages vendors to utilize CWDS to manage their Purchase Orders and to submit invoices where possible. Invoices may also be submitted via email to the OVR Counselor for processing or can continue to be mailed to the District Office. For instructions on how to access CWDS or if additional clarification is needed please contact your local District Office.
3. Virtual Service Provision Approvals
 - a. The local OVR District Manager (or their designee) must approve all service provision modalities that may need to be altered during the mitigation process which may include, but are not limited to:
 - i. Teletherapy;
 - ii. Tele Rehab;
 - iii. virtual services through a web-based platform like Skype, Zoom, etc.;
 - iv. virtual services through teleconferencing; or
 - v. other.
 - b. Should a unique situation arise, or a vendor covers multiple counties/OVR District Offices, or if a local District Manager has questions about the service provision modality, OVR Central Office will make the final determination on how to proceed
 - c. OVR may ask for approvals from governing bodies, insurance, or other forms of reasonable assurances, etc. that would indicate that your agency has the appropriate security, software, confidentiality protocols, etc. to be able to perform work virtually.

- d. These assurances are necessary to protect our customers information, condition, and that services can be provided effectively using a virtual modality based on the customers disability, limitations, or available technological resources (computer, internet, software, etc.).
 - e. OVR reserves the right to withdraw approval of alternate service provision modalities at any time via written notice (email or mail) but will honor all services provided through the date of notification.
4. Customer Approval
- a. If the vendor determines that services can still be provided, and OVR has approved the services and the modality, the OVR customer must agree to services under that modality.
 - b. If at any time the customer determines that they are unable to proceed, or that the modality is ineffective, services must halt and a plan to address their concerns must be developed in coordination with the vendor, customer, and OVR counselor.
 - c. Should a plan be unable to be crafted, services may need to be put on hold or a different vendor selected to proceed with services.

NOTE: This document addresses General Vocational Rehabilitation Services. Specific guidance regarding Pre-Employment Transition Services and Supported/Customized Employment Services is outlined in a separate document. If you are unsure of how to proceed please contact your local OVR District Office.