# Vocational Rehabilitation Services Manual B-600: Closure

Revised January 16, 2024

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## B-603: Successful Closures

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### B-603-1: Verifying Start Date for Closure

Supporting documentation that verifies the customer's start date of employment must be in the customer’s case file before the case closure and a case note must be entered to include the method used to verify the customer’s start date. This includes employment that was obtained before receiving VR services if VR assisted with maintaining this employment. This documentation may be obtained at any time during the life of the case and does not need to be re-verified at closure, unless there are changes to the start date that was initially verified. VR staff must first attempt to obtain one of the following primary source documents to verify the start date:

* A pay stub that identifies the customer's start date;
* Automated database systems (for example, The Work Number) indicating the customer's start date;
* Self-employment worksheets indicating the customer's start date, including any of the following:
	+ IRS 1040;
	+ IRS schedule forms;
	+ self-Employment Financial Actual Spreadsheet; or
	+ accounting system, documentation, or worksheets used to verify income and expenses for the business such as a profit and loss statement.
* A dated email, fax, or letter completed by the customer's employer indicating the customer's start date (For an optional template, refer to the TWC Employment and Wage Verification Letter- Template) found on the Program Policy & Support Intranet Page; or
* Employment Service Provider (ESP) written documentation or reports. The documentation must include the start date of employment and must be signed by both the customer and provider.

After three documented attempts to obtain the primary source documents listed above, VR staff may then pursue alternate methods to verify the customer’s start date. For more information, refer to VRSM B-603-4: Alternative Methods to Obtaining Primary Source Documentation.

### B-603-2: Verifying Wages for Closure

Under 34 CFR § 361.47(a)(9), VR agencies must maintain documentation verifying that an individual who obtains employment is compensated at or above minimum wage and that the individual's wage and level of benefits are not less than that customarily paid by the employer for the same or similar work performed by individuals without disabilities.

Supporting documentation that verifies the customer's wages must be in the customer's case file and a case note must be entered to include the method used to verify the customer’s wages. The wages must be accurate at the time of the case closure. This documentation may be obtained any time throughout the life of the case but must be obtained before the case closure. VR staff must first attempt to obtain one of the following primary source documents to verify wages:

* Unemployment Insurance (UI) wage match for out of state employers, federal employment records, or military employment records that verify the hourly wage rate (not aggregated for the quarter);
* A pay stub indicating the individual's hourly wage rate or annual salary;
* Income earned from commission in sales or other similar positions as evidenced by a pay stub or documentation from the employer;
* Automated database systems (for example, The Work Number);
* One-stop operating systems' administrative records, such as current records of eligibility for programs with income-based eligibility (for example, Temporary Assistance for Needy Families (TANF) or Supplemental Nutrition Assistance Program (SNAP));
* Self-employment worksheets, including any of the following:
	+ IRS 1040;
	+ IRS schedule forms;
	+ self-Employment Financial Actual Spreadsheet (VR1806); or
	+ accounting system, documentation, or worksheets used to verify income and expenses for the business such as a profit and loss statement.
* A dated email, fax, or letter completed by the customer's employer verifying the customer's wages. (For an optional template, refer to the TWC Employment and Wage Verification Letter - Template) found on the Program Policy & Support Intranet Page; or
* Employment Service Provider (ESP) written documentation or reports. The documentation must include the accurate wages at the time of the closure and must be signed by both the customer and provider.

After three documented attempts to obtain one of the primary source documents listed above, VR staff may then pursue alternate methods to verify the customer's wages. For more information, refer to VRSM B-603-4: Alternative Methods to Obtaining Primary Source Documentation.

Note: The RHW Employment Information page requires unit management verification when a VR staff member enters wages greater than $40 per hour. This note displays on the Employment Information page in RHW and sends an action to the VR manager to complete this verification. The VR manager reviews the documentation, and, if accurate, marks the checkbox in RHW labeled “VRM Reviewed”.

### B-603-3: Verifying Employment for Closure

The customer must be employed at the time of the case closure. Supporting documentation that verifies the customer’s employment must be in the customer’s case file before the case closure in RHW and a case note must be entered to include the method used to verify the customer's employment. ocumentation must be as current as possible and no older than 14 calendar days; however, if the source documentation does not display the date of closure, VR staff must verify that the customer is employed at the time that the case is closed. Confirmation may be made by contact with the customer, employer, observation, verifying with the ESP, or other verification method that confirms the customer continues to be employed. The documentation must reflect 90 days of employment after all substantial services have been completed.

If requesting the Work Number, the “current as of” date must be within 14 days of the date of closure and the “current as of date” must reflect 90 days of employment after the hire date or substantial services completed date (90-day clock), whichever is later.

If using a paycheck stub, the date range for the paycheck stub must be within 14 calendar days of the day of closure and must reflect 90 days (or more) of employment after the hire date or after the date substantial services are completed, whichever is later.

If using Employment Service Provider (ESP) reports, the provider signature date must be within 14 calendar days of closure and must reflect 90 days (or more) of employment after the hire date or after the date substantial services are completed, whichever is later.

VR staff must first attempt to obtain one of the following primary source documents to verify employment:

* Unemployment Insurance (UI) wage match for out of state employers, federal employment records, or military employment records that verify the hourly wage rate (not aggregated for the quarter);
* A pay stub indicating the individual's hourly wage rate or annual salary;
* Income earned from commission in sales or other similar positions as evidenced by a pay stub or documentation from employer;
* Automated database systems (for example, The Work Number);
* One-stop operating systems' administrative records, such as current records of eligibility for programs with income-based eligibility (for example, TANF or SNAP);
* Self-employment worksheets, including any of the following:
	+ IRS 1040;
	+ IRS schedule forms;
	+ self-Employment Financial Actual Spreadsheet; or
	+ accounting system, documentation, or worksheets used to verify income and expenses for the business such as a profit and loss statement.
* A dated email, fax, or letter completed by the customer's employer verifying that the customer is employed (For an optional template, refer to the TWC Employment and Wage Verification Letter- Template) found on the Program Policy & Support Intranet Page; or
* Employment Service Provider (ESP) written documentation or reports. The documentation must include documentation of 90 days of employment after the completion of substantial services and must be signed by both the customer and provider.

After three documented attempts to obtain one of the primary source documents listed above, VR staff may then pursue alternate methods to verify the customer's employment. For more information, refer to VRSM B-603-4: Alternative Methods to Obtaining Primary Source Documentation.

### B-603-4: Alternative Methods to Obtaining Primary Source Documentation

After three attempts to obtain one of the primary source documents for verifying wages, employment, and start date, VR staff may pursue alternate methods. The three attempts may include any combination of the listed primary source documents. Each attempt must be entered in a RHW case note that includes the type of document requested and the reason it could not be obtained. If an alternate method is used, VR staff must enter a detailed case note in RHW to include the method of verification used and the date that the verification was received, as well as justification for the customer not providing formal documentation. The following alternative methods may be used:

* Contacting the customer's place of employment to verbally verify the customer's information by speaking to the HR representative, manager, or supervisor, or, if the customer's superior or HR representative is not available, by speaking directly to the customer at the place of employment
* Contacting the customer
* Contacting the customer's guardian, if applicable

If direct contact was made with the customer's place of employment, VR staff must document the name of the individual who verified the customer's information (for example, the manager’s name or the customer's name, if the VR staff member spoke to the customer directly).

When contacting the place of employment to verify the customer's wages, employment, or start date, VR staff must not disclose any details regarding the customer's disability or the nature of their VR services unless the customer has signed a specific consent form for this information to be disclosed. Use Form VR1517-2, Authorization for Release of Confidential Customer Records and Information to document consent for disclosure, when appropriate.

### B-603-5: More Than One Employment in the 90-Day Period

A customer may have more than one job, concurrently, during the 90-day period and still meet the requirements for successful closure if each job is consistent with the customer's unique strengths, resources, priorities, concerns, abilities, capabilities, career interests, and informed choice. Verification of wages must be obtained for each job prior to successful case closure.

#### Concurrent Jobs

A customer may have more than one job at the same time during the minimum 90-day period. To document concurrent jobs in RHW, the VR counselor does the following:

1. Records each job on a separate Employment Information page.
2. When all jobs appear on the Employment List page, selects one job to be used for closure, typically the job with more hours or greater pay. For this job, VR staff selects "yes" for the Start 90-Day Clock field.
3. For other jobs, selects "no" for Start 90-Day Clock field.
4. Enters the hire date or the substantial services completed date, whichever is later, in the Substantial Services Completed Date (90-day clock) field for the job that is selected as "yes" for the Start 90-Day Clock.
5. Documents in a case note that the customer is working at concurrent jobs and why working two (or more) jobs is preferred to working one and how that will support a successful closure.
6. Enters, on the Monthly Financial Information page, the total net wages for the concurrent jobs.

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