# **Vocational Rehabilitation Services Manual B-600: Closure and Post-Employment Services**

Revised October 1, 2021

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## **B-603: Successful Closures**

To close a Vocational Rehabilitation (VR) case successfully, the VR counselor must ensure that the following requirements are met.

The customer must:

* have received substantial VR services, as stated on the individualized plan for employment (IPE) or IPE amendment, that have had an impact on the customer's employment outcome;
* have achieved the employment outcome that is:
	+ described in the current IPE or IPE amendment (the first two digits of the SOC must match);
	+ consistent with the customer's unique strengths, resources, priorities, concerns, abilities, capabilities, career interests, and informed choice; and
	+ meet one of the employment outcome types discussed in the Types of Employment section below;
* have maintained the employment outcome for at least 90 days after substantial services have been completed;
* be employed at closure;
* be notified before their case is closed (refer to [B-605: Customer Notification](https://twc.texas.gov/vr-services-manual/vrsm-b-600%22%20%5Cl%20%22b605));
* be informed about the availability of Post-Employment Services; and
* be offered or provided a copy of the brochure “Can We Talk?”

The VR counselor and customer must:

* consider the employment outcome to be satisfactory; and
* agree that the customer is performing well on the job.

The VR counselor must:

* in every case, update in ReHabWorks (RHW) the type of employment outcome when:
	+ the customer becomes employed; and
	+ the Successful Closure page is completed.

For more information on successful closure procedures, refer to B-603-9: Procedures for Closing Cases as Successful. For an optional checklist on successful closure requirements before closing the case, refer to the Successful Closure Checklist.

**Types of Employment**

The following table shows employment outcome types and RSA-911 definitions.

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| **Type of Employment Outcome** | **RSA-911 Definition** |
| Competitive Integrated Employment | For the RSA-911 definition of competitive integrated employment, refer to [Competitive Integrated Employment (CIE) Overview](https://intra.twc.texas.gov/intranet/vrs/html/competitive-integrated-employment.html), [VR Glossary (Word)](https://twc.texas.gov/files/jobseekers/vr-services-manual-glossary-twc.docx), or 34 CFR 361.5(c)(9). |
| Self-Employment | Refers to work for profit or fees including operating one's own business, farm, shop, or office. Self-employment includes sharecroppers, but not wage earners on farms. |
| Randolph-Sheppard Business Enterprise Program | Refers to entrepreneurial self-employment through the Randolph-Sheppard Vending Facilities Program in which individuals who are legally blind are operators/managers of vending facilities located on Federal, State, or private locations with management services and supervision provided by a State VR agency that serves as the State Licensing Agency for the Randolph-Sheppard program. |
| Supported Employment in Competitive Integrated Employment | Refers to "competitive integrated employment" as defined in above with ongoing support services for individuals with significant disabilities (supported employment). |
| Supported Employment on Short-term Basis | Refers to a supported employment outcome while working toward competitive integrated employment on a short-term basis. |

Note: The employment outcome may vary based on status of case in RHW. Refer to the [ReHabWorks Users Guide, Chapter 21: Closure](https://intra.twc.texas.gov/intranet/manuals/rhwhelp/index.html) for additional instructions for closing cases in RHW.

### **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 must 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. 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;
* 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); 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 attempts to obtain the primary source documents listed above, VR staff may pursue alternate methods to verify the customer’s start date. For more information, refer to 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 reflect the accurate wages 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;
* 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](https://intra.twc.texas.gov/intranet/vrs/html/policysupport.html)); 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 attempts to obtain one of the primary source documents listed above, VR staff may pursue alternate methods to verify the customer's wages. For more information, refer to 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 must include the method used to verify the customer's employment. Documentation must be as current as possible, but no older than 14 calendar days. The documentation must reflect 90 days of employment after all substantial services have been completed.

Example: 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 start the clock date, whichever is later.

For additional examples, refer to the VRSM FAQ document.

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;
* 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); 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 attempts to obtain one of the primary source documents listed above, VR staff may pursue alternate methods to verify the customer’s employment. For more information, refer to 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 [VR1517-2, Authorization for Release of Confidential Customer Records and Information](http://intra.twc.state.tx.us/intranet/gl/html/vocational_rehab_forms.html) 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, consecutively or concurrently, during the 90-day period and still meet the requirements for successful closure if each job is consistent with:

* the employment goal stated in the IPE; and
* the customer's unique strengths, resources, priorities, concerns, abilities, capabilities, career interests, and informed choice.

**Consecutive Jobs**

Employment is considered "consecutive" and does not require a new 90-day employment period if the:

* criteria for successful closure are met; and
* the customer:
	+ changes jobs with no gap in employment;
	+ is promoted by the same employer with no gap in employment; or
	+ changes jobs with a gap in employment of fewer than eight weeks.

If a customer loses a job before the end of the 90-day period, the customer's progression toward the 90-day period freezes. If the gap in employment is fewer than eight weeks, progression toward completion of the 90-day period resumes when the customer starts another job. Before closing the case, the VR counselor determines whether the remaining count of the 90 days is enough to determine whether the customer is stable on the job, given the customer’s individualized circumstances, and documents this in a RHW case note. The VR counselor may consult with the VR supervisor for guidance, if needed.

Note: If the customer is working with an ESP for job placement, the ESP is able to bill for Benchmark C in accordance with [VR-SFP 17.4.4 Bundled Job Placement—Benchmark C](https://twc.texas.gov/standards-manual/vr-sfp-chapter-17#s1744). If the gap between placements is eight weeks or more, the 90-day period for VR successful closure starts over. To document consecutive jobs in RHW, the VR counselor does the following:

1. Records each job on a new Employment Information page. All jobs appear on the Employment List page.
2. For the current job, selects "yes" for Start 90-Day Clock field.
3. Enters the hire date for the first job in the Start the Clock Date and Hire Date fields.
4. Documents in a case note:
	* that the hire date was predated;
	* why the hire date was predated; and
	* the correct hire date, weekly earnings, and weekly hours for each job.
5. On the Monthly Financial Information page, enters the net wages for the last job.
6. At closure, reports the weekly earnings and weekly hours for the last job.

**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. 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.
5. Enters, on the Monthly Financial Information page, the total net wages for the concurrent jobs.

### **B-603-6: VR Services During 90-Day Employment Stability Period**

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### **B-603-7: Additional Requirements for Self-employment Closures**

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### **B-603-8: Additional Requirements for Supported Employment Closures**

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### **B-603-9: Procedures for Closing Cases as Successful**

Before closing a case as successfully rehabilitated, the VR counselor completes the following actions:

1. Confirms that the criteria for closure and the conditions for successful employment have been met.
2. Reviews the case:
	1. for technical compliance and data integrity, and makes needed corrections; and
	2. to determine:
		1. that the SOC code is appropriate; or
		2. whether an amendment to the IPE is needed.
3. Reviews any open service authorizations, in-house service records, and associated financial actions needed. (Case will not close if in-house service records are open. Only the in-house specialist is authorized to close their service records).
4. Ensures that verification of the start date of employment is documented in RHW and includes the method used in a case note. If using the primary source documentation, this must also be placed in the case file. (Refer to B-603-1: Verifying Start Date for Closure.)
5. Ensures that verification of wages is documented in RHW. If using the primary source documentation, this must also be placed in the case file. (Refer to B-603-2: Verifying Wages for Closure.) If using the alternate method, a case note is also required. (Refer to B-603-4: Alternative Methods to Obtaining Primary Source Documentation.)
6. Ensures that verification of employment is documented in a case note to include the method used. If using the primary source documentation, this must also be placed in the case file. (Refer to B-603--3: Verifying Employment for Closure.)
7. Confirms that:
	1. substantial services were delivered; and
	2. 90 days have passed since the end of substantial services.
8. Ensures that agreements for extended services are still in place, when necessary.
9. Contacts the customer to discuss closure and availability of Post-Employment Services. (Refer to [B-605: Customer Notification](https://twc.texas.gov/vr-services-manual/vrsm-b-600%22%20%5Cl%20%22b605).)
10. If Post-Employment Services are needed, follows the procedures outlined in [B-607-2: Post-Employment Procedures](https://twc.texas.gov/vr-services-manual/vrsm-b-600#b607-2).
11. If Post-Employment Services are not needed, closes the case in RHW and notifies the customer according to the requirements in [B-605: Customer Notification](https://twc.texas.gov/vr-services-manual/vrsm-b-600#b605).

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## **B-605: Customer Notification**

Before closing the case, the VR counselor must inform the customer that his or her VR case is being closed. Notification may be provided in person, by phone, or in writing. The notification must include the reason that the case is being closed and the availability of Post-Employment Services, if applicable, and must be documented in a case note in RHW.

If the customer has completed an application for VR services and the VR counselor is unable to contact the customer directly for any reason, then written notification must be sent by letter or encrypted email at least 10 business days before closing the case, to allow time for the customer to contact the VR counselor if there are any concerns about closing the case. The VR counselor copies and pastes the email or letter notification that was sent in a case note with the topic "Attempt to Contact." For additional details, refer to [VRSM E-300: Case Note Requirements](https://twc.texas.gov/files/partners/vrsm-e-300.docx).

If there is no response from the customer, then the case may be closed successfully or unsuccessfully.

After the closure has been processed in RHW, a closure letter is available in RHW. VR staff must email or mail the letter to the customer at the time of closure

For information about closing a case before an application is completed refer to [B-203-3: Closing an Initial Contact in RHW](https://twc.texas.gov/vr-services-manual/vrsm-b-200#b203-3).

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