**VRE-NCT-08-Plan Writing Fundamentals**

Slide 1:

Welcome to Plan Writing Fundamentals. This training is designed to provide Veteran Readiness & Employment (VR&E) Vocational Rehabilitation Counselors (VRC) with the foundational skills necessary to develop a rehabilitation plan according to the guidelines of the M28C policy manual.

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Upon completion of Plan Writing Fundamentals training, you will be able to:

1. Identify the different types of rehabilitation plans, purposes and requirements.
2. Determine the type of plan to develop with your claimant.
3. List the elements of a rehabilitation plan.
4. Implement a rehabilitation plan.

Slide 3:

There are four rehabilitation plan types to assist the claimant in receiving the rehabilitation services they need to include the Individualized Extended Evaluation Plan (IEEP), Individualized Written Rehabilitation Plan (IWRP), Individualized Employment Assistance Plan (IEAP) and the Individualized Independent Living Plan (IILP). Each rehabilitation plan type is contingent on the specific needs of the claimant.

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VRCs must determine which plan to use based on their feasibility determination. As a reminder, a feasibility determination documents whether the claimant has the potential to benefit from rehabilitation services and achieve a vocational goal. If feasibility is uncertain, the VRC will develop an Individualized Extended Evaluation Plan (IEEP). If a vocational goal is reasonably feasible, the VRC will develop an Individualized Written Rehabilitation Plan (IWRP) or Individualized Employment Assistance Plan (IEAP). Lastly, if a vocational goal is not reasonably feasible, then the VRC will consider the development of an Individualized Independent Living Plan (IILP) for claimants with a Serious Employment Handicap (SEH). The focus of this training is on developing an IEEP, IWRP and IEAP.

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Individualized Extended Evaluation Plan (IEEP).

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When a VRC is uncertain of the claimant’s ability to achieve a vocational goal, feasibility is in question and an IEEP may be developed to further evaluate the circumstances in question. The purpose of an extended evaluation is to determine whether it is currently reasonably feasible for a claimant with a serious employment handicap (SEH) to achieve a vocational goal.  The VRC must determine that a period of extended evaluation is necessary when the feasibility of achieving a vocational goal cannot readily be determined based on the information obtained in the initial evaluation.

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An IEEP can be a very helpful tool for the VRC and a claimant in determining employment feasibility when it is used correctly. However, the IEEP can be used incorrectly at times. Some examples include the following:

1. Using an IEEP to evaluate a claimant’s aptitude for college is not appropriate. An IEEP with a training objective is possible when it is used in determining feasibility, but it may not be used for the sole purpose of determining whether a claimant can complete college classes.
2. Using an IEEP to delay a difficult decision is also not an appropriate use of the IEEP. When there is enough evidence to demonstrate that a claimant cannot pursue a vocational goal due to the limitations of their disability conditions, the VRC will need to inform the claimant promptly of their decision. The VRC can share the regulations with the claimant to demonstrate the decision was based on VR&E policy.

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An IEEP is used when the VRC needs more time to determine feasibility.

The claimant must have an SEH to receive IEEP services. The IEEP must address the factors contributing to the SEH and the reasons a vocational goal is uncertain. Some factors may include but are not limited to:

* Homelessness: What can the VRC do to assist with stability in housing? Resources may include the Veterans Integration Center, HUD VASH with the VHA, Goodwill Industries, or other facilities in your area.
* Legal history: Will it impact the claimant’s ability to gain certain types of work? What is their status in the legal process? The VRC may want to gain a Release of Information to speak with their Parole officer or other legal representation to see the impact on work.
* Polytrauma with unstable treatment; Why is the claimant not in treatment? Do they need to be? What type of treatment?

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Services approved under an IEEP must logically contribute to determining whether the claimant meets the conditions of feasibility. A variety of diagnostic, evaluative and other services are available for use during an extended evaluation to improve and assess the feasibility of achieving a vocational goal, including:

* Assessment of Physical and/or Cognitive Limitations and Abilities
* Occupational Therapy
* Physical Therapy
* Substance Abuse Treatment
* Mental Health Services
* IL Needs Assessment
* Assistive Technology Assessment
* VA Work-Study
* Volunteer Activities
* Compensated Work Therapy (CWT)
* Aptitude Testing
* Work Hardening
* Situational Assessments
* Academic Coursework

Academic coursework may be an appropriate part of an IEEP, but services cannot consist solely of academic programs. The IEEP should consist of no more than one term of academic coursework; however, one additional academic term may be approved by the VR&E Officer if the reason for the additional term is not solely to determine academic potential.

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Extended evaluations must be at least two weeks long, but may not exceed 12 months unless a longer period is necessary to determine whether achievement of a vocational goal is currently reasonably feasible. The VRC can approve the initial 12-month extended evaluation period, but the VR&E Officer or designee approval is required for any extension beyond the initial 12-month period. Up to two additional six-month periods (not to exceed 24 months) of extended evaluation may be approved if there is reasonable certainty that the feasibility of achieving a vocational goal can be determined during this period.  Any request for an extension beyond the basic period of 12 months must be justified by a discussion of the claimant’s circumstances and the issues related to the feasibility of achieving a vocational goal.  This justification should be documented in memo format with VR&E Officer or designee concurrence and must be placed in the claimant’s VR&E record.

Claimants who served during Operation Iraqi Freedom (OIF), Operation Enduring Freedom (OEF), and/or Operation New Dawn (OND) can be provided with an initial extended evaluation plan of 18 months if the severity of the claimant’s disabilities warrants additional time to determine feasibility. VR&E Officer or designee concurrence is required; concurrence should be documented in memo format and must be placed in the claimant’s VR&E record.

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Individualized Written Rehabilitation Plan (IWRP).

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When a claimant’s vocational goal is currently reasonably feasible and has been identified, the VRC will determine the claimant’s rehabilitation and training needs and identify the corresponding services that will assist them in overcoming their impairments to employment. An IWRP may be developed when the claimant is pursuing re-employment, rapid access to employment, employment through long-term services, or when developing an IWRP with a deferred vocational goal.

The tracks or services to employment include the following:

Re-Employment – for claimants who held an occupation before entering the military and provides short-term or refresher training and rehabilitation services to help them return to previous employment (e.g., updated license/certification or identified accommodations for return to work)

Rapid Access to Employment Services – helps the claimant receive services to enhance already acquired skills (e.g., short-term or refresher training for interviewing, job seeking, or resume)

Employment Through Long-Term Services – used when a claimant needs an extended period of training to acquire skills and/or credentials (e.g., college, technical training, Non-Paid Work Experience (NPWE), On-the-Job Training (OJT), Apprenticeship)

IWRP with a Deferred Vocational Goal - allows training to begin while exploring and identifying a vocational goal The IWRP must be documented on VA Form 28-10214, Rehabilitation Plan.

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IWRPs are developed and tailored to the specific needs of each claimant, ensuring that they receive the necessary training to qualify and compete for suitable employment in their selected occupation. As such, claimants may be authorized to receive services that help them complete their rehabilitation plan. Services may include but are not limited to:

* Academic Coursework
* Vocational Training
* Non-Paid Work Experience (NPWE), On-The-Job Training (OJT), and Apprenticeships
* Employment and Counseling Services
* Payment of Tuition, Books and Supplies
* Short-Term Training or Certificates
* Subsistence Allowance
* Revolving Fund Loan
* Retroactive Induction
* Dental, Medical and Mental Health Services
* Payment For Licenses, Certifications and Fees

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When selecting a training facility, VRCs must verify the school/facility and training program have been approved by VA Education Service (Chapter 30 and Chapter 33) in the Web Enabled Approval Management System (WEAMS). VRCs must complete the verification in WEAMS before developing or redeveloping a rehabilitation plan and authorizing the claimant’s attendance. VRCs must consider the claimant’s preference for a particular training or rehabilitation facility. However, the cost of education and training services is one of the factors that must be considered in selecting a training facility. The VRC and the claimant must work together to identify the facility that can best meet the claimant’s needs.

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In any instance that a course of education or training is not approved by the VA Education Service for CH 30 or CH 33, a waiver must be requested for each claimant to use a Chapter 31-only course of education or training. VRCs must exhaust all efforts to use facilities approved by VA Education Service, Chapter 30 and Chapter 33, to the maximum extent possible. Only after an exhaustive search has been conducted can a VRC explore a Chapter 31-only course of education or training.

VRCs are required to get approval for each claimant wanting to pursue a course that is not approved by Education Services in WEAMS. If it’s not approved by Education Service, the VRC will seek approval from the Executive Director of VR&E Service which will require written justification, a site visit, and a review of the school’s catalog or bulletin, to gain final approval. The procedures for establishing CH 31-only programs can be found in M28C.IV.C.1.04.

Under no circumstances should a counselor authorize a claimant to attend a school, facility, education, or training program that is not approved in WEAMS unless there is approval from the Executive Director of VR&E Service for that specific claimant to attend that program.

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The links to WEAMS can be found below:

1. [WEAMS](https://ssologon.iam.va.gov/centrallogin/Default.aspx?appname=core&URL=https://ssologon.iam.va.gov/centrallogin/core/redirect.aspx&TYPE=33619969&REALMOID=06-4a6ba0dc-5da3-4fe8-b320-fe776d8c7da0&GUID=&SMAUTHREASON=0&METHOD=GET&SMAGENTNAME=$SM$FWBCa3mBryfBbOQaDTc4W%2bHBfELozzqDgScfLx5o6lbQBUmmEf7wPkut2Q0P7C25&TARGET=$SM$https:%2f%2fiamwebapps.vba.va.gov%2fweams%2fhome.do) Internal link for counselors
2. [WEAMS](https://inquiry.vba.va.gov/weamspub/searchInst.do) public site

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The duration of an IWRP is limited to the eligibility termination date (ETD) and the number of months of entitlement that the claimant has remaining. The ETD is 12 years from the date the claimant was notified of their 1st compensable disability rating. This is the very first rating the claimant receives that has money attached to it (i.e., compensation). However, if the claimant was discharged after 1/1/13, he or will not have a delimiting date due to a change in the law.

The law also allows a claimant to receive up to 48 months of entitlement under Chapter 31 which includes all Education chapters. Some of those chapters include Chapter 30 -Montgomery GI Bill and Chapter 33 - Post 9/11 GI Bill. For example, if a claimant used entitlement under an Education benefit before utilizing benefits under VR&E CH 31, those months of entitlement will be deducted from the 48 months. To summarize, the claimant’s plan cannot exceed the ETD if applicable, or 48 months of entitlement.

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There are exceptions when a claimant may be granted entitlement beyond their ETD or 48 months. Entitlement extensions may be granted with VR&EO or designee approval if the criteria are met (refer to M28C.IV.A.2.06). Claimants with an EH may be authorized to receive entitlement extensions only. Claimants with an SEH may be authorized to receive both entitlement extensions and participation past their ETD. If a claimant is not approved for an entitlement extension, a plan beyond the ETD or 48 months cannot be developed.

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The cost of education and training services will be one of the factors considered in selecting a facility when:

* There is more than one facility in the area that has been identified that meets the claimant’s needs and enables him or her to achieve the vocational goal outlined in the rehabilitation plan;
* Meets requirements for approval under 38 CFR 21.292through 21.298;
* Can provide the education and training services, and other supportive services specified in the claimant’s plan; and
* Is within reasonable commuting distance; or
* The claimant wishes to train at a suitable facility in another area, even though training can be provided at a suitable facility in which the claimant resides.

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If more than one facility has been identified, but there is a significant difference in cost, the VRC must document the justification for choosing the higher-cost facility before developing a plan listing the higher-cost facility as a service provider.  For instance, the claimant’s vocational goal is to become an Engineer.  The local public university has an engineering program with an annual estimated cost of $12,000 per year; however, the claimant prefers to attend a private university nearby with an annual estimated cost of $40,000.  Before the VRC develops a rehabilitation plan that includes training at the high-cost facility the following questions must be addressed:

Are there differences in support services that will ensure the claimant's successful completion of training?

* Are there special programs of assistance for students with disabilities that will also be utilized by the claimant in the course of his or her program?
* Are there significant differences in the availability of placement services and placement records?
* If a shorter commute from the claimant's home to the training facility is the reason for selecting a higher-cost facility will the claimant complete his or her training program in a shorter amount of time?

If an analysis of these issues indicates that the higher-cost facility should be selected, then the VRC will document the decision onVAF 28-1902n, Counseling Record-Narrative Report.

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The VRC’s cost approval threshold is $50,000 per calendar year. If the estimated program costs per calendar year exceed the VRC’s approval threshold, a high program cost memo must be developed to obtain the proper level of concurrence. Program costs include tuition, fees, books, and supplies. Subsistence allowance is not included in the estimated calendar year program costs. The VREO must concur by signing the high program cost memo before the rehabilitation plan is signed by the VRC and the claimant. Refer to M28C.V.B.1 for appropriate Cost Approval/Concurrence Levels.

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This is an example of a High-Cost Memo screen to be completed in CWINRS. After completing this screen, press print to generate the memo and send it to the VREO for review and concurrence. Upon approval, high-cost memos are to be filed in the Veteran’s electronic file.

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IWRPs with a deferred vocational goal are plans that are usually written for claimants entering Ch 31 under the National Defense Authorization Act (NDAA) criteria and who are being medically discharged from the military. However, they can also be developed for claimants to allow training to begin even though a suitable vocational goal has not been identified but vocational exploration will continue to identify a suitable goal. The achievement of a vocational goal must be determined to be currently and reasonably feasible. In addition, the plan must include a training objective for needed remedial and/or general education course(s) only.

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The criteria in the M28C provides a time standard for IWRPs with a deferred vocational goal. First, the training must begin within 3 months of the development of the IWRP. If it is an NDAA case, training must begin within 6 months from the date of the IWRP. Counselors can only authorize one standard term or two non-standard terms. Whether it’s an NDAA case or not, all plans with a deferred vocational goal must be redeveloped within 9 months of finding the claimant entitled to include a suitable vocational goal and appropriate objectives.

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There are several key components of an IWRP-deferred vocational goal. The program goal of the plan is “to determine a suitable occupational goal”. As a result, DOT 999, deferred, must be used since a vocational goal cannot be readily identified at the time the plan is developed and the achievement of a vocational goal has been determined reasonably feasible. The IWRP must also include a training objective, which is limited to required remedial training or general education courses only. Vocational exploration and planning activities must be included in the IWRP as well. The vocational objectives should outline evaluations or sources of information that will assist in determining a suitable vocational goal, such as a background check, medical evaluations, or labor market research. There should also be a health and medical services objective included that addresses appropriate medical, psychological, counseling, and health-related services needed. Lastly, VRCs should conduct Level 3 case management for IWRP-deferred vocational goal plans which requires monthly face-to-face meetings either in-person or via tele-counseling.

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Individualized Employment Assistance Plan (IEAP).

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The IEAP’s primary purpose is to provide employment services to assist claimants in preparing for, obtaining, and maintaining employment. The goal of the IEAP is employment.

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IEAP services are individualized and designed to assist the claimant in obtaining suitable employment. The case manager works closely with the claimant to develop a list of value-added services to promote the attainment of the vocational goal. Here are some examples of employment services which may be beneficial:

* + Resume development
  + Interviewing skills training
  + Job-readiness training
  + Registration with the career services office on campus
  + Participation in professional organizations and/or groups
  + Referral to Department of Labor-sponsored employment services
  + Job Accommodations
  + Travel
  + Payment of Licenses and Certifications
  + Employment Adjustment Allowance

Slide 29:

IEAPs address the specific services that will assist the claimant with obtaining and maintaining employment. They can be developed independently upon completion of an IWRP or when the claimant only needs employment services as identified during the evaluation stage. They may also be developed in combination with the IWRP with separate objectives specifically written for employment services. This is typically referred to as an IWRP/IEAP. IEAPs may be developed when the claimant enters any of the following tracks: re-employment, rapid access to employment, and employment through long-term services. If the rehabilitation plan was not written as a combined IWRP/IEAP, the IEAP must be developed no later than 60 calendar days before the anticipated completion date of training as outlined in an IWRP.

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Per 38 U.S.C. 3117, a claimant who does not meet the entitlement criteria for employment handicap and serious employment handicap may be provided limited employment assistance if the claimant meets all the criteria. The specifically defined employment assistance may include the following:

* Direct placement in employment
* Utilization of employment, training, and placement services
* Utilization of job development and placement
* Referral to a DVOP Specialist and/or a LVER
* Assistance for claimants who previously received self-employment assistance from CH 31 or State VR

Please note: Claimants participating in an IEAP under U.S.C. 3117 may not be authorized Employment Adjustment Allowance.

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VR&E provides employment assistance to help claimants secure and maintain suitable employment. The duration of an IEAP is limited to 18 months of employment assistance. The only exception is for IEAPs under U.S.C. 3117 which does not have a specific time limit; however, the IEAP should be developed according to what the claimant needs, and the appropriate amount of time required to complete services.

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Elements of a Rehabilitation Plan.

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The rehabilitation plan is documented on VA Form 28-10214. The first element of a rehabilitation plan is the program goal which will depend on the type of plan developed.

The program goal of an IEEP is to determine if the achievement of a vocational goal is currently reasonably feasible. The VRC must use the specified code of 999 under the occupational code on the IEEP since the feasibility of achieving a vocational goal needs to be determined for the claimant.

IWRPs must include a specific occupational goal or occupational cluster and a three-digit Dictionary of Occupational Titles (DOT) code. An IWRP may be written as a combined IWRP/IEAP with a specific occupational goal and corresponding DOT code. The VRC must indicate the appropriate DOT code on every IWRP. Note: Use DOT Code 999 for an IWRP-Deferred Vocational goal, which indicates that a suitable vocational goal has not been selected for the claimant.

The program goal for an IEAP must include a specific occupational goal or occupational cluster and a three-digit DOT code. An IEAP may be written as part of a combined IWRP/IEAP with a specific occupational goal. The VRC or EC must put the first three digits of the DOT on every IEAP.

Lastly, the program goal for an IILP is to increase the claimant’s independence in daily living. Since the goal of IILPs is not vocationally based, the VRC must use the first three numbers of the DOT code 000.

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In Block 5 of the rehabilitation plan, an anticipated completion date is required to indicate the estimated completion date of all services included in the plan. In addition, an anticipated completion date is required for each objective to help track progress toward the program goal.

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Block 7 of the rehabilitation plan, pertains to the level of case management and must be selected depending on the type of plan and characteristics of the claimant. There are 3 levels of case management.

Level 1 requires one in-person or tele-counseling appointment per year as well as at least one contact for each standard term or three contacts yearly for non-standard terms or non-academic training.

Level 2 requires an in-person or tele-counseling appointment perstandard term or at least three times yearly for nonstandard terms.

Level 3 requires an in-person or tele-counseling appointment per month.

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Block 8 refers to the Subsistence Allowance Rate Election. The claimant will indicate which subsistence allowance they want to receive while in training (if applicable). There are three options: Chapter 31 Subsistence Allowance Rate (CH31SA), Post 9/11 Subsistence Allowance Rate (P911SA), or the Higher Rate Between CH31SA and P911SA. Please note: the VRC will verify if the claimant is eligible for the Post 9/11 Subsistence Allowance before this option is checked on the rehabilitation plan.

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Intermediate objectives identify secondary goals that contribute directly to the achievement of the program goal. The intermediate objectives of the rehabilitation plan must identify all the necessary services and requirements needed to achieve the program goal of the plan. The development of appropriate intermediate objectives is the foundation of an effective rehabilitation plan.

When developing a rehabilitation plan, the VRC must ensure that each plan's objective:

1. Is clear and easily understood,
2. Relates to achieving the goal,
3. Is observable and can be evaluated,
4. Has a measurable outcome

An example of a well-written objective is, “Veteran (or Claimant) will complete a Bachelor of Science degree in Social Science Education through (add the name of the school).”

When developing an IWRP, each training objective must include the training facility. For concurrent enrollment, all facilities including branch and satellite campuses must be listed in the rehabilitation plan with the degree-granting institution identified as the primary facility.

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Each objective in the plan must include a description of services to be provided to assist the claimant in achieving the objective. The services outlined in the plan must address medical, psychological, and related services, as appropriate, to ensure the claimant’s needs are addressed and met. All rehabilitation plans must include counseling.

Additionally, the services provided as part of the rehabilitation plan must comprehensively address the claimant’s needs to reach the program goal.  The description of planned services must be specific and detailed as well as clear and unmistakable in its relationship to the intermediate objective.

Provided in the slide is a good example of a well-written services description.

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Each intermediate objective has a projected start and end date for each planned service. The duration of the service must correspond with any statutory limitations, limitations of eligibility and/or entitlement, or approved extensions thereof, to ensure the claimant has sufficient time to complete the objective.

The duration of services must be indicated for each objective to help track progress toward the program goal. It also informs the case manager and the claimant of the time frame in which services will be provided.

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Services can be provided by a variety of sources. Some examples are listed below:

* VR&E
* Veterans Health Administration (VHA)
* Rehabilitation Facility
* IL Center
* Medical Personnel
* Education/Training Facility
* Non-Profit Entity
* Private Company
* Individual

The rehabilitation plan must list the contact information of the service provider(s), including the name, address, telephone number and email address.

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The rehabilitation plan must include information on how the claimant’s progress will be measured during the rehabilitation process and provide an evaluation schedule in this section of the rehabilitation plan. Evaluation information is captured in three areas: Evaluation Criteria, Evaluation Procedures, and Evaluation Schedule.

The Evaluation Criteria evaluate what is expected for each objective. There are some examples on the slide such as maintaining a specific grade point average while in training.

The Evaluation Procedures outline how the evaluation criteria are being measured. For example, a VRC may request the claimants’ grades after each term to ensure the claimant is meeting the expected grade point average specified in the Evaluation Criteria.

The Evaluation Schedule is used to annotate the frequency of the evaluations. In other words, how often will the VRC and the claimant meet for case management appointments to assess progress and ensure the claimant is meeting the expectations? In many cases, the case management level and description will be described under the Evaluation Schedule.

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The VRC must provide the claimant notification of the authorization of services via VR-67, Positive Chapter 31 Decision Letter - Plan Development, and place a copy in the claimant’s VR&E record. The letter needs to include all applicable approved components of service provision such as the approved vocational goal, subsistence allowance, books/supplies, employment services, entitlement extension, etc.

VRC must document the plan development activities, justification for services and/or training, and the suitability of the goal on VA Form 28-1902n, Counseling Record - Narrative Report (Supplemental Sheet).

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The specific M28C references this training covers include the following:

1. Rehabilitation Plan Types: M28C.IV.C.2.04.a
2. Individualized Extended Evaluation Plan (IEEP): M28C.IV.C.3
3. Individualized Written Rehabilitation Plan (IWRP): M28C.IV.C.4
4. Individualized Employment Assistance Plan (IEAP): M28C.IV.C.7
5. Required Elements of Rehabilitation Plans: M28C.IV.C.2.04.b.

Accordingly, VRCs are encouraged to review the sections above to gain a deeper understanding of plan development.

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In the course, VRCs learned about the major concepts of plan writing fundamentals. These concepts included identifying the different types of plans, their purposes and requirements. The course also outlined how to determine the type of plan to develop with a claimant. Additionally, VRCs learned what elements to include in a rehabilitation plan and how to implement the rehabilitation plan.

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This concludes the training on Plan Writing Fundamentals. Thank you for your dedication and commitment to the VR&E mission.