# **Developing an IL Plan**

**Slide 1**: Welcome to Developing an Independent Living (IL) Plan Training. This course focuses on developing an IL plan.

**Slide 2**: Upon completion of this training, you will be able to:

* Complete an Independent Living Plan
* Evaluate program costs for an Independent Living Plan
* Obtain approval of an Independent Living Plan

**Slide 3**: The VRC must document and describe the services that will assist the claimant in achieving the selected program goal and intermediate objectives that contribute directly to the achievement of the program goal. First, the VRC will start with the program goal. Because this rehabilitation plan is being written for Independent Living, the program goal should reflect an outcome related to enhancing activities of daily living and independence from family and community.

**Slide 4**: This slide outlines the steps in completing the VA Form 28-10214, Rehabilitation Plan. The form includes the following:

* Objectives - The objectives of the rehabilitation plan must serve to prepare the claimant to achieve his or her program goals.
* Services provided - IL services must be individualized and designed to assist the claimant in achieving the maximum level of independence possible, and when feasible, to increase the claimant’s potential to return to work. The services must be outlined in the rehabilitation plan with observable, measurable objectives to meet the overall goal of the rehabilitation plan.
* Duration of services specifies a start date and end date for each intermediate objective.
* Name and address of person or facility providing services – Contact information for the specific services being provided.

**Slide 5**: Some additional fields include:

* Evaluation criteria - must specify the basis or measure for the evaluation. Example: If an objective under Independent Living is for the claimant to volunteer, criteria may be to measure volunteer time spent or participation in an avocational activity.
* Evaluation procedure - must specify the method that will measure the claimant’s progress while participating in a specific service. Example: procedure may be to track the number of hours the claimant spends in the activity.
* Evaluation schedule – must specify the frequency of evaluation of the specific service that will be provided to the claimant. For Independent Living, it will be at least monthly.

**Slide 6**: In the Objective One field, document the first objective developed for the claimant’s Individualized Independent Living Plan. For example, the objective may be “the claimant will dress himself independently.” All the fields on VA Form 28-10214, Rehabilitation Plan have been covered through the 1st objective. The VRC will continue to do the same thing for Objective 2 up to the number of objectives that are being used for the specific plan.

**Slide 7**: Independent Living Plan objectives support the overall IL program goal and should focus on services that will improve activities of daily living. If the IL plan includes the VR&E Housing Adaptation Grant, it is important to ensure that the VRC has coordinated with the VR&E Independent Living Coordinator and the Specially Adapted Housing (SAH) agent and that a feasibility study is included with an agreed scope of work. This slide provides some sample IL objectives such as an objective for an accessible bathroom and another one for a potential hospital bed and/or lift chair. Services are unique to the specific needs of the claimant.

**Slide 8**: If the plan involves services within the VR&E 2102b housing adaptation grant, the VRC must ensure the referral memo has been approved by local management, the SAH agent has completed the suitability/feasibility assessment, home ownership complies with SAH guidance, and the scope of work has been agreed upon by the VRC, SAH agent and VR&E management before developing a signed Rehabilitation Plan.

**Slide 9**: On this slide different levels of approval are listed based on the entire cost of the plan (with or without modifications). No matter the cost of both types of services, the plan must through the VR&E Officer for approval. For the most part, IL plans will consist of no adaptations or modifications and will be approved solely by the VR&E Officer.

**Slide 10**: For IL plans with no home modifications where costs are under $75,000, the VRC will submit the eFolder to the VREO which will include the following:

* Case note narrative
* VA Form 28-10214, Rehabilitation Plan
* VA Form 28-0814, Checklist for Independent Living Plan Approval. (the checklist will be addressed later in this topic after program costs).

A VRC cannot approve annual program costs exceeding $25,000 for an Independent Living Plan.

For IL plans that do not include home modifications, the VREO can approve up to $75,000. The VRC should include a case note narrative, VA Form 28-10214, Rehabilitation Plan, and the VA Form 28-0814 Checklist for Independent Living Plan Approval.

For IL plans without construction between $75,000 - $100,000, they will first go to the VREO for approval, and then to the RO Director. They should include a summary of the case, an outline of the IL costs and IL supporting documents in eFolder/VBMS.

If the costs exceed $100,000, the same supporting information should be provided, and the approval level will go from the VREO to the RO Director to the Executive Director of VR&E Service. The VA Form 28-0953, Director’s Checklist for IL Cost Approval must be included along with a summary of the case, the outline of IL costs and the VMBS eFolder with supporting IL documentation.

**Slide 11**: This slide covers home modification costs and approval levels for the IILP.

It’s important to note that there is a difference between “home modifications” and “home adaptations.” VR&E does not have the authority to provide home adaptations. VR&E is responsible for identifying the home adaptations needed such as zero entry shower or widened doorways. The VRC must identify the services through a comprehensive independent living assessment and then complete the referral memo to coordinate the delivery of the home adaptations with the Specially Adapted Housing (SAH) program under the VR&E Housing Adaptation Grant.

However, VR&E may provide home modifications that are defined as more installation-only projects that would not meet the criteria outlined in one of the four elements of the VR&E housing adaptation grant. Before proceeding with the home modification process, VR&E SAH partners must reject the referral. Home adaptation is defined as a project to adapt a housing unit including any component of construction for which any of the following requirements apply and/or are needed for completion to ensure that the housing unit is suitable or fit for the residential living needs of an eligible claimant:

* + - A technical drawing
    - A permit, if required by local or State laws or building codes
    - The use of a licensed contractor to complete the home adaptation.
    - A required compliance inspection under the current SAH policy.

**Note:** The SAH agent assigned to the home adaptation must certify if a compliance inspection is required.

If the identified IL need does not meet the definition of a home adaptation as determined in writing by the Regional Loan Center (RLC), services may be provided to meet the need for a home modification using the government purchase card (GPC), local contracts and/or the acquisition process.

**Slide 12:** VREO Approval

If the IL program costs for home modifications are less than $2,000, the VRC will submit the eFolder along with the following components of the IILP to the VREO, including:

* + Case Note narrative.
  + Denial documents from RLC or SAH agent on noting meeting one of the VR&E housing adaptation grant elements.
  + VAF 28-10214, Rehabilitation Plan (proposed)
  + VAF 28-0814, Checklist for Independent Living Plan Approval

**Slide 13:** RO Director Approval

If the IL program costs for home modifications are between $2,000 and $15,000, use VA Form 28-0953, Director's Checklist for Independent Living (IL) Cost Approval, along with the supporting documentation included in the checklist.

**Slide 14:** VR&E Service Director Approval

If the IL program costs for home modifications are greater than $15,000, prepare the eFolder, VA Form 28-0953, Director's Checklist for Independent Living (IL) Cost Approval, and supporting documentation requesting approval from the VR&E Service Director.

**Slide 15:** The VR&E Housing Adaptation Grant is not a traditional SAH grant. A claimant qualifying for the grant is not required to exhaust any other benefit first to include Home Improvements and Structural Alterations (HISA) or SAH funding and does not need to apply for SAH to be found in need of the VR&E grant. However, this grant counts toward the six-time usage rules for SAH grants. There is a waiver with this grant that provides the authority to exceed the calendar limit on the amount of money one can receive from the VR&E housing adaptation grant.

If the in-home comprehensive evaluation indicates that home adaptation is needed, the VRC must send a copy of the evaluation and the VR&E home adaptation memo through encrypted email to the Regional Loan Center (RLC) of jurisdiction and VR&E IL Mailbox at [**VBAVREIndependentLiving@va.gov**](mailto:VBAVREIndependentLiving@va.gov),to refer the completion of the home adaptation to SAH.

Refer to [**RLC office's website**](https://www.benefits.va.gov/homeloans/contact_rlc_info.asp)for a list of RCLs and the jurisdiction covered by each. The VRC must send the email referral to the following address, as applicable based on the area of jurisdiction.

The VRC must upload a copy of this email to the claimant’s VR&E record.

VR&E home adaptation grants will be managed in LGY’s Specially Adapted Housing Special Home Adaptation (SAHSHA) records management system. The VRC and local station management must register in the LGY hub and complete the TMS course titled VRE Housing Adaptation Grant & SAHSHA System Training (# VA 4633274) on managing the referral in SAHSHA. Confirmation of this course completion should be sent to the VR&E IL Coordinator via email.

**Slide 16:** The SAH agent will be instrumental in assisting with the VR&E Housing Adaptation Grant.

They will complete the following duties:

* Coordinate with the referring VRC on the initial meeting with the claimant regarding the grant referral. Resolve any queries with the VRC regarding the required home adaptations.
* Following notification and verification of the comprehensive evaluation being uploaded in SAHSHA, the SAH agent and VRC shall conduct an in-home adaptation evaluation within 30 business days from the date the plan is uploaded into the system.
* Complete a home suitability and feasibility study of the requested adaptations. This evaluation is documented on the VA Form 26-1858a. If feasible, the VRC is encouraged to attend this initial meeting with the assigned agent. The agent will include photos of the property. The report will cover all the necessary items required for SAH paraplegic cases.
* The Minimum Property Requirements (MPR) may also be considered if the claimant is entitled to SAH benefits or their medical conditions determine that the requirement is necessary. If the claimant is not eligible for SAH grants, then an MPR will not be required.
* The claimant is required to meet the SAH guidelines on home ownership. SAH will review all title documents.

**Slide 17:** The VR&E Officer may approve the cost of all rehabilitation plans that include VR&E home adaptations up to the current VR&E grant amount. If the total amount of the home adaptation under the VR&E Housing Adaptation Grant exceeds the current VR&E grant limit, a waiver is required.

The Executive Director of VR&E Service, in collaboration with the Executive Director of LGY Service, must approve the waiver before the rehabilitation plan is signed. The VR&E Officer, or designee, must submit a draft of VAF 28-0953, Executive Director’s Checklist for Waiver of Veteran Readiness and Employment (VR&E) Housing Adaptation Grant Amount, and all required documentation noted on the checklist to the Executive Director of VR&E Service for approval through the VR&E IL Mailbox.

The Executive Directors of VR&E Service and LGY Service will review the information and provide a written response to the RO Director for the approval request, with a copy to the VR&E Officer and SAH agent of record within 30 business days from receipt of the drafted VAF 28-0953.

The concurrence process must be completed before the VRC and claimant sign the rehabilitation plan. Once the plan is signed, the VRC must provide a copy of the signed rehabilitation plan to the SAH agent. At this point, the home adaptation may begin.

**Slide 18:** A VRC needs to know the basic steps for Home Adaptation and Home Modification. VR&E is required to use the grant. A VRC should not tell a claimant to go purchase items then the VA will reimburse them.

If it is an installation-only project that does not meet the grant requirements. First, the VRC must get confirmation that the project cannot be approved under the grant. They can get this confirmation by contacting the Regional Loan Center and asking for them to sign the referral memo that the project doesn’t meet the requirements. Then the VRC must work with local contracting to get the required items (unless it is within their credit card limits in which case, they can use a Government Purchase Card).

Again, it is important to note that the VRC should not instruct the Veteran to purchase the items and then get a direct reimbursement.

**Slide 19:** VA Form 28-0814, Checklist for Independent Living Plan Approval

The checklist allows the VRC to review each of the required steps to complete before submitting the IL plan for VREO approval. On the checklist, there is a column for the VRC to check off as they review each step. There is also a column where the VREO reviews the items and checks off each step. Finally, there is a signature line for both the VRC and the VREO. The checklist is mandatory and must be submitted as part of the documentation in the eFolder.

Item 1 is to confirm that the feasibility of a vocational goal was thoroughly assessed and the decision that achievement of a vocational goal is not currently feasible is supported by evidence.

Item 2 is to confirm that the VRC completed a Preliminary IL Assessment with the claimant and documented it on VA Form 28-0791 and uploaded the file.

Item 3 is to confirm that a Comprehensive IL Assessment was conducted.

Item 4 is to confirm that the feasibility of an IL goal was assessed and supported by evidence in the file.

**Slide 20:** The Home Adaptation section is next. This should ***only*** be completed if the IL plan includes home adaptations.

Item 5 is to confirm that a copy of the email to the RLC of jurisdiction and VR&E Service IL Coordinator is in the file.

Item 6 is to confirm that the feasibility of a vocational goal was thoroughly assessed and the decision that achievement of a vocational goal is not currently feasible is supported by evidence.

Item 7 is to confirm that the VRC completed a Preliminary IL Assessment with the claimant and documented it on VA Form 28-0791 and uploaded the file.

Item 8 is to confirm that a Comprehensive IL Assessment was conducted.

Item 9 is to confirm that the feasibility of an IL goal was assessed and supported by evidence in the file.

If a home modification is a part of the proposed IILP and the project is not part of the VR&E Housing Adaptation Grant, the VRC must complete an analysis of the home modification plan for review and concurrence by the VR&E Officer, Regional Officer (RO) Director, and/or Executive Director of VR&E Service, as applicable.

**Slide 21:** Pre-solicitation requirements for home modification. This process only applies to claimants who do not meet the requirements for the VR&E Home Adaptation Grant. The denial from the SAH program must be in writing and documented in the claimant’s VR&E record before proceeding with the acquisition process for home modifications.

Item 10 – The VRC will confirm a written denial from the RLC has been established and placed in the electronic file.

Item 11 – Pre-solicitation requirements must include a Statement of Work, VAF 2237 – Request Turn-in and Receipt for Property of Services, and Appendix A of VA Handbook 6500-6.

Item 12 – The VRE&O concurrence on the proposed IL plan with home modification.

Item 13 – Title verification completed.

Item 14 – Appropriate cost levels have been obtained.

Item 15 – Orientation for Home Modification Process was completed.

If home modifications are part of the IILP and the cost of the modification is greater than the Micro-Purchase Threshold for construction, currently $2,000, the VRC must work closely with the Contracting Officer to secure the acquisition of these services. The VRC must complete the following activities:

**Slide 22:** For all IL cases, the VRC should confirm the following:

Item 16 shows that the IILP is appropriately developed, addresses all IL needs from the assessment, and includes all services needed, including specific equipment to be purchased for the claimant to achieve IL goals. Additionally, monthly case management is required, the objectives are measurable, and the outcomes will be sustained after the IL case ends.

Item 17 is to confirm all required information is in the file.

Item 18 indicates that all required IL forms are being used and completed.

Item 19 is to confirm that all the items on the checklist have been reviewed and the proposed IL plan is approved.

Item 20 – the Case Manager will sign, and date and the VR&E Officer will sign and date.

**Slide 23:** Once the IILP comes back approved with the VR&E Officer’s signature, the VRC will review it again with the claimant and obtain their signature on the plan. First, determine that they are in full agreement with the plan. Obtain the claimant's signature. The VRC will then sign the plan and place it in the eFolder. Provide the claimant with a copy of their plan.

If the individual disagrees with the plan, the VRC should use counseling skills to find out reasons why and work together to reach an agreement.

Now, the services on the Independent Living plan may commence. Adaptation and Modifications will require additional coordination with the VR&E Service Independent Living Coordinator.

**Slide 24:** *Now that you have completed the training, you can now:*

Complete an Independent Living Plan

Evaluate program costs for an Independent Living Plan

Obtain approval of an Independent Living Rehabilitation Plan

You have now completed the course.

**Slide 25:** References

VRCs will need to access the following reference(s) when Developing an IL Plan:

* + M28C.IV.C.2.05.e (Independent Living)
  + M28C.IV.C.6.01 (Independent Living Plan Overview)
  + M28C.IV.C.6.02 (Independent Living Planning Process)
  + M28C.IV.C.6.03 (Avocational Options)
  + M28C.IV.C.6.04 (Home Modifications and Home Adaptation Options)
  + M28C.IV.6.05 (Independent Living Plan Development)