# PART B, CHAPTER 7: COMPREHENSIVE ASSESSMENT

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| **Policy Number** | **Authority** | **Scope**  | **Effective Date** |
| Part B, Chapter 7 | 34 CFR [§361.45(f)](https://www.ecfr.gov/current/title-34/part-361#p-361.45(f)), and TWC Rule [§856.41](https://texreg.sos.state.tx.us/public/readtac%24ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=40&pt=20&ch=856&rl=41) | All TWC-VR staff | 9/3/2024 |

## PURPOSE

In accordance with the authority (Federal and State) listed above, this policy is issued by the Texas Workforce Commission Vocational Rehabilitation Division (TWC-VR). Adherence to these rules and regulations issued under the Rehabilitation Act of 1973, as amended by Title IV of the Workforce Innovation and Opportunity Act (WIOA), supports Texans with disabilities in gaining, maintaining, and advancing in competitive integrated employment (CIE).

Specifically, the purpose of this policy and these procedures is to ensure adherence to provisions for conducting a comprehensive assessment of a customer's rehabilitation needs in order to determine their employment goal and to plan for the TWC-VR services required to assist them with employment in a competitive integrated environment.

## DEFINITIONS

Informed Choice: The means by which a customer chooses their rehabilitation path, from options based on their needs and circumstances and TWC-VR rules. The information discovered in the comprehensive assessment equips the customer with more data to further identify an optimal employment outcome and the services needed to achieve that outcome.

Integrated Setting: A work environment, typically found in the community, where individuals with disabilities work alongside their non-disabled peers in jobs that are typical for that industry or workplace. In an integrated setting, individuals with disabilities have equal opportunities for employment, access to the same benefits, resources, and training, and are fully included in all aspects of the workplace culture.

Labor Market Information (LMI): Comprehensive knowledge regarding a specific labor market, including information about occupations, locations, wages, demographics, etc.

## POLICY

### General Overview

The VR Counselor must conduct, to the degree necessary, an assessment of rehabilitation needs sufficient to develop an Individualized Plan for Employment (IPE). This includes obtaining sufficient information (e.g., existing assessments and history, LMI) to determine the employment goal and nature and scope of services. Comprehensive assessments must be conducted in the most integrated settings possible.

### Comprehensive Assessment

A comprehensive assessment is an individualized process to determine the customer's unique strengths, resources, priorities, concerns, abilities, capabilities, and interests. This includes assessing the need for supported employment. Comprehensive assessment is an ongoing process that occurs both before and after IPE development and implementation.

The comprehensive assessment must be limited to information that is necessary to determine the employment goal, identify the rehabilitation needs of the customer, and plan for services required to assist the customer to become employed in a competitive integrated environment, and, therefore, should not be delayed and an IPE should be developed immediately.

If it is determined that additional information is necessary to identify the employment goal and the nature and scope of rehabilitation services to be included in the IPE, the VR Counselor must conduct a comprehensive assessment that meets the following criteria:

* Information available from other programs and providers, particularly information used by education officials and the Social Security Administration;
* Information provided by the customer and the customer's family; and
* Information obtained under the assessment for determining the customer's eligibility and VR needs.

This information is used to increase the VR Counselor's and customer's knowledge of their capacities to promote appropriate and informed choices during the rehabilitation process. It enables the customer to identify an optimal employment outcome and to reach their maximum employment potential.

The comprehensive assessment may include the following:

* An assessment of the personality, interests, interpersonal skills, intelligence and related functional capacities, educational achievements, work experience, vocational aptitudes, personal and social adjustments, and employment opportunities of the customer and the medical, psychiatric, psychological, and other pertinent vocational, educational, cultural, social, recreational, and environmental factors that affect the employment and rehabilitation needs of the customer;
* An appraisal of the patterns of work behavior of the customer and services needed for the customer to acquire occupational skills and to develop work aptitudes, work habits, work tolerance, and social and behavioral patterns necessary for successful job performance, including the use of work in real job situations to assess and develop the capacities of the customer to perform adequately in a work environment;
* LMI that shows the employment goal and training/education aligned with a strong job outlook with opportunities for success;
* Information on the customer's criminal background; and
* Information obtained from experiences in integrated employment settings in the community and in other integrated community settings to the maximum extent possible.

TWC-VR must also provide rehabilitation/assistive technologies needed to assess and develop the customer's capacities to perform in a work environment.

### Required Assessments

TWC-VR may require assessments to ensure that appropriate services are offered. TWC-VR staff must follow the service provision requirements listed in the corresponding service chapter of the VRSM to ensure the required assessment, documentation and approvals are completed before including the service in the IPE.

### Additional Policy Considerations

* Comparable Services and Benefits: Assessment services are exempt from the requirement to secure comparable services and benefits prior to TWC-VR expending funds.
* Customer Participation in the Cost of Services: Assessment services are exempt from applying Basic Living Requirements (BLR) and, therefore, the customer is not required to participate in the cost of services.
* Recipients of Social Security Disability Benefits: Recipients of Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI), due to the customer’s disability, are exempt from the requirement to participate in the cost of TWC-VR services regardless of income.
* Exceptions to Policy: When necessary to meet the VR needs of a customer, TWC-VR staff members may request exceptions to policies and procedures through their chain of management up to the Deputy Division Director of Field Services Delivery, or designee. However, exceptions to policies and procedures based on Federal and State laws, statutes, and rules or regulations are not allowable.

## PROCEDURES

### Purpose of the Comprehensive Assessment

The comprehensive assessment is an ongoing process that occurs both before and after IPE development and implementation. The VR Counselor will determine what assessments may be necessary to inform the development of the IPE, which can change over time. Services provided in the IPE may be used to assess further needs of the customer (e.g., work-based learning experiences).

The comprehensive assessment is intended to—

* Clarify the customer's vocational interests and aptitudes;
* Assess the marketability of the customer's present and potential skill levels;
* Describe the types of services needed to gain or improve the customer's skills;
* Identify the best use of rehabilitation/assistive technologies; and
* Identify other needs and issues relevant to TWC-VR services.

The VR Counselor ensures that assessments are provided in the most individualized and most integrated setting possible that is consistent with the customer's informed choice.

### Use of Existing Records

To the maximum extent possible, the VR Counselor must do the following:

* Use existing records;
* Rely on information from the individual's experiences in an integrated employment setting or in other integrated community settings; and
* Consider the validity or correctness of the information based upon the source and the VR Counselor's knowledge of the customer.

Customers must not be required to participate in unnecessary assessments, such as a psychological assessment or medical assessment, if—

* Comparable sufficient information is available from existing records; or
* The assessment will not directly assist with determining the employment goal or the VR services available to the customer.

### Requesting Records or Assessments

When additional records and/or assessments are necessary to complete the comprehensive assessment, they should be requested as soon as the need has been identified.

### Updating Disability Classification

During the TWC-VR process, additional disabling conditions or functional capacity limitations may arise. When this information affects the customer's disability classification or level of significance, the VR Counselor is required to update the classification and level of significance in RHW and describe the circumstances in a case note.

### Blind and Visually Impaired Specialty Services

TWC-VR offers specialized evaluation and support services for blind and visually impaired customers including the following:

* Assistive Technology Unit Services (ATU)
* DeafBlind Services (DB)
* Diabetes Education Services
* Employment Assistance Services (EAS)
* Orientation and Mobility Services (O&M)
* Vocational Diagnostic Unit Services (VDU)
* Vocational Rehabilitation Teacher Services (VRT)

Customers who are blind or have significant visual impairment can receive evaluation and support through TWC-VR provided services (i.e., in-house) and specialized contract providers throughout the rehabilitation process.

### Labor Market and Career Information

The VR Counselor and customer should explore the LMI as it relates to the customer's employment goal and/or potential employment goals. Having such information will assist the customer in making an informed choice about determining a career pathway, availability of jobs where they live, whether to return to work in an industry or with a specific employer, and other employment industries with projected growth opportunities. The VR Counselor discusses the job requirements and conditions, training, work environment and duties, local demand for workers, and possibility of relocating to find employment when considering any employment goal.

Labor market information is available through the [Texas Workforce Commission's Labor Market and Career Information (LMCI) website](https://lmci.state.tx.us/explore/TSC/YBF.asp).

### Comprehensive Assessment Documentation

Throughout the comprehensive assessment process, the specific details that are gathered and evaluated by the VR Counselor can be entered as "Assessment and Planning" case notes.

When all the assessment information has been gathered and reviewed, the VR Counselor enters a case note with the title "Comprehensive Assessment" in ReHabWorks (RHW). The comprehensive assessment case note can be amended as additional information is obtained throughout the life of the case.

Comprehensive Assessment Case Note: This case note, or series of case notes, must include the following:

* Summary of the customer's disabilities and related impediments to employment;
* Summary of the customer's adjustment to the disability;
* Services recommended that will address specific functional limitations;
* Assessment of the customer's needs for rehabilitation technology or assistive technology for blind and visually impaired customers;
* Justification for a selected employment goal;
* Justification for services needed to achieve the employment goal (Include justification for each service and documentation of best value for purchased goods and services.);
* Available resources and comparable benefits;
* Independent living skills that support the employment goal;
* Any relevant legal issues;
* Description of the customer's involvement in and informed choice regarding the selection of services and providers and the customer's employment goal;
* Educational and vocational history and goals;
* Justification for planned frequency of contact;
* Explanation of the customer's contribution to planned services (if required);
* Any other factors that might impact the customer's participation in services.

When relevant, the case note, or series of case notes, may also include information about the following:

* Customer's work tolerance;
* Customer's ability to acquire specific job skills;
* Customer's patterns of work behavior;
* Additional medical or psychological evaluations needed to determine the nature and scope of services;
* Vocational and psychological assessments;
* Functional assessments conducted in a trial work setting; and
* Any additional assessments needed to determine—
	+ Best job placement; or
	+ Support services to be provided through supported employment services.

## APPROVALS & CONSULTATIONS

There are no approvals or consultations for this policy and these procedures.

**REVIEW**

The Policy Planning and Statewide Initiatives Team, or designee, is responsible for reviewing this policy and these procedures and will update the Document History log if necessary.

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| **Date** | **Type** | **Change Description** |
| 9/3/2024 | New | VRSM Policy and Procedure Rewrite |