

Division for the Visually Impaired

Independent Living Services Program Policies & Procedures

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Purpose

The purpose of Independent Living Services (ILS) is to provide a variety of services to enhance the ability of the blind and visually impaired to live as productively and independently as they choose.

The purpose of the following policy and procedures is to provide a framework in which services will be delivered in an equitable, consistent manner, while at the same time meeting all the applicable federal and

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state statutes. As such, the policies and procedures will encompass all services provided by ILS from funding sources.

Scope

Services are provided to those consumers who are determined visually eligible. A consumer's eligibility is determined after the most current eye report from their medical provider has been obtained. Once eligibility has been established, services may be provided within the home, through community-based programs, on the job, within the DVI Training Center, or at any other location requested by the consumer in the state of Delaware. A consumer may request or require one or more of the services listed.

In accordance with the Delaware Code, the Division for the Visually Impaired maintains a listing of residents who are blind or visually impaired through a consumer database.

Information and Referral

Any individual included in the consumer database receives important, informational mailings. Information is also provided to anyone inquiring about DVI services regardless of the program or eligibility criteria. Information may also be provided regarding services within and beyond DVI as related to a specific visual impairment and/or about vision loss in general.

Although DVI receives referrals from within Delaware Health and Social Services, external referrals are also received from a variety of sources outside the Department. Sources may include eye doctors, professionals such as school officials, employees of senior residences or nursing homes, other consumers, relatives, and friends. Consumers may also refer themselves. External referrals may be received by the agency via telephone, mail, fax, and in-person. Referrals are primarily received by the Central Intake Unit Administrative Specialists, but can be taken from other unit members.

Assessment

After a referral has been made and eligibility has been established, an assessment will be completed to determine the functional level of skills and needs of the consumer. The assessment will also determine whether equipment and/or training will improve functional independence of the consumer (Appendix A). This assessment shall be housed in the case file and updated upon each contact with the consumer.

If the consumer is active with Vocational Rehabilitation (VR), the ILS staff will forward a copy to VR after data entry of all information into the consumer database has been completed.

Lesson Plans

In addition to the assessments, the Vision Rehabilitation Therapist (VRT) will complete a lesson plan for each home visit. This plan will be entered into the consumer database.

Adaptive Living Skills Training

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Adaptive Daily Living Skills (ADLs) are skills required by an individual to be able to function in their living environment. These skills may encompass areas such as cooking, cleaning, dining skills, safe kitchen skills, money identification, time identification, and home management. ILS team members provide training in any or all of these areas as requested by the consumer.

Communication Skills Training

ILS Team members provide training on how to use adaptive aids to those consumers with residual vision. Adaptive aids for the use of reading and writing may be provided and may include magnifiers, reading glasses, 20/20 pens, and writing guides. Adaptive aids for the use of communication may include talking watches and calculators, and Large Print clocks.

Braille instruction in reading and writing is available and encouraged for individuals with insufficient vision to read and write print.

Low Vision Screening and Examination

The Low Vision policy governs the services that are provided by Independent Living Services.

Support Services

Vision loss may often be a traumatic experience to those that have been sighted. ILS offers a variety of different support services to our consumers.

Peer Support is a joint program of BlindSight and the Division for the Visually Impaired for residents of Delaware over the age of eighteen. This service is free to consumers and offers supportive services over the telephone by trained volunteers who are visually impaired.

Support Group counseling sessions are facilitated by consumers in all three counties.

Professional Seminars designed to assist/support families in coping with the demands involved while living with a person who is visually impaired are available to both family and the public as deemed appropriate.

For those individuals who are interested in learning new techniques or refreshing their skills, we offer various workshops to enable independent living.

Community Integration Services

Training may be provided to consumers to facilitate integration and independence in the community. Training services are offered to prevent consumers from unnecessarily entering skilled nursing facilities. These services also function to train those consumers who are currently residing in skilled nursing facilities but are able to live in the community.

Provision of Adaptive Aids and Appliances

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ADL communication appliances and low vision aids may be purchased for individual consumers with specific and documented needs in accordance with specific ILS policies.

Education and Transition Services

The Individuals with Disabilities Education Act (IDEA) and the Rehabilitation Act are two of the laws that help students who are blind and visually impaired prepare for the transition from school to adult life, employment and independence. These laws are in place to ensure that services and supports for transitioning students are coordinated among service providers. ILS is one of the service providers for blind and visually impaired students. At a minimum the Vision Rehabilitation Therapist for the Visually Impaired will:

- Evaluate the skills of the student and provide an assessment to the Teacher for the Visually Impaired and/or the Vocational Rehabilitation Counselor;
- Discuss with the student, parents, and DVI team members the goals and develop a training plan;
- Teach/train the student in the areas that need strengthening;
- Evaluate the student's skills after the provision of training;
- Submit a written evaluation/assessment of the student's skills.

Outreach

The purpose of outreach is to increase public awareness of DVI and vision loss in general, extending information about services to the various communities in the State of Delaware and surrounding areas. Outreach efforts include presentations about DVI services, participation in health fairs and/or other community events, dissemination of newsletters and brochures, newspaper advertisements and radio or television spots.

Case Management

Case management requires maintaining cases in active status until all necessary services have been provided. These services include those cases directly affiliated with ILS, as well as cases that have been referred to other programs such as Orientation and Mobility, the Training Center, and Peer Support. The purpose is to provide continuity, consistency and a stable point of contact for consumer questions and/or concerns.

Case Files

The ILS team maintains case files on each consumer in a central location at the Biggs Building on the Herman Holloway Sr. Campus. ILS team members are not to make duplicate consumer files.

A. File Content

Case files consist of the following:

- Documentation of visual impairment.
- Dated narrative entries, completed by the assigned worker on all case activity with, or on behalf of the consumer.

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- All required forms to establish/maintain eligibility for various funding sources.
- ILS ADL Assessment forms.
- Equipment loan forms as appropriate.
- Low Vision functional assessment forms as appropriate.
- Reports from other service providers.
- Miscellaneous information collected
- Printed narrative entries, completed by the assigned worker on all case activity with or on behalf of the consumer at case closure.
- Requisitions and Placement forms for equipment provided.

B. Housing of Case Files

All ILS files are the permanent property of DVI/ILS. The files will be housed in locked filing cabinets within the New Castle County offices of DVI. Files will not be removed from the office without the approval of the ILS Social Service Administrator or the Division Director.

Files of individuals who are deceased or who have moved out of the state will be housed within the New Castle County office for one year then be forwarded to State of Delaware Archives.

C. Consumer Review of Case Files

Consumers may schedule to review their case files at any DVI location.

All requests will be made through the ILS Social Service Administrator. The Director will be advised of all scheduled reviews and the reasons for the review, as given by the consumer.

The ILS Social Service Administrator or designee will advise the consumer that they may not remove documents from the file. ILS staff may make copies of individual pages from the file for the consumer subject to confidentiality procedures. If the consumer requests more than five pages, ILS may charge the cost of the paper.

The ILS Administrative Specialist will maintain a written list of materials from the case file that have been copied for the consumer. The list will include the date the copies were requested and provided to the consumer. The list will remain in the case file, while copies of the list will be provided to the ILS Social Service Administrator and the Division Director.

Prioritization for Service Delivery

Generally, referrals are processed based on the date they are received. If referrals cannot be processed in a timely manner, a waiting list will be established. The referrals will then be processed according to the following priority list:

- The degree of vision loss. Individuals who are legally blind will be served first, followed by those who are severely visually impaired.

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- The existence of immediate health and safety risks.
- A consumer's employment is in jeopardy.
- New referrals by date.
- Consumer in consumer database:
 - In need of daily living skills instruction.
 - In need of Braille Instruction.

ILS staff will communicate with consumers every 90 days to request an update related to their vision or needs. This information will be updated in the consumer database and discussed with the ILS Social Service Administrator for prioritization. If it is decided that the consumer needs to be prioritized, the case will be assigned to a Vision Rehabilitation Therapist to initiate services.

Applications and Forms

The consumer must complete all forms or applications required to establish or maintain eligibility for any ILS program. If the consumer is not able to complete the necessary forms, their representative or the ILS team member may complete the forms. The forms would then be read to the consumer and signed by the consumer as appropriate or required by law. All forms will be maintained in consumers' case files.

Copies of all forms will be provided to the consumer in regular, large print, Braille, or on audiocassette or CD, as requested by the consumer.

Availability of Policy

ILS policy is available to the consumer. The policy may be in large print, Braille or on audiocassette or CD, as requested by the consumer.

Case Reviews

A quarterly meeting will be held between the ILS Social Service Administrator and each VRT for the purpose of reviewing activity on all respective consumers.

Consumer Satisfaction Surveys

At the end of each quarter a list is generated by consumer database of those consumers who have terminated services for the purpose of gauging consumer satisfaction. This list will be provided to a third party to conduct the consumer satisfaction survey. Primarily, the survey is completed via telephone but the consumer can request that the survey be mailed to them in their preferred media. Consumers will be provided with a self-addressed, stamped envelope for return mailing purposes.

A VRT may not under any circumstances assist a consumer in completing the survey.

Certification of Legal Blindness

A. For Income Tax Purposes

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Consumers may request a Certification of Legal Blindness form to attach to their federal or state income tax returns. The ILS staff will confirm the individual's legally blind status by consulting consumer database. The Certification of Legal Blindness form will be completed and provided to the individual consumer. A copy of the Certification will be included in the consumer's case file

B. For DART Bus Passes

In accordance with the Delaware Code, DART bus fares will not be charged to individuals who are certified by DVI as Legally Blind. As a result, consumers may obtain a DART bus pass through DVI. When a consumer makes a request for a DART bus pass, ILS staff will confirm the individual's legally blind status by consulting consumer database. A current eye report must also be on file before a DART bus pass will be signed by ILS staff and provided to the individual consumer. A copy of the bus pass will remain in the consumer's case file. An individual will not be provided more than three passes in a lifetime and must provide written explanation to the ILS Social Service Administrator for any duplicate copies to be prepared.

DVI Registries

A. Change of Vision

An individual's vision status may be changed to another based upon a change in their vision. Documentation of the change in vision level must be provided from a licensed ophthalmologist or optometrist. The updated eye report documenting this change will be loaded into consumer database. Individuals may be inactivated from consumer database due to death or if they have moved to another state.

B. Data Entry

Each program within DVI is able to enter pertinent program data in consumer database for each consumer.

ILS team members should ensure all data is gathered on each consumer (i.e. goals, referrals, age of onset, living arrangements, secondary medical conditions, education level, transportation methods, media preferences, eye physicians, point of contact, directions, and special information). If there is any missing data or questions, the consumer should be contacted for verification.

Copies of consumer database information will not be distributed beyond DVI unless authorized by the Division Director.

C. Audit of Entries

It is critical that the information contained in consumer database remains accurate. ILS staff will monitor the reports and seek to obtain any missing information.

D. Distribution of Information

Individuals receive informational mailings from DVI throughout the year. These mailings may include information regarding new programs and current events. DVI strictly controls the distribution of information to consumers. All information to be distributed must be approved by the Division Director.

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Occasionally groups such as the National Federation of the Blind or American Council of the Blind may request that information be distributed to consumers. Although mailing lists will not be released, volunteers from such groups may come to one of the DVI offices to affix mailing labels and “Free Matter for the Blind” stamps to their literature. This process must be completed under the supervision of a DVI employee and the Division Director must approve the literature.

Fiscal Procedures

Each federal and state fiscal year the agency receives allotments from the federal and state governments to provide independent living services to residents of the state who are visually impaired. The agency is responsible for the utilization of all the funds in accordance with the appropriate state and federal statutes. As such, all funds are subject to state and federal audits.

ILS team members are responsible for ensuring that necessary documentation is contained within all case files to meet all federal and state statutes. The Vision Rehabilitation Therapists are responsible for providing the necessary documentation explaining the expenditure of any funds in the area of consumer services.

Purchase and Placement of ADL and Communications Equipment

The ILS Consumer Assessment/Goals form documents the need for equipment to meet specific consumer identified goals. When completing the form, the VRT indicates the date that each specific goal and device is provided. Only equipment so noted will be provided to the consumer. Requisitions must be fully completed in accordance with DVI's fiscal office procedures for all equipment. The completed requisition forms are forwarded to the ILS Social Service Administrator for approval and funding code assignment.

Low Vision Examinations and Equipment

DVI has developed a Low Vision (LV) Program including policies and procedures. These policies and procedures govern the program regardless of which unit provides the services. A copy of the Low Vision Policies and Procedures should be referenced for clarification.

In order to provide a Low Vision Examination and/or Low Vision equipment, the VRT must complete a requisition in the consumer database and must have the request approved by the ILS Social Service Administrator. The form must be fully completed in accordance with procedures set forth by DVI's fiscal office. The requisition must include the age of the consumer, the date of the Low Vision examination, if applicable, and a listing of all types of medical insurance available to the consumer. Any available medical insurance may pay for all or part of the cost of the service. The requisition must also include an indication of whether the consumer is active with Vocational Rehabilitation and whether an Individualized Written Independent Living Plan has been developed. The ILS Social Service Administrator, or designee, is responsible for assigning the proper funding code to the expenditure.

Consumer Database PO Ordering Process

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1. Orders are initiated and approved at the respective level.
2. The Social Service Administrator will check their work list to approve any requisitions pending approval and assign funding.
3. Fiscal manager will check their work list daily to assign funding when missing and approve any requisitions pending approval. Fiscal will notify the Division Director that a requisition needs approval only if not a multiple copy. The purchase order is generated. If a multi copy is provided, the Director's Office will use this as notification that consumer database needs approval.
4. The Fiscal team generates purchase orders from consumer database on scheduled (weekly, monthly, as notified) basis. For appropriate fiscal forms, contact the fiscal team.
5. After full approvals are received in consumer database the PO process outlined in Section B, will be followed. Additionally, the ILS staff will enter the consumer database purchase order (PO) into the description line of the First State Financials (FSF) purchase order. For Items that are generally pulled from inventory (low vision aids, ADL supplies, disposable items from Material Center, etc.), ILS staff will hold the consumer database PO and initiates a FSF purchase order into workflow when inventory reaches a level (as determined by the Team Leader) that requires replenishing.

When orders are received:

1. Person checking in the order prints receiving report. This report shows MCI #, Client Name, Ship to Name, Item Description, Funding Source, and Item Price and is to be provided to fiscal as back up to the PO and Packing List/Invoices instead of using copies of each "client requisition copy".
2. Items will be marked with the consumer's name and "ship to" person's initials and delivered.

The VRT is responsible for delivering items (or their designee) and printing out the "equipment placement form".

The VRT then updates consumer database with placement of items with consumer.

After all items on the requisition are placed with the client and the status changes to complete, then the Administrative Specialist will print out the "Client Requisition Copy" to go to the consumer's file with the "Equipment Placement Form". This results in the Client Requisition Copy having noted all people responsible for approving the purchase, the purchase prices, the item status showing it has been delivered, the consumer's signature indicating all items received and the terms/conditions.

Services and Peer Counseling

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These services are provided on a contractual basis with vendors approved by the Division. The ILS Social Service Administrator negotiates the contracts in accordance with State, Department and Division policies and procedures. The Division's fiscal officer and the Director, prior to the contractual signing, must approve the contracts.

Data Collection

A. Consumer Database

This database is an automated system that tracks all levels of service provision. The ILS staff are responsible for entering and updating all consumer information into the database.

The consumer database is also the mechanism that will be utilized for ordering all devices. In the event an item is not listed in database, the responsible team member shall email the system administrator(s) and provide the vendor, vendor's address, item, item number, a brief description, and the cost.

B. Case Statistics

Statistical data will be tracked as needed to complete all required federal and state reports relating to all funding sources. The ILS Social Service Administrator is responsible for including the appropriate data in the reports and maintaining accurate instructions for data entry. The VRTs and Administrative Specialists are responsible for the accuracy of the data provided.

SERVICE DELIVERY AND DOCUMENTATION

A. Case Status

When an individual has met eligibility criteria, their case status will be determined as one of the following:

- **Active:** The consumer is currently receiving ILS services and a referral is in consumer database with a case status of "in progress".
- **Inactive:** The consumer is not currently receiving ILS services and all referrals are closed in consumer database.
- **Waitlist:** The consumer is eligible for services but we are currently in order of selection.
- **Medical Hold:** The consumer is active but for health reasons is unable to participate in ILS services.
- **Other Holds:** The consumer is active but circumstances prevent participation in ILS services.
- **Interview/Intake:** Consumer has been contacted and is awaiting in-home evaluation.

B. Service Delivery Requirements to Newly Assigned Cases

It is important to provide services to newly assigned cases as quickly as possible in order to ease the circumstances surrounding the referral and in order to facilitate satisfaction of services provided. Therefore, when new referrals or inactive cases are assigned to an VRT, contact must be attempted within 5 working days of the receipt of the assignment. All attempts to contact referrals will be documented in consumer database under the contact log.

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C. Duration of Services

There is no time limit placed on services. Cases will be active for varying time periods depending on the needs of the consumer. In addition, cases may be reactivated if the consumer's circumstances give rise to the need for additional services.

Services are terminated on an individual basis after consultation and agreement between the VRT and the consumer. In the event, the VRT has made three attempts to contact the consumer and does not receive a response, a letter indicating that the consumer could not be contacted should be mailed to the consumer and an entry noted under the contact log in consumer database.

When ILS services have been completed, the case is inactivated after a 30-day follow-up contact has been conducted. The purpose of the contact is to determine with the consumer that their training and equipment needs have been fully met and additional services are not needed.

If the ILS team member has made referrals for services to other providers within or beyond DVI, as part of the ILS case management service; the case will remain active until all such services have been provided. During this time, the ILS team member will review reports or maintain contact with the service providers at regular intervals to determine that services delivered are consistent with consumer needs. If the consumer is on a waiting list for services, the ILS team member will maintain contact with the provider and the consumer at 6-8 week intervals, to update the consumer needs and current status.

The referral source will be contacted as appropriate when cases are inactivated.

D. Referrals to Adult Protective Services

A referral shall be made to Adult Protective Services whenever an ILS team member perceives that there is a possibility of abuse, neglect or insufficient self-care. The consumer may or may not be informed that a referral has been made. It is not necessary to obtain consumer approval of such referrals. A copy of the written referral must be filed in the consumer's case file and noted in the consumer's contact log in consumer database.

E. Suicide Prevention

Whenever a consumer expresses thoughts or feelings, however vague, about committing suicide, the ILS team member will immediately notify the ILS Social Service Administrator and be prepared to notify Mobile Crisis. Consumer consent will not be sought.

F. Case Notes/Documentation

While cases are in active status, the VRT will provide and collect pertinent information essential for efficient and complete service delivery. The information must be reflected within consumer database. Lesson plans and narratives must be completed regarding all significant contacts made with or on behalf of the consumer and must be included in case documentation and/or the consumer database contact log.

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When inactivating a client, the closing report will be completed and will include whether goals were completed.

G. Provision of Adaptive Aids and Appliances

The need for specific adaptive aids and appliances will be established during the assessment process completed by an ILS team member with a consumer, usually within the home environment.

The Adaptive Living Needs Assessment will establish areas in which vision loss has negatively impacted the individual consumer's independence. This information, together with the personal needs of the consumer, will dictate the goals for independence, which are recorded on the Assessment Form. The Needs Assessment, together with the etiology of the eye condition and at times trial and error, will determine the adaptive aids that are to be provided to the consumer.

As specific aids are provided, the ILS team member will so note it on the Assessment/Services form with the date the aid was provided. The ILS staff will ensure that the goals and devices are entered into consumer database. Each time an aid is dispensed, it must be included on the Assessment form. Only aids listed on these forms will be provided to consumers. All assessment forms will be forwarded to the central file.

Specific equipment will generally only be provided to the consumer once, unless the item is found to be faulty during any warranty period that may apply. If the consumer requires a replacement of equipment due to loss, etc., the consumer may purchase new items. If the equipment is lost due to natural disaster, theft, etc., equipment may be replaced with written approval of the ILS Social Service Administrator.

H. Braille Instruction

Braille instruction will be offered to all individuals who do not have sufficient vision to read or write print. Braille instruction may also include those individuals who possess an active degenerative condition that will render insufficient vision in the future.

Students with any residual vision will be instructed not to use their vision when reading Braille, but to rely on their fingertips. Generally, Braille instruction is provided by the DVI team member who is providing other services to the consumer. The instruction is usually provided in the home of the consumer or in a group setting, in a series of sessions whose frequency depends on the need of the student and the schedule of the Braille instructor.

As resources permit, students will be provided with a Perkins Braille for their personal use during the instruction process. A Loan Agreement should be completed by the VRT, ILS Social Service Administrator and the consumer. The use of the Perkins Braille should be coordinated with the DVI Materials Center. They will be encouraged to purchase a Braille for their permanent use and will be provided with ordering information. It is recognized that a consumer may want to alter their Braille reading and writing goals as lessons progress. Therefore, VRTs will utilize a variety of resources to teach Braille, including the Hadley School for the Blind and other teaching aids to determine the most efficient instruction method.

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I. Funding and Related Spending Requirements

Equipment and services may be paid from a variety of funding sources. For an ILS-eligible consumer to receive equipment or services from a particular funding source, all eligibility criteria must be met. The VRT is responsible to ensure that all eligibility criteria have been met relative to each funding source. Consumers must provide the information requested by the VRT in for eligibility to be established.