

**Disability Coordinator Orientation – Part 1**

**Applicant**

**Center Process**

FILE REVIEW

Q&A Responses

from DC 1 Webinar

January 31 and February 2, 2023

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**Questions and Answers**

**Disability Coordinator Orientation – Part 1, Applicant File Review Webinar**

**1/31/23 and 2/1/23**

# Recommendations of Denial

1. **Question:**

Who is filling out the Eligibility Review/New Information Center Recommendation of Denial Form?

**Response:**

Typically, the Health and Wellness Director completes this form as they are the File Review Coordinator for the center. (Form 1-06)

1. **Question:**

Can you please clarify when to return the applicant file to Outreach? We currently have a file in review. During the Center Mental Health Consultant completing the clinical interview, applicant reported arrest for assault, pending court date in Feb. Do we continue the review process, or return to Outreach? Outreach is aware of the charges.

**Response:**

If the center has determined (based upon Exhibit 1-1 criteria) that the applicant “may” not be eligible and the original eligibility determination perhaps was made in error, then the center should contact the DOL Program Manager to discuss. If the Regional Office informs the center that the applicant is eligible, then the center must proceed with the applicant file review.

In a different scenario, if an applicant becomes incarcerated during the center’s applicant file review, the center does not return the file to admissions but instead “may” recommend denial of enrollment based upon “new” information if the center has determined that the applicant may no longer be eligible as per Exhibit 1-1 of the PRH. The center must complete the Center Recommendation of Denial Form – Eligibility Review/New Information found in Form 1-06, upload the form and any supporting documentation to the Health E-Folder in CIS and the Health and Wellness Director must select the “Flag for Regional Review” button in the Health E-Folder and notify the Records Manager so that they may update the applicant’s status in OASIS Pending Arrivals and the information in the center’s File Review Tracking Log.

1. **Question:**

Is other Wellness staff allowed to "Flag” and send the HCNA/DTA or is it only the Health and Wellness Director?

**Response:**

The center can decide who in Wellness selects the Flag, but the Health and Wellness Director should be aware of all file review activities as the File Review Coordinator for the center.

# Applicant is Cleared for Enrollment but not yet Arrived

**Question:**

What happens if new or additional information comes out after the student (applicant) is cleared by Wellness?

**Response:**

If the information now raises health care needs or direct threat concerns, the qualified health professional may need to contact the applicant again to discuss the updated or new information received. If necessary, the center may recommend denial of enrollment for health care needs that exceed those of basic health responsibilities or if the individual poses a direct threat to others.

# Reapplication Timelines

**Question:**

If an applicant is denied because of HCNA, how long until they can reapply to Job Corps?

**Response:**

Currently, the PRH does not have a time restriction for reapplication.

# Document Storage

**Question:**

Does the File Review Tracker follow the 3-year hold policy like other documents, or do we need to hold each year indefinitely?

**Response:**

Please contact the Regional Office Records Point of Contact if the center/operator does not have a related policy.

# Health and Wellness Director’s Initial Review of an Applicant File

1. **Question:**

Do we currently use this form? (HWD Form from 1-06)

**Response:**

This is a new form that was included in the PRH Change Notice 22-02. The WORD version is on the Job Corps Disability website.

1. **Question:**

Do we put name or just titles (HWD Form from 1-06)?

**Response:**

The Referral to Qualified Health Professionals should include names and titles since the document will be stored in secured locations (i.e., the Health E-Folder in CIS and may be stored in the Student Health Record).

1. **Question:**

Is it necessary to both upload the form to Health E-Folder in CIS and save a copy in the Student Health Record?

**Response:**

No, it is not required to do both. The form must be uploaded to the Health E-Folder, but it is not required that a copy of the form be maintained in the Student Health Folder. That is optional.

1. **Question:**

What tab under Health E-Folders do we put the HWD Center File Review Form?

**Response:**

Upload the HWD Center File Review Form to the “OTHER” sub-folder within Health E-Folder.

1. **Question:**

When do we upload the form (from 1-06) into CIS? After it is completed completely?

**Response:**

Yes, after the file review is complete.

1. **Question:**

Can the "designee" with the same credentials sign in place of the Health and Wellness Director? (HWD form from 1-06)

**Response:**

Yes.

1. **Question:**

Does the Health and Wellness Director sign the applicant file review form when they review or when applicant review is completed and approved?

**Response:**

The Health and Wellness Director should sign the Center File Review Form once they have completed their initial review of the applicant file.

1. **Question:**

Does the Center Applicant File Review form replace the Routing Slip for Regional Waivers and Reviews form?

**Response:**

The Center File Review Form in Form 1-06 is required to be completed for all applicants (or the similar form in Form 2-04 if a possible direct threat review). Please check with your respective Regional Office regarding the Routing Slip for Regional Waivers and Reviews form.

1. **Question:**

On the Center File Review Form completed by the Health and Wellness Director, under the reason for referral, must a specific person be named or can "CMHC" be used?

**Response:**

The name and title of the individual should be listed. This form will be stored in secure environments and limited access to only those who have a need to know.

1. **Question:**

Can the file review process be designated to a trained nursing staff who is LPN?

**Response:**

The Health and Wellness Director’s roles and responsibilities can be designated to a Wellness staff member with appropriate credentials.

1. **Question:**

Do we need to forward the form to the reviewer or just upload it into CIS E-Folder when the review is completed?

**Response:**

Upload to the Health E-Folder.

# Non-health DC Role in AFR

1. **Question:**

Does the Non-health DC review information in the Disability E-Folder?

**Response:**

Yes. The Non-health DC must review documents like IEPs, 504 plans, or other educational or rehabilitation type documentation to provide written feedback to the Health and Wellness Director about any concerns that were identified.

1. **Question:**

What if there is no IEP during File Review even though they are requesting accommodations?

**Response:**

It depends.

* If the applicant is requesting testing or academic-related accommodations, for example, then the request does not need to be addressed until the applicant has been cleared for enrollment.
* If the applicant is being recommended for denial of enrollment AND is requesting accommodation that might support a barrier to enrollment such as an accommodation request for a private room, then the DC should first collaborate with the Health and Wellness Director to determine whether there is documentation of the disability in the health documentation. Often, there is sufficient documentation. If there is no documentation of disability, then the center would inform the student that the request cannot be considered unless documentation of the disability is provided.
1. **Question:**

With the push to increase OBS, often the file review is completed, arrival date set and student arrives on center within a couple of days. We usually are given the list of students arriving on Monday late Friday. So, if Non-health DC does not call during file review, there is no time to contact applicant and input accommodations before arrival. How do we keep it from being a problem that accommodations are not being entered before arrival on center?

**Response:**

If the Health and Wellness Director is a co-DC, they may assist in making pre-arrival calls as soon as Wellness clears the applicant for arrival and while Records (or whoever) is setting the arrival date. Applicants with disabilities should have accommodations in place upon arrival if they wish to have accommodations to participate in the Job Corps Program. Contacting applicants who have not yet been approved for enrollment to establish an accommodation plan is confusing to applicants and may be even more surprising when they receive a letter informing them of denial of enrollment. Generally, applicants who are contacted during the completion of a HCNA or a DTA are informed they are being contacted as part of the center review of their application and they will be notified of an enrollment decision when the application review is complete.

1. **Question:**

The Non-health DC does NOT call the applicant to clear them? Only if there is a direct threat? When do we call them as soon as Records sets an arrival date? And that is when we input their accommodation plan?

**Response:**

That is correct. The Non-health DC does not contact applicants to clear them. The Non-health DC role in applicant file review is a paper review of the file documentation and then providing written feedback to the Health and Wellness Director.

If the center qualified health professional is completing either a Health Care Needs for Direct Threat Assessment and the applicant is a person with a disability, then the QHP, in collaboration with the either DC or the center’s full time DC will identify accommodations on the respective assessment (e.g., HCNA or DTA) that potentially reduce the barriers to enrollment. Then either the qualified health professional OR a DC will contact the applicant to discuss those identified accommodations along with any that the applicant or an outside provider may have requested (if they are relevant to the functional limitations, specific symptoms and behaviors that are barriers to enrollment). Again, this would not include discussions of testing or general academic type accommodations typically.

1. **Question:**

Does the Non-health DC either provide information if there is no concern and if there are concerns, does the DC send that information to the Center Mental Health Consultant to review the IEP and other Disability Documentation?

**Response:**

If there are no concerns in the educational or non-health disability documents, the Non-health DC’s written feedback to the Health and Wellness Director should state that there are no concerns. The Health and Wellness Director is then responsible for referring the file and corresponding information to the respective qualified health professional for review.

1. **Question:**

Do the Non-health DCs review the IEP first and give feedback to the Health and Wellness Director?

**Response:**

Yes, unless your center’s Center Mental Health Consultant routinely reviews all IEPs, 504 plans, etc. and then there may not be a need for the non-health DC to review and provide feedback for file review purposes. In this instance, you would review after notified (by Wellness) that the applicant has been cleared for enrollment and you begin your pre-arrival disability accommodation process.

1. **Question:**

Can the DC also start working on the accommodation plan at the same time as the file review?

**Response:**

No, if “working on the accommodation plan” means contacting the applicant. Discussing accommodations plans and developing draft plans should not occur until the applicant is cleared for enrollment.

1. **Question:**

Does the pre-arrival DAC meeting still need to be done if the Center Mental Health Consultant is reviewing?

**Response:**

The Center Mental Health Consultant is reviewing initially as they do for all other disclosed documentation so that they can make an informed decision on enrollment. Their review is not a substitute for the center DCs to contact the applicant and complete the disability accommodation process in preparation for arrival if cleared for enrollment.

# Non-health DC Role for Applicants APPROVED for Enrollment

**Question:**

Can the DC call once the Health and Wellness Director has cleared the file or do you have to wait until they are scheduled for arrival? (I am referring to discussing accommodations, not scheduling.)

**Response:**

Yes. Once the applicant has been approved for enrollment, pre-arrival calls can and should occur!

# Qualified Health Professional

1. **Question:**

Should the Center Mental Health Consultant do an HCNA on each file they review?

**Response:**

No. Please consult with your respective Regional Health Specialist for more information on the qualified health professional’s specific role in the applicant file review process.

1. **Question:**

Does the HCNA which is completed by the qualified professional have to be completed on all students with a disability?  Even ones with an IEP and 504 Plan?

**Response:**

No. The HCNA is not completed for every applicant. It is completed by the qualified health professional if they believe that an applicant’s health care needs exceed those of basic health responsibilities as per Exhibit 2-4 of the PRH. If the applicant who is being recommended for denial is also an individual with a disability, then the qualified health professional, in collaboration with a disability coordinator identifies potential accommodation that may reduce the barriers to enrollment, contacts the individual to discuss the accommodations, and documents the outcome of the HCNA (i.e., recommends denial of enrollment or enrolls the applicant).

1. **Question:**

Does the Center Mental Health Consultant call the student when reviewing the files or do we simply review the clinical sections then tell our Health and Wellness Director our vote?

**Response:**

It depends re calling the student. If the applicant has disclosed information on the 653, Health Questionnaire or via health documentation that the Center Mental Health Consultant has concerns regarding, then the Center Mental Health Consultant, as the qualified health professional, should conduct a clinical interview with the applicant. If the qualified health professional is recommending denial of enrollment, they MUST contact the applicant. If there is a Chronic Care Management Plan (CCMP) where the outside treating provider has documented information that seems to conflict with the applicant interview, health documentation, etc., typically the qualified health professional also will contact the outside treating provider to discuss. The particulars of the clinical interview are best discussed with your respective Regional Mental Health or Health Specialist.

If an applicant file has been referred to a qualified health professional for review, it is the qualified health professional who clears the applicant for enrollment or recommends denial of enrollment.

1. **Question:**

Why would a QHP be trying to contact an applicant "After" sent for Regional review?  Example please

**Response:**

The Regional Review process consists of an administrative or process review and a health or medical review. If there is a determination that some component of the applicant file review process was not completed or needs to be updated, the Regional Reviewer contacts the qualified health professional with a list of actions that need to be completed to move the applicant file on through the Regional Review process.

For example, the qualified health professional did not contact the applicant to complete a clinical interview. The Regional Reviewer would ask the qualified health professional to complete that interview, update the respective assessment and reupload it to the Health E-Folder.

1. **Question:**

Where are the other reviewers documenting their clinical interviews?

**Response:**

That is an internal decision and the QHPs are encouraged to seek guidance from their respective Regional Health Specialist regarding the documentation and storage of this information. If the QHP is recommending denial of enrollment, their notes should be uploaded to the respective Health E-Folder sub-folder as a stand-alone document (i.e., not attached to the Health Care Needs Assessment).

1. **Question:**

Can the Center Mental Health Consultant review and approve a student without ever receiving the Center Review Form and if there is no DAC documentation?

**Response:**

The Center File Review Form completed by the Health and Wellness Director is a required form and should be completed first so that the appropriate QHPs are identified to review each specific file. The QHP should ensure they review the feedback on the non-health information before making their final decision on enrollment so that there are no known serious health care needs or direct threat concerns known but not conveyed. Some QHPs routinely review the non-health documents (IEPs, 504 plans, behavior intervention plans, functional behavior assessments, etc.) but that is a center-by-center decision.

# File Review Tracking Log

1. **Question:**

On the Applicant File Tracking Log, is the date of assignment the date that arrangements made for arrival date or the anticipated arrival date?

**Response:**

It is the date the center assigns the applicant to arrive at the center. Changes to this original date can be added to the comments section of the File Review Tracking Log.

1. **Question/Comment:**

Our Centers do not determine when a student is assigned a date to arrive that is done by the AC after they are told by records the file is approved for arrival assignment.

**Response:**

Whoever assigns the applicant an arrival date must inform the Records Manager so that the File Review Tracking Log can be updated.

1. **Question:**

On the File review log - on the Other/dept column can specify that the DC or should we put Academic in that column?

**Response:**

Yes, identify the department. Do not identify the other reviewer as a DC.

1. **Question:**

Can you clarify that the actual arrival date of a student needs to be documented on the tracking log? We get applicants all the time who are approved for arrival, but they never show. I know Records documents the date the file has been cleared for arrival, but I am fairly sure that the actual arrival date is not placed on the file log.

**Response:**

PRH Chapter 1: 1.5 (R3) lists the required information that must be documented on the File Review Tracking Log. This includes the Disposition Date, Date of Assignment, and the Date of Enrollment.

# Wellness Tracking Log (Internal)

1. **Question:**

Is the Wellness Log on the Support Services site?

**Response:**

No, a sample log has not yet been developed but is forthcoming.

1. **Question:**

Who is typically responsible for keeping this log? The Academic DC or Wellness Dept. Lead?

**Response:**

The Health and Wellness Director would be responsible for the maintenance of the internal Wellness Tracking Log. The Records Manager maintains the primary tracking log for the center.

1. **Question:**

How do we verify this information is able to be accessed if the Health and Wellness Director transfers or leaves if we have multiple logs?

**Response:**

The internal Wellness Log should only be maintained and accessed by the Wellness Department. The Health and Wellness Director is still responsible for ensuring that required information needed for maintaining the center’s primary tracking log (i.e., Health and Wellness Director review date completion, Disposition and Disposition dates, extensions needed, etc.) is conveyed to the Records Department. The Wellness Log will only include the internal file review movements and will contain protected health information that should not be available to anyone who does not have a need to know.

# CIS Access to Health and Disability E-Folders

**Question:**

Should all DCs have access to OASIS?

**Response:**

I think the question meant to the Health E-Folder. DCs should have access to the Disability E-Folder in CIS and “may” have access to the Health E-Folder if needed.

# Returns to Outreach and Admissions

**Question:**

How do we address it if we send an email and prior to the official change to outcome in records and OA requests the record back without providing a reason.   I know it cannot go back but how do we address the issue especially if CD is aware.

**Response:**

The center is the custodian of the applicant file during the center portion of the applicant file review process (i.e., PRH Chapter 1: 1.5). If Outreach and Admissions is requesting a file back from the center, then they should be able to provide the center with the reason that the file is being requested so that the center can assure compliance with Job Corps policy and so the Records Department can update the File Review Tracking Log accurately.

# Eligibility Documents and Receiving a “Complete” Applicant File

**Question:**

A file is received for a minor student and the file is Wellness approved but once the Records Department reviews the file, it is noticed that the person who signed the minor student up for the program is not the parent nor has proof of guardianship. How should this file be handled?

**Response:**

Generally, Records staff confirms that they have a “complete” file upfront (i.e., received all the required eligibility documents) and before assigned to the Wellness Department. Doing this on the front end should minimize process issues that could occur later in the file review process. If it were to occur after approval of the application and it is a PRH requirement that must be met, then the center should attempt to resolve the documentation issue. Contact your DOL Program Manager if you are unable to resolve.

# Clinical Interviews

1. **Question:**

The Center Mental Health Consultant, MD/NP can review information and don't necessarily have to do a clinical interview?

**Response:**

Correct. It depends upon the QHP’s findings in completing a review of file documents. However, if the QHP is going to conduct a Health Care Needs or Direct Threat Assessment, the applicant must be interviewed.

1. **Question:**

When does the HCNA need to be used? Is this with any clinical interview?

**Response:**

No. Only when the QHP believes that the applicant’s health care needs may exceed those of basic health responsibilities. Please contact your Regional Health Specialist to discuss specific considerations for conducting clinical interviews.

# Disability Accommodation

1. **Question:**

Can a private room be requested as an accommodation?

**Response:**

Yes. An applicant or student can request any accommodation. Not every request will be determined to be reasonable. There are numerous students in the Job Corps program who have private rooms, some specifically provided because of their accommodation needs. Many students accept alternative accommodations such as screen dividers, white noise devices, fewer roommates, or a private space to get away from others at times, etc. Centers may not deny accommodations at the center level if the applicant/student does not accept the alternative accommodations, or the center determines that the requested accommodation may be unreasonable. Contact your Regional Disability Coordinator if you receive a request the center believes is unreasonable.

1. **Question:**

If there is a history of violent or aggressive behavior, how recent should these behaviors have occurred to not have to consider disability accommodations.

**Response:**

Please consult with your respective Regional Mental Health Specialist regarding this question. The QHP in collaboration with the DC identifies disability accommodations that potentially reduce the barriers to enrollment. Documented history and/or presence of active violent or aggressive behavior *may* be a factor in whether disability accommodations that potentially reduce the barriers to enrollment can be identified. The source of the aggression, if known, may be a factor and best discussed with your respective Regional Mental Health Specialist.

1. **Question:**

Can applicants ask to do the accommodations process when they arrive on campus?

**Response:**

Yes. However, the DC must engage the applicant pre-arrival to discuss disability accommodation process to include accommodation needs. If the applicant states they wish to wait until they arrive, they may do so.

1. **Question:**

If an applicant has specified supports by "Special Education supports" in their IEP and you are not staffed with a Special Education teacher, is this when you redirect to another center?

**Response:**

Center’s determine enrollment based upon health care needs or direct threat. Job Corps does not require the hire of special education teachers because it does not provide special education services. Job Corps is most closely aligned with the requirements of post-secondary institutions. Job Corps does provide disability accommodation (e.g., RA/RM/AAS) to individuals with disabilities who need it to participate in the Job Corps program.

# Disability Documentation

**Question:**

Can I notify the Health and Wellness Director to ask the applicant before they are approved for enrollment if they can provide more sufficient documentation before they arrive at the center (IEP)?

**Response:**

There are multiple considerations here. First, how does the center know that the person has an IEP? Ensure that appropriate disclosure has occurred before seeking any documentation related to a disability (i.e., that the center is not routinely asking every applicant/student if they have an IEP). If the applicant disclosed the presence of an IEP during the application process and signed the appropriate releases but Outreach and Admissions was not able to retrieve it, then the center may attempt to secure it.