



Washington State Department of  
**Labor & Industries**

# VOCATIONAL FIRM QUALITY ASSURANCE PLAN

Effective June 1, 2024

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## Quality Assurance Requirements

**The primary purpose of quality assurance (QA) activities is to ensure continuous improvement in the quality of vocational services.** The Department of Labor and Industries (L&I) Quality Assurance team partners with vocational firms to ensure qualified counselors are serving workers according to the [QA Elements](#) and QA Plan. The firm's responsibility is to:

- Develop internal processes for adopting changes.
- Provide guidance.
- Monitor progress to ensure consistent, quality services.

The QA plan is a requirement for all firms performing State Fund (SF) vocational services for L&I per the Washington State Administrative Code. Failure to submit, implement, and periodically report on the QA plan (at intervals determined by L&I) may result in the inability of firms to continue to provide services on open SF referrals, as well as prohibit their ability to receive new referrals.

### **QA requirements:**

- Identify the firm owner(s), manager(s), or representative(s) responsible for the firm's QA plan oversight; implement changes and report progress.
- Track and report monthly data on [QA Elements](#) (see [reporting template](#)) for applicable referral types (VR, AWA, PD, PI).
- On a schedule determined by L&I, the firm will attend the following meetings:
  - **Validation meetings** – The QA team will schedule regular validation meetings with the firm. L&I will provide the firm with a list of randomly selected claims as a representative sample for review. Prior to the meeting, the firm will review and validate the overall effectiveness of their internal QA program. The QA team will verify the quality of services according to the [QA Elements](#).
  - **QA check-in meetings** – L&I will meet with the firm on a periodic schedule to discuss firm strategies for implementing their internal QA program and provide support.
  - **Ad hoc meetings** – L&I may meet with the firm as needed to provide additional QA support.

**Items validated by the firm are outlined in the [QA Elements](#). Additional validation items include, but are not limited to:**

- Progress towards the implementation of prior firm QA addendums.
- Firm-reported QA data that is consistent with information verified during the firm validation process.
- Services provided emphasize worker-centric plans and actions that aim to reduce work disability.

- Progress reports and closing reports document meaningful interactions with the worker, employer, and medical providers that address goals, return-to-work priorities, concerns, and barriers. Documentation is concise, thorough, complete, and submitted timely per WAC requirements.
- Firm-supported referral extensions are necessary and properly requested.
- Preferred Worker applications are verified, submitted, and approved.
- Effective processes for managing aged vocational referrals (referrals open for one year or longer).
- Appropriate action to address VRC Feedback from L&I's vocational services specialists (VSSs).
- Documented resources and plans to ensure VRCs have the training and coaching they need to successfully perform activities outlined in the [QA Elements](#).
- The incorporation of any additional activities to improve services based upon:
  - A worker-centric approach.
  - Work disability prevention principles.
  - Appropriate statutes and WACs.

## Vocational recovery through work disability prevention

SF vocational referrals must be worker-centric and address the four principles of preventing workplace disability.

**Worker-centric** means:

- Empowering workers to lead their own recovery.
- Making it easy for workers to choose returning to work.
- Engaging and activating workers through goal planning and attainment.
- Developing trust and relationships with workers.
- Helping workers identify their motivations, goals, concerns, and concerns of returning to work.

VRCs can **prevent a confusing process** by:

- Frequently explaining the industrial insurance and return-to-work process, the purpose of the vocational recovery referral, and the roles of all parties involved.
- Connecting with the worker, employer, treating providers, claim manager, and other L&I staff to discuss next steps.
- Promoting vocational recovery.
- Accessing interpreter services, if needed.

VRCs **prevent unnecessary delays and duration** by:

- Meeting regularly with the worker to identify and address barriers and psychosocial risk factors.
- Connecting the worker to community resources.
- Helping the worker proactively take responsibility for and participate in their medical treatment.

- Discussing potential interventions to address the workers’ psychosocial risk factors with providers, when appropriate (may include activity coaching or behavioral health services).
- Ensuring the worker, employer, and all parties to the claim understand next steps.
- Meeting on-site with the employer and treating providers to discuss return-to-work strategies and tools, that may include:
  - Job modifications.
  - New jobs.
  - Return-to-work incentive programs, such as Washington Stay at Work and Preferred Worker Programs.

VRCs **prevent unclear return to work expectations** by:

- Using a worker-centric approach.
- Building rapport and trust with workers.
- Helping workers identify why it’s important to return to work and next steps to accomplish their goals.

**Proactive interaction** with all parties to the claim is important. Examples of proactive interaction may include:

- Meeting in-person with the worker and providing follow-up in the communication method best suited to the worker’s needs.
- Meeting in-person with the employer and providing follow-up communication.
- Discussing job modifications with the worker and the employer.
- Discussing the Preferred Worker program with the worker and the employer and assisting with the application process.
- Discussing the Washington Stay at Work program with the employer and assisting with the application process.
- Providing clear documentation for the worker and L&I.

## Referral Distribution

Firm managers, owners, or supervisors will review, document, and assign referrals within one business day. The referral assignment process is as follows:

Referrals received before 12:00pm	Referrals received after 12:00pm
Assigned before 12:00pm of the next business day	Assigned between 12:00pm and close of the next business day.

Firms should use their professional judgment and be prepared to discuss their process for assigning referrals upon L&I’s request.

Assigning a new referral or reassigning an open referral must support both a worker-centric and work disability prevention approach.

**In assigning the appropriate VRC, firms should consider:**

- Specific referral characteristics.
- VRC availability.
- Skills in work disability prevention and worker-centric services.
- Caseload management and size.
- Other expertise specific to the needs of the case.

**Examples of referral characteristics may include:**

Worker data	Claim data	Special factors
Age	Date of injury	Legal representation
Gender identity	Type of injury	Third party administrator (TPA) representation
Geographical area (proximity of VRC to worker)	Case complexity	Special/restricted access to employer's worksite
Language preference	Industry	

**Note:** VR referrals for workers residing in Washington State or a border city must be assigned to a VRC residing in Washington State or a border city in alignment with best practices.

**For out of state/out of country referrals:**

To receive out-of-state/out-of-country (OOS/C) referrals, the firm must have VRCs attached to the OOS/C referral hub. A counselor's attachment to the OOS/OOC hub is not included in their (up to) three contiguous service locations within Washington State.

Firms that agree to take new OOS/OOC VR referrals will retain the referrals throughout the subsequent phases (AWA, PD, and PI).

**For existing referrals when the worker relocates:**

If a worker relocates out of the state/country, the firm must send an EVOC with the new address and phone number. The VSS will contact the firm to discuss if the firm plans to retain or return the referral.

- If the firm already accepts new OOS/C referrals, the firm will be expected to retain the referral throughout all subsequent phases of vocational services.
- If the firm does not currently accept new OOS/C referrals, but decides to keep the referral, they also agree to retain the referral throughout all subsequent phases of vocational services. The VSS will need to close the referral and re-refer back to the firm's hub.
- If the firm wishes to return the referral, the VSS will close the referral and send to a firm accepting new OOS/C referrals.

**When a referral is declined:**

If the firm determines it is unable to keep an assigned referral, the firm must contact the VSS to explain the reasons for declining. A maximum of three professional hours may be billed for reviewing the file and preparing a brief rationale. The firm must also send the rationale using an EVOC message and the ADMA outcome code, per [MARFS, Chapter 30](#).

Firms cannot selectively decline referrals in favor of less complicated cases. It is the firm's responsibility to proactively manage counselor capacity and inform the QA team at [VocRecoveryProject@Lni.wa.gov](mailto:VocRecoveryProject@Lni.wa.gov) when a counselor or the firm needs to pause accepting new referrals. The ADMA code should not be used to manage counselor caseload.

**Returning referrals to L&I:*****If a VRC leaves the firm and obtains a provider number with a new firm:***

- Referrals (all types) are generally retained by the firm, provided the firm has capacity.
- Firms must contact L&I at [VocRecoveryProject@Lni.wa.gov](mailto:VocRecoveryProject@Lni.wa.gov) to reassign referrals within the firm or to discuss returning the referrals.
- The former firm and new firm will complete the appropriate documentation and submit notice of the changes to Private Sector Rehabilitation Services (PSRS).
- The former firm will email the QA team at [VocRecoveryProject@Lni.wa.gov](mailto:VocRecoveryProject@Lni.wa.gov) to notify them of the changes submitted to PSRS.
- Firms must ensure a smooth transition for the worker when reassigning referrals.

***L&I will:***

- Complete transfers within five business days.
- Process emergent transfers, when needed.
- Review cases to determine if reassignment is in the best interest of the worker.

***If a VRC leaves the firm and there is no request for a new provider number:***

- Referrals (all types) are generally retained by the firm, provided the firm has capacity.
- The firm will complete the appropriate documentation and submit notice of the changes to PSRS.
- The firm will email the QA team at [VocRecoveryProject@Lni.wa.gov](mailto:VocRecoveryProject@Lni.wa.gov) notifying them of the changes submitted to PSRS.
- Firms must contact L&I at [VocRecoveryProject@Lni.wa.gov](mailto:VocRecoveryProject@Lni.wa.gov) to reassign referrals within the firm or to discuss returning the referrals.
- Firms must ensure a smooth transition for the worker when reassigning referrals.

***L&I will:***

- Contact the current firm owner/manager to confirm capacity to retain referrals.
- Complete transfers within five business days.
- Process emergent transfers, when needed.

**Note:** L&I won't reassign referrals without the firm's knowledge.

## Assigned VRC and intern guidelines

### **Firms that list credentialed VRCs in their capacity count must:**

- Assign referrals in accordance with the referral distribution model.
- Assign referrals to VRCs listed as available and able to perform VR work in a manner consistent with the overall distribution of referrals to the firm.
- Consider the challenges and requirements related to geography, skill, and workload.

**Note:** If a VRC is not assigned a new VR referral in 90 days, the firm's capacity will be automatically reduced to correspond with actual available VRCs.

### **VRCs who are assigned VR referrals must:**

- Document that they have established themselves as the primary point of contact for the worker.
- Demonstrate a high degree of worker engagement. A high degree of worker engagement is generally understood as completing at least 50% of engagement activities and billing submissions.

**Interns should be supervised according to the appropriate WACs and the QA plan.** Interns can't be assigned referrals. L&I anticipates, in some circumstances, an intern may be established as the primary point of contact for the worker, only if they:

- Complete applicable phases of the [Vocational Intern Supervisor Expectations](#).
- Are under the close guidance of their supervisor.
- Document they have established themselves as the primary point of contact.
- Demonstrate a high degree of worker engagement (at least 50%).

**Note:** Only VRCs with appropriate L&I supervisor credentials may supervise interns per [WAC 296-19A-210\(2\)](#).

## Firm authentication & capacity

### **Authentication**

Authentication is the process L&I uses to maintain the effectiveness of the referral distribution model. Firms are asked to authenticate the following information at regular intervals:

- VRCs and/or interns working within the firm.
- Service locations to which VRCs and intern supervisors are attached.
- VRCs and interns that are "on" or "off" to new referrals and if they are counted toward firm's capacity.
  - VRCs can still be assigned new referrals even if they are turned off.
  - VRCs can be on or off for SF, Self-Insurance (SI), or both.
- Referrals paused in particular service locations by firm.
- Intern information.



Firm authentication doesn't replace the normal processes used by firms to notify L&I of changes in firm, VRC, or intern availability. Failure to participate in firm authentication or misrepresentation of information may result in removal of the firm from the referral distribution model.

L&I will route any changes to the appropriate programs so that all other L&I systems are updated. L&I may reach out to firms for clarification or more information.

**Capacity**

Firm capacity is calculated by:

- The number of VRCs turned on for SF and VR referrals. Each VRC counts as 1.0.
- When an intern has more than one year of experience, an additional 0.5 is added to their supervisor's capacity (when active).

Firms must proactively manage their volume of referrals. Firms can reduce referral volume, as needed, to improve service quality and manage firm capacity. The firm should communicate when a VRC should be turned "off" or when service locations should be paused. Firms can increase the volume for individual VRCs when they are ready to accept new referrals again.

<b>Reduce volume</b>	<b>Increase volume</b>
Parental leave	Return from leave
Medical leave	Interns can work independently
Retirement	New staff on the team
Planned vacation	Improved quality of work
Improving on quality of work	Resolved caseload issues
Complex caseload	

The QA team is available to help with firm-specific strategies to manage volume. Email [VocRecoveryProject@Lni.wa.gov](mailto:VocRecoveryProject@Lni.wa.gov) for questions and assistance.

## Review of service delivery and work product

All firms are expected to regularly review the work of their VRCs to ensure that individualized and appropriate services are being provided to workers and employers.

**Reviews may include:**

- Random case evaluations.
- Supervisor and peer staffing.
- Firm-specific statistics.
- Claim file documentation.

***L&I's validation and verification process includes:***

- Review of VRC work on a randomized collection of referrals.
- Identification of service gaps and opportunities for improvement.
- The firm's specific plan to address gaps and promote effective practices.

***During validation, the firm is required to:***

- Review the work of VRCs on the randomized collection of referrals.
- Follow the validation guidance provided by L&I.
- Discuss their validation with VRCs to support continuous improvement.
- Hold individual VRCs accountable for using effective practices and addressing any identified gaps.
- Submit the completed validation template before the scheduled meeting with L&I.
- Participate in validation meetings with L&I to compare and contrast observations, review evidence that effective quality services are being delivered, and discuss the firm's strategies for continuous improvement.
- Review and determine progress on agreed upon QA Plan Addendum items.
- Submit the signed QA Plan Addendum to L&I.

**NOTE:** For information on billable QA activities, see [MARFS Chapter 30](#). Some case evaluation, staffing, and documentation, as defined in [WAC 296-19A-340](#), is a part of a firm's everyday business operations and isn't considered a QA activity.

## VRC & Intern Development

The firm is responsible for comprehensive oversight of hiring principles, credentialing, professional development, and adherence to industry best practices.

***Staff development may include, but is not limited to:***

- New staff hiring procedures.
- Employee performance reviews.
- Professional growth and mentoring.
- Continuing education units (CEUs).
- Company and industry sponsored training and education.
- Company meetings and information releases.
- Review of the VRC Feedback List.
- Regular review of applicable RCWs and WACs.
- Review of applicable L&I communications.

***Progressive performance management techniques may include, but are not limited to:***

- Employee review and write-up.
- Internal claim review and audits.
- Supplementary training and consultation.
- Targeted work review.
- Alternative compliance agreement.

## Interns

Firms are responsible for the comprehensive development of interns. This includes adherence to best practices, quality, and ethical standards. All interns must be supervised by approved VRC supervisors as outlined in [WAC 296-19A-210\(2\)](#).

***The VRC intern training program may include, but is not limited to:***

- Completion of firm-specific intern training program.
- Training reviews.
- Staff proficiency standards.
- Referral staffing and tandem case management.
- Professional growth and mentoring.
- Firm and industry sponsored training and education.
- Firm meetings and information release.
- Regular review of applicable RCWs and WACs.
- Review of applicable L&I communications.

## Supervisor development of interns

The intern supervisor is responsible for teaching, coaching, and mentoring interns. To create consistency, L&I has set expectations for supervisors to follow. The expectations include a phased approach to help interns gain foundational knowledge and build the skills they need to become a proficient VRC. The phased approach to vocational skill development begins with introductory content and evolves through observation, active learning, and demonstration.

Supervisors use the [Vocational Intern Supervisor Expectations](#) as a tool to assess an intern's ability to learn and acquire skills to become a proficient VRC by the end of their internship. Firms may modify the training structure. All items must be complete before an intern submits an application to become a VRC.

## Vocational Intern Supervisor Application

To receive supervisory status, the individual must submit the [Vocational Intern Supervisor Application](#) on an annual basis. The firm manager must approve the application prior to submission. Applications are processed by [PSRS](#).

## New Firm Managers

When a firm appoints a new firm manager, they must attend the New Firm Orientation and review the training materials below:

- Read [Vocational Recovery Reference Manual](#)
- Read Vocational Firm Quality Assurance Plan
- Review [Quality Assurance Elements](#)
- Watch:
  - [Work Disability Prevention 101](#) (video learning module)
  - [Vocational Recovery Plan](#) (video learning module)
  - [Beyond the Injury: Beyond the Pain](#) (video learning module)

**Note:** Email the [Vocational Recovery Project](#) to request an orientation session. New firm managers can also subscribe to the GovDelivery firm manager distribution list.

## Coverage Plan

Firms must document their coverage plan in the event of an assigned counselor’s absence. The plan must outline how the firm manages expected and unexpected absences to maintain services to the worker. Firms should be proactive in identifying back-up counselors or emergency contacts for workers.

## Appendix

<a href="#">MARFS Chapter 30</a>	Vocational services providers must use the codes listed in this chapter to bill for services.
<a href="#">Reporting Template</a>	Firms will track QA data on VR, AWA, PD, and PI referrals. The QA data must be tracked and reported on a monthly basis by the firm.
<a href="#">Quality Assurance Elements</a>	Quality Assurance Elements are published by L&I and define the measures for applicable referral types. The firm will validate how the QA Elements are being addressed during a firm’s validation meeting.
<a href="#">Quality assurance requirements</a>	Firms that wish to receive referrals from L&I must comply with QA requirements in law, rule, and policy.
<a href="#">Sending firm and VRC information to L&amp;I</a>	Use this chart to find where to send your firm and VRC information to L&I.

<p><a href="#"><u>Vocational Firm Compliance Management</u></a></p>	<p>L&amp;I uses a set process to address non-compliance based on the issue type. The QA team documents compliance issues at any time during the validation process and provides firms with instructions on how to return to compliance.</p>
<p><a href="#"><u>Vocational Intern Supervisor Expectations</u></a></p>	<p>The expectations outline a phased learning approach for supervisors to help interns gain foundational knowledge and build skills to become a proficient VRC.</p>
<p><b>Validation template</b> (A current version of the template will be sent to the firm when the validation meeting is scheduled)</p>	<p>Validation documents must be submitted by the scheduled due date.</p>
<p><b>What L&amp;I staff might discuss during validation/verification meeting</b></p>	<p>Includes, but is not limited to:</p> <ul style="list-style-type: none"> <li>• QA addendum from prior validation meeting</li> <li>• The firm’s internal QA management</li> <li>• Claims selected for validation/verification</li> </ul>
<p><a href="#"><u>Vocational Recovery Reference Manual</u></a></p>	<p>Recommended best practices.</p>
<p><b>Laws and Rules related to QA</b></p>	<p><a href="#"><u>RCW 51.32.095(8)</u></a> - making vocational referrals based on quality and effectiveness is required by statute.</p> <p><a href="#"><u>WAC 296-19A-050</u></a> - delivery of services must be consistent with vocational recovery.</p> <p><a href="#"><u>WAC 296-19A-210(9)(d)</u></a> - firms agree to submit, implement, and periodically report on the L&amp;I approved QA plan.</p>

## Vocational Firm Quality Assurance Plan signature page

Firm name	Firm provider number
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The signature below indicates all parties agree to adhere to the QA plan outlined in this document.

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Signature of firm owner/manager

Date

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Printed name of firm owner/manager

Name and contact information of the person responsible for administering the QA plan and attending QA discussions with the L&I.

Name	Phone	Email address
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Email the completed **signature page** to: [VocationalFirmData@Lni.wa.gov](mailto:VocationalFirmData@Lni.wa.gov).