

Create a culture focused on vocational recovery that engages all parties in preventing needless work disability while improving return to work outcomes.

Vocational Firm Quality Assurance Plan



Washington State Department of
Labor & Industries



Vocational Firm Quality Assurance Plan

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Vocational Firm Quality Assurance Plan requirements

The primary purpose of quality assurance (QA) activities is to ensure continuous improvement in the quality of vocational services for each referral type.

A department-approved QA plan is a requirement for all vocational firms performing State Fund vocational services for the department ([Washington Administrative Code \(WAC\) 296-19A-210](#)). Failure to submit, implement, and periodically report on a department-approved QA plan at intervals determined by the department may result in the inability of a vocational firm to continue to provide services on open State Fund referrals as well as prohibit their ability to receive new referrals.

Vocational Firm Quality Assurance Plan requirements:

- Identify the firm owner(s), manager(s), or representative(s) responsible for implementing and reporting on the QA plan.
- Outline the vocational firm's strategy for monitoring and managing vocational rehabilitation counselor (VRC) performance for each referral type.
- Track and report monthly data on QA elements (see [reporting template](#)) for applicable referral types according to the measures defined in the [QA elements](#).
- On a regular and reasonable schedule (to be determined by the department), the firm will review the work of VRCs and validate how well the [QA elements](#) are being addressed based on department published [QA elements](#) definitions and QA plans. The department will provide your firm with a group of randomly sampled cases for validation.

Items validated by the firm include, but are not limited to:

- Firm reported QA data is consistent with information found in firm records during firm validation (applies to vocational recovery (VR), ability to work assessment (AWA), plan development (PD), and plan implementation (PI) referrals).
 - Engagement with the stakeholders is meaningful, consistent, proactive, and documented (applies to VR, AWA, PD, and PI).
 - Services provided emphasize worker-centric planning that aims to reduce needless work disability (applies to VR, AWA, PD, and PI).
 - Progress reports and closing reports document meaningful interactions with the worker, employer, and medical providers to address goals, return-to-work (RTW) priorities, concerns, and barriers. Documentation is concise, yet thorough and complete, and submitted timely per Washington Administrative Code (WAC) requirements (applies to VR, AWA, PD, and PI).
 - Preferred worker (PW) discussions with workers have occurred and the application is completed if appropriate (applies to AWA).
 - If necessary, 'good cause' plan development extensions are submitted through EVOC (applies to PD).
 - PW applications are verified, submitted, and approved (applies to PD).
 - Plan modifications are completed as needed and a new Plan Modification Accountability Agreement is signed to ensure the worker understands the purpose of the change (applies to PI).
- Develop processes for managing aged vocational referrals, which are defined as referrals open for a year or longer.

- Monitor, review, and outline how the firm will address VRC feedback provided by Department of Labor and Industries' (L&I) vocational services specialists (VSS).
- Outline and document resources and plans the firm will utilize to ensure VRCs have the training and coaching they need to successfully perform activities outlined in the [QA elements](#) document.
- Update and incorporate necessary [progressive performance management](#) steps into the QA plan to improve services focused on a worker-centric approach and work disability prevention principles while adhering to appropriate statutes and WACs.

Firm VRC & intern authentication process

The department will periodically request vocational firms to authenticate the number of VRCs in each firm who are willing and able, and meet the required expectations to receive VR referrals, including interns with more than one year of internship within Washington State ([see page 5 – Assigned VRC and Intern Guidelines for VR referrals](#)). Periodically, you will receive an email with a list of names of your VRCs and interns. The subject line of the email will have the month and name of your firm. You will need to review and validate all of the information such as intern start dates, service location information, and the availability of VRCs to take vocational recovery referrals.

Reply to VocationalFirmData@Lni.wa.gov by the date indicated, using the same subject line. We will acknowledge your submittal by confirmation email.

Having accurate VRC and intern counts is required for the effectiveness of our referral distribution model. We will route any changes to the appropriate programs so all department systems remain in sync. Based on the changes, we may reach out to you for more information or clarification.

Note: The authentication process doesn't replace the normal processes used to notify the department of [firm, VRC, or intern changes](#) and availability.

Failure to participate in the authentication process as part of a firm's QA plan and/or misrepresentation of the number of VRCs assigned as counselor for VR referrals ([see page 5 – Assigned VRC and Intern Guidelines for VR referrals](#)) and interns with more than one year of internship within Washington State, may result in removing your firm from the State Fund referral distribution model.

Note: Vocational recovery (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.

Firm referral distribution

Firm managers, owners, or supervisors will review, document and assign referrals to their authenticated VRCs within one business day (Monday through Friday only). Referrals received by noon will be assigned before noon on the next business day; referrals received in the afternoon up to close of business will be assigned by close of the next business day. Firms will use the criteria below, along with their professional judgment, to determine the most qualified VRC to assign. If firms cannot meet this criteria, they must decline the referral within one business day of receipt of the referral.

Examples of assignment criteria:

Worker data: Age, gender, geographical area (VRC who is closest to the worker), language preference.

Claim data: Date of injury, type of injury, case complexity, industry.
Special factors: Legal counsel assigned, third-party administrator (TPA) representation, special access to employer's worksite.

Consideration must support a worker-centric work disability prevention approach when assigning a new referral or reassigning an open referral, regardless of the circumstances.

In selecting the appropriate VRC, firms should consider:

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

Note: Vocational recovery (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.

Use the following guidelines when a VRC leaves the firm:

- Firm referrals (including all referral types) are generally retained by the firm.
- Upon receipt of the [Vocational Provider and Firm Application](#), Private Sector Rehabilitation Services (PSRS) will notify the VSS supervisor of upcoming redistribution of the VRC's open referrals.
- A VSS supervisor will contact the VRC's current firm own/manager to inform them of the request.
- Firms must ensure a smooth transition for the worker when reassigning referrals in keeping with a worker-centric work disability prevention model.
- VSS staff will have five days to complete transfers.
- VSS supervisors will process emergent transfers when necessary.
- VSS supervisors may review cases to determine if reassignment is in the best interest of the worker.

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

Assigned VRC and intern guidelines for vocational recovery referrals

Firms that list credentialed VRCs in their capacity count must:

- Assign referrals in accordance with the [firm referral distribution](#).
- Assign referrals to all credentialed VRC staff listed as "available and able to perform VR work" in a manner consistent with the overall distribution of referrals to the firm, given the challenges and requirements related to geography, skill, and workload.
- If possible, assign at least one VR referral every month to each credentialed VRC in the firm's capacity count, provided adequate number of referrals are received (subject to department verification).
- If a credentialed VRC included in the firm's capacity count doesn't receive a VR referral for a period of time not to exceed 90 days, provided adequate referral numbers, the firm's capacity will be reduced to correspond with actual available VRCs.
- [Contact the department](#) to reassign VR referrals if the original credentialed VRC assigned is not meeting the criteria as listed below or criteria required by appropriate statutes, WACs, or the firm.

VRCs who are assigned VR referrals must:

- Document they have established themselves as the primary point of contact for the worker.
- Demonstrate a higher degree of worker engagement, which is generally construed as completing at least half of the worker engagement activities and correlated billing submissions.

Interns should be supervised according to the appropriate WACs and the department-approved QA plan.

Interns cannot be assigned cases. It is anticipated that in some cases an intern, after completing all phases of the [Vocational Intern Supervisor Expectations](#), and under close guidance of their supervisor, may establish themselves as the primary contact for a worker. In those cases, the intern must document they have established themselves as the primary point of contact and demonstrate a higher degree of worker engagement generally construed as completing at least half of the worker engagement activities and correlated billing submissions.

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

Development of vocational staff

Interns

Vocational firms are responsible for the comprehensive development of VRC intern staff. 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 company-specific intern training program.
- Intern interval training reviews.
- Staff proficiency standards.
- Case staffing/tandem case management.
- Professional growth/mentoring.
- Company/industry sponsored training/education.
- Company meetings/information release.
- Regular review of applicable RCWs and WACs.
- Review of applicable department communications.

VRC & intern development, monitoring, and hiring practices

Vocational firms must commit to 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/mentoring.
- Continuing education units (CEU) training/completion.
- Company/industry sponsored training/education.

- Company meetings/information release.
- Review of VRC feedback list.
- Regular review of applicable RCWs and WACs.
- Review of applicable department communications.

Supervisor development of interns

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

Supervisors and firm managers use the [Vocational Intern Supervisor Expectations](#) as a guide to assess the 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. However, the expectation is that all phase activities be covered.

Vocational Intern Supervisor Application

To receive supervisor status, each VRC must submit a [Vocational Intern Supervisor Application](#) on an annual basis. The firm manager must approve the application prior to submittal. These applications will be processed by Private Sector Rehabilitation Services (PSRS@Lni.wa.gov).

Progressive performance management

Vocational firms must adhere to best practice standards and meet quality requirements as outlined in [WAC 296-19A-210](#). Firms will respond efficiently and effectively to identified concerns regarding their VRC or intern's performance. Firms shall communicate with L&I when progressive correction measures have been unsuccessful. Progressive performance management techniques may include, but are not limited to:

- Employee review/write-up.
- Internal claim review/audits.
- Supplementary training and consultation.
- Targeted work review to include alignment with applicable RCWs and WACs.
- Alternative compliance agreement.

Review of service delivery and work product

All vocational 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 (when applicable). This process may include, but is not limited to:

- Random case evaluations.
- Supervisor/peer staffing.
- Firm-specific statistics report/review.
- Firm templates and forms to ensure they are in plain language and at an appropriate reading level.

Work product review as defined in [WAC 296-19A-340](#) is a part of a vocational firm's everyday business operations and isn't considered a quality assurance activity.

The department's validation process includes review of VRC work on specified referrals, the ability to identify service gaps and opportunities, and the use of a robust and proactive QA plan to address gaps and promote effective practices ([page 3 - Firm QA plan requirements](#)).

The validation process requires the firm owner or manager responsible for administering the QA plan as required on [page 3 - Firm QA plan requirements](#) to:

- Review the work of their VRCs on specified referrals following the department-provided validation guidance.
- Discuss their validation with VRCs to support excellent work and address gaps.
- Develop and execute a plan to ensure all VRCs at the firm are using effective practices and addressing identified gaps.
- Submit completed validation template/s prior to the scheduled meeting with the department.
- Participate in meetings with the department to discuss evidence that:
 - Effective validation is being done.
 - The firm's QA plan is proactively used to promote effective practices and continuous improvement in providing required department vocational services.
- Update their firm QA plan as needed and in preparation for department approval.

For additional clarification see [MARFS Chapter 30 Quality Assurance](#).

Vocational recovery through work disability prevention

Excluding forensic and stand-alone job analysis (SAJA), all State Fund vocational referrals must be worker-centric and address the four principles of preventing workplace disabilities.

Worker-centric means, but is not limited to:

- Putting the worker in the lead role and making it easy for them to choose to return to work.
- Engaging and activating workers through goal planning and attainment to enable them to successfully return to work or progress through the process.
- Developing relationships and trust with workers to help them identify their motivations, goals, concerns and risks with return to work.

VRCs **(1) prevent a confusing process** by, but not limited to:

- Frequently explaining the industrial insurance and return-to-work processes, the purpose of the vocational referral, and the roles of the parties involved.
- Facilitating frequent contact with the worker, employer, treating providers, claim manager, and other L&I staff to discuss next steps while promoting vocational recovery.
- Accessing interpreter services when necessary.

VRCs **(2) prevent unnecessary delays and duration** by, but not limited to:

- Meeting regularly with the worker to identify and address return-to-work barriers, psychosocial risk factors and connecting the worker to community resources, such as WorkSource.
- Helping the worker proactively participate in and take responsibility for their medical treatment.
- Discussing with provider potential interventions to address the workers' psychosocial risk factors when appropriate for the case (such as activity coaching or behavioral health services).
- Making sure the worker, employer and relevant stakeholders understand next steps.
- Meeting on-site to engage the employer and treating providers to discuss return-to-work strategies and tools, including but not limited to, job modifications, new jobs and return-to-work incentive programs such as the Washington Stay at Work and Preferred Worker Programs.

VRCs **(3) Prevent Unclear Return to Work Expectations** by, but not limited to:

- Using a worker centric approach to establish rapport and build trust to help the worker identify why it's important for them to return to work and what needs to happen to accomplish their goals.

In supporting these efforts, proactive interaction with all necessary stakeholders is crucial.

Examples of interactions include:

- Meeting(s) face to face* with the worker with follow-up communication in the form best suited to the worker's needs.
- Meeting(s) on-site* with the employer of record with follow up communication as needed.
- Having job modification conversations with the worker and the employer.
- Having preferred worker conversations with the worker and the employer and assisting both stakeholders with application processes as needed.
- Discussing Washington Stay at Work with the employer and assisting with the application process as needed.
- Providing clear documentation for the worker and the department.

* DUE to COVID-19, these activities need to be completed as is safe and consistent with state guidance on safe interactions.

<p>Firm manager training requirements</p>	<p>To receive State Fund referrals, firm managers must attend a new firm orientation and review the training materials listed below. To request your orientation session, contact the Vocational Firm Quality Assurance Team at VocationalFirmData@Lni.wa.gov.</p> <p>Required training</p> <ul style="list-style-type: none"> • Vocational Recovery Reference Manual • Vocational Firm Quality Assurance Plan • Quality Assurance Elements • Work Disability Prevention 101 (video learning module) • Vocational Recovery Plan (video learning module) • Beyond the Injury: Beyond the Pain (video learning module) <p>Note: Firm managers should regularly monitor L&I's website and review all emails from the department to ensure they and their staff keep up to date on best practices for helping workers heal and return to work.</p>
<p>MARFS Chapter 30 – Quality Assurance</p>	<p>Vocational services providers must use the codes listed in this chapter to bill for services.</p>
<p>QA reporting template contents</p>	<p>Firms will track QA data on vocational recovery referrals. The QA data should be tracked and submitted for each month in the reporting template linked here.</p>
<p>Quality Assurance Elements</p>	<p>Quality Assurance Elements are published by the department and define the measures for applicable referral types when monthly data is tracked and reported. The vocational firm will validate how well the QA elements are being addressed during a firm's scheduled validation period.</p>
<p>Quality assurance requirements</p>	<p>To receive State Fund referrals, firm managers must ensure their quality assurance representative reads and understands L&I's quality assurance requirements, participates in quality assurance activities, and communicates with L&I about quality assurance as required. These requirements include, but aren't limited to:</p>

	<p>Read and understand:</p> <ul style="list-style-type: none"> • Vocational Recovery Reference Manual • Vocational Firm Quality Assurance Plan (firm manager must sign) • Quality Assurance Elements <p>Attend and participate in:</p> <ul style="list-style-type: none"> • New firm orientation training • Cohort validation reviews • Quality assurance meetings with L&I <p>Send to L&I within required timelines:</p> <ul style="list-style-type: none"> • Signed Vocational Firm Quality Assurance Plan • Confirmed authentication of VRCs who are willing and able to meet the expectations required to accept vocational recovery referrals. • Quality Assurance Data Reporting information • All related quantity assurance correspondence • Signed Quality Assurance Plan Addendum(s)
<p>Sending firm and VRC information to L&I</p>	<p>Use this chart to find where to send your firm and VRC information to L&I.</p>
<p>Vocational Firm Compliance Management</p>	<p>The vocational firm compliance management process describes the process L&I will follow in the event a firm isn't remaining in compliance with the requirements surrounding these activities:</p> <ul style="list-style-type: none"> • Sign and submit the Annual Vocational Firm Agreement. • Sign and submit the Vocational Firm Quality Assurance Plan. • Track and submit monthly QA data. • Provide vocational rehabilitation counselor (VRC) authentication details upon request. • Submit validation documents. • Participate in QA meetings with L&I. • Sign and return QA Plan Addendums.
<p>Vocational Intern Supervisor Expectations</p>	<p>To create consistency for interns, L&I has set expectations for supervisors to follow. The expectations include a phased learning approach to help interns gain foundational knowledge and build</p>

	skills they need to become proficient as a vocational rehabilitation counselor (VRC).
Vocational recovery referral validation template	Must be submitted within a reasonable amount of time prior to the scheduled meeting with representatives from the department.
What L&I staff might review during verification	<p>Review includes but is not limited to: <i>Listed in alphabetical order</i></p> <ul style="list-style-type: none"> • All firm VRC feedback list entries • Billing – for activity frequency, to determine who performs the work on the claim • Correspondence in file – claim file notes and letters for all parties • Employer’s report of accident/report of accident (EROA/ROA) – for employer comments on light duty, how many positions the worker has, length of employment • Electronic vocational communications (EVOCs) for barriers and VR Plans • Firm assignments to VRCs • LINIIS screens – Prior vocational services, what conditions/treatments are authorized, employer’s risk class history to assist with determination of likelihood of modified duty, first calls – early contact team/CM, tie-in claims • Medical reports – for notation of conversations with VRCs • Prior validation • Progress reports – for documentation of engagement • Secure messages from all stakeholders

Vocational Firm Quality Assurance Plan signature page

Firm name

Firm provider number

The signature below indicates all parties agree to adhere to the quality assurance plan outlined in this document.

Signature of firm owner/manager

Date

Printed name of firm owner/manager

Name of the firm owner or manager responsible for administering the QA plan and attending QA discussions with the department ([see page 3 Firm QA Plan Requirements](#)).

Name

Phone number

Email address

NOTE: All attachments must be properly marked with:

Firm provider number in the top right corner

Index: AGREE in the lower right corner

Email the completed **signature page** and attachments to: VocationalFirmData@Lni.wa.gov.

Index: **AGREE**