



Bureau of Workers' Compensation

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CSI-BIA Addendum A.

Stakeholder Feedback Recommendations for Changes to the 4123-6-02.2 Provider access to the HPP – provider certification criteria

Line #	Rule #/ Subject Matter	Stakeholder	Draft Rule Suggestions	Stakeholder Rationale	BWC Response	Resolution
1	OAC 4123-6-02.2 (C) (16)	Elaine Owens, MA, CRC	I have read the credentialing rule and am in agreement.		Thank you.	No BWC Action needed.
2	4123-6-02.2	Debra Odenthal, Pittsburgh Glass Works	Agree with recommendations.	Does not see problems with requirements being recommended.	Thank you for your input.	No BWC action needed
3	4123-6-02.2	Leila Drawl, Lake Health System	Commented that they are required to credential their health care providers.		Thank you for your input	No BWC action needed
4	4123-6-02.2	Richard Ward, Roppe Holding Company	Questioning how Occupational Health Clinics would be addressed in this Rule		Occupational Health Clinics would be able to be in as a hospital provider type if they are hospital (provider) based clinics and paid at facility rates. If they aren't they would be in as a group practice type 12, and paid at non facility rates.	No BWC action needed
5	4123-6-02.2	Karen Dunn, Fresh Mark, Inc.	Agrees criteria is important for Fresh Mark as an SI employer but also for IW's to receive medical care from professionals that meet this criteria.		Any SI employer with a Qualified Health Plan would also use the BWC certification criteria for their providers. Thank you for your input.	No BWC action needed
6	4123-6-02.2	R. Garrett for Medical Director H. Popovich MD, Advocare	All requirements under section B 1-10 should also apply to chiropractors under section C10	None given	The first sentence of 4123-6-02.2 (B) supports this suggestion currently.	No BWC action needed.
7	4123-6-02.2	Brian Miller, Ohio Licensed Ocularist	I am BWC certified vision care provider for BWC, and also an ocular provider in 4 Ohio cities. Offering to provide any information		Acknowledged receipt of email and thanks for offering assistance as a resource for BWC.	No BWC action needed.

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			that will help this new provider type to flow smoothly.			
8	4123-6-02.2	James Rough, Exec Director, Counselor, Social Worker, Marriage & Family Therapist Board	Please correct Board name and add licensed independent marriage and family therapists under paragraph C.		We will update the correction to include the full name of the Board. BWC does not enroll/certify marriage and family therapists as those services are unrelated to work injury medical care. Recognized therapists service the needs of Ohio's workers.	Social Worker and clinical counselor sections under paragraph C updated with full Board name.
9 x	OAC 4123-6-02.2 (C) (16)	International Association of Rehabilitation Professionals (IARP)	Reconsider the need to require certification of providers of the specified employment services.	There does not appear to be a driving need as statistics show there is no difference in outcome between the credentialed and non-credentialed providers of these services. Moreover, BWC policy already outlines expectations and responsibilities for these providers.	BWC certification serves to facilitate clarity with respect to providers designated as being able to perform services for Ohio injured workers within the workers compensation system. Further certification ensures consistency in how providers are held accountable in meeting the workers' compensation rules. Finally, certification bring into play administrative protocols which also protects the rights of providers through the application of Chapter 119 hearings before a provider is terminated from the system. While it is pointed out that the statistical data reflects equal return to work rates for credentialed and non-credentialed providers, such is not the only basis for why BWC strives for consistency in how we manage all Ohio workers' compensation service providers.	No change required

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10 y	OAC 4123-6-02.2 (C) (16)	International Association of Rehabilitation Professionals (IARP)	The association indicated that the minimum qualifications needed to apply for the BWC Employment Specialist certification are unrealistic (100 hours of study) and present an undue financial burden.		The initial draft of the rule did reflect a recommendation that in the alternative of a provider having a full fledge credential, a provider could be certified as an Employment Services Specialist if they have a total of 100 hours of education in the indentified educational domain areas. One hundred hours of appropriate training in employment services for injured workers is roughly equivalent to completing three, 3 credit courses at the college level in the identified domain areas. Appreciating the concern IARP presented, this initial position of requiring 100 hours was adjusted to reflect a recommended requirement of 80 hours of education in the identified educational domain areas.	Maintain the current revised requirement of 80 hours of education in the identified domain areas.
11 z	OAC 4123-6-02.2 (C) (16)	International Association of Rehabilitation Professionals (IARP) Robin Markey, CRC Markey and Company, Inc.	The association suggested that BWC grandfather current providers of this service; set criteria such as grandfather those employment service specialists who have provided these services for eighteen (18) months prior to implementation of this rule.		BWC considered IARP's request to grandfather current providers of employment specialist services under the new regulations, and has chosen to adopt this approach.	BWC will grandfather those employment service specialists who have provided these services for eighteen (18) months prior to implementation of this rule.

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12 y,z	OAC 4123-6-02.2 (C) (16)	<p>International Association of Rehabilitation Professionals (IARP)</p> <p>Robin Markey, CRC Markey and Company, Inc.</p> <p>Al Allington M.S., CRC</p>	<p>No suggestion but general comment as follows:</p> <p>The credential represents a burdensome regulation not in keeping with the Governor’s Common Sense Initiative.</p> <p>I think the key is for the state agency to support the many vendors and small business that provide service and support the goals of the agency. If a person is not good at job placement, job coaching, teaching job club and so on, the business will get rid of them.</p> <p>I do fully support the 20 CEU's every two years. I think the agency should identify specific brief training classes for the different aspects of placement with injured workers that everyone could benefit from. Many private workers that support the BWC could learn from classes in ethics, job coaching and more. Making those classes not only available to employment specialists but anyone involved with the BWC programs can only strengthen the program and the results.</p>	<p>Most if not all BWC employment specialist providers (e.g. job placement specialists, job coaches) work within the framework of a small business or they are independent providers. This provider group comprises the kind of small business that the Governor is speaking to in the mission statement of his Common Sense Initiative.</p> <p>I think this new rule, if enacted would hurt small businesses because of its related costs. I think at least in the short run, it would hurt the injured workers seeking jobs and overall, I think this would hurt the goals of the bureau's costs and re-employment stats.</p>	<p>The Governor’s Common Sense Initiative, while having the goal of ensuring that regulation is not unnecessarily burdensome for businesses; such is balanced against the goal of protecting the public. Requiring a certification or license to show skill competencies is standard practice in virtually every industry, and facilitates meeting the objective of ensuring access to quality care for Ohio’s injured workers. It is necessary for BWC to have minimum criteria for providers to participate in the HPP in order to ensure the health and well-being of injured workers. Recognizing there may be differences in the provider community, the regulation does provide flexibility in the manner in which a provider or entity can meet the credentialing requirements of the rule.</p> <p>BWC has agreed to allow for grandfathering of current providers and has also agreed to a reduced number of hours of education (80) in the identified domain areas as an option for certification of new providers.</p>	<p>BWC will grandfather those employment service specialists who have provided these services for eighteen (18) months prior to implementation of this rule. As well, BWC has reduced the number of hours of education required for new providers from 100 hours to 80.</p>

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13 y	OAC 4123-6-02.2 (C) (16)	International Association of Rehabilitation Professionals (IARP) Robin Markey, CRC Markey and Company, Inc.	Concern: Requiring courses or seminars in this field is costly. This coursework is not readily available.		Employment service specialists are professionals that BWC relies on to work effectively with injured workers toward their goal of return to work. Continuing education, keeping abreast of best practices in an industry and always improving skill levels is part of every profession. Therefore BWC does not believe it is unreasonable to require proof of this education in lieu of a nationally recognized credential. There are many seminars and conferences held all year around in the field of re-employment and vocational rehabilitation. Online courses can be found as well and if their subject matter can be associated with any of the domain areas they will certainly be approved.	
14 y	OAC 4123-6-02.2 (C) (16)	International Association of Rehabilitation Professionals (IARP) Robin Markey, CRC Markey and Company, Inc.	Concern: How will providers know what courses will be approved? Will BWC become a certifying body?		Operational policies have been developed and will be posted on OhioBWC.com. BWC currently certifies all providers in the system with the exception of these providers of employment services.	No change required.
15 x	OAC 4123-6-02.2 (C) (16)	International Association of Rehabilitation Professionals (IARP)	Why weren't the CDMS (Certified Disability Management Specialist) included?	Guidelines for this certification is developed upon ability to maintain knowledge, professionalism and expertise and based on Focus	After further consideration the CDMS course work was considered adequate for the educational requirement	BWC has added the CDMS (Certified Disability Management Specialist) credential.

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		<p>Donna Kollar, MA, LSW, CDMS</p> <p>David Radecke, CDMS</p> <p>Amy Rodgers, B.S., CDMS</p>		<p>Domains of: 1. Disability and Work Interruption Case Management, 2. Workplace Intervention for Disability Prevention, 3. Program Development, Management and Evaluation, 4. Employment Leaves and Benefits Administration and 5. Ethics.</p>		
16 x	OAC 4123-6-02.2 (C) (16)	Rehab PRO	<p>Recommended technical correction: <u>...or commission on accreditation of rehabilitation facilities (CARF) accreditation for employment and community services in job development or employment supports;</u></p>	<p>CARF accredits several <i>specialty areas</i> under the umbrella of the Employment & Community Services accreditation <i>category</i>, including "job development", and "employment supports". Thus, a provider's certificate of accreditation would read: "Accredited in Employment and Community Services: Job Development", and/or "Accredited in Employment and Community Services: Employment Supports."</p>	<p>After consideration of the recommended language change the determination was that the language provided additional clarity to the expectations.</p>	<p>Recommended technical language change accepted.</p>
17 x	OAC 4123-6-02.2 (C) (16)	Rehab PRO	<p>Recommend the addition of language to clarify provider certification requirements for providers working with BWC-RSC dual eligible clients.</p>	<p>In addition, this is to seek clarification on how the proposed rule would impact Employment Specialists providing BWC services to BWC-RSC dual eligible consumers. While RSC mandates providers to be CARF accredited,</p>	<p>BWC does not regulate the requirements for providers of services authorized by Rehabilitation Services Commission (RSC) when they are serving BWC injured workers. Currently, providers of these employment services authorized by RSC must maintain CARF accreditation, so</p>	<p>No change required.</p>

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				<p>not all are accredited in the specialty areas to be required in the BWC proposed rule. In addition, not all hold the certificates that the proposed rule would require. I am never sure if and when a BWC referral to RSC retains the color of its BWC origin. If a referral to RSC remains a BWC case, but referrals for service are made to RSC certified providers for Employment Specialist services, it would seem that those service providers would have to comply with 4123-6-02.2 (C)(16). Currently, the proposed rule is silent on this issue.</p>	<p>these providers would already meet the standard of this proposed rule.</p>	
18 x	OAC 4123-6-02.2 (C) (16)	Gail Michalski LPC, CVE	Why wasn't the CVE (Certified Vocational Evaluator) credential included?		<p>The focus of the Certified Vocational Evaluator (CVE) credential is vocational evaluation, work adjustment and/or career assessment. This does not fit with the employment services included in this rule. In addition, the CVE credential has been discontinued and is not being supported by a credentialing body.</p>	No change required.

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19 x	OAC 4123-6-02.2 (C) (16)	International Association of Rehabilitation Professionals (IARP)	Eliminate the following credentials: Global Career Development Facilitator (GCDF), Associate Certified Coach (ACC), Professional Certified Coach (PCC), Master Certified Coach (MCC)		BWC has fully validated the credentials recommended and does not believe they should be eliminated.	No change required.
20 x,y	OAC 4123-6-02.2 (C) (16)	Al Allington M.S., CRC	As a State vendor for 9 years and with over 25 years experience as a career counselor, vocational counselor and job placement specialist I disagree with the suggested 80 hours of courses, seminars or workshops prior to application for certification for employment specialists. I have used persons with degrees and some with a significant number of college classes but found they do no better than those with less formal classroom training.	I worked as a state vocational counselor for the BWC (1991-1992) and remember we had in our office, two very skilled employment specialists as state employees, with little college. I have seen, met and used a number of employment specialists in my 25 years as a vocational counselor that have had no degree and no real training but are very good in placing injured workers and disabled persons. Persons with sales backgrounds make wonderful placement specialists.	When we contemplated this rule change, the belief at the time was that the indicated 80 hours of study requirement would not be difficult for most, if not all, providers to show evidence of having met. It appears the interpretation is that once the rule was in effect, providers in the system now would have to undertake and complete 80 hours of training to meet the requirement. The intent of this component was for providers to show evidence that they had completed 80 hours of training at anytime. There is vagueness in the rule as we did not have fully vetted every aspect of evidence that a person could submit to show they had received the requisite training. The intent was to be judicious, but liberal in the evaluation. Existing providers as a matter of their protocols attend seminars and lectures.	BWC will grandfather those employment service specialists who have provided these services for eighteen (18) months prior to implementation of this rule. Maintain the current revised requirement of 80 hours of education in the identified domain areas.

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					Thus, the belief remained that evidence of this could be shown. However, we have become appreciative of some comments which emphasized that perhaps not all providers effectively tracked or kept past evidence of educational training; and thus may not be able to meet the 80 hours criteria.	
21 X,y	OAC 4123-6-02.2 (C) (16)	Kristen LaFountaine, Vocational Service Provider	The proposed changes do not seem to be based on the outcome of the statistics and research completed by BWC. Also, it would be difficult for providers to meet the demands of certification in the proposal. It is not clear, the monetary cost of training, time necessary for training, availability and accessibility of proposed training/certification.	I am all for continued education and/learning; keeping up to date with BWC rules, guidelines/expectations, general hiring practices, changing labor market, etc...	While the performance data would indicate that there was no marked difference in outcomes between those parties credentialed and those non-credentialed, the real issue was a provider's certification or non-certification. If a provider is not certified in the BWC system then they cannot be held accountable to follow BWC rules. There are many seminars and conferences held all year around in the field of re-employment and vocational rehabilitation. Online courses can be found as well and if their subject matter can be associated with any of the domain areas they will be approved.	No change needed.
22 x	OAC 4123-6-02.2 (C) (16)	Kathleen L. Reis ALLWORK, Inc	What is the problem that is being solved with the proposed new rule?	It's my opinion that if the objective is to improve RTW outcomes, the	BWC certification serves to facilitate clarity with respect to providers	No change needed.

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				<p>goal could be met more effectively with BWC requiring providers to pass a BWC exam to demonstrate knowledge & proficiency. None of the proposed credentials will provide the assurance that the individual provider is aware of the basis for BWC laws and policies, upon which all should depend when making decisions and taking actions in a case. None of them train providers in effective job placement skills. The proposed credentialing solution merely eliminates the providers who showed the most success (non-credentialed) in BWCs own study about which credentials related to what outcomes. This proposed credentialing requires the most successful providers to spend precious time and money earning a credential that adds no value to the process of job placement.</p>	<p>designated as being able to perform services for Ohio injured workers within the workers compensation system.</p> <p>Further, certification ensures consistency in how providers are held accountable in meeting the workers' compensation rules.</p> <p>Finally, certification brings into play administrative protocols which also protect the rights of providers through the application of Chapter 119 hearings before a provider is terminated from the system.</p> <p>While it is pointed out that the statistical data reflects equal return to work rates for credentialed and non-credentialed providers, such is not the only basis for why BWC strive for consistency in how we manage all Ohio workers' compensation services providers.</p>	
23 x	OAC 4123-6-02.2 (C) (16)	Ms. Gigi Boggs	<p>I am opposed to the proposed rule 4123-6-02 regarding provider credentialing for employment specialists. In developing this rule, the BWC issued its own outcome data regarding return-to-works statistics. The data issued by the BWC reflected that for credentialed providers and non-credentialed providers both achieved about a 39% return to work rate. If the</p>		<p>BWC certification serves to facilitate clarity with respect to providers designated as being able to perform services for Ohio injured workers within the workers compensation system. Further certification ensures consistency in how providers are held accountable in meeting the workers' compensation rules.</p>	No change needed.

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			<p>BWC is wanting for these providers to have an ethical standard to adhere to, then the BWC could instead implement a set of ethical guidelines that must be followed.</p> <p>Another concern is that there are no national or state recognized certifications for this type of provider (employment specialist). It would seem that the BWC is obligated to provide oversight for this certification and to provide education that these types of providers can access.</p>		<p>Finally, certification bring into play administrative protocols which also protects the rights of providers through the application of Chapter 119 hearings before a provider is terminated from the system.</p> <p>While it is pointed out that the statistical data reflects equal return to work rates for credentialed and non-credentialed providers, such is not the only basis for why BWC strive for consistency in how we manage all Ohio workers' compensation services providers.</p> <p>BWC will work with the provider community to help identify good courses and workshops that will support their continuing education.</p>	
24 x,y	OAC 4123-6-02.2 (C) (16)	Ms. Vicki Williams	I suggest that (16)(a)(ii) should include verbiage that states that these CRCs and CCMs show evidence of Ohio licensure by the Counselor, Social Worker, Marriage and Family Therapist Board show evidence of Ohio licensure and/or Medical Board and/or Nursing Board and/or Ohio Psychologist licensure Board. Also, continuing education units should be approved by the aforementioned Ohio licensure Boards.		BWC follows all state regulations regarding providers providing counseling services to injured workers. All of these counselors must be licensed. The employment service specialists are not providing counseling services.	No change needed.
25 y	OAC 4123-6-02.2 (C) (16)	Tim O'Hara – VECA II, Rehab Placement	My concern with the plans for job search credentialing are WHAT AND WHO	I am opposed to the manner in which BWC is proposing this new	BWC has considered this feedback and has adjusted its position on	BWC will grandfather those employment service specialists who

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		Services, LLC	determines what is acceptable, how long non-credentialed providers will have to obtain the required certifications, and if previous work experiences (grandfather clause) will have any significance or carry any weight. I truly believe the years of experience possessed in this field should play a major role in determining who can and cannot provide these services, as I believe each individual case is different.	policy and not considering individuals who have been doing the work for many years as it is a fact that when BWC required DMC's to have credentialing they grandfathered their own people in who had no education beyond High School. BWC Claims Specialists have these positions with no education or certification beyond High School and are not required to possess certification in Claims Management. Claims Management Supervisors who supervise TEAMS – DMC(s), Medical Specialists and CSS(s) also have these positions without education beyond High School and without credentialing. If you are going to require credentialing in the future, require it for any new Providers requesting to do work with BWC as the guidelines and policies that Job Placement Specialists and Job Developers currently follow are very specific.	<p>grandfathering of these providers. Operational policies for the determination of BWC certification have been developed and will be posted on Ohioabc.com.</p> <p>BWC required all of its DMCs (Disability Management Coordinators) to acquire and maintain one of the identified credentials within a set period of time. BWC did not grandfather these individuals without credentials.</p> <p>BWC Claim Specialist and Claim Specialist supervisors are not required to maintain a professional credential as they do not provide direct care for injured workers.</p> <p>Lastly, without being BWC certified, these providers cannot be held accountable to follow BWC rules.</p>	have provided these services for eighteen (18) months prior to implementation of this rule.
26 y	OAC 4123-6-02.2 (C) (16)	Janice Gruhn, M.Ed., CRC, CDMS, Rehabilitation Counselor	My suggestion is that they be given two years from the date the rule goes into effect to complete the necessary coursework if 80 hours is going to be required. I have 5 years to obtain 80 hours of continuing education.	While I support the idea that these folks need to take some professional courses in job placement, job search strategies, job development, resume development, etc; and also strongly suggest that they take	BWC will work with the provider community to help identify good courses and workshops that will support their continuing education.	BWC will provide a grandfathering provision for providers having no credentials and who has billed in the last 18 months from the effective date of the rule, for the services covered under this section of the rule.

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				some courses in disabilities and their resulting work restrictions, I think more time needs to be given to them to complete this coursework before they must comply with the new rule.		
27 z	OAC 4123-6-02.2 (C) (16)	Debbie Tarr	I also like the Grandfather idea too if the ruling is decided to go with the credentialing too.	My concern is how we provide services to the people we are working with and go to school and get CEU's. The time and cost needs to be weighed.	BWC has considered this feedback and has adjusted its position on grandfathering of these providers.	BWC will grandfather those employment service specialists who have provided these services for eighteen (18) months prior to implementation of this rule.
28 z	OAC 4123-6-02.2 (C) (16)	Roxanne Santell, Job Placement Specialist, Santell Vocational Services LLC	I have been working as a Job Placement Specialist for the past 12 years for Ohio BWC cases. I am very disappointed that the fact that I have a very high RTW rate and an MBA do not seem to carry any value by Ohio BWC. If you want to improve services you would be better off only keeping "employment specialists" who have a certain RTW rate. The proposed credentialing will force me to take time off of work and spend money on a credential that I do not feel is needed. I also think that with a Master's degree and over 12 years of experience and a high RTW rate I would be grandfathered in but so far I don't see any option for this.		BWC values the successful outcomes achieved by providers in the system and will consider provisions in the future that help us to more fully utilize providers with a high return to work rate. The proposed requirements for continuing education are standard for professionals and can be attained in many ways that would not require a provider to take time off of work. BWC has considered this feedback and has adjusted its position on grandfathering of these providers.	BWC will grandfather those employment service specialists who have provided these services for eighteen (18) months prior to implementation of this rule. As well, BWC has reduced the number of hours of education required for new providers from 100 hours to 80.

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29 z	OAC 4123-6-02.2 (C) (16)	Marshall J Karp MA NCC LPC, Career Counselor	<p>Credentials are good as a quality standard.</p> <p>I am an LPC and have been doing the BWC job search and placement work for over 20 years. I do not see LPC in the list of credentials and was wondering if this was some oversight?</p> <p>Also, I was wondering about a "Grandfathering" provision for people like me who have been doing this work for so long?</p>		<p>In our research, the LPC (Licensed Practical Counselor) designation does include course requirements in life-style and career development; and professional, legal and ethical codes. While these are related to the domain areas for employment services, the focus is on career exploration and vocational choice more than on job placement activities.</p> <p>BWC appreciates professionals like you serving injured workers and believes the grandfathering element will allow you to continue providing services.</p>	BWC will grandfather those employment service specialists who have provided these services for eighteen (18) months prior to implementation of this rule.
30 x	OAC 4123-6-02.2 (C) (16)	Gail A. Klier M.Ed., CRC, CCM	I do not understand the reasons behind this proposed change in regard to the purpose and rationale?		BWC certification serves to facilitate clarity with respect to providers designated as being able to perform services for Ohio injured workers within the workers compensation system. Certification brings into play administrative protocols which also protect the rights of providers through the application of Chapter 119 hearings before a provider is terminated from the system.	No change needed.
31 z	OAC 4123-6-02.2 (C) (16)	Ms. Pat Hulec	Reconsider grandfathering in current providers and maintain the need for ongoing continuing education.	<p>Will college transcripts suffice? Non credit coursework? How will this be validated and by whom? How difficult will this process be made</p> <p>Conduct 6 month trials of the</p>	BWC has considered this feedback and has adjusted its position on grandfathering of these providers. Operational policies for the determination of BWC certification have been developed and will be posted on Ohiobwc.com.	BWC will grandfather those employment service specialists who have provided these services for eighteen (18) months prior to implementation of this rule.

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				credentialing process i.e. have current providers submit what would be their credentials to function in the role of JP/JD provider and redo the business impact analysis.	As with all rule and policy changes, BWC will evaluate the impact of this rule on the entire vocational rehab environment.	
32 y	OAC 4123-6-02.2 (C) (16)	Ms. Rebecca Kendrick	<p>CARF accreditation is essentially irrelevant to all of the independent job placement providers.</p> <p>Does it matter through whom, when or where the training courses, seminars, and workshops are completed?</p>	I realize I may or may not be misunderstanding the above; but if understanding correctly, I am not sure the BWC has adequately addressed the concerns presented within and clarification of this certification process.	<p>The staff did perform research on each of the identified credentials and determined that areas of required study within each of those credentials did reflect and exposed professionals to concepts and learning related to services performed by Employment Specialists.</p> <p>CARF has recently incorporated a single provider option for the community employment services, job placement and employment supports accreditation.</p> <p>Operational policies have been developed and will be posted on OhioBWC.com. BWC currently certifies all providers in the system with the exception of these providers of employment services.</p>	No change needed.
33 z	OAC 4123-6-02.2 (C) (16)	Nancy L. Miller, Ph.D. Rhiannon Resources	My first concern is that there appears to be no dialog occurring between BWC and the IARP. Such changes have the capacity to impact the income and career viability of many providers who have functioned effectively within the field without formal credentials.	I believe that much more groundwork needs to occur prior to implementing anything and that there should be some forum for grandfathering individuals in and an established curriculum and training in place, that has a	BWC began dialogue with IARP in March of 2013 and continues this communication. IARP's collective voice is important to BWC as we move forward in improving the vocational rehab system.	BWC will provide a grandfathering provision for providers having no credentials and who has billed in the last 18 months from the effective date of the rule, for the services covered under this section of the rule.

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			<p>I myself have a PhD in Psychology and did career counseling as part of an APA approved internship. Additionally, I essentially did job development, job placement type work, and career counseling with individuals that had medical disabilities, for over 10 years, while on a large hospital's medical staff as a psychologist on a medical rehabilitation unit. Despite this background and experience, there is no place for me according to the credentialing criteria noted.</p>	<p>demonstrated correlation with higher rates of success as an Employment Specialist before anyone is held accountable to these changes.</p> <p>I appreciate the intentions behind this but hate to see an unresearched "shot in the dark" approach to addressing this given it will cost money to implement and the goal of better providers and higher RTW rates has not been empirically demonstrated with this. In the medical field, intervention protocols are not implemented without substantial research across time as there are financial and human consequences to this. I think this would be well heeded here as well.</p>	<p>As a provider with a PhD in psychology who has provided employment services as listed in this proposed rule, you would be able to be grandfathered in as a certified employment services provider.</p> <p>BWC has researched best practices and protocols for the delivery of these employment services as well as studied many possible minimum qualification or credential options for providers of these services.</p> <p>We looked at return to work outcomes for providers with a variety of credentials and those without. While the statistical data reflected equal return to work rates for credentialed and non-credentialed providers, such is not the only basis for why BWC strives for consistency in how we manage all Ohio workers' compensation services providers.</p>	
34 y,z	OAC 4123-6-02.2 (C) (16)	K. M. Eakin, M.Ed., CRC, CCM, LPC	<p>As a vocational rehabilitation professional and BWC provider, I strongly object to the proposed credentialing rule for Employment Specialists. The rule exempts CARF organizations, thus unfairly favoring one group of providers over another. While exempting CARF</p>		<p>BWC has reconsidered the position on grandfathering of current providers.</p> <p>CARF accreditation is included as an option for certification. CARF does allow accreditation of individual providers at this time.</p>	<p>BWC will provide a grandfathering provision for providers having no credentials and who has billed in the last 18 months from the effective date of the rule, for the services covered under this section of the rule.</p>

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			<p>providers seems understandable, same consideration should be afforded to the individual proprietors via grandfathering procedures.</p> <p>In summary, this proposed rule is extremely unfriendly to Ohio small business owners.</p>		<p>The Governor’s Common Sense Initiative, while having the goal of ensuring that regulation is not unnecessarily burdensome for businesses; such is balanced against the goal of protecting the public. Requiring a certification or license to show skill competencies is standard practice in virtually every industry, and facilitates meeting the objective of ensuring access to quality care for Ohio’s injured workers. It is necessary for BWC to have minimum criteria for providers to participate in the HPP in order to ensure the health and well-being of injured workers. Recognizing there may be differences in the provider community, the regulation does provide flexibility in the manner in which a provider or entity can meet the credentialing requirements of the rule.</p>	
35z	OAC 4123-6-02.2 (C) (16)	Mrs. Cathy Tippenhauer	<p>May I suggest allowing grandfathering of those individuals providing services for 5 years or more?</p>	<p>Since case managers are responsible for selecting job placement providers logic would dictate they would choose those who are both qualified and successful in the field.</p> <p>I agree with the basics of the proposal with the exception of the lack of a grandfather clause. I believe grandfathering those</p>	<p>BWC has reconsidered the position on grandfathering of current providers.</p>	<p>BWC will provide a grandfathering provision for providers having no credentials and who has billed in the last 18 months from the effective date of the rule, for the services covered under this section of the rule.</p>

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				seasoned providers will allow us to continue working to assist the IW find employment		
36 z	OAC 4123-6-02.2 (C) (16)	Philip Fulton, Ohio Association of Claimant's Council	<p>Credentialing rule has no rationale other than bureaucratic maneuvering.</p> <p>Grandfather providers.</p>		<p>BWC certification serves to facilitate clarity with respect to providers designated as being able to perform services for Ohio injured workers within the workers compensation system. Further certification ensures consistency in how providers are held accountable in meeting the workers' compensation rules.</p> <p>Finally, certification bring into play administrative protocols which also protects the rights of providers through the application of Chapter 119 hearings before a provider is terminated from the system.</p>	<p>BWC will provide a grandfathering provision for providers having no credentials and who has billed in the last 18 months from the effective date of the rule, for the services covered under this section of the rule.</p>
37 z	OAC 4123-6-02.2 (C) (16)	Mr. Steve Gray	<p>Existing JPS providers should be grandfathered in, without exception.</p> <p>There should be a BWC database with all JPS providers email addresses. One group email could be used to present all information to us in a timely manner.</p>		<p>BWC has reconsidered the position on grandfathering of current providers.</p> <p>BWC will continue to work toward building a list-serve of JPS providers and at that time will use it for communication beyond associations and the email groupings we use today.</p>	<p>BWC will provide a grandfathering provision for providers having no credentials and who has billed in the last 18 months from the effective date of the rule, for the services covered under this section of the rule.</p>
38 z	OAC 4123-6-02.2 (C) (16)	Ms. Susan Oancea	<p>1) Grandfather in current non-credentialed providers. Once everyone is credentialed the BWC has processes in place to de-certify providers. Use that process if necessary to eliminate providers.</p> <p>2) Ensure that the de-certification process</p>	<p>The BWC rule will require JPS/JD to maintain malpractice and liability insurance. BWC's new rule also indicates documentation of the provider's malpractice history for the previous 5 years is necessary. Since we don't currently maintain</p>	<p>1) BWC has reconsidered the position on grandfathering of current providers.</p> <p>2) Provider compliance rule outlined in OAC 4123-6—02.7</p> <p>3) 4) 5) BWC will work with the provider community to help</p>	<p>BWC will provide a grandfathering provision for providers having no credentials and who has billed in the last 18 months from the effective date of the rule, for the services covered under this section of the rule.</p>

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			<p>is clearly outlined to the individuals providing the service.</p> <p>3) Require continuing education classes (BWC has proposed this as well.)</p> <p>4) Identify what classes are acceptable; classes that have practical application back to the jobs that we do. Include ethics classes.</p> <p>5) Ensure that there is more than one acceptable path to obtain CEU's. For example, IARP Ohio has 2 workshops a year and CEU's could be obtained for job placement. However, more avenues need to be available. Online classes should be acceptable as well.</p> <p>6) Improve communication. BWC needs to communicate better with job placement providers.</p> <p>7) BWC stated they spoke with stakeholders about this new rule. While it may be true that they spoke with certain organizations and MCO's they did not actively involve independent providers. And they did not involve the key players at the beginning of this process.</p>	<p>malpractice insurance we would not be able to provide 5 years history.</p>	<p>identify good courses and workshops that will support their continuing education.</p> <p>6) BWC will continue to build a list serve of employment services providers.</p> <p>7) BWC actively collaborates with the vocational rehabilitation associations. BWC does not necessarily reach out to each individual service provider when changing rules or policy. Stakeholders were brought in at the very inception of the idea of requiring minimum standards for employment service providers. In 2006.</p> <p>BWC rules allow for BWC to determine if and at what level malpractice insurance is required. In addition, the 5 year history would simply show whether a provider has been convicted of malpractice.</p>	
39 x,y,z	OAC 4123-6-02.2 (C) (16)	Mrs. Diana Hardbarger MA, CRC, Working Concepts	<p>I do not think credentialing is necessary however, with this information in mind, there have been no mention of grandfathering experienced JPSs based on their college degree or years providing this service.</p> <p>I have nothing against training or CEUs as I am accustomed to the process and feel that ongoing education keeps one's</p>	<p>If one does not yield a good RTW rate, they do not get more business.</p> <p>The list of credentials includes CCM. I would like to see where certified case managers have received their vocational training. According to the Dictionary of Occupational Titles, a job</p>	<p>Under the educational domain areas for a CCM (Certified Case Manager) is "rehabilitation", under which is listed job placement and development and accounts for 5% of the questions on the certification examination. BWC has considered this feedback and has adjusted its position on grandfathering of these providers.</p>	<p>BWC will grandfather those employment service specialists who have provided these services for eighteen (18) months prior to implementation of this rule</p>

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			practice fresh.	developer has a vocational training of 5 which equates to training of 6-12 months. Therefore, a Job Placement Specialist that has been doing this for longer than a year or holds a degree in a related field supersedes this benchmark.		
40y	OAC 4123-6-02.2 (C) (16)	Brett Salkin, LPC, CRC, CDMS, CCM, NCC Vocational Rehabilitation Counselor	<ol style="list-style-type: none"> 1. Create an independent task force to study employment specialist's efficacy factors for RTW's. 2. Consult experts in the field - Ohio Chapter of International Association of Rehab Professionals, National Rehabilitation Association and Ohio Rehabilitation Association Job Placement Division. 3. Conduct a literature search for research conducted on positive outcome placement factors. 4. Consider effective means of early referral for services, a well established RTW outcome factor that would call for further streamlining the injury claim process for Ohio's injured workers. 	<p>I oppose these policy and rule changes about credentialing employment specialists.</p> <ol style="list-style-type: none"> A. The proposed standards are contrary to provider data about job placement services RTW's. B. It is therefore not in the interest of Ohio injured worker voc rehab services benefit. C. Proposed added credentials have little to do with core competencies for employment staffers. D. Further certification criteria are a financial and time burden on job placement and development providers. 	<ol style="list-style-type: none"> 1. A workgroup comprised of provider stakeholders was convened in 2006 -2007 and best practices in employment services was researched and outlined. 2. Input was sought from appropriate professional associations. 3. Research of professional literature on the subject was conducted. 4. BWC will continue to seek better ways to achieve early vocational referrals and streamline the claim process. A. While RTW rates for credentialed and non-credentialed providers were similar, the real issue is being a "certified" BWC provider. B. Becoming a BWC certified provider will hold providers accountable to follow BWC rules which are in the best interest of injured workers. C. Core competencies of each credential or accreditation recommended were researched and fit within the employment services study domains. D. The proposed requirements for 	No change needed.

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					<p>continuing education are standard for professionals and can be attained in many ways that would not require a provider to take time off of work.</p>	
41 x,y	OAC 4123-6-02.2 (C) (16)	Mr. Michael Latkovich, Vocational Guidance Services	<p>This rule provides an answer to something that is not a problem. It places an unnecessary financial burden on provider agencies.</p>	<p>The proposed training requirement on staff represents a significant percentage of an individual's available work time over one year.</p>	<p>BWC certification serves to facilitate clarity with respect to providers designated as being able to perform services for Ohio injured workers within the workers compensation system. Certification brings into play administrative protocols which also protect the rights of providers through the application of Chapter 119 hearings before a provider is terminated from the system.</p> <p>The proposed requirements for continuing education are standard for professionals and can be attained in many ways that would not require a provider to take time off of work.</p>	No change needed.