APPENDIX 610 HEALTH CARE NEEDS ASSESSMENT

Purpose

To provide additional information and guidance on the health care needs assessment process currently outlined in PRH Chapter 1, Section 1.4, R3.

Background

Based on a review of previous applications, Job Corps has learned that the majority of applicants' treatment and/or monitoring needs can be met, but there may be situations in which a particular applicant's needs are beyond what the Job Corps' health and wellness program can provide as defined as basic health care in Exhibit 6-4: Job Corps Basic Health Care Responsibilities. Current disability data indicate that the majority of our applicants with medical, mental health, oral health, and substance abuse conditions have stable health and require only routine and episodic health care interventions with accommodations. However, a small percentage of applicants may have complex, newly diagnosed, persistent or recurring medical, mental health, oral health, and/or substance abuse health care issues that require services and/or care management beyond Job Corps' basic health care as determined Job Corps health and wellness staff.

This document provides guidance to Job Corps health and wellness staff on how to determine whether Job Corps can meet the medical, mental health, oral health, and/or substance abuse treatment/monitoring needs of a particular applicant.

This determination is derived in part by a review of the "Job Corps Health Questionnaire (ETA 653)."

The "Job Corps Health Questionnaire (ETA 653)" serves three main purposes:

- 1. Determine the health care needs of the applicant and assist in the assessment of whether Job Corps can meet those needs
- 2. Alert center staff to the potential need for evaluation of direct threat to self or others
- 3. Obtain consent for required routine medical assessments and/or consent to receive basic health care services

If the individual is a person with a disability, the center's reasonable accommodation committee (RAC) must convene and consider accommodations and/or modifications that the individual may need. Before making a recommendation about the applicant's enrollment, the qualified licensed professional who conducted the original assessment must review the previous findings giving consideration to the identified accommodations to determine whether or not the accommodations and/or modifications can remove the barriers to enrollment due to health care needs.

Instructions

The attached form may be used to conduct an individualized assessment of an applicant's health care needs.

Who May Conduct the Assessment?

The clinical assessment of health care needs caused by the individual's medical condition or disability fall under the health and wellness department on each center. As such, these clinical assessments are to be carried out by qualified licensed/certified health providers only. Those providers employed or subcontracted by Job Corps include nurses, physicians, center mental health consultants (CMHCs), dentists, and Trainee Employee Assistance Program (TEAP) specialists. This group, therefore, has a significant role to play in determining whether, in a given Job Corps setting, a particular individual's health care needs can be managed within the scope of Job Corps basic health services. Medical health conditions should be assessed by nurses and/or physicians; mental health conditions should be assessed by mental health consultants; oral health conditions should be assessed by dentists; and conditions related to substance use should be assessed by TEAP specialists. In some cases, it may be necessary to consult an outside specialist with expertise in the particular medical condition or disability and its effects.

Indicators that a review is needed

- 1. Within the past six months, two or more emergency room visits or one or more hospitalizations for medical, mental health, oral health, and/or substance abuse reasons.
- 2. New diagnosis or recurrence of medical, mental health, extensive untreated oral health, and/or substance abuse condition that would require frequent medication adjustments, significant health resources and/or substantial change to the training day (e.g., daily dialysis, only able to attend Job Corps 3 hours per day, hourly medication or behavioral monitoring, daily assistance with activities of daily living, long-term weekly on-center therapy provided by the CMHC, complex full-mouth reconstruction/rehabilitation).
- 3. Failure to follow previous treatment recommendations by licensed health providers that have adversely affected the applicant's health, behavior, and/or adaptive functioning, and now requires significant health care management. (Note: Some students are non-adherent and experience adverse consequences, but may still benefit from enrollment. Examples might include substance abuse relapse, poor diabetic control, poor asthma control, etc.)
- 4. Applicant has followed treatment recommendations by licensed health providers with no improvement in applicant's health, behavior, and/or adaptive functioning which continue to place applicant in need of significant health care management.
- 5. Applicant's condition or behavior has not been successfully managed in a similar academic, work, or group environment in the past year.

6. Applicant is in treatment for a condition that is not in the scope of Job Corps Basic Health Care Responsibilities (e.g., orthodontic braces for malocclusion).

Elements of the Review Process

The review should, at a minimum, be comprised of the following elements:

- 1. A review of specific condition(s) identified on "Job Corps Health Questionnaire (ETA 6-53)," or self-disclosed by applicant.
- 2. Review of health documentation in the file.
- 3. Request additional recent health information, to determine applicant needs, if appropriate and medically necessary. Collaborate with OA counselor.
 - If the "Job Corps Health Questionnaire (ETA 6-53)" indicates a health condition and there is no supporting information included and no note from the OA counselor indicating their attempt to secure information, contact the OA counselor to gather information.
 - If the "Job Corps Health Questionnaire (ETA 6-53)" indicates a health condition and there is supporting information or a note from the OA counselor indicating they could not secure the information and the center wants additional information, the center will need to request that information from the applicant, provider, or facility.
 - If a center wants additional tests or evaluations from the applicant and this information is necessary to make an enrollment decision, the center may request the applicant obtain these if they have insurance and/or access to a facility that can provide the testing or evaluations at a rate the applicant can afford. The center will need to work with the applicant and OA counselor to identify specific resources. If applicant cannot afford to obtain additional tests or evaluations, or has not provided the additional health information requested within a reasonable amount of time, the center must make their best recommendation based on the information available.
 - In cases where a minor is involved, the center should collaborate with the OA counselor to get parent/guardian permission for health information.
- 4. Documented communication with treating provider, if possible and required if there are conflicting recommendations between the center health consultant and the treating provider. If unable to contact treating provider, all attempts need to be clearly documented. This should be included on Appendix 610 Form.
- 5. Interview with the applicant, either face to face, videoconferencing, or via telephone. Documentation of the interview process should be included on Appendix 610 Form. If

- unable to contact applicant, all attempts need to be clearly documented including collaboration with OA counselor.
- 6. Identification of the functional limitations (specific symptoms/behaviors) and health care needs of the applicant that are barriers to enrollment.
- 7. If condition rises to a level of a disability, then refer to the RAC for consideration of accommodations and/or modifications for discussion with applicant. **See Appendix 605 for definition of a disability.**
- 8. Consider if accommodations and/or modifications would remove the barriers to enrollment and make condition manageable at Job Corps as defined by basic health services in Exhibit 6-4.

<u>Decision Tree</u> (based on file review, treating provider information, if available, interview with applicant, and reasonable accommodations, if appropriate)

- 1. Health care needs manageable at Job Corps as defined by basic health care services in Exhibit 6-4, but require community support services which are not available near center. Documentation of efforts to arrange for less frequent treatment in home state and/or to secure community support near center included on the health care needs assessment in section 7. (i.e., name of organizations/facilities and specific individual contacted). Applicant should be considered for center closer to home where health support and insurance coverage is available. File is forwarded to Regional Office for final determination.
 - If community support is not available near requested center, the center shall do the following:
 - Ocontact the treating provider and discuss applicant's needs to see if less frequent treatment or monitoring can be arranged. For example, instead of monthly sessions with the psychiatrist, can it be every 3 months and allow applicant to go home and receive follow-up.
 - o If center is unable to make arrangements, applicant may be considered for center closer to home where health support and insurance coverage is available. Documentation of efforts to arrange for less frequent treatment in home state and to secure community support near requested center should be included in section 7 of the health care needs assessment. (i.e., name of organizations/facilities and specific individual contacted). File is forwarded to Regional Office for final determination.
 - For applicants being considered for any center who wear orthodontic braces, applicant furnishes proof of suitable period of compliance with current treatment plan; a treatment plan is in place for continued care; a signed agreement that the cost of continued treatment and transportation related to treatment will be borne

by the student, parent, or legal guardian; and a signed agreement that he/she will remain compliant with the care plan and schedule appointments such that he/she will not exceed authorized leave limits for elective treatment.

2. Health care needs exceed basic health care as defined in Exhibit 6-4.

Applicant has health condition with current symptoms at a level that will interfere
with successful participation in the program at this time. Deny entry and refer to
other appropriate program/provider. File forwarded to Regional Office for final
decision.

Accommodations or Modifications

If the individual is a person with a disability, the center's RAC must convene and consider accommodations and/or modifications that the individual may need. In considering accommodations related to the symptoms and behaviors that are presenting the barriers to enrollment, the RAC may only need to be comprised of the center clinician and a Disability Coordinator and the accommodations could be discussed during the same phone call as the one in which the clinical assessment is being performed.

Once the accommodations and/or modifications have been identified, the qualified licensed professional who conducted the original assessment must review the previous findings giving consideration to the identified accommodations to determine whether or not the accommodations and/or modifications can remove the barriers to enrollment due to health care needs.

Center Director Reasonableness Determination

If there is a recommendation for an applicant to be enrolled with accommodations or modifications which you believe are not reasonable and/or pose an undue hardship, the Center Director is responsible for making that determination using the "Accommodation Recommendation of Denial Form" found on the Job Corps Disability website and including that form along with the applicant file that is being submitted to the Regional Office with a recommendation for denial. The final determination is made by the Regional Office.

Guidance on how to make this determination is available in the "Evaluating a Request and Denying a Request" sections of the Appendix 605. Please attach the completed "Accommodation Recommendation of Denial Form."

FORM FOR INDIVIDUALIZED HEALTH CARE NEEDS ASSESSMENT

Applicant's Name: Center Name:			Date of Review: ID #:		
wh	at the	Job Corps' health	and wellness progran	n can provide as de	named individual's health care needs are beyond efined as basic health care in Exhibit 6-4: Job and respond accordingly.
the the vie	ir con barriew, a p	ndition rises to a lever to enrollment and	el of a disability, con d list any suggested a dation or modificatio	sider whether any accommodations or	Job Corps basic health care responsibilities and accommodations or modifications would remove r modifications. Do not consider whether, in your That determination must be made by the center
		at factors triggere	ed review of the individual's file for a health care needs assessment?		
		Within the past si			m visits or one or more hospitalizations for use reasons.
		abuse condition the substantial change hourly medication	nat would require free to the training day (n or behavioral monit	quent medication a (e.g., daily dialysis coring; daily assista	extensive untreated oral health, and/or substance adjustments, significant health resources and/or s; only able to attend Job Corps 3 hours per day; ance with activities of daily living; long-term lex full-mouth reconstruction/rehabilitation).
		affected the applicate management	cant's health, behavion. (Note: Some student enrollment. Example	or, and/or adaptive nts are non-adhere	y licensed health providers that have adversely functioning, and now requires significant health and experience adverse consequences but may abstance abuse relapse, poor diabetic control, poor
		applicant's health			icensed health providers with no improvement in , which continue to place applicant in need of
			tion or behavior has	not been successfu	ally managed in a similar academic, work, or
			eatment for a condition		e scope of Job Corps Basic Health Care on).
2. What is the applicant's history and present functioning to support statemen (Include information from ETA 653, file review, Chronic Care Management Plan interview with applicant.)					
	ETA 653:				
Applicant File Review Summary:			Summary:		

	CCMP Provider Form: Does provider recommend applicant to enter Job Corps? Yes No If conflicting recommendation with treating provider, please indicate effort to contact treating provider for discussion in addition to summary of information on the CCMP.					
	App	licant Interview Summary:				
3.		What are the functional limitations (specific symptoms/behaviors) of the applicant that are barriers to enrollment at this time?				
		Difficulty with social behavior, including impairment in social cues and judgment	☐ Difficulty with concentration			
	П	Avoidance of group situations and settings	☐ Difficulty with sleep patterns			
		Difficulty managing stress	☐ Difficulty with stamina			
		Difficulty regulating emotions	Difficulty with self-care			
		Difficulty with communication	☐ Difficulty handling change			
		Impaired decision making/problem solving	☐ Organizational difficulties			
		Uncontrolled symptoms/behaviors that interfere with functioning	☐ Interpersonal difficulties with authority figures and/or peers			
		Sensory impairments	☐ Difficulty coping with panic attacks			
		Difficulty with memory	Other (specify)			
		te: This list is not all inclusive. These are suggestion nmodations beyond this list.	ns for your use and you may need to consider functional limitations			
4. What are the health-care management needs of the applicant that are barriers to enrollment			he applicant that are barriers to enrollment at this time?			
		Frequency and length of treatment	☐ Severe medication side effects			
		Hourly monitoring required	☐ Medical needs requiring specialized treatment			
		Therapeutic milieu required	☐ Complex full mouth reconstruction/rehabilitation			
		Complex behavior management system beyond Job Corps current system	Out of state insurance impacting access to required and necessary health care			
		Daily assistance with activities of daily living	Other (specify)			
	Brie	f Narrative:				
5.	Reas	sonable Accommodation Consideration				
	(i.e.,		Yes No stance-abuse, cognitive, or other type of disability is sus (i.e., blind, deaf). If no, please skip to Question #6.			

☐ Yes

If yes, convene the reasonable accommodation committee (RAC) along with the applicant and list below any accommodations and/ or modifications <u>discussed with the applicant</u> that could either remove or reduce the barriers to enrollment as documented in Question #4 above.

Note: Accommodations or modifications are not things that treat the impairment; they are things that will help the individual participate in the program. See Program Instruction 08-26 "Reasonable Accommodation and Case Management" for guidance.

Check one of the two options below.						
The RAC has been unable to identify any accommodations appropriate to support this applicant.						
The following accommodations/modifications listed below have been discussed v considered as a part of this assessment:	The following accommodations/modifications listed below have been discussed with the applicant and considered as a part of this assessment:					
Please avoid suggesting extreme accommodations already known to likely be unreasona has requested a specific support (i.e., 24 hour supervision). If unsure if a support or mo accommodation or is actually a case management support, please contact your regional consultants for assistance.	dification is r	eally an				
Based on functional limitation(s) checked in Section 3, please check the appropriate below discussed with the applicant. Please note: This list is not all inclusive. These your use and you may need to consider functional limitations and accommodations beyo be entered in the "Other" section.	are suggestio	ns for				
Difficulty with social behavior, including impairment in social cues and judgment						
Assign mentor to reinforce appropriate social skills	Yes	☐ No				
Allow daily pass to identified area to cool down	Yes	☐ No				
Provide concrete examples of accepted behaviors and teach staff to intervene early to shape positive behaviors	☐ Yes	☐ No				
Adjust communication methods to meet students' needs	☐ Yes	☐ No				
Avoidance of group situations and settings						
Allow student to arrive 5 minutes late for classes and leave 5 minutes early	☐ Yes	☐ No				
Excuse student from student assemblies and group activities	Yes	☐ No				
Identify quiet area for student to eat meals in or near cafeteria	Yes	☐ No				
Difficulty managing stress						
Allow breaks as needed to practice stress reduction techniques	☐ Yes	☐ No				
Modify education/work schedule as needed	Yes	☐ No				
Identify support person on center and allow student to reach out to person as needed	Yes	☐ No				
Difficulty regulating emotions						
Allow breaks as needed to cool down	☐ Yes	☐ No				
Allow flexible schedule to attend counseling and/or emotion regulation support group	Yes	☐ No				
Teach staff to support student in using emotion regulation strategies	Yes	☐ No				
Provide peer mentor/support staff	Yes	☐ No				
Difficulty with communication						
Allow student alternative form of communication (e.g. written in lieu of verbal)	☐ Yes	☐ No				
Provide advance notice if student must present to group and opportunity to practice or alternative option (e.g. present to teacher only)	Yes	☐ No				
Impaired decision making/problem solving						

Utilize peer staff mentor to assist with problem solving/decision making

Provide picture diagrams of problem solving techniques (e.g., flow charts, social stories)	☐ Yes	☐ No
Uncontrolled symptoms/behaviors that interfere with functioning		
Alter training day to allow for treatment	☐ Yes	☐ No
Allow passes for health and wellness center outside of open hours to monitor symptoms	☐ Yes	☐ No
Reduce tasks and activities during CPP to not aggravate symptoms/behaviors	☐ Yes	☐ No
Sensory impairments		
Modify learning/work environment to assist with sensitivities to sound, sight, and smells	Yes	☐ No
Allow student breaks as needed	☐ Yes	☐ No
Difficulty with memory		
Provide written instructions	Yes Yes	☐ No
Allow additional training time for new tasks and hands-on learning opportunities	☐ Yes	☐ No
Offer training refreshers	☐ Yes	☐ No
Use flow-charts to indicate steps to complete task	☐ Yes	☐ No
Provide verbal or pictorial cues	☐ Yes	☐ No
Difficulty with concentration		
Allow use of noise canceling headset	☐ Yes	☐ No
Reduce distractions in learning/work environment	☐ Yes	☐ No
Provide student with space enclosure (cubicle walls)	☐ Yes	☐ No
Difficulty with sleep patterns		
Allow for a flexible start time	☐ Yes	☐ No
Provide more frequent breaks	☐ Yes	☐ No
Provide peer/dorm coach to assist with sleep routine/hygiene	☐ Yes	☐ No
Increase natural lighting/full spectrum light	☐ Yes	☐ No
Difficulty with stamina		
Allow more frequent or longer breaks	Yes Yes	☐ No
Allow flexible scheduling	☐ Yes	☐ No
Provide additional time to learn new skills	☐ Yes	☐ No
Difficulty with self-care		
Provide environmental cues to prompt self-care	Yes Yes	☐ No
Assign staff/peer mentor to provide support	Yes Yes	☐ No
Allow flexible scheduling to attend counseling/supportive appointments	Yes Yes	☐ No
Difficulty handling change		
Provide regular meeting with counselor to discuss upcoming changes and coping	Yes Yes	☐ No
Maintain open communication between student and new and old counselors and teachers	Yes Yes	☐ No
Recognize change in environment/staff may be difficult and provide additional support	Yes	☐ No
Difficulty with organization		
Use staff/peer coach to teach/reinforce organizational skills	Yes	☐ No
Use weekly chart to identify and prioritize daily tasks	Yes Yes	☐ No
Interpersonal difficulties with authority figures and/or peers		
Encourage student to take a break when angry	Yes	☐ No
Provide flexible schedule to attend counseling and/or therapy group	Yes Yes	☐ No
Provide peer mentor for support and role modeling	Yes Yes	☐ No
Develop strategies to cope with problems before they arise	Yes Yes	☐ No
Provide clear, concrete descriptions of expectations and consequences	Yes Yes	☐ No
Allow student to designate staff member to check in with for support when overwhelmed	Yes Yes	☐ No

Difficulty	coping wit	h panic attacks			
Allow student to designate a place to go when anxiety increases in order to practice relaxation techniques or contact supportive person				Yes Yes	☐ No
Provide flexible schedule to attend counseling and/or anxiety reduction group					☐ No
Allow student to select most comfortable area for them to work within the classroom trade site				Yes Yes	☐ No
Provide peer mentor to shore up support				Yes Yes	☐ No
Other					
Summariz	ze any spec	ial considerations and findings of the R	AC as well as the appli	cant's input:	
or agree to determinat	a specific ion of when	ps cannot impose accommodations upon accommodation, there is no need to consi her the accommodations listed will reduccomplete a reasonableness review related	der that specific accomn e the barriers to enrollm	nodation in yo ent sufficientl	our
Reasonab	le Accomm	odation Considerations:			
Yes No Did the applicant participate in the RAC meeting? (Note: The applicant must be a par of the discussion for reasonable accommodation).				be a part	
RAC Part	icipants:				
Name:			Position:		
Name:			Position:		
Name:			Position:		
			+ + + + + + + + + + + + + + + + + + + +		
		adation for an applicant to be enrolled with			

If there is a recommendation for an applicant to be enrolled with the accommodations or modifications listed in Question #5 above which you believe are not reasonable and/or pose an undue hardship, the **Center Director is responsible for making that determination** using the "Accommodation Recommendation of Denial Form" found on the Job Corps Disability website and including that form along with the applicant file that is being submitted to the regional office with a recommendation for denial. The final determination is made by the regional office.

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If there are agreed upon accommodations between the RAC and applicant listed in Question # 5 then consider whether those accommodations reduce the barriers to enrollment sufficiently to allow for the applicant to be enrolled.

• If the accommodations would sufficiently reduce the barriers to enrollment, then you do not need to complete the remainder of this assessment and the center can assign the applicant a start date. Retain all the paperwork included in completing this assessment within the applicant's Student Health Record.

		proceed to Question #0.	
6.	Based on your review of the applicant's health care needs above, does the named individual have health care needs beyond what the Job Corps' health and wellness program can provide as defined as base health care in Exhibit 6-4: Job Corps Basic Health Care Responsibilities? [Please mark one below.]		
		In my professional judgment, health care needs are manage care services in Exhibit 6-4, but require community support Documentation of efforts to arrange for less frequent treatm support near center can be found in Question #7 below. Ap to home where health support and insurance coverage is ava for final determination.	services which are not available near center. ent in home state and/or to secure community plicant should be considered for center closer
		In my professional judgment, health care needs are not man health care services in Exhibit 6-4. Applicant has health co will interfere with successful participation in the program a appropriate program/provider. File is forwarded to Region	ndition with current symptoms at a level that this time. Deny entry and refer to other
7.	and	ecommending a different center, document efforts to arra /or secure community support near center in the space be anizations/facilities and specific individuals contacted and	low. (Include name of
Pri	nted	or Typed Name and Title of Licensed Health Provider Co	ompleting Form
Sig	natur	re of Licensed Health Provider Completing Form	Date

If the accommodations would NOT sufficiently reduce the barriers to enrollment for your center, please