

HireAbility (HA) Vermont **Policy** and Procedures Manual

Process for Revisions and Updates for State Rehabilitation Council (SRC) Policy and Procedures Sub-Committee

This is a brief guide for SRC members about the process for revising the HA Policy and Procedures Manual.

Step 1. Decision to Review

HA management or the SRC can decide to review any chapter at any time. The SRC reviews chapters on a schedule to help ensure that policies and procedures are always up to date. HA and the SRC may need revise chapters off schedule for any of the following reasons:

- Federal law and regulations change.
- The HA management and field staff identify the need for new or improved guidance.
- Federal audit findings that require new or updated policy

Step 2. Drafting an Updated or New Chapters

For chapters that only need minor edits, HA staff will make the changes in consultation with the SRC. These can often be completed within an SRC P&P meeting. For **more** complex rewrites (in response to audits, or for service improvement) it might be necessary to form a small team or a dedicated individual. In some circumstances we may seek guidance from the Vocational Rehabilitation Technical Assistance Center (VR-TAC) Drafts will be brought back to the SRC P&P committee for final review and a vote in support or against the proposed changes.

Step 3. Review by the Rehabilitation Services Administration (RSA)

Though not required in law and regulation RSA has asked HA to share drafts before they go out for public comment. In some cases, RSA will provide extensive comments and/or identify areas where they consider the draft out of compliance with regulations. This may require going back to Step 2 for further drafting and review.

Step 4. Public Comment

HA is required to seek public comment on any substantial policy changes. If a chapter revision only includes inconsequential changes public comment is not needed. HA must follow the DAIL requirements for public comment which include:

- Posting the request for comment on the HA and **DAIL** websites
- Announcing the opportunity for public comment in statewide news outlets
- Posting on the State Library electronic notice boards

- An open public meeting

If HA does not receive any public comment, it can move on to publishing the new chapter (this is what happens most of the time). If HA receives public comment but determines that feedback does not warrant further review, HA can move on and publish the chapter. If HA determines the public comment warrants further review of the chapter, we will go back to Step 2.