

**Department of Veterans Affairs
Veterans Health Administration
Washington, DC 20420**

**Transmittal Sheet
November 23, 2010**

**READJUSTMENT COUNSELING SERVICE
GUIDELINES AND INSTRUCTIONS
FOR CONTRACT FOR FEE PROGRAM**

- 1. REASON FOR ISSUE.** These Guidelines and Instructions for Vet Center Contract for Fee Program provide additional information regarding Veterans Health Administration (VHA) Handbook 1500.01 which establishes procedures for the Department of Veterans Affairs (VA) Readjustment Counseling Service.
- 2. MAJOR CHANGES.** This Handbook provides guidance for the administration of the Readjustment Counseling Services.
- 3. RELATED ISSUES.** VHA Directive 1500, VHA Handbook 1500.01.
- 4. RESPONSIBLE OFFICE.** The Chief Officer, Readjustment Counseling Services (15) is responsible for the contents of this Handbook. Questions may be referred to (202) 461-6525.
- 5. RESCISSIONS.** VHA Manual M-12 Parts I and II are rescinded.

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DISTRIBUTION: All RCS Regional Offices (10B/RC1A-4B)
All RCS Vet Centers



READJUSTMENT COUNSELING
SERVICE

Guidelines and Instructions for Contract for Fee Program

1. SOLICITATION AND AWARD OF CONTRACTS

a. Determination of Need

(1) The determination of need for a readjustment counseling contract program is made by RCS Vet Center program officials. The primary criterion for consideration is the level of unmet need among the eligible Veteran population in a particular area where existing Vet Centers are not capable of furnishing needed services due to geographical distances.

(2) The RCS Regional Manager or designee must approve a proposed requirement for a contract in an area within 50 miles of an existing Vet Center.

b. Solicitation for Proposals. Contracting with private sector providers is under the authority of the Contracting Officer (CO) at the VA medical center. The Contracting Officer has full responsibility for soliciting and receiving offers resulting from the applicable solicitation. The minimum requirements used will be set forth in an electronic performance based statement of work (PBSW). Requirements shall address: Nature of services required, timeframe for providing the services, location and frequency of services, as well as any special requirements. (PBSWs are to be structured around the results to be achieved as opposed to the manner to which the work is to be performed).

c. Designation of the COTR. Vet Center Team Leaders with responsibility for managing contract programs will be designated by and function as the VA Contracting Officers Technical Representative (COTR). The Vet Center COTR has responsibility for first echelon oversight of contract program clinical and administrative operations.

d. Award of Contract.

(1) Upon determination by the Contracting Officer that a contract will be awarded, a post award conference will be conducted at the before the contractor commences performance of the required tasks.

(a) This post award conference shall be conducted by the CO and the Team Leader COTR.

(b) The purpose of the post award conference is to discuss the roles and responsibilities of the Team Leader functioning as the COTR.

(2) RCS contracts shall be awarded for an initial 12-month period, with an option for 2 additional 1-year renewals.

- (3) RCS contract providers are strictly prohibited from engaging in community access services such as outreach, education or any other community-based professional activities designed to solicit Veteran clients. The solicitation shall address this issue in detail.
- (4) Contract program readjustment counseling services should be provided by licensed clinical social workers, psychologists, psychiatrists, psychiatric clinical nurse specialists, or other master's level licensed professional counselors from related disciplines. All providers identified on the contract must hold a valid state license. The solicitation shall address this issue in detail.
- (5) VA contractors providing readjustment counseling shall have the capability through referral to arrange for emergency medical backup services as clinically indicated for the care of the Veteran's readjustment problems, i.e., for example as may pertain to crises response. However, medical health care services are not part of readjustment counseling per se, and RCS contract providers are prohibited from billing for such services provided to Veteran referrals. The solicitation shall address this issue in detail.
- (6) Every RCS contractor shall have at least one qualified VHA mental health professional (clinical social worker, clinical psychologist, psychiatric clinical nurse specialist, or psychiatrist) designated as a key personnel in the contract with replacement subject to VA approval.

e. **Contractor Orientation Meeting.**

- (1) A post-award orientation shall be given to all new service providers. The orientation team should include the Contracting Officer, the Team Leader COTR and other VA officials as designated by the Contracting Officer.
- (2) All contract related administrative and clinical responsibilities and duties should be reviewed in the orientation.
- (3) Contractors shall be advised that Contracting Officers, acting within the scope of the contract and their duties and responsibilities, and, after advice and consultation from the COTR, have the sole authority to make changes to the contract, including quantities, fees, and other service delivery terms and conditions.
- (4) The orientation shall take place prior to the referral of Veterans to the new contract provider.

- g. **Contract Renewal Option.** The RCS, in collaboration with the Contracting Officer, shall maintain responsibility for ongoing assessment and determination of the need for readjustment counseling contracts programs.
- (1) The COTR remains responsible for advising Contracting Officers regarding the continuing need for contract services with particular attention to contract renewals, non-renewals, expirations, and/or initiating a new acquisition in lieu of exercising the renewal option.
 - (2) The COTR shall give Contracting Officers 75 days advance notice for contract renewals, and 160 days advance notice for contracts that are expiring or for a new acquisition in lieu of exercising the renewal option.
 - (3) In renewing existing contracts, Contracting Officers will request a current list of key personnel and providers working for contractor under the contract. The listing will be compared with the existing contract to ensure that the level and quality of service is consistent with the initial proposal and the terms of the original contract. Any changes in key personnel or providers proposed by the contractor will be brought to the attention of the COTR and approved in writing by the Contracting Officer. The provision of such a list of key personnel shall be included as a contract requirement addressed in detail in the solicitation.

2. ELIGIBILITY FOR CONTRACT READJUSTMENT COUNSELING.

- a. Eligibility for RCS contract readjustment counseling is limited by law to Veterans who served in a theater of combat operations or in an area during hostilities in that area.
- b. To be eligible Veterans must also have been discharged under honorable conditions or with a character of service for which basic eligibility to receive VA benefits has been established through adjudicative decision by VA.
- c. Eligibility is determined by review of the Veteran's DD Form-214, a copy of which will be placed in the Veteran's client file, and/or by submission to the VHA Business Office at the VA support facility for verification of basic eligibility to receive VA benefits.
- d. In those situations where eligibility cannot be verified prior to authorization for services by the COTR, referral to a contract provider may be authorized on the basis of presumptive eligibility, if it is clinically determined that emergent conditions exist requiring provision of immediate readjustment counseling services.

3. REFERRAL FOR CONTRACT READJUSTMENT COUNSELING

- a. Referrals to readjustment counseling contract providers may only be made by qualified Vet Center staff: the COTR, other Vet Center counselors designated by the COTR, the Regional Manager, the Deputy Regional Manager and/or the Associate Regional Manager for Counseling. Authorized ordering officials shall be addressed in detail in the solicitation.
- b. Since the type of contract will typically be an IDIQ, the solicitation shall include the government's best quantity estimates for the referrals for services to be purchased. However, there is no obligation under the RCS contract program for VA to provide any specific number of referrals to any contract provider. The specific number of referrals actually purchased under the contract will be totally based on Veterans' needs in the geographical area to be served as determined by the Vet Center referrer. The solicitation shall address this issue in detail.
- c. Within the scope of the Vet Center program mission, referrals to contract providers shall be solely for psychological counseling for social and psychological military-related readjustment problems. The latter problems must be clearly related to combat military duty and post-military readjustment to civilian life. Contract providers are prohibited from providing general mental health services. The solicitation shall address this issue in detail.
- d. Combat theater Veterans with war-related post-traumatic stress disorder (PTSD) will be considered the highest priority recipients for contract readjustment counseling.
- e. Prior to making a referral to a contract provider, the Veteran will be interviewed by the VA referrer. Authorized ordering officials shall be addressed in detail in the solicitation.
 - (1) Although this may be either in person or by telephone, the referrer is responsible for ensuring that eligibility and clinical assessment requirements are met.
 - (2) The VA referrer should make every effort to determine whether the Veteran being referred is accessing care from any other source, VA or non-VA. This information is essential for effective coordination of care.
 - (3) Veterans referred to a readjustment counseling contract provider are Vet Center clients. The VA referrer should utilize the interview process for establishing the Vet Center program as the primary point of contact for

Veterans to address any questions or concerns they may have during the course of treatment.

4. MANAGEMENT OF CONTRACT PROVIDER AUTHORIZATIONS

- a. After eligibility has been verified and the need for readjustment counseling clinically established, the COTR will complete and sign VA Form 10-5565b which officially effects a referral to a contract service provider. The completion and disposition of VA Form 10-5565b is to be implemented according to the instructions on the form.
- b. All initial referrals to a contract provider will be for up to three visits for clinical assessment, brief counseling and development of a treatment plan. The solicitation shall address this issue in detail.
- c. If additional visits are indicated upon completion of the three initial visits, the Vet Center COTR, or other authorized ordering official, shall obtain from the contract provider a counseling plan documenting the need for continuing readjustment counseling. Contract provider clinical assessments and counseling plans shall adhere to the standard protocols used at Vet Centers. The solicitation shall address this issue in detail.
- d. Contingent upon clinical assessment, the COTR, or other authorized ordering officials, may make referrals for individual or group readjustment counseling, and/or family counseling for military related issues as necessary for the readjustment of the Veteran. The Vet Center COTR, or other authorized ordering official, will specify on VA Form 10-5565b number of visits and the type of counseling to be provided (individual, group, etc.).
- e. After reviewing the plan, the COTR, or other authorized ordering officials, may authorize the Veteran for up to a block of 15 additional visits for ongoing counseling.
- f. To assure quality clinical oversight of case progress, additional blocks of up to 15 sessions may be authorized contingent upon clinical indication as reflected in the contractor's updated treatment plans. Updated treatment plans shall be submitted upon the completion of each block of 15 sessions, and are subject to evaluation and approval by the COTR, or other authorized ordering officials, prior to further authorization.
- g. The course of clinical treatment will be managed in conjunction with available funding. This requires that the COTR specify on the VA Form 10-5565b a time period within which the block of authorized visits will be delivered. For example, a Veteran may be authorized a block of 15 weekly sessions to be used within a three month period. If the Veteran does not access services for all 15 sessions

during the specified time, he may be reviewed and re-authorized for additional visits at the beginning of the next quarter.

- h. Immediate family members, legal guardian of a Veteran, or individual in whose household such Veteran certifies an intention to live, may be seen conjointly with a Veteran in couple or family counseling by a contract service provider for military related problems as necessary for the readjustment of the Veteran, and as approved by VA.
 - (1) This will be limited to counseling for problems which have a distinct relationship to the Veteran's readjustment from military duty.
 - (2) For couple or family counseling, billing and reimbursement will be at the established per session family counseling rate as specified in the contract.
 - (3) Immediate family members, legal guardian of a Veteran, or individual in whose household such Veteran certifies an intention to live, may be seen without the Veteran present only when clinically required as an integral part of couple or family counseling. Such visits by significant others, without the Veteran present, are limited to 1 visit per 10 couple or family sessions. Exceptions may be granted to the limitation on significant other visits only when clinically approved by the COTR.
- i. As specified in the contract PBSW for this program, authorization for readjustment counseling through a contract provider is limited to 1 year from the time of the Veteran's first visit, and is subject to available funding. Case review at the one-year point enables the COTR to assure optimum use of available funding in serving as many eligible Veterans as possible.
 - (1) This provision should not be implemented in an arbitrary manner nor should it be applied in isolation from other indicators for clinical case resolution.
 - (2) If longer term extension of authorization is necessary, the following procedures will be followed:
 - (a) The COTR will interview the Veteran (in person or by telephone) to conduct an updated comprehensive psychosocial assessment to ensure continuing clinical need for readjustment counseling.
 - (b) All requests for contract readjustment counseling beyond 1 year, must be reviewed and approved by the RCS Regional Manager or Deputy Regional Manager, reported to the CO, and documented in the Veteran's clinical record. The solicitation shall address this issue in detail.

5. CONTRACT PROGRAM FISCAL MANAGEMENT PROCEDURES

- a. Team Leader COTRs, or other authorized ordering officials, working in coordination with Fiscal Service and the Contracting Officer, will be held accountable for full and effective utilization of their contract program budget to provide readjustment counseling services to eligible Veterans.
- b. For this purpose a standardized fund control point has been established for all RCS contract program funds.
 - (1) Team Leaders, acting in their capacity as contract program control point officials, will be responsible for initiating a timely and accurate recommendation for the CO to obligate and de-obligate contract funds.
 - (2) To ensure the fiscal integrity of their contracts programs, Vet Center COTRs will carefully monitor the number of Veterans referred and the number of counseling sessions authorized. Referrals and ongoing authorizations for counseling should be managed to ensure the availability of services to the largest number of eligible Veterans throughout the fiscal year.
- c. The Team Leader COTR shall coordinate with the Fiscal Service, the Contracting Officer and the Business Office as necessary to ensure appropriate processing of contractor billings.
 - (1) The only counseling sessions accepted by RCS for reimbursement are those made by the Vet Center COTR, or other authorized ordering official, for counseling for military related readjustment problems. In no case may VA be billed or required to pay for services delivered prior to, or after the dates on the Vet Center referrer's written authorization for care.
 - (2) Contract providers will forward invoices regarding referred Veteran clients to the COTR at the end of each month. The invoice will contain a signed Veteran's verification for each session billed identifying the therapist, type of session, and length of session. The COTR will reconcile the invoices submitted against individual Veteran authorizations. Discrepancies should be addressed with the Contracting Officer. Following verification, the COTR will certify the invoice for payment and forward the invoice to Fiscal Service, or directly to the Austin Resource Center, for further processing.
 - (3) Reimbursement will only be for in-person counseling sessions.
 - (4) Reimbursement for Veteran's travel in connection with contract readjustment counseling is not authorized.
 - (5) For reimbursement purposes, the length of individual and group counseling sessions will adhere to the standards specified in the contracts PBSW.

6. CONTRACT MONITORING AND QUALITY OVERSIGHT

- a. **Program Oversight Responsibilities** Quality management and oversight of contract program operations requires an effectively coordinated effort by RCS program officials and VHA officials at supporting medical centers. The following officials are central in this process:

- (1) Vet Center Team Leader COTR
- (2) RCS Regional Manager or Designee
- (3) Chief Readjustment Counseling Officer or Designee
- (4) VISN Head of Contracting Activity
- (5) Contracting Officer or Designee
- (6) Chief Fiscal Service or Designee

b. **Quality Management Duties of the Team Leader COTR**

- (1) Monitoring all aspects of the contractor's clinical and administrative performance to assure compliance with technical requirements of the contract.
- (2) Reviewing for approval all eligibility determinations, authorizations, clinical services, treatment plans, and billing and reimbursement procedures for quality and compliance with the contract.
- (3) Providing periodic consultation to contract providers upon request regarding the nature of post-war readjustment, readjustment counseling and the technical requirements of the contract.
- (4) Conducting annual onsite quality reviews of clinical and administrative operations for each contract program assigned to their Vet Center. Contract provider quality reviews are conducted using standardized protocols. The solicitation shall address this issue in detail.
- (5) Notifying the Contracting Officer immediately regarding deficiencies in contract provider performance.
- (6) Ensuring that changes in the work required under contract are not initiated before written authorization through a contract modification is issued by the Contracting Officer.

- (7) Providing the Contracting Officer with written request and justification for proposed contract changes.
- (8) Assuring that contract providers comply with Vet Center clinical crises management standards by reporting clients who show signs of suicidal and/or homicidal risk. The solicitation shall address this issue as a requirement for contract providers.
- c. RCS Regional Managers are responsible for all contract program operations administered by Vet Centers within their respective regions, and for supervising Vet Center Team Leaders functioning as COTRs. RCS Regional Managers, or their designees, are responsible for conducting annual onsite quality reviews of clinical and administrative contract program operations at every Vet Center with a contract program in their respective regions. Contract program quality reviews at Vet Centers are conducted using standardized protocols.
- d. The Chief Readjustment Counseling Officer, in VA Central Office, or designee has responsibility for the RCS contracts program operations nation-wide.
- e. Referrals for group counseling will be encouraged whenever clinically or logistically feasible as this method is both clinically indicated for most Veterans with readjustment difficulties and cost effective. The composition of such groups should include at least 50 percent eligible war-zone Veterans for a contract provider to be reimbursed. Exceptions to this may be granted by the COTR when clinically indicated. Solicitations shall address the capability to provide group counseling, as appropriate.
- f. **Regional Manager Reporting Requirements:** Regional Managers will submit monthly reports of contract operations in their respective regions for the fiscal year. The Contract Report protocol will be located in RCSNet and consist of the following data elements.
 - (1) **Contract Provider Directory.** A list of all active contract programs in the region identifying the contractor by business name, primary point of contact, professional credentials of the primary point of contact, location by town and state, and telephone number. The report will also identify new programs, programs due to expire and contract provider distance from the Vet Center.
 - (2) **Contract Status.** The report will identify the status of each provider's contract in terms of renewal options following the initial 12 month period, and the number of times the contract has been re-awarded.
 - (3) **Cumulative Budget Utilization.**
 - a. Initial Distribution

- b. Net Transfers
- c. Current Available Funds ((a) + or- ((b))
- d. Funds Expended to Date
- e. Remaining Balance

(4) Cumulative Workload Outcomes.

- a. Total Veterans Seen by Gender and Era of Service
- b. Total New Veterans Seen by Gender and Era of Service
- c. Cost Per Veteran
- d. Total Visits Provided
- e. Percent of Group Visits Provided
- f. Cost Per Visit
- g. Number of Veterans in the Program Over One Year