# Overview of Revisions to *SFP 3: Basic Standards*

## Purpose

* The purpose of revisions to SFP 3 is to:
* Reduce burdensome requirements
* Clarify requirements
* Streamline chapter content
* These changes will apply to all contractors who provide services or goods listed in the SFP manual.

## Process Used

* Initial planning
* Project kickoff with internal workgroup
* Survey sent to provider workgroup
  + Pulled the main requirements out of SFP 3 and asked providers to rate how burdensome SFP 3 requirements are on a scale of 1-5.
* Core team work sessions
  + Reviewed feedback from the provider survey
  + Identified possible solutions to reduce burden while still achieving the objective/need of the requirement. If no objective or need for the requirement existed (or it is of minimal importance), the core team recommended removing the requirement.
* Consultations
  + Contract monitoring consultation
  + Legal consultation regarding signatures and physical locations
  + IT consultation regarding encryption and record storage
  + VR program operations consultation
* VR executive management made decisions on the core team’s recommendations
* SFP 3 drafted and sent for review
* Publication process (anticipated publication date: February 1, 2023)

## Overview of SFP 3 Revisions and Improvement Initiatives

Along with streamlining several requirements, the team reorganized SFP 3 into easier-to-follow sections.

The chapter now contains six major sections:

1. SFP 3.1 Overview of the Basic Standards
2. SFP 3.2 Basic Standards – All Contract Types
3. SFP 3.3 Contractor Standards for Physical Locations
4. SFP 3.4 Basic Standards for Service Providers
5. SFP 3.5 Basic Standards for Goods Providers
6. SFP 3.6 Contract Monitoring

The team also identified several exceptions for communication access service providers.

### Updates to SFP 3 Requirements

* 1. **VR3472, Contracted Service Modification Request**
     1. Remove VR Supervisor signature from 3472 form
     2. Allow staff to authorize the purchase of a benchmark more than once with VR Supervisor approval and with appropriate justification, including which interventions and/or services have been provided to the customer to address needs, circumstances, and/or other employment barriers since the first purchase of the service.
     3. Clarify in SFP 3 when the 3472 is used, why it is needed, and how to use it.
     4. Quickinar for staff and providers on the 3472 (what it is, why it exists, when to use it, how to complete the process, who is involved, importance of not allowing it to delay services).
  2. **Director Credential**
     1. Require all providers take the foundational course once. For renewal, design periodic refresher courses based on pertinent topics. For refresher courses, prepare every 3 years or as required by the VR division.
     2. Create an optional UNT WISE course that explains how to set up a business.
  3. **Credential/education requirements**
     1. Continue efforts with UNT WISE on course improvement.
     2. Revise UNT WISE contract to reduce their reporting requirements and to streamline deliverables.
  4. **Customer satisfaction surveys**
     1. Remove requirement for providers.
     2. There is still value in obtaining customer satisfaction data, so VR will obtain customer satisfaction data in another way. For example, through the upcoming SARA messaging platform.
  5. **Forms maintained on file**
     1. Create an application packet for specific types of providers (e.g., goods providers). This would involve only completing the forms specific to the open enrollment/contract type.
     2. Adopt a technology solution to exchange files securely and easily with third parties. IT and VR program operations are working on this solution.
  6. **Standards for physical locations**
     1. Reformat SFP 3 to quickly identify which providers need to follow these requirements.
     2. Occupation permit or building permit and fire inspection report 🡪 The provider must have the inspection or the permit, or they need documentation of their due diligence to arrange for an inspection or to request the permit.
  7. **Signatures**
     1. After consulting with TWC legal, it was determined that the authorized representative signature on the SFP forms is technically not needed, because receipt of service does not impact customer legal rights. The team is planning to remove the authorized representative signature on all SFP and Pre-ETS forms. This will remove the burden of obtaining parent/authorized rep signatures.
        + A statement will be added to the VR technical review sections for VR staff to contact the customer or their authorized representative if there are any concerns the signature is valid.
     2. Explain the state of Texas purchasing requirement to verify receipt of services with the customer and that a signature may be the most efficient method for a provider to do this.
  8. **Form submittal process**
     1. Adopt a technology solution to exchange files securely and easily with third parties. IT and VR program operations are working on this solution.
  9. **Health and safety protocols**
     1. Add links to the CDC website for easy retrieval;
     2. Add link to Texas Department of State Health Services.
  10. **Monitoring**
      1. State office teams to continue working with VR staff and providers to ensure understanding of policy and how to fill out forms is correct/consistent.
      2. Clarify that there is an internal process to address the related internal issues.
      3. Adopt a technology solution to securely and easily exchange files with third parties.
      4. Request monitoring team to suggest areas that providers may need TA on or trends to address.
      5. Consider a recorded training that covers the monitoring process and expectations and that is available for providers at any time to view and reference.
  11. **Customer orientation**
      1. Explain the expectation for the customer orientation in SFP 3.
      2. Create a checklist for providers to quickly identify what to cover in the customer orientation.
  12. **Provider policies**
      1. Remove requirement for provider to maintain their own policies and maintain all policy in SFP 3.
  13. **Primary contacts at TWC**
      1. List SME contacts on the Providers' Resources webpage. This would include SMEs, Qs, RPSSs.
      2. Recommend departments consider a dedicated mailbox in case of staff turnover or staff out of office (e.g., deaf and hard of hearing mailbox). Allows for better oversight, coverage, and history.
  14. **Required documentation**
      1. Streamline the VR3455, Provider Staff Information Form
      2. Adopt a technology solution to securely and easily, exchange files with third parties; consider rolling details on the 3455 into the Provider Locator tool.
      3. Align all SFP policy on the VR3455 to indicate that each service provider must submit the VR3455 form and the supporting evidence that the staff member meets the required qualifications to Q or RPSS **within 30 days of**: hiring new staff; making a significant change to a staff member's job duties; changing staff qualifications; or terminating a staff member.
  15. **Record storage**
      1. Revise to 7 years to match the State of Texas Procurement and Contracting Guide and TWC contract language.
      2. Clarify standards for storing records on the cloud.
         + Since the Service Provider (SP) is creating and storing either PII/PHI/HIPAA content, FedRAMP Moderate controls will be required for a cloud provider. If the SP is working with one of the 3 main cloud vendors, Google, Amazon Web Services (AWS), and Microsoft Azure (Azure), they all have Government Cloud offering that meet the FedRAMP moderate controls (as detailed at https://www.fedramp.gov/understanding-baselines-and-impact-levels/)
      3. Clarify security measures for electronic storage, not on the cloud.
         + If the SP is storing VR records electronically and not in a cloud environment such as on a server, PC, or USB device, they will need to adhere to Federal Information Processing Standard (FIPS) 140-2 using AES-256 encryption to encrypt the whole hard drive (PC), drive (Server), or device (USB or other portable media).
      4. Clarify that all documents (forms/SAs/etc.) should be retained in the provider case files.
  16. **Self-evaluation system**
      1. Remove requirement.
  17. **Incident reporting**
      1. Remove requirement for providers to create their own policy and procedures on incident reporting. Clarify exactly what is required for incident reporting, including what to report and when to make an incident report and to whom.
      2. Create an incident report form that helps the provider capture all required information when reporting an incident.
      3. Add an exception for communication access service providers.