

VOCATIONAL PROGRAMMING

Minnesota Sex Offender Program

Issue Date: 7/11/23

Effective Date: 8/1/23

Policy Number: 220-5070

POLICY: The Minnesota Sex Offender Program (MSOP) offers vocational programming opportunities for clients to apply clinical treatment skills in a vocational setting and an opportunity to acquire or improve skills necessary to live productive and prosocial lifestyles.

AUTHORITY: Minn. Stat. §§ 246B.05; 246.B06.

APPLICABILITY: MSOP, program-wide

PURPOSE: To provide clients with vocational training and guidance to therapeutically enhance clients' overall individual treatment programming.

DEFINITIONS:

Academic assessment – formal measures used by Education staff to identify a client's academic progress.

Client tier level – see MSOP Division Policy 215-5014, "Client Tier Level System."

Good standing – a client currently assigned a vocational placement, whose participation hours are not limited due to group attendance/VPC recommendation.

Treatment team – see MSOP Division Policy 215-5005, "Treatment Overview."

Vocational Area Supervisor – staff member responsible for overseeing and facilitating vocational programming opportunities in practical operational settings.

Vocational Placement Committee (VPC) – staff assigned to the committee, chaired by a rehabilitation counselor senior, representing many programming areas of the facility, which includes but not limited to:

1. Vocational area supervisors from the vocational shop(s), the living units/laundry, Food Service, Special Services, and Plant Operations;
2. Behavioral Expectations Unit;
3. Clinical Treatment;
4. Health Services; and
5. Clinical Programming.

Vocational programming – clinical programming opportunities in a vocational setting, including training and skill building in vocational shops, food service, vocational groups, semi-supervised unit cleaning, supervised crews, independent assignments, and laundry tasks.

Vocationally ready – a determination a client has met the requirements and the placement is clinically indicated.

PROCEDURES:

A. Vocational Placement Committee (VPC)

1. The VPC meets at least every-other-week to review client placement considerations and discuss any client behaviors and/or concerns regarding a client's vocational programming. The VPC discusses the client's participation/progress in treatment as it relates to vocational readiness.

2. The VPC, in conjunction with the treatment team, may recommend an increase, reduction or removal of a client's scheduled vocational programming hours as documented in the VPC meeting minutes.

B. Vocational Programming Requirements

1. Clients must have treatment team support to participate in vocational programming. The treatment team considers the client's treatment progress, motivation, and behavior in determining whether the client is vocationally ready. Clients may submit a Client Request (420-5099a) to the facility associate clinical director for an exception to the vocational programming hours as noted in section C below.
2. Clients must complete an academic assessment or have a current assessment on file with Education staff. Clients who test below the tenth-grade level and are in a vocational placement identified as having an academic need area are expected to participate in educational courses to address deficits to maintain their vocational placement. Clients who do not participate in educational courses may be removed from their vocational placement, have a reduction in vocational programming hours, or be removed from all vocational programming as determined by the VPC and/or treatment team. Education staff and the treatment team must approve any deviations from this requirement.
3. Clients may participate in vocational programming which is not impacted by any medical accommodations. Health Services staff note any medical accommodations in the Client Accommodations section of Phoenix.
4. Clients must submit a Client Request (420-5099a) and attach a Vocational Assignment Application (220-5070a) to Vocational to be considered for a vocational placement.
5. Clients must review and sign the Vocational Programming Agreement (220-5070b) prior to participating in their vocational programming.

C. Vocational Programming Hours

1. All clients participating in vocational programming may receive a minimum of eight vocational programming hours per week unless otherwise approved for less by the treatment team and the VPC. Clients actively participating in clinical treatment are given priority for hours of programming and placements.
2. Client vocational programming hours are directly related to the client's treatment progress (see MSOP Division Policy 215-5010, "Treatment Progression"). MSOP assigns vocational programming hours according to availability.
 - a) Non-Participants: eight programming hours per week.
 - b) Admissions: eight to 14 programming hours per week.
 - c) Clinical Treatment Participants: Clients participating in clinical treatment and vocational programming must maintain 90% attendance in assigned core groups and modules throughout an entire quarter to remain eligible for placement. The primary therapist reviews attendance during the client's quarterly and annual treatment progress reviews. If at the treatment progress review the client did not meet the 90% attendance criteria in the previous quarter, the client receives no more than eight hours of vocational programming

per week until the client's next quarterly treatment progress review. The client must submit a Client Request (420-5099a) to the facility associate clinical director for an exception.

- (1) Phase I: eight to 14 programming hours per week.
- (2) Phase II: eight to 24 programming hours per week.
- (3) Phase III: eight to 30 programming hours per week.

D. Vocational Programming Expectations

1. Clients must agree to and abide by all vocational area expectations.
2. Vocational area supervisors and/or rehabilitation counselor seniors assign vocational programming based on VPC recommendations, client needs, and placement availability.
3. Upon vocational placement, vocational area supervisors provide and review the position description (example attached as 220-5070d) with the client.
4. Clients must immediately notify the vocational area supervisor when a medical issue and/or Client Accommodation (Phoenix) arises which could impact their assigned vocational programming. Vocational staff review the client's report with Health Services. Clients who fail to report these changes may be removed from vocational programming.
5. Clients who resign from their assigned vocational programming without their primary therapists' approval receive a Vocational Treatment Notice (220-5070e-3011), which may delay eligibility for future vocational opportunities, as determined by the primary therapist in consultation with Vocational staff and the VPC.
6. Clients may jeopardize vocational opportunities if they are not following the policies and procedures of the facility.

E. Vocational Assignment Process

1. Vocational Opportunity Postings

- a) The vocational area supervisor notifies the rehabilitation counselor senior of any open positions.
- b) Rehabilitation counselor seniors post all open positions in designated areas and on the client network. The posting must include a current position description describing task assignments and required qualifications and tier level.
- c) Clients are responsible for reviewing the posting areas or the client network.
- d) MSOP does not follow the posting process for sub-minimum wage positions. If the treatment team determines a client would be appropriate for a sub-minimum wage position, they refer the client to the VPC.
- e) Vocational opportunities may require a specific level of education, tier level or skill in order to complete the assigned tasks.

2. As a client demonstrates meaningful change and treatment progress, the VPC may assign the client to less supervised vocational placements.
3. Clients who transfer to another MSOP site and are determined by Vocational staff and the facility VPC to be in good standing in a vocational placement, receive priority for vacant positions when assigned to a vocational placement at the receiving site, consistent with their treatment needs. If a client is not deemed to be in good standing, a rehabilitation counselor senior issues a Vocational Treatment Notice (220-5070e-3011).
4. Application Processing for Vocational Postings
 - a) Clients must complete the Vocational Assignment Application (220-5070a) and send it with a Client Request (420-5099a) directly to the rehabilitation counselor seniors to be considered for a vocational placement.
 - b) Rehabilitation counselor seniors may meet with clients who need assistance with completing the Vocational Assignment Application (220-5070a).
 - c) Rehabilitation counselor seniors review the submitted Client Requests (420-5099a) and Vocational Assignment Applications (220-5070a) for client eligibility.
 - d) Rehabilitation counselor seniors consult with the treatment team regarding vocational placement and document the meeting in the VPC meeting minutes.
 - (1) A vocational area supervisor/designee may set up interviews and area tours with clients deemed vocationally ready.
 - (2) Vocational area supervisors notify the clients and rehabilitation counselor seniors of the dates and times of applicant interviews.
 - (3) Vocational area supervisors provide a Vocational Placement Memo (220-5070f) to notify clients of the determination regarding the application and/or interview. The original Vocational Placement Memo (220-5070f) is forwarded to the client, with a copy in the client vocational file.
 - (4) All clients being considered for a specific placement remain in the eligible pool of applicants for six months unless they have been selected for placements in other areas, have been removed from vocational programming or are no longer deemed vocationally ready.
 - e) Vocational area supervisors consult with the rehabilitation counselor seniors to ensure a client is still eligible prior to offering additional programming to a client.

F. Vocational Programming Attendance

1. Clients must report on time to their vocational assignment, remain for all scheduled vocational programming hours and complete all required tasks.
2. Client absence – unless there is an emergency, the client must have pre-approval from the assigned vocational area supervisor for an expected absence from vocational programming or obtain a medical lay-in as outlined in MSOP Division Policy 310-5450, “Medical Lay-In.” The vocational area supervisor must document the absence in a Communication Log (410-5075a) (Phoenix) entry.

3. Requested time off

The vocational area supervisor, in consultation with the VPC and rehabilitation counselor seniors, reviews client requests for time off in excess of one day on a case-by-case basis in consultation with the client's primary therapist.

G. Vocational Programming Compensation - MSOP monetarily compensates clients on a bi-weekly basis for vocational tasks performed. MSOP withholds a percentage of the client's earnings for program obligations and/or court-ordered deductions as outlined in MSOP Division Policy 125-5700, "Client Vocational Compensation." MSOP automatically deposits all funds into the client's individual facility bank account.

H. Vocational Programming Documentation and Evaluation

1. Vocational area supervisors document the client's vocational progress quarterly and as needed in a Vocational Evaluation Form (220-5070c). The rehabilitation counselor senior incorporates the evaluation into the client's quarterly and annual treatment progress reports. (See MSOP Division Policy 215-5007, "Clinical Documentation.")
2. MSOP provides vocational progress at the client's quarterly and annual treatment progress reviews. (See MSOP Division Policy 215-5007, "Clinical Documentation.") MSOP also provides progress information for Sexual Violence Risk Assessment Reports and clinical treatment assessments. MSOP's assessment of client vocational progress includes skills related to specific vocational tasks as well as Matrix factors addressed during vocational placement.
3. In consultation with the primary therapist/treatment team and determination from the VPC, the rehabilitation counselor senior and/or the vocational area supervisor may issue a Vocational Treatment Notice (220-5070e-3011) to a client:
 - a) to inform the client of behavioral, clinical, or vocational concerns having an impact on vocational placement(s). A client who engages in non-therapeutic behaviors, receives three Vocational Treatment Notices for non-therapeutic incidents and/or vocational performance concerns within a 90-day period may be removed from vocational programming; or
 - b) to recognize the client for positive vocational performance.
4. Rehabilitation counselor seniors review all Vocational Treatment Notices completed by vocational area supervisors prior to the notice being sent to the client. Vocational area supervisors meet with the client when it is determined a Vocational Treatment Notice will be used to address vocational programming expectations.
5. The author of the Vocational Treatment Notice (220-5070e-3011) signs the memo, provides the original to the client (see MSOP Division Policy 135-5100, "Confidentiality and Data Privacy") and submits a copy to Health Information Management Systems (HIMS).

I. Probationary Period

1. Each client completes a 30-day probationary period (Client signed Agreement for Vocational Programming and Rules (220-5070b)).

2. During the probationary period, the vocational area supervisor evaluates the client's performance and behavior via a Vocational Evaluation Form (220-5070c) to determine if the client meets the requirements of the vocational placement.
3. Upon successful completion of the probationary period, vocational area supervisors evaluate the client's vocational performance on a quarterly basis via the Vocational Evaluation Form (220-5070c).
4. The VPC and/or the treatment team may determine a client is not meeting the requirements of the vocational placement and may withdraw the client from the vocational assignment. MSOP provides the client this information in a Vocational Treatment Notice (220-5070e).

REVIEW: Annually

REFERENCES: MSOP Division Policy 125-5700, "Client Vocational Compensation"
MSOP Division Policy 215-5007, "Clinical Documentation"
MSOP Division Policy 215-5010, "Treatment Progression"
MSOP Division Policy 215-5014, "Client Tier Level System"
MSOP Division Policy 310-5450, "Medical Lay-In"
MSOP Division Policy 135-5100, "Confidentiality and Data Privacy"

ATTACHMENTS: Vocational Assignment Application (220-5070a)
Vocational Programming Agreement (220-5070b)
Vocational Evaluation Form (220-5070c)
Position Description Example (220-5070d)
Vocational Treatment Notice (220-5070e-3011) (Phoenix)
Vocational Placement Memo (220-5070f)

Client Request (420-5099a)
Communication Log (410-5075a) (Phoenix)
Client Accommodation (Phoenix)

SUPERSESSSION: MSOP Division Policy 220-5070, "Vocational Programming," 5/2/23.
 All facility policies, memos, or other communications whether verbal, written, or transmitted by electronic means regarding this topic.

/s/

Nancy A. Johnston, Executive Director
 Minnesota Sex Offender Program