



A Systematic Approach to Revising Florida's Integrated Employment Funding System

Prepared for: Florida Developmental Disabilities Council

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This study does not necessarily reflect the views of the United States Department of Health and Human Services, Administration on Intellectual and Developmental Disabilities or the Florida Developmental Disabilities Council, Inc. It is intended to serve as an objective summary of national and state findings to guide Florida in decisions related to funding providers of employment services.

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Table of Contents

Introduction.....	3
Background on Choosing Comparison State's to inform Florida's Funding System.....	4
Cross-State Summary: Learning from Other States' Funding Systems	16
Key Assumptions for a High Quality Funding System	19
Recommendations for Florida's Funding System (includes Excel workbook).....	21
Concluding Comments.....	28
References.....	29
Appendices.....	31
Appendix A: State Funding System Summaries.....	31
Appendix B: State IDD Agency Data Comparison matrix.....	92
Appendix C: Summary of September Florida Supported Employment Rate Options Study Focus Groups	96

Introduction

The Florida Developmental Disabilities Council (FDDC) has been working to facilitate change in the employment system for all Floridians with disabilities, including individuals with intellectual and developmental disabilities. In 1999 the Agency for Persons with Disabilities (APD) supported 30% of adults in supported employment services, in FY2015 that number had plunged to 12% (Butterworth, Smith, Winsor, Ciulla Timmons, Migliore & Domin, 2016). Data from the 2014-2015 National Core Indicators (NCI) Project found that 9% of adults receiving services from APD were actually working for pay in the community. Additional data from the NCI found that 41% of adults served by APD who are not working in the community responded that they would like a job in the community, but that only 19% have community employment as a goal in their service plan (National Core Indicators Project, 2016).

Findings from the 2012 EmployME 1st Report, funded by the FDDC, found that the rates paid by the APD for supported employment services in Florida are insufficient, that rate structures encourage providers to focus on Adult Day Training (ADT) services, and lead many providers to stop providing supported employment services (Institute for Community Inclusion, 2012). The report further found that the current funding structures in Florida undermine the ability of individuals with disabilities to receive high quality supported employment services. The 2012 EmployMe1st Report findings were also identified in the Florida Association of Rehabilitation Facilitates (FL ARF) July 2013 report, “Proposed Monthly Support Model for Independent Supported Employment Services.”

Florida, however, is intently working to change the current service and employment outcomes of individuals served by APD. This report places this review within the context of Florida’s employment systems change initiatives. Setting the tone for these changes is Florida’s 2016 Employment First law which defined employment as:

Integrated employment, including supported employment, customized employment, and self-employment, where an individual is paid by an employer at minimum wage or greater or receives earnings through one’s self-employment business, fully integrated in the community workforce, with a goal of maximum self-sufficiency.

The law also codified the role of specific state agencies including APD to meeting the expectations of the legislation including the development of a cross-agency memorandum of understanding outlining specific efforts that each agency will undertake to prioritize community employment. The Employment First Interagency Cooperative Agreement, of which APD is a signatory, specifies that all partners will:

“Develop and implement an annual action plan to include methods for identifying and addressing the following:

- *A commitment to maximize resources to improve employment outcomes for persons with disabilities seeking publically funded services;*
- *Strategic goals and reasonable benchmarks to implement this agreement;*
- *Financing and contracting methods that will prioritize employment among the array of services provided by the respective agency or organization;*

- *Training opportunities that can be better utilized by agency employees and contracted providers to ensure effectiveness of employment services; ...”*

APD employment and day services are funded through Medicaid and legislatively appropriated Employment Enhancement Project Funds. Florida is also responsible for developing and implementing plans to address the Center for Medicare and Medicaid Services (CMS) Home and Community-Based Settings (HCBS) 2011 guidance and 2015 1915c Technical Guide that makes clear that individual competitive employment is the preferred outcome of employment-related supports, including prevocational and group supported employment services. The guide defines the outcome of individual supported employment services as “paid employment at or above the minimum wage in an integrated setting in the general workforce, in a job that meets personal and career goals” (Centers for Medicare and Medicaid Services, 2011; 2015). Additionally Florida is working to address the 2014 HCBS rules governing community settings, that emphasize “full access of individuals receiving Medicaid HCBS to the greater community, including opportunities to seek employment and work in competitive integrated settings, engage in community life, control personal resources, and receive services in the community, to the same degree of access as individuals not receiving Medicaid HCBS” (Center for Medicare and Medicaid Services, 2015, p. 136).

This document represents the findings from a systematic review of state Intellectual and Developmental Disabilities (IDD) payment rates and processes for supported employment and other day and employment services as well as recommendations for the types of process and payment rates that will ensure that Florida develops and sustains a robust supported employment infrastructure and is in compliance with HCBS rules and regulations for prevocational and group supported employment systems and community settings requirements for individuals supported by APD.

Background on Choosing State's to Inform Florida's Funding System

In 2015, a partnership between the Institute for Community Inclusion (ICI) at the University of Massachusetts Boston and the National Association of State Directors of Developmental Disabilities Services (NASDDDS) was formed in order to design an effective funding model that is customized to Florida’s structure and goals and includes recommendations and corresponding rates for an effective strategy for funding supported employment and ensuring that all Floridians with disabilities have access to high-quality supported employment services. For almost ten years SELN and ICI have conducted case study and descriptive research on funding models and structures for employment and related day services (Butterworth, Kennedy-Lizotte, and Winsor, 2012; Hall, Freeze, Butterworth, and Hoff, 2011). The SELN has documented funding structures, services, and rates across member states (SELN, 2012), hosted a 2012 annual meeting of member states focused on using funding systems to support individual integrated employment (SELN, 2012), developed a “Funding Toolkit” to support state IDD agencies to diagnosis barriers within their funding system to individual integrated employment outcomes, facilitated a funding workgroup for 8 SELN member states, and provided in-depth technical assistance to Iowa, Nevada, and South Dakota to develop and implement new employment funding strategies. An analysis of states’ employment funding structures suggests that there is a series of essential elements for developing and implementing a supported employment payment model (SELN,

2015). Findings from this research have led to a SELN funding framework (Appendix A) for describing and assessing state financing of employment support. This SELN funding framework guided the process of developing new payment rates.

Ten comparison states with a demonstrated sustainable supported employment provider base and high performance in delivery of supported employment services were selected for in-depth analysis. Additional selection criteria used for the ten states included: having an individualized budget structure for developing funding allocations, and having established payment rates and structures for customized employment and discovery services. The comparison states are: Alaska, Colorado, Iowa, Minnesota, New York, North Carolina, Oklahoma, Oregon, Virginia, and Washington. The table below shows the employment outcomes of the selected states' Intellectual and Developmental Disabilities (I/DD) Agencies (Table 1). Data on all 50 states and the District of Columbia can be found in Appendix B.

Findings presented in Table 1 confirm that Florida is below the national average for the percentage of individuals with IDD receiving integrated employment services but is also well below the national average for per person spending on integrated employment services.

Table 1: Comparison of Integrated Employment Service Outcomes in States Selected for Funding Comparison¹

State	Percent of individuals receiving integrated employment services	Average spending per individual in integrated employment services
National Average	19	\$7,194
Florida	13	\$2,527
Alaska	23	\$14,535
Colorado	28	\$5,341
Iowa	16	\$3,757
Minnesota	11	\$5,857
New York	12	*
North Carolina	22	\$5,360
Oklahoma	60	\$8,087
Oregon	32	\$3,104
Virginia	26	\$8,279
Washington	86	\$7,024

¹ Data Source: *The ICI National Survey of Day and Employment Services for People with Intellectual/Developmental Disabilities*. This survey collects summary data on day and employment service distribution and funding at the state level annually. Data presented are from FY 2014.

The payment rates for the following five services were examined: individual integrated employment, group supported employment, facility-based work (sheltered work), community-based non-work, and facility-based non-work (day habilitation). The billable activities, rate structure, unit of service, financial incentives for integrated employment, portability of funds, individualization of rates, funding for transportation, and work with the state vocational rehabilitation are described for each state. A cross-state comparison is provided and then data from each state is presented in more detail.

Table 2 provides the payment rate and unit of service for each state for the five-day and employment services. Table 3 provides a comparison of hourly rates for integrated employment services across the selected states.

Table 2: Rate per Service per State

State	Individual Integrated Employment	Group Supported Employment	Facility-based Work	Community-based Non-Work	Facility-based Non-Work
Alaska	Pre-employment - \$12.12/15 minutes Individual supported employment - \$12.12/15 minutes	Pre-employment - \$8.49 /15 minutes Supported employment - \$8.49 /15 minutes	N/A	Day habilitation individual - \$10.71/15 minutes Day habilitation group - \$7.50/15 minutes	Day habilitation individual - \$10.71/15 minutes Day habilitation group - \$7.50/15 minutes
Colorado	Prevocational services range from \$2.36-\$6.05/ 15 minute unit depending on level determined Job Coaching - \$13.02 per 15 minute unit. Job Development - \$13.02 per 15 minute unit. Job Placement - \$1.00 per dollar	Job Coaching services range from \$3.16-\$6.94/ 15 minute unit depending on level determined. Job Development - \$4.15 per 15 minute unit. Job Placement - \$1.00 per dollar spent on item purchase	Prevocational services range from \$2.36-\$6.05/15 minute unit depending on level determined	Supported Community Connections services range from \$2.87 - \$9.52 /15 minute unit depending on level determined in HCBS-DD and between \$2.87 - \$6.44/15 minute unit depending on level determined in HCBS-SLS	Specialized Day Habilitation services range from \$2.36 - \$9.52/15 minute unit depending on level determined in HCBS-DD And between \$2.36 - \$6.05/15 minute unit depending on level determined in HCBS-SLS

State	Individual Integrated Employment	Group Supported Employment	Facility-based Work	Community-based Non-Work	Facility-based Non-Work
	spent on item purchase				
Iowa	<p>Prevocational - \$10/hr</p> <p>Career exploration - \$38.27/hr. Maximum of 34 hours of Career Exploration over a 90 day (12 week) period</p> <p>Job development: Initial authorization: \$66.13 per hour Not to exceed 40 hourly units</p> <p>Supported employment - \$66.13/hr</p> <p>Total monthly cost for all supported employment services not to exceed \$3,059.29 per month.</p>	<p>Ranges from \$1.26 – \$2.84/per person, per 15 minute unit depending on Tier (\$1.26 for groups of 7-8, \$1.77 for groups of 5-6, to \$2.84 for groups of 2-4)</p> <p>Total monthly cost for all supported employment services not to exceed \$3,059.29 per month.</p>	Prevocational - \$10/hr	<p>Provided under Day Habilitation - \$6.60/15 min unit up to 16 units per day</p> <p>\$132 per full day (4.25-8 hours)</p>	<p>Provided under Day Habilitation - \$6.60/15 min unit up to 16 units per day</p> <p>\$132 per full day (4.25-8 hours)</p>

State	Individual Integrated Employment	Group Supported Employment	Facility-based Work	Community-based Non-Work	Facility-based Non-Work
Minnesota	Base rate begins at \$13.33/hour for direct staffing then increases based on Supported Employment (SE) inputs (see full state profile)	\$13.33/hour base rate plus SE inputs if individual not on DD waiver \$13.33/hour or \$4.14/15 minutes base rate plus SE inputs, plus RN and LPN hours for individuals on DD waiver	\$13.33/hour or \$4.14/15 minutes base rate plus SDS inputs	\$11.86-\$15.67/hour depending on how billed	\$13.33/hour or \$4.14/15 minutes base rate plus SDS inputs
New York	Supported employment - \$56.11 to \$70.11/hr depending on region Pathways to Employment - \$40.58/hr to \$44.23/hr depending on region Community-Based Prevocational – Ranges from \$20.82 - \$41.65/hr	Supported employment - \$22.64 to \$28.05/hr depending on region Pathways to Employment - \$34.49 to \$38.70/hr depending on region	N/A	Individual Community habilitation – ranges from \$39.99-\$35.58/hr depending on Region. Also available in 15 minute units. Group Community habilitation ranges from \$17.10-\$25/hr depending on region and group size (2-4	Rates vary by region and provider

State	Individual Integrated Employment	Group Supported Employment	Facility-based Work	Community-based Non-Work	Facility-based Non-Work
	depending on Region and # of individuals served			individuals). Also available in 15 minute units	
North Carolina	Individual supported employment - \$7.39/15 min Long-term follow-up - \$7.39/15 min	Group supported employment - \$1.90/15 min Long-term follow-up - \$1.90/15 min	N/A	Community Living and Support - \$4.71/15 min for individual or \$3.10/15 min for a group Community Networking - \$5.35/15 min for individual or \$2.98/15 min for a group	Day supports-may be prevocational - \$24.52/hr for an individual or \$14.56/hr for a group
Oklahoma	\$22.64/hour of service Assessment, intensive job development, etc. Post placement Job Coaching: \$16.60/per hour worked by individual	Job coaching: \$12.48/per hour individual works Enhanced rate job coaching: \$14.52/per hour individual works Stabilization and extended services:	\$4.67/hour center based services \$11.77/Supplemental support as needed/hour individual participates	\$15.13/hour individual participates in individual activity \$9.34/hour individual participates in group activity	\$4.67/hour individual participates Supplemental support as needed \$11.77/hour individual participates

State	Individual Integrated Employment	Group Supported Employment	Facility-based Work	Community-based Non-Work	Facility-based Non-Work
	<p>Stabilization and extended services: \$5.16/per hour worked by an individual for up to 2 years</p> <p>Employment training specialist rate (after stabilization): \$22.64/hour of service</p>	<p>\$5.16/per hour individual works</p>		<p>\$12.47/hour individual participates in group activity enhanced rate</p>	
Oregon	<p>Discovery ranges from \$1,728.65 - \$2,222.55 upon completion of a Discovery Profile.</p> <p>Job development is outcome based and ranges from \$1,977.20 - \$2,965.80</p> <p>Job coaching pays \$31.02-\$64.41 per hour worked</p>	<p>Max daily billing rate varies from \$18.83-24.77/hour based on support need</p>	<p>Max daily billing rate varies from \$10.39-22.03/hour based on support need</p>	<p>Max daily billing rate varies from \$15-24.77/hour based on support need</p>	<p>Max daily billing rate varies from \$8.48-21.58/hour based on support need</p>

State	Individual Integrated Employment	Group Supported Employment	Facility-based Work	Community-based Non-Work	Facility-based Non-Work
Virginia	<p>Supported employment rates are individualized for providers by VR vendor. Medicaid bills at the individual rate set by VR.</p> <p>Workplace assistance services range from \$29.24 - \$33.53/hr depending on location (only under FIS and CL waivers)</p>	<p>Ranges from \$19.25 - \$20.99/hr if 2 or fewer members per staff</p> <p>\$13.52 - \$14.70/hr if 2-4 members per staff</p> <p>\$11.21 - \$12.18/hr if more than 4 members per staff</p>	<p>No more pre-voc or facility based employment services are being funded by Medicaid in VA. Any remaining facility-based services are currently being billed as Group Day services.</p>	<p>Community engagement ranges from \$14.29 - \$22.61/hr depending on Tier</p> <p>Community Guide ranges from \$39.19 - \$49.62/hr depending on location</p> <p>Community Coaching ranges from \$29.24 - \$33.53/hr depending on location (only under FIS and CL waivers)</p>	<p>Group day support ranges from \$8.60 - \$17.34/hr depending on Tier</p> <p>Community Guide services can act as a linking service between facility-based non-work and community based. Guide services can provide some service delivery but that is not what it is intended for.</p>
Washington	<p>Supported employment - \$75/hr ceiling for an individual</p>	<p>Supported employment - \$65/hr ceiling</p>	<p>Prevocational - \$55/hr ceiling for an individual</p>	<p>Community guide - \$20.26/hr individual \$25.68/hr Agency</p> <p>Community Access - \$35/hr ceiling for an individual</p>	<p>N/A</p>

State	Individual Integrated Employment	Group Supported Employment	Facility-based Work	Community-based Non-Work	Facility-based Non-Work
				Community engagement - \$20.26/hr individual \$25.68/hr Agency	

Table 3: Comparison of Hourly Rates for Integrated Employment Services

State	Hourly rate for individual integrated employment	Hourly rate for group supported employment
Alaska	Pre-employment - \$48.48/hr Individual supported employment - \$48.48/hr	Pre-employment - \$33.96/hr Supported employment - \$33.96/hr
Colorado	Prevocational services range from \$9.44-\$24.20/hr depending on level determined Job Coaching - \$52.08/hr Job Development - \$52.08/hr	Job Coaching services range from \$12.64-\$27.76/hr depending on level determined. Job Development - \$16.60/hr
Iowa	Prevocational - \$10/hr Career exploration - \$38.27/hr. Maximum of 34 hours of Career Exploration over a 90 day (12 week) period Job development: Initial authorization: \$66.13 per hour Not to exceed 40 hourly units Supported employment - \$66.13/hr	Ranges from \$5.04 – \$11.36/ per person, per hr
Minnesota	Base rate begins at \$13.33/hour for direct staffing then increases based on Supported Employment (SE) inputs (see full state profile)	\$13.33/hour base rate plus SE inputs if individual not on DD waiver \$13.33/hour base rate plus SE inputs, plus RN and LPN hours for individuals on DD waiver
New York	Supported employment - \$56.11 to \$70.11/hr depending on region	Supported employment - \$22.64 to \$28.05/hr depending on region

State	Hourly rate for individual integrated employment	Hourly rate for group supported employment
	<p>Pathways to Employment - \$40.58/hr or to \$44.23/hr depending on region</p> <p>Community-Based Prevocational – Ranges from \$20.82 - \$41.65/hr depending on Region and # of individuals served</p>	<p>Pathways to Employment - \$34.49/hr to \$38.70/hr depending on region</p>
North Carolina	<p>Individual supported employment - \$29.56/hr</p> <p>Long-term follow-up - \$29.56/hr</p>	<p>Group supported employment - \$7.60/hr</p> <p>Long-term follow-up - \$7.60/hr</p>
Oklahoma	<p>\$22.64/hour of service Assessment, intensive job development, etc.</p> <p>Post placement Job Coaching: \$16.60/per hour worked by individual</p> <p>Stabilization and extended services: \$5.16/per hour worked by an individual for up to 2 years</p> <p>Employment training specialist rate (after stabilization): \$22.64/hour of service</p>	<p>Job coaching: \$12.48/per hour individual works</p> <p>Enhanced rate job coaching: \$14.52/per hour individual works</p> <p>Stabilization and extended services: \$5.16/per hour individual works</p>
Oregon	<p>Discovery ranges from \$1,728.65 - \$2,222.55 upon completion of a Discovery Profile.</p> <p>Job development is outcome based and ranges from \$1,977.20 - \$2,965.80</p>	<p>Max daily billing rate varies from \$18.83-24.77/hr based on support need</p>

State	Hourly rate for individual integrated employment	Hourly rate for group supported employment
	Job coaching pays \$31.02-\$64.41 per hour worked.	
Virginia	Supported employment rates are individualized for providers by VR vendor. Medicaid bills at the individual rate set by VR. Workplace assistance services range from \$29.24 - \$33.53/hr depending on location (only under FIS and CL waivers)	Ranges from \$11.21 - \$20.99/hr depending on staff to person ratio
Washington	Supported employment - \$75/hr ceiling for an individual	Supported employment - \$65/hr ceiling

Cross-State Summary: Learning From Other States Funding Systems

Information presented in the cross-state summary is intended to inform stakeholders in Florida about the various funding models that states are implementing or proposing to implement. In-depth information on each state's funding system can be found in the Appendix section.

Status of States. The ten states selected are at various stages in the process of revising and implementing funding systems:

- Alaska provides a regional differential to service rates, not per individual. But individuals in Alaska have a choice in services and providers. As money moves with the individual, they can always make changes to their supported employment provider.
- Colorado's employment service rates are determined through a multi-factor algorithm that assesses the support needs of the individual, with enhanced rates for individuals that have high medical and behavioral needs.
- In 2012, Iowa asked the State Employment Leadership Network (SELN) to produce a comparison of states' funding structures for integrated employment, with the goal of revising their own funding system to support increased employment outcomes. Using this report along with input from stakeholders, updated payment rates were adopted in May of 2016. Additionally, most Iowa Medicaid programs have now been joined together into

one managed care program called IA Health Link operating statewide with three managed care organizations.

- In January of 2014, in lieu of published home and community-based services waiver rates, Minnesota adopted several rate setting frameworks over the next five years. Rate stabilization is expected at the end of the five years, but is currently banded to existing, historic rates to allow adjustment to the new system. The rates are designed to account for wages, employee and program-related expenses, and general and administrative expenses.
- New York bills for services based on region. Region 1 is New York City, Region 2 is Putnam, Rockland, Westchester, Suffolk, and Nassau Counties, and Region 3 includes the rest of New York State.
- North Carolina has recently moved all of their employment services under the Innovations Waiver which allows funding to provide community-based services and supports that promote choice.
- Oklahoma's rate structure has been in place for many years and is viewed within the state as an important tool to encourage supported employment services. The focus on payment for the number of hours a person works is unique, but also has created some challenges including incentivizing group supported employment and requiring strong oversight of the fading process to ensure movement between job coaching and stabilization.
- Oregon has implemented their new streamlined funding system which provides adult DD services through two state and federally funded Medicaid programs: The Community First Choice Option or "K Plan"; and Home-based and community-based waivers. Individuals can purchase a combination of employment (on either waiver) and day supports (via the K-plan). Service rates remain the same under all plans and waivers.
- Virginia is redesigning its Medicaid Home and Community-Based Services (HCBS) Waivers. Supported employment rates are currently individualized to the provider and rates are intentionally increased for more community integrated services.
- In Washington, unit rates for prevocational as well as individual and group supported employment are negotiated between the counties and their providers. Variations in rates are due to differences among providers related to overhead, staff wages, and the local demand for services.

Key Differences Across States. Important differences across states are the unit of service payment (15 minutes vs. hour, and monthly for ongoing support. Other differences include the development of a specific funding rate schedule based upon individual's level of support need (Iowa, Colorado, North Carolina, Washington), long-term job coaching payments to the provider based upon the number of hours worked by the individual as opposed to hours of direct support received (Oklahoma), and the explicit development of rates that would prioritize integrated employment over other day and employment services (Iowa, Virginia, Oklahoma, and Oregon).

Pros and Cons. ICI and NASDDS staff members conducted a cross-state analysis of the ten states' funding systems. A summary list of the cross-state pros and cons of different funding approaches and assumptions are summarized.

Pros:

- The rate is built up from the cost of hiring high-quality employment training specialists and job coaches.
- Employment training specialists' services are paid at a higher rate than job coaching services after stabilization on the job or for personal support staff at the job site. Note that while separating job development and initial placement from long-term job coaching is a common approach across states, using a team of employment training specialists that support all phases of the employment process may be cost-effective in accelerating the process of fading supports.
- The funding system and rate provides a steady and reliable income source for employment service providers and maintains a flexible resource base for responsive support. While states vary in their approach, providing a predictable funding stream for long-term supports based on either hours worked (Oklahoma) or a monthly allocation based on level of need (Iowa, Colorado, North Carolina, Washington) seems to provide a stable follow along resource and a pathway to fading supports.
- The individual's level of support need is included in the determination of the rate for group services (Colorado, North Carolina, and Washington).
- Individual integrated employment is financially incentivized over other service options.
- Funding for all day and employment services is designed to support the individual's whole life and allows wrap-around supports during times when the individual is not working.
- Quality assurance and case management structures are used as tools to manage the cost of employment services and the client authorization process is able to be quickly modified to meet the individual's present needs.
- Either standard or ceiling and floor rates (a cost corridor) for employment and day services are identified (Iowa and Oregon).
- There are clearly defined billable activities and the rate is designed to take into account non-billable activities such as provider agency staff meetings, time to complete paperwork, transportation without the individual, and time for staff to attend employment-related training. This approach recognizes that the number of billable hours varies by service, and is in general lower for staff that are responsible for job development or individual job support.
- There is a specific process for determining the transition from initial job coaching to job stabilization or ongoing support services.
- Transportation is funded separately from integrated employment services.

- Individuals are able to use I/DD agency services to begin the employment process while they are waiting for the availability of Vocational Rehabilitation Agency services.
- Job development, negotiation, and initial job entry services are available through both the vocational rehabilitation and the Medicaid systems. Processes and practices are developed to determine the most appropriate funding source on an individualized basis.
- Job development, negotiation, and initial job entry are funded differently from long-term job coaching and other employment support services.

Cons:

- Overly complicated funding systems that are not easily understood by provider agencies, case management staff, resource allocation staff, and individuals and their families.
- The non-direct services needed for successful job development are not defined as billable activities.
- Transportation of the individual is expected to be paid for out of the integrated employment rate.
- States neglect to adjust the payment rate for group supported employment based upon the number of individuals participating in a group. This can lead to group supported employment services that are often more financially lucrative for employment service providers than individual integrated employment.
- There are different payment rates for different funding sources (i.e. different Medicaid waivers or individuals who receive state/county only funded services). Oregon is an example of a state that has recently moved away from this model and streamlined its rates.
- The true cost of hiring high-quality staff or staff time for professional development is not accounted for in the rate.
- The payment structure does not support a stable staffing base for flexible long-term employment support and follow along.

Key Assumptions for a High-Quality Funding System

Based upon the cross-state comparison and multiple years of experience supporting state IDD agencies through the SELN, the authors identified a series of key assumptions that we believe are crucial to the development of an effective and efficient funding system for individual integrated employment (SELN, March 2016).

Key assumptions:

- Simplicity is essential: The funding process and payment rates need to be simple to understand and implement.

- Service definitions must link to billable activities: Clear service definitions must be developed that are directly linked to the billable activities allowed under each type of integrated employment service.
- High-quality staff must be compensated: Employment training specialist and individual job coach wages need to be sufficient to attract individuals who have the capability to operate effectively in complex and diverse work environments.
- Rate must be based upon staff cost: Staff cost is the primary driver of service costs. Rates must be based upon the cost of competent staff needed to complete the job tasks and not historical costs of providers.
- Payment for indirect staff time must be included in the rate: In-direct staff time needs to account for specific employment training requirements and career development opportunities, staff transportation when not with the individual, meeting with businesses and other system professionals, and the completion of paperwork.
- Providers' skill sets must be consistent across the state: Part of developing a high-quality integrated employment system is ensuring that there is consistency across the state in providers' ability to provide employment services. Statewide training and certification requirements for integrated employment are an important tool to facilitate this factor.
- Support a stable work team for long-term support: Providers need a predictable stream of income that will allow them to maintain flexible staff resources for employment support and that encourages fading intensive job coaching.
- Some services must be time-limited: Clear points in time must be identified for the transition between different levels of integrated employment services. There should be a time limit on the amount of time needed to complete the career exploration process and a standardized method for determining the fading of job coaching and transition to ongoing supports with a process for exceptions.
- The budget allocation process is different from the payment rate process: The development of the process for individual budget allocation must be done separately from the development of payment rates for day and employment services.
- Individual level of need matters: Both the individual budget allocation and payment authorization for day and employment services must account for the individual's level of need.
- Transportation must be a separate allocation: Funding for transportation for the individual must be a separate allocation and rate. The separation of service is transportation funding must occur for across all day and employment services not just integrated employment services.
- Funding systems need to have complementary case management systems that support the individual: The case management structure and process need to be responsive to changes in individual's support needs and be able to quickly fund additional supports during times of crisis. Additionally the funding and case management systems must be designed to support a whole life individual community centered approach.

- Funding systems must acknowledge the long-term costs: For long-term cost management, state I/DD agencies must determine what facility-based and day services they will reduce to allow reallocation of resources for expansion of employment and employment-related integrated services, for instance adding career planning/discovery to the service options.
- Know the changes your state needs: States that are in the process of revising their funding system must review the status of their current funding system and determine the extent to which their system must change to reflect their goals. Some states may only need to tweak their funding systems to increase funding incentives, some may need to simplify their system to make it more effective and efficient, and some may need to completely revise their system of funding day and employment services so that integrated employment is the most popular services option for both individuals and providers.

Recommendations for Florida's Funding System

Within the context of the cross-state summary, identification of funding system pros and cons, and the development of key assumptions for a high-quality funding system, ICI and NASDDS staff developed a funding approach for Florida to consider. Modifications to the proposed funding rates that APD may wish to consider are also provided.

Approach. Project staff used a rate model that begins with the staff resources needed for implementation, and then builds additional cost factors on that expense. We are providing the spreadsheet used to build the rate from this cost. Factors included in the calculation can be modified to meet the needs and assumptions in Florida for factors like benefits and employee costs, program support and program administration, and available (billable) hours. The model included uses a fairly simple approach to addressing costs. A more complex model could be built that breaks costs into finer categories.

Factors ICI / NASDDS Considered in Developing Recommended Rates. ICI and NASDDS staff considered the following factors as the recommendations were developed:

- *Staff Salary.* Staff cost is the largest cost component providers encounter when offering integrated employment services and therefore the service rate should be grounded in this cost. The other costs are cost of staff transportation to complete job responsibilities, and administrative and program costs.
- *Employee Related Expenses.* Employee related expenses is a direct charge for staff benefits and related direct costs for employing staff.
- *Mileage Cost.* Mileage costs are comprised of the number of miles an individual is expected to travel and cost per mile at the federal rate of .53.5/mile (Internal Revenue Service, 2016).
- *Program Support and Administrative Costs* are comprised of: cost of supervisory staff, administrative business costs, equipment costs, and office expenses.
- *Adjustment for Available (Billable) Hours.* Staff available for billable tasks varies according to the job responsibilities. For example, employment staff that has responsibility for job development will in general have more non-billable hours because of time spent traveling without the job seeker, performing non-specific job development,

and transitioning between customers. The available billable hours per staff considers adjustments for (1) vacation, holiday and sick time; (2) training and staff development; (3) job specific activities that are not billable including employer and supervision time, team meetings, non-billable job development, and job tasks such as progress notes that are not billable; and (4) a productivity adjustment that addresses general non-billable time such as missed appointments or other responsibilities.

Service Assumptions. The model proposed considers the costs of three distinct types of employment support. Job development and job entry require support by an employment training specialist with advanced skills. Expert intervention at this stage will influence the long-term costs of a job placement based on the quality of the job, the job match, and the effectiveness of job entry including the establishment of workplace supports. Job exploration and career planning services are proposed as a service to support the 41% of individuals who say they want a job in the community but are not yet working. Staff providing this service should receive training related to how to support individuals to translate interests and experiences into employment goals. Florida may choose to reconsider this assumption. Finally, ongoing supports are a distinct service that requires building a flexible resource base, and simultaneously encouraging fading of resources.

- Job development and initial training supports require staff that have advanced community employment competencies and therefore employment training specialists should provide this service and be compensated for their expertise at a rate greater than that paid for providing on-going individual level; similar to considerations given to funding behavioral specialist.
- Job exploration and career planning services are proposed as a pathway to support individuals who are in ADT services to begin exploring employment in the community. These services are proposed to support individuals who wish to pursue integrated employment or who would like opportunities to explore integrated employment a concrete strategy to begin the integrated employment process prior to referral to DVR or while waiting for a DVR case to be opened.
- Provision of on-going employment supports is a major driver of systems costs. The model for funding ongoing supports needs to balance the importance of establishing a flexible and responsive support team and encouraging fading and the development of natural workplace supports. The project team considered several models for providing ongoing supports including an on-demand hourly or 15-minute unit based service, a payment based on the hours an individual works (Oklahoma), or a monthly payment based on the assessed level of need. Funding this cost at a monthly rate is one way to ensure stabilization of provider capacity to deliver quality employment services and within the context of the intermittent demand for employment services.
- Service costs that do not take into account the individual's level of support need can unintentionally exclude individuals with complicated support needs from individual integrated employment services.
- In order to effectively implement these services, clear service definitions must be developed and the activities described in the service definitions must correspond to the allowable billable activities for each service.

- Service definitions must reflect best practices in integrated employment services and take into account that billable activities must include a mix of in-person and on-behalf-of-the-individual services.
- Individuals need access to individual and small group community-based non-work services during the times that the individual is not working.

Recommendations for Calculating Service Rates. The following recommendations are made regarding the determination of service rates. All rates are based upon the cost to providers for delivering quality services. The Microsoft Excel workbook included in the product provides detailed information regarding essential assumptions that will allow APD to test these rates and determine cost neutrality in reallocating funding for other day and employment services.

- Different rates should be developed for *employment training specialists (ETS)* providing individual level employment supports, *job coaches* when providing individual level employment supports, *job coaches when providing group* supported employment supports, and direct support professionals in facility-based services.²
- Annual wages (varies based upon staff title), related expenses including benefits (consistent across staff title), travel costs (varies based upon staff title), and program support and administration (varies based upon staff title) each need to be factored into the determination of staff costs.
- The calculations assume 37.5 hours of work per staff week and 32 days of sick/vacation/holidays per staff per year. Factors that vary by staff position and service include training and staff development hours, available hours to work, and the percent of total work week that is billable
- Group supported employment and group community-based ADT services rates should be prorated based upon group size per staff. Group supported employment staff to group community-based ADT individual ratios were calculated at group sizes of 1:6, 1:4, and 1:3. While current staff to client ratios for some APD services are higher it is recommended that for group supported employment and group community-based ADT services that the largest group is no more than six clients.
- Facility-based ADT payment rates are recommended to remain constant. This will support APD in its efforts to transition individuals from facility-based employment and facility-based day settings and come into compliance with the HCBS community settings rule.
- The real world costs of developing and sustaining a high-quality supported employment system must be regularly evaluated and updated. Increases in the costs of living, benefits, program support and administration must be planned for and included in APD budget proposals on a routine basis.

² Data for suggested staff wages came from U.S. Census income rates for Florida and Occupational Outlook Handbook data for Social and Human Service Assistants.

Additional Rate Recommendations. ICI and NASDDS have additional recommendations that we believe Florida should consider as they revise their service funding rates.

- Review and make changes to allowable billable activities. A current barrier within APDs employment service system is the requirement that services be provided face-to-face. The face-to-face requirement does not support evidence-based supported employment services for job development and job coaching services. Service definitions and billable activities must be revised and amended to support a mix of services that need to occur in-person and on-behalf of the individual.
- Authorize job development and training as an initial allocation. Authorize job development and training as an initial hour allocation with the option to increase if needed. ICI and NASDDS staff assumed an initial 40 non-consecutive hour allocation, however it is recommended that APD review available internal data to determine the number of hours on average it takes providers to complete this component of the employment process. APD may want to identify the average hours spent based upon the individual's level of need. Ideally, service hours should correspond to the number of hours that service is funded by DVR, and DVR services should be used to support short-term job development and stabilization services to the maximum extent possible.
- Develop a job exploration and career planning service. The implementation of the HCBS community settings rule service can be used to support the transition of individuals from work and non-work services in ADTs to supported employment. Additionally, the HCBS guidance related to pre-vocational and sheltered employment services also requires that individuals in jobs in ADTs must have community employment as a goal in their service plan and that these services need to be time-limited in their authorization. However, skills in experiences in ADT based employment do not directly transfer to community employment. The development of a job exploration and career planning service would provide a venue for individuals to fully explore their interests and skills outside of the ADT setting prior to being reviewed to DVR for a supported employment placement. It was also shared by providers who participated in the project focus groups that individuals who are eligible for EEP funded long-term job coaching services often are slow to obtain employment because they not have a formed vision of their ideal employment outcome.³ The development of a short-term job exploration and career planning service would help to speed up actual job development process for EEP recipients as well.
- Authorize job exploration and career planning as an initial allocation. Authorize job exploration and career development for a specific number of hours at a time, with a maximum time limit, and the development of a career plan as the final product. ICI and NASDDS staff assumed an initial 20 hour allocation with a process of allotting up to a maximum of 40 hours for this service.
- ADT services should be converted from a day rate to a quarter hour rate. A significant barrier to individuals who are in ADT services and want to pursue community

³ Data from the RSA 911 data base shows that in 2014 it took individuals with ID 1,011 days to obtain a successful employment closure, the national average was 718 days. Statedata.info. (2017). *State Vocational Rehabilitation (VR) Agency Data, VR Closures with an Intellectual Disability (ID). Florida, U.S. Total: Average days, status 26.* Retrieved from <http://www.statedata.info/data/showchart/444928>

employment is that ADT services are billed on a daily basis. This makes it challenging for providers of employment services to offer services on the same day, but not during the same time, as the individual is receiving ADT services. Further aligning the billing process will streamline the provision of services within individual provider agencies that offer both ADT and supported employment services and want to support individuals served by their agency to pursue their goal for supported employment.

- Align billing, case note, and quality assurance process. Providers consistently reported that the current billing, case note, and quality assurance system is unnecessarily burdensome. Further current APD practices do not reflect best practices in administrative processes. APD should make full use of their membership in the National Association of State Directors of Developmental Disabilities Services to receive guidance and technical assistance on how to reduce the administrative burden on their provider community while simultaneously ensuring quality services.
- Authorize individuals in Adult Day Training to pursue career planning. Through the service planning process individuals in ADT should be asked if they want to pursue career exploration and planning. An outcome of the career exploration and planning service should be a career profile.
- Work together with the Division of Vocational Rehabilitation (DVR). APD should work with DVR to ensure that career plans developed as an outcome of the career exploration and planning process be used as part of the information gathered during the DVR Individual Career Plan benchmark for supported employment services. Ideally the individual would first pursue DVR job development, but if DVR declines to open a case, then the career plan should be used as the first step in APD funded job development services.
- Authorize on-going job supports based upon the anticipated number of hours of services needed per month. Authorize on-going job supports for four levels of hours of support (SELN staff used the following groupings: 1 contact per month, 2-8 hours per month, 9-16 hours per month, and 17-24 hours per month). Develop a process for exceptions (ICI and NASDDS staff used 25+ hours per month). While not analogous this structure is in line with Florida Association of Rehabilitation Facilities July 2013 report, “Proposed Monthly Support Model for Independent Supported Employment Services”.
- Modify service categories and types to support employment and community inclusion. The development of new supported employment service categories, billable activities, and payment rates must be done within the context of other required changes to Medicaid Home and Community-Based Services.
 - For this reason it is recommended that the group supported employment ratios not exceed 1:6 individuals and that the total number of individuals in APD funded group supported employment remain constant.
 - For this reason it is recommended that community-based ADT services be rebranded as community-based non-work services and a new service definition and billable activities based upon Community Life Engagement Guideposts: Individualize supports for each person; Promote community membership and contribution; Use human and social capital to decrease dependence on paid supports; and ensure that supports are outcome-oriented and regularly monitored (Timmons and Sulewski, 2016). It is also recommended that the funding methodology for this service use many

of the same inputs as the long-term job coaching service and group supported employment service.

- For this reason it is recommended that facility-based ADT services be split into distinct non-work and pre-vocational (sheltered employment) services. To further support compliance with the HCBS 2011 guidance and community settings rule it is recommended that individuals who choose pre-vocational employment services be informed that they need to develop a goal for integrated employment as part of their service plan, that individuals and their supports coordinator must work together to develop a plan and timeline to implement the integrated employment goal.
- Identify Florida’s current cost for each service. In order to ensure that changes are implementable as well as for individual employment to be prioritized in the iBudget algorithm, APD needs to determine the current cost for each of the following services: job development and training, on-going individual level job support, group supported employment, and ADT services. This total cost for services is an additional factor that will need to be used to finalize the rate for each service.
- Develop a separate allocation for transportation services. In order to address the barrier that transportation can be to supporting individuals and providers to transition to individual community employment, APD should not roll funding for transportation into the rates for any employment or day service but instead provide individuals a separate allocation. The allocation could vary based on the availability of public transportation, para-transit services, and population density.
- Assume that supported employment payment rates and community-based non-work payment rates be the same regardless of provider type. The cost of providing high-quality supported employment services and community-based non-work services is not substantially different for solo or provider agencies. Additionally, having separate payment rates for different types of providers does not encourage individuals to choose employment services based upon the quality of services and measurable employment outcomes, instead it encourages them to choose in part based upon available funds.

Specific rates as calculated by ICI and NASDDS staff are identified in Table 5. The Microsoft Excel Workbook included in the product provides detailed information that will allow APD to test these rates and determine cost neutrality in reallocating funding for other day and employment services.

Table 5: Recommended Service Rates

Service	Rate
Job development and training by ETS (authorize 40 hours at a time)	\$52/hour
Job exploration and career planning by job coach (authorize 20 hours at a time, max 60 hours, outcome is a career plan)	\$52/hour
On-going job 1 check in per month	\$52
On-going job 1:1 support (2-8 hours per month)	\$256/month
On-going job 1:1 support (9-16 hours per month)	\$512/month
On-going job 1:1 support (17-24 hours per month)	\$704/month

On-going job 1:1 support for exceptions (25 hours+ per month)	\$32/hour
Group supported employment (1:6 staff to individual)	\$6/hour
Group supported employment (1:4 staff to individual)	\$9/hour
Group supported employment (1:3 staff to individual)	\$12/hour
Community-based non-work support (1:1 staff to individual) (formerly ADT services in the community)	\$32/hour
Community-based non-work support (1:6 staff to individual) (formerly ADT services in the community)	\$6/hour
Community-based non-work support (1:4 staff to individual) (formerly ADT services in the community)	\$9/hour
Community-based non-work support (1:3 staff to individual) (formerly ADT services in the community)	\$12/hour
ADT pre-vocational employment service	Maintain current ADT rate for facility based services, however bill as quarter hour service
ADT facility-based non-work service	Maintain current ADT rate for facility based services, however bill as quarter hour service

Potential Modifications or Alternatives to the Proposed Rate Structure. The service rates proposed by ICI and NASDDS could be modified in the following way:

- Add a modifier based upon geographic location to payment rates for employment and day services.
- Fund ongoing supports at an hourly rate based on utilization instead of providing a tiered monthly rate.
- Fund group supported employment at a monthly rate rather than a tiered hourly rate.
- Use a benchmark payment system based upon specific employment outcomes as a supplement to (outcome-based payment) or as an alternative to an hourly rate. This approach could build in tiers based on individual level of need.
- Fund ongoing supports at an hourly rate based on the number of hours an individual works (similar to Oklahoma).

Additional Funding System Recommendations. ICI and NASDDS have additional recommendations that we believe Florida should consider as they revise their funding system.

- Focus on the long-term sustainability of the funding system. One strategy to improve the long-term sustainability of the funding system is to develop specific funding guidelines in cooperation with the Florida Division of Vocational Rehabilitation Services (DVR) to ensure that the job development process for most individuals is paid for by DVR, and that APD dollars are the funder of last resort for job development services. An additional step that is recommended to support this strategy is for APD and DVR to implement complementary funding rates for job development services so that providers are adequately compensated under both systems to meet the needs of individuals with I/DD.

This change may include the development of funding tiers based on the individual's level of need or a fee-for-service payment structure.

- Ensure that the funding system does not impede the employment process. When individuals are engaged in the earlier stages of the employment process it is important that they do not experience a lag in services between identification of an employment goal, the referral to DVR services from and opening or denial of a DVR case. One strategy to ensure this does not occur is to write the APD funding guidelines so that APD dollars can be used to support job development services during the period before a DVR decision is implemented.
- Require individuals providing integrated employment services complete a certification process. To make sure that staff providing integrated employment services have the necessary skills to implement high-quality services it is recommended that APD develop and implement certification and ongoing training requirements for provider staff. These requirements will ensure that providers have the expertise to effectively deliver the billable activities.
- Align billing and credentialing. Bringing billing expectations in line with DVR's expectations is advised in order to create acceptable statewide guidelines. Bringing credentialing requirements in line with APSE and ACRE's requirements is advised to better match Florida's current Employment First curriculum.

Concluding Comments

The comparison states highlighted in this report as well as information available in the report StateData: The National Report on Employment Services and Outcomes and the StateData website: <https://www.statedata.info/> consistently confirm that APD's employment and day services system is underfunded. States profiled in this report have been able to increase funding for supported employment services by rebalancing their rates and significantly reducing the rates paid for non-integrated employment services. In order for Florida to make the necessary changes to their system to implement its 2016 Employment First Florida Law and truly prioritize individual integrated employment the iBudget system will require a substantial state-level financial investment, payment rates for supported employment services will need to be raised accordingly, and APD policies and practices will need to be substantially realigned.

The recommendations provided by the ICI and NASDDDS in this document are based on the identification of best practices in funding approaches and the ways in which different funding approaches can undermine state efforts to use funding to increase integrated employment outcomes. This document does not take the typical approach of revising funding based upon historical costs and is not a traditional cost study. The approach presented is based on the real world costs of providing high-quality integrated employment services; for this reason, the authors believe that it is an approach that meets the specific barriers faced by the Florida employment service system to deliver and for Floridians with intellectual and developmental disabilities to receive high-quality integrated employment services. Lastly, we recommend that Florida take a comprehensive approach to revising its funding of the full array of employment and day, including separating funding for transportation from funding for services. Past experience has found that making fragmented changes to one or two service rates is not sufficient to address the underlying funding issues faced by providers and service recipients.

Revising the entire funding system will help ensure that individuals receive services that support a whole life individualized community-centered approach.

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Appendix A
State Case Summaries
Florida Summary

State Note these are for waiver funded services.	Individual Integrated Employment		Group Supported Employment		Facility-based Work	
	Solo	Agency	Solo	Agency	Solo	Agency
Geographical	\$7.71/15 min	\$9.43/15 min	Ranges from 1:1 support=\$3.05/15 min to 1:8=\$0.92/15 min	Ranges from 1:1 support=\$3.72/15 min to 1:8=\$1.11/15 min	NA	Ranges from 1:1=\$15.76/hr to 1:6- 10=\$4.89/hr
Non- Geographical	\$7.46/15 min	\$8.93/15 min	Ranges from 1:1 support=\$3.02/15 min to 1:8=\$0.91/15 min	Ranges from 1:1 support=\$3.63/15 min to 1:8=\$1.08/15 min	NA	Ranges from 1:1=\$15.67/hr to 1:6- 10=\$4.80/hr
Monroe County	\$7.82/15 min	\$9.57/15 min	Ranges from 1:1 support=\$3.18/15 min to 1:8=\$0.95/15 min	Ranges from 1:1 support=\$3.86/15 min to 1:8=\$1.16/15 min	NA	Ranges from 1:1=\$16.11/hr to 1:6- 10=\$4.89/hr

State	Community-based Non-Work			Facility-based Non-Work	
	Solo (Companion)	Agency (Companion)	Agency (ADT)	Solo	Agency
Geographical	Ranges from 1:1=\$2.73/15 min to 1:3=\$1.42/15 min	Ranges from 1:1=\$2.92/15 min to 1:3=\$1.88/15 min	Ranges from 1:1=\$15.76/hr to 1:6-10=\$4.89/hr	NA	Ranges from 1:1=\$15.76/hr to 1:6- 10=\$4.89/hr
Non-Geographical	Ranges from 1:1=\$2.73/15 min to 1:3=\$1.39/15 min	Ranges from 1:1=\$2.92/15 min to 1:3=\$1.80/15 min	Ranges from 1:1=\$15.67/hr to 1:6-10=\$4.80/hr	NA	Ranges from 1:1=\$15.67/hr to 1:6- 10=\$4.80/hr
Monroe County	Ranges from 1:1=\$2.73/15 min to 1:3=\$1.68/15 min	Ranges from 1:1=\$2.92/15 min to 1:3=\$2.23/15 min	Ranges from 1:1=\$16.11/hr to 1:6-10=\$4.89/hr	NA	Ranges from 1:1=\$16.11/hr to 1:6- 10=\$4.89/hr

The information in this summary comes from:

1. Florida Association of Rehabilitation Facilities. (2013). Proposed Monthly Support Model for Independent Supported Employment Services, July 2, 2013.
2. Florida Medicaid Developmental Disabilities Individual Budgeting Waiver Services Provider Rate Table: http://apd.myflorida.com/ibudget/docs/59G-13%20081_iBudget_Rate_Table_Adoption.pdf
3. DEVELOPMENTAL DISABILITIES INDIVIDUAL BUDGETING WAIVER SERVICES COVERAGE AND LIMITATIONS HANDBOOK. Agency for Health Care Administration September 2015. http://apdcares.org/ibudget/docs/DD_iBudget_Rule%2059G-13.070Adoption.pdf
4. Personal communication with Meghan Murray, Director of Community Supports, Agency for Persons With Disabilities.

Background

APD’s current supported employment rates have not been updated in at least 10 years. In July 2013 the Florida Association of Rehabilitation Facilities (FARF) released a report documenting from the perspective of the provider community how APD could modify its long-term supported employment support rates to reflect a monthly payment rate model. These rates are based upon hours of support that an individual would need to maintain employment. The rates proposed by FARF are:

	Non-Geographic Rate	Geographic Rate	Monroe Rate
Level 1: Basic (Approximately 1-5 Hours/Month)*	\$142.88	\$150.88	\$153.12
Level 2: Intermediate (Approximately 6-10 Hours/Month)*	\$285.76	\$301.76	\$306.24
Level 3: Intense (11+ Hours/Month)*	\$428.64	\$452.64	\$459.36

*The approximate hours per month are provided for each level as a reference to the current rate system and are not offered as a requirement for service billing and reimbursement. (p.4)

However, there is no evidence that the proposed rates and additional recommendations developed by FARF have been considered by APD.

APD has established specific provider staff qualifications for different service types.

Life Skills Development (Level 1) Companion: Providers and employees providing companion services hired after September 2015 (the effective date of this rule) must meet the qualifications outlined in the APD handbook. Providers and employees of agencies must be age 18 years or older, have a high school diploma or GED, and have at least one year of verifiable experience working directly with individuals receiving services in a medical, psychiatric, nursing, or childcare setting or working with recipients who have a developmental disability. In lieu of the required work experience, providers and employees may have 30 semester hours, 45 quarter-hours, or 720 classroom hours of college or vocational school. Providers and employees providing companion services hired before September 2015 (the effective date of this rule), with no break in employment, must meet the qualifications outlined in Developmental Disabilities Waiver Service Coverage and Limitations Handbook, November 2010, as outlined below. Minimum qualifications for a companion include:

- Be at least 18 years of age and have
- One year of experience working in a medical, psychiatric, nursing or child care setting, or in working with recipients having developmental disabilities
- College, vocational, or technical training from an accredited institution can substitute at the rate of 30 semester hours, 45 quarter or 720 classroom hours for the required experience.

Life Skills Development (Level 2) Supported Employment: Providers of supported employment services must meet one or more of the following requirements:

- Have a bachelor's degree from an accredited college or university with a major in education, rehabilitative science, business or a related degree.
- Have an associate's degree or two years of college from an accredited college or university and have two years of documented direct experience with recipients with developmental disabilities.
- Have one year of college from an accredited college or university and three years of documented direct experience in working with recipients with developmental disabilities.
- Four years of direct professional experience in working with recipients with developmental disabilities may substitute for college on a year for year basis. The provider must hold a valid high school diploma or GED diploma.

Life Skills Development (Level 3) ADT: The provider must meet the following minimum qualifications for staff:

- The program director must possess at a minimum an associate's degree from an accredited college or university and two years, verifiable experience working directly with individuals receiving services or related experience.
- Supervisors of direct care staff will have a high school diploma or GED and one year of direct, care-related experience.
- Related experience will substitute on a year-for-year basis for the required college education.
- Direct service staff must be age 18 years or older at the time they are hired.

As part of Supported Employment services providers are required to furnish APD with employment outcome data, including information regarding the recipient's job, benefits, pay, and other quality indicators as part of billing documentation and as otherwise requested.

Billable Activities

Life Skills Development (Level 1) Companion: Companion services consist of non-medical care, supervision, and socialization activities provided to recipients age 21 years or older. This service

must be provided in direct relation to the achievement of the recipient's goals as specified in the recipient's support plan. The service provides access to community-based activities that cannot be provided by natural or other unpaid supports, and should be defined as activities most likely to result in increased ability to access community resources without paid support. These services can be scheduled on a regular, long-term basis. Activities can be volunteer activities performed by the recipient as a pre-work activity or activities that connect a recipient to the community. Companion services can be provided in the following settings: • Recipient's own home • Recipient's family home • This service may be provided to individuals who resided in a licensed facility while the recipient is engaged in a community activity as long as the companion service is not duplicative of what is required by the residential provider licensing requirements.

Life Skills Development (Level 2) Supported Employment: Supported employment services provide training and assistance to help support recipients in job development and sustaining paid employment at or above minimum wage unless the recipient is operating a small business. This service can be performed on a full or part-time basis and at a level of benefits paid by the employer for the same or similar work performed by trained non-disabled recipients. The provider assists with the acquisition, retention, or improvement of skills related to accessing and maintaining such employment, or developing and operating a small business. With the assistance of the provider, the recipient receives help in securing employment according to the recipient's knowledge, skills, abilities, supports needed, desired goals, and planned outcomes. This service is conducted in a variety of settings, including work sites in which individuals without disabilities are employed. This service should include assisting a recipient to learn job tasks needed to be employed, and the recipient should be included in all aspects of job development, interviewing, and job seeking activities.

There are three models of Life Skills Development Level 2 – Supported Employment: (1) Individual, (2) Group, and (3) Supported Self-Employment: • The individual model is an approach to obtaining and maintaining competitive employment through the support of a job coach on a one-on-one basis. The individual model can apply to either employment in the general workforce or in establishing a business that will be operated by the recipient. There are two phases under the individual model. – Phase 1 funded through the waiver is defined as time-limited supports needed to obtain a job and reach stabilization. Phase 1 is typically paid for by the Division of Vocational Rehabilitation. When Phase 1 is funded through the waiver, reimbursable support activities include: • Completion of a situational assessment to determine a recipient's employment goals, preferences, and skills. • Job development for a specific recipient, matching the recipient with a job that fits personal expectations. • Intensive, systematic on-the-job training and consultation focused on building skills needed to meet employer productivity requirements, learning appropriate behaviors, and acceptance in the social environment of the job setting, and building job-related supports with the employer from those naturally occurring at the work site and other job-related supports. The number of hours of intervention is intended to diminish over the first few weeks of employment as the supported employee becomes more productive and less dependent on paid supports. Phase 1 ends after demonstration that the supported employee has established job stability. The stabilization period begins when the recipient has achieved satisfactory job performance as judged by the employer, provider, vocational rehabilitation counselor (if applicable), and the recipient; or when the need for paid supports diminishes to fewer than 20% of weekly hours of employment. The stabilization period

is a minimum of 90 days. If the recipient continues to perform the job satisfactorily, the services move into extended, ongoing support services (Phase 2).

During waiver funded Phase 1, the provider is expected to provide varying intensities of services to each recipient. The service intensity must be sufficient to support the recipient in finding a job within three months. The provider must furnish:

- On-the-job training which begins with high-intensity support and fades to achieve stabilization.
- Job development must be done with the recipient's input. Activities on behalf of the recipient must be limited to less than 20% of the provider's time.
- Weekly updates to the job seeker regarding progress in attaining employment.

The APD regional operations manager or designee must approve the waiver funded job development period, if it exceeds three months at Phase 1. This will include a review of written justification from the provider of the reasons that employment has not been achieved. – Phase 2 is defined as long-term, ongoing supports needed to maintain employment indefinitely. Reimbursable support activities include:

- Ongoing, systematic contacts with recipients to determine the need, intensity, and frequency of supports needed to maintain productivity, social inclusion, and continued employment
- Educative, on-the-job training, to meet productivity expectations, consultation and refinement of natural supports or other elements important to maintaining employment
- Related work supports, such as accessing transportation and other supports necessary for the recipient to maintain employment or consultation with family members or other members of the supported employee's support network, including employers and co-workers
- Efforts to expand work responsibilities within current employment for the purpose of increasing hours, pay, or benefits
- Social Security wage reporting and work incentive instruction to maximize income

Double billing for multiple job seekers is not reimbursable. For example, if a provider develops jobs for three hours for three different individuals, billing one hour for each person would be the maximum allowable billing. Phase 2 supports assume periodic life changes that can cause job instability. Supports and services are designed to be dynamic and to change in intensity and duration consistent with the needs of each supported employee during periods of job instability and possibly during job loss and re-employment activities.

When supports needed to maintain employment for a given recipient become too great in intensity or duration, it will be necessary to move back to Phase 1 services to access a better job match or seek employment alternatives. Moving to Phase 1 supports must include a referral to Vocational Rehabilitation or the local school system (as applicable) to seek required funding. Medicaid waiver funding must be used only if these alternative resources are not available. Recipients who maintain successful employment over a number of years with the help of natural supports should no longer require a high-level intensity of supports. In these instances, the supports intensity may be faded in consultation with the employer, the recipient, and the provider.

- Group supported employment models are defined as follows: – Enclave: A group approach to employment where two to eight recipients with disabilities work either as a group or are dispersed individually throughout an integrated work setting with supervision by the employer. – Mobile Crew: A group approach to employment where a crew, such as lawn maintenance or janitorial, of one to eight recipients with disabilities are in the community in businesses or other community settings with supervision by the provider. – Entrepreneurial: A self-employment approach where a small group starts a business or micro-enterprise created specifically by, or for, the recipients. Group models should be considered a bridge to individual supported employment based on the recipient's interest and goals for employment. Generally,

group models are needed only when constant paid supervision of a recipient is required. • The supported self-employment model of service is defined as working for oneself with direct control over the work and services undertaken and can include micro-enterprise or micro-credit arrangements such as proprietorships, partnerships, and corporations. Those recipients that select supported self-employment must contribute to the development of a business service or product or perform a core function of the business. Supported self-employment services can be provided to recipients who own their own businesses and need supports and ongoing assistance in the day-to-day running of the business.

Any recipient expressing an interest in supported self-employment will be referred by their WSC, to the DVR through the local supported employment liaison (EL), or the regional employment coordinator (REC) for tracking purposes. If the WSC finds that the recipient has gone to DVR on their own, the recipient must notify the EL or REC within five business days for tracking purposes. The WSC will be responsible for providing the information required to DVR and following APD guidelines to determine eligibility and vocational goals. Any recipient determined eligible for services through DVR will generally be provided funding and supports by DVR. If DVR deems a recipient ineligible for DVR services, then services may be provided through APD.

Life Skills Development (Level 3) ADT: Adult Day Training (ADT) are training services intended to support the participation of recipients in valued routines of the community, including volunteering, job exploration, accessing community resources, and self-advocacy, in settings that are age and culturally appropriate. Adult day training services can include meaningful day activities and training in the activities of daily living, adaptive skills, social skills, and employment. The training, activities, and routine established by the ADT must be meaningful to the recipient and provide an appropriate level of variation and interest. The service expectation is to achieve individually determined goals and support recipient participation in less restrictive settings. This training must be provided in accordance with a formal implementation plan, developed under the direction of the recipient, reflecting goal(s) from the recipient's current support plan. Mobile crews, enclaves, and entrepreneurial models that do not meet the standards for supported employment and are provided in groups of four or more recipients are included as Life Skills Development Level 3 – ADT off-site services. Off-site models include services that teach specific job skills and other services directed at meeting specific employment objectives. Adult day training models include: • Enclave: A group approach to training where no more than ten recipients with disabilities work either as a group or are dispersed individually throughout an integrated work setting with supervision by the provider. • Mobile Crew: A group approach to training where a crew (lawn maintenance, janitorial) of recipients with disabilities is in a variety of community businesses or other community settings with supervision by the provider. • Entrepreneurial: A group approach to training with experienced professionals in assisting the recipient with disabilities to set up and work in a small business created especially by or for the recipient. Such models include self-employment and micro-enterprise. Any profits earned from this model must be used to either pay the recipients, per federal guidelines, or reinvested in the business or both. Any recipient receiving ADT service who is performing productive work either on-site or off-site must be financially compensated commensurate with members of the general workforce doing similar work per wage and hour regulations of the United States Department of Labor.

Rate Structure

APD has a multi-tiered rate structure for services provided under the Home and Community-Based Waiver that varies based upon location (geographical, non-geographical, and Monroe County) and provider type (solo or agency). Both supported employment services and ADT services are Life Skills Development Services; individuals may not purchase more than 112 hours of combine Life Skills Development services per week.

Rates provided for services under the Employment Enhancement Program (EEP) also abide by this waiver structure; however, EEP does not pay for ADT services.

Unit of Service

Supported employment services (Life Skills Development Level 2) and Companion services (Life Skills Development Level 1) are billed in 15 minute increments. Adult Day Training (ADT) (Life Skills Development Level 3) services are billed on an hourly basis.

Financial Incentives to Encourage Integrated Employment

There are no financial incentives to encourage providers to improve or expand integrated employment services or for individuals to choose to purchase individual integrated employment services over other day supports. Individuals who receive ADT services are expected at least annually to receive from the ADT provider an orientation informing recipients of supported employment and other competitive employment opportunities in the community.

There are financial incentives that support providers to encourage ADT services as opposed to individual integrated employment. The stepped rate published for ADT is based on one extra hour of staff time to accommodate the variance in recipient schedules for attendance. Adult day training services and ADT off-site services will be billed based on the stepped rate for the services. The agency manager or director will not have full-time responsibility for providing direct services and will not be included in determining the staffing ratios. The staffing ratio will not exceed 10 recipients per direct service staff for ADT facility-based programs (supervisory and other management staff can be included in determining the direct care staffing ratio. Administrative staff and those not providing direct service to the recipient are not considered direct service staff). Direct service staff will work under appropriate supervision. Life Skills Development Level 3 – ADT services must be billed at the standard 1:10 rate level for the service. The standard 1:10 rate is paid when a recipient requires minimal assistance, through instructional prompts, cues, and supervision to properly complete the basic personal care areas of eating, bathing, toileting, grooming, and personal hygiene. Rates based on staffing ratios for ADT services are provided at one of the following levels 1:1, 1:3, 1:5, or 1:6 to 1:10. For any ratio other than 1:10, the following is used to determine the correct ratio assigned to the recipient: For the purposes of staffing ratios for ADT services, the following will apply: • Indicators of a one staff-to-one individual staffing rate ratio level include: – A recipient who is on a behavior services plan that is implemented by the ADT provider and who exhibits the characteristics required for intensive behavior residential habilitation services as outlined in this

handbook and as determined by a certified behavior analyst. The need for this level of supervision must be verified in writing by the APD regional office local review committee (LRC) chairperson. The recipient is not required to live in a licensed residential facility. The behavior services plan and its effects on the behavior must be reviewed on a regular schedule as determined appropriate by the LRC chairperson. – The ADT provider must maintain a copy of the Behavior Analysis Service Plan being implemented by the ADT. • Indicators of a one staff-to-three individual staffing rate ratio level include a recipient that either: – Requires an intense level of personal care support services (which include assistance with eating, positioning, assistance with lifting, or total physical assistance as indicated on the Questionnaire for Situational Information (QSI). – Is on a behavior services plan that is implemented by the ADT provider, and exhibits the characteristics required for behavior focus residential habilitation services as outlined in the handbook and as determined by a certified behavior analyst. The recipient is not required to live in a licensed residential facility. Indicators of a one staff-to-five individual staffing ratio level include a recipient that either: – Routinely requires prompts, supervision, and physical assistance to perform basic personal care tasks such as eating, bathing, toileting, grooming, transitioning, and personal hygiene as identified in the current abilities section of the QSI. – Is on a behavior services plan that is implemented by the ADT provider and requires visual supervision during all waking hours and occasional intervention as determined by a certified behavior analyst. The recipient does not have to live in a licensed residential facility. Support provided to groups of nine or ten recipients must be billed as adult day training off-site, regardless of the recipient's wage. If the support is provided in groups of eight or fewer recipients and the recipients are paid less than minimum wage, the service must be billed as ADT off-site.

Portability of Funds

Individuals are able to change providers through the individual support coordination process.

Individualization of Rates

Rates are not developed on a per client basis.

Transportation Funding

Life Skills Development (Level 1) Companion: Companion service providers are not reimbursed separately for transportation and travel costs. These costs are integral components of companion services and are included in the rate.

Life Skills Development (Level 1) Supported Employment: Transportation of a recipient to and from a job is not a reimbursable component of Supported employment services. Separate payment for transportation services furnished by the supported employment provider will not be made when rendered as a component of this service.

Life Skills Development (Level 3) Adult Day Training: Providers are paid separately for transportation services only when the service is authorized in the cost plan, the provider is enrolled as a transportation provider, and transportation is provided between a recipient's place

of residence and the training site. Transportation between ADT sites, if the activities provided are a part of the respective services, will be included as a component and in the rate paid to the provider of ADT services. Adult day training staff responsible for transporting recipients must meet the minimum requirements of a transportation provider. Adult day training staff is responsible for assisting recipients into and out of facilities when they have been transported in vehicles not owned or operated by the ADT center. Drivers of such vehicles are responsible for ensuring the recipient's safe entry into and exit from the vehicle.

Transportation providers can be community transportation coordinators (CTC) for the transportation disadvantaged; limited transportation providers; public transit authorities that run the community's fixed-route, fixed-schedule public bus system; group homes and other residential facilities in which the recipients being transported reside; adult day training programs to which the recipients are being transported; and other public, private for-profit, and private not-for-profit transportation entities. To be reimbursed under the iBudget Waiver, all providers will comply with the Commission for the Transportation Disadvantaged Rule 41-2.006 (2) and (4), F.A.C., Insurance, Safety Requirements and Standards. Family members or friends or who are not considered "for hire" provider must have a valid driver's license and a current automobile and liability insurance.

The public transportation provider must be an enrolled Medicaid waiver provider. Public transit authorities that operate the community's fixed-route, fixed schedule public bus system can enroll as providers in the iBudget Waiver to facilitate the purchase of monthly or other frequency bus passes for participants. If natural supports are unavailable, this transportation option is to be used for recipients who can use the fixed-route, fixed-schedule public bus system to go to some or all of their waiver services. Bus passes are to be purchased for recipients who can utilize the bus system to go to their waiver service sites whenever the cost of the trips to be taken during the month, if taken by Paratransit, would exceed the cost of the monthly bus pass. Public transit authorities will adhere to minimum safety standards as required by Rule Chapter 14-90, F.A.C.

Group homes or other residential facilities in which recipients live can enroll as transportation providers to transport the recipients to and from their waiver services. Life Skills Development Level 3 – ADT providers, which regularly provide services to recipients, can enroll as transportation providers to transport the recipients to and from the agencies' programs. Transportation providers that are not part of the CTC system (e.g., taxi companies and private for-profit and not-for-profit transportation companies) can be paid with waiver funds to transport recipients to and from waiver services if the CTC determines it is unable to provide or arrange the required transportation.

Working with VR

A recipient seeking supported employment must first exhaust available resources through the Division of Vocational Rehabilitation (DVR). If the recipient is under the age of 22 years and does not have a standard high school or GED diploma, they must first exhaust available resources through the public school system.

Alaska Summary

State	Individual Integrated Employment	Group Supported Employment	Facility-based Work	Community-based Non-Work	Facility-based Non-Work
AK	Pre-employment - \$12.12/15 minutes Individual supported employment - \$12.12/15 minutes	Pre-employment - \$8.49/15 minutes Supported employment - \$8.49/15 minutes	N/A	Day habilitation individual - \$10.71/15 minutes Day habilitation group - \$7.50/15 minutes	Day habilitation individual - \$10.71/15 minutes Day habilitation group - \$7.50/15 minutes

The information in this summary comes from:

1. <http://dhss.alaska.gov/dsds/Pages/hcb/hcbwaivers.aspx>
2. <http://dhss.alaska.gov/dsds/Documents/docs/SupportedEmploymentCOPs.pdf>
3. <http://dhss.alaska.gov/dsds/Documents/pca/PCA-waiver-service-rates201607.pdf>
4. Personal communication with Anastasiya Podunovich, Research analyst, DHSS Alaska, and Velja Elstad, Community Rehabilitation Program Specialist, Alaska Division of Vocational Rehabilitation.

Background

Alaska currently has four Medicaid waivers. Employment is provided under the Adults with Physical and Mental Disabilities (APDD), Children with Complex Medical Conditions (CCMC), and Intellectual and Developmental Disabilities (IDD) waivers.

Billable Activities

Supported employment services are services for individuals who employment at or above the minimum wage is unlikely or who need intensive, ongoing supports to perform in a work setting. They are provided in a variety of settings, particularly ones in which people without disabilities are employed. Services may include: vocational or job-related discovery or assessment, person-centered employment planning, job placement, job development, negotiation with prospective

employers, job analysis, job carving, training and systematic instruction, and career advancement activities. Following job placement, the provider may offer intensive, ongoing supports, including supervision, job coaching, and additional training, to enable the recipient to perform in the workplace.

Supported employment services may be offered in a variety of settings, but, because independence and community integration are significant goals for these services, they may not be provided in sheltered workshops or other similar specialized vocational facilities.

Unit of Service

Supported and pre-employment services are billed in 15 minute units.

Portability of Funds

Individuals in Alaska have a choice in services and providers. As money moves with the individual, they can always make changes to their supported employment provider.

Individualization of Rates

Alaska provides a regional differential to service rates, not per individual. For example: there is no adjustment made to providers doing business in the Anchorage Region, but a 48% adjustment to those providers in the Arctic Region. These differentials reflect regional differences in the cost of doing business.

Transportation Funding

Transportation is available under all three waivers. Under the CMCC and APDD waivers, transportation services enable the waiver recipient to gain access to services, activities, and resources specified in their plan of care. It is offered in addition to required medical transportation. Whenever possible, natural transportation services (family, friends, and neighbors) should be utilized.

Working with VR

Individuals wishing to access waiver services must first apply for VR services. If found eligible, the individual must first close their case with VR before receiving DD waiver services. Alaska VR provides a checklist to ensure a smooth transition and documented closure from their services to waiver services. Currently, VR supported employment funds cannot be used until an individual has secured employment. Previously, supported employment funds from VR could be used by the DD provider to identify employment options.

Colorado Summary

State	Individual Integrated Employment	Group Supported Employment	Facility-based Work	Community-based Non-Work	Facility-based Non-Work
Colorado	<p>Prevocational services range from \$2.36-\$6.05/15 minute unit depending on level determined</p> <p>Job Coaching - \$13.02 per 15 minute unit</p> <p>Job Development - \$13.02 per 15 minute unit</p> <p>Job Placement - \$1.00 per dollar spent on item purchase</p>	<p>Job Coaching services range from \$3.16-\$6.94/15 minute unit depending on level determined</p> <p>Job Development - \$4.15 per 15 minute unit</p> <p>Job Placement - \$1.00 per dollar spent on item purchase</p>	<p>Prevocational services range from \$2.36-\$6.05/15 minute unit depending on level determined</p>	<p>Supported Community Connections services range from \$2.87 - \$9.52/15 minute unit depending on level determined in HCBS-DD and between \$2.87 - \$6.44/15 minute unit depending on level determined in HCBS-SLS</p>	<p>Specialized Day Habilitation services range from \$2.36 - \$9.52/15 minute unit depending on level determined in HCBS-DD And between \$2.36 - \$6.05/15 minute unit depending on level determined in HCBS-SLS</p>

The information in this summary comes from:

- https://www.colorado.gov/pacific/sites/default/files/HCBS%20DD%20SLS%20CES%20Rate%20Schedules%20FY1617_3.pdf
- https://www.colorado.gov/pacific/sites/default/files/CMS1500_HCBS_DDD_6.pdf
- <https://www.colorado.gov/pacific/sites/default/files/HCBS-SLS%20Waiver%20Application.pdf>
- https://www.colorado.gov/pacific/sites/default/files/Final_HCBS-DD_Wavier_Application_07.01.14-06.30.19_%28CO.0007.R07.00%29_0_1.pdf
- <https://www.colorado.gov/pacific/hcpf/long-term-services-supports-benefits-services-glossary>
- Personal communication with Michele Craig, Program Services Unit Manager, and Adam Tucker, Adult Services Coordinator, Colorado Department of Health Care Policy & Financing.

Background

Colorado provides employment services under two Home and Community Based Service Waivers: Persons with Developmental Disabilities (HCBS-DD) and Supported Living Services (HCBS-SLS). HCBS-DD is intended for persons in need of supports 24 hours a day, and HCBS-SLS is intended for persons who can live independently or with limited supports.

Billable Activities

Employment supports are defined in the same way in both waivers:

Prevocational services are billable in 15 minute units and are designed to assist individuals with developmental disabilities in acquiring and maintaining work habits and work-related skills. They include teaching concepts such as: following directions, attendance, task completion, problem-solving and safety. They are primarily directed at teaching habilitative rather than job-specific skills. To qualify for prevocational services, the individual must demonstrate they cannot earn more than 50% of the federal minimum wage. Compensation for these prevocational services is paid at 50% of the federal minimum wage (agencies that pay less than minimum wage shall ensure compliance with Department of Labor regulations). The intended outcome of prevocational services is to obtain paid or unpaid community employment within five years.

Supported employment is billable in 15 minute units and consists of intensive, ongoing supports that enable participants, for whom competitive employment at or above the minimum wage is unlikely absent the provision of supports, and who, because of their disabilities, need supports, to perform in a regular work setting. Supported employment is conducted in a variety of settings in which participants interact with non-disabled individuals. Participants must be involved in work outside of a base site. Included are participants who work in community jobs, in enclaves, and on mobile crews. Group employment (e.g. mobile crews and enclaves) shall not exceed eight persons.

Job Development services focus on assessment and identification of vocational interests and capabilities in preparation for job development as well as assisting the participant to locate a job or job development on behalf of the participant.

Job Coaching services focus on activities needed to sustain paid work by participants, including supervision and training. When supported employment services are provided at a work site where persons without disabilities are employed, payment is made only for the adaptations, supervision, and training required by participants receiving waiver services as a result of their disabilities. This does not include payment for the supervisory activities rendered as a normal part of the business setting.

Job Placement services are billable at \$1.00 for every dollar spent and may be used to purchase items that a participant needs to obtain and/or sustain employment that are not otherwise the responsibility of the employer to provide under the Americans with Disabilities Act of 1990.

Supported Employment does not take the place of nor is it duplicative of services received through the Division for Vocational Rehabilitation. The unit cap on supported employment is equal to 7 hours a day for 254 service days on average.

Rate Structure

Prevocational, job coaching, and job development service rates vary depending on the support level determined using a multi-factor algorithm. Factors applied when determining DD support include: adaptive skills, behavioral and medical support needs, and risk to self or the public.

Unit of Service

Prevocational and most Supported Employment services are billable in 15 minute units with Job Placement items billed at \$1.00 per dollar cost of the item. Supported Employment services are maximized at 7,112 units. The limits for combined Day Habilitation Services and Supports and Prevocational Services is 4,800 units and when these services are used in combination with Supported Employment, the cumulative total cannot exceed 7,112 units. This number of units is the equivalent of 1,778 hours of service per year or on average 7 hours a day for 254 service days.

Financial Incentives to Encourage Integrated Employment

Colorado does not currently offer incentives to encourage integrated employment.

Individualization of Rates

The rates for supported employment, prevocational services, community-based non-work services, and structured day services provide enhanced rates for individuals that have high medical and behavioral needs.

Transportation Funding

Transportation in order to enable individuals served on the waiver to gain access to waiver day program services and activities are specified by the plan of care only under HCBS-DD. Transportation services under the waiver, including vehicle modification, shall be offered in accordance with the individual's plan of care.

Non-medical transportation is offered under both waivers and is limited to 508 units (trips) per Service Plan year and must be used as transportation to a provided service. Non-public transportation is banded by miles (0-10, 11-20, and Over 20) and pays \$5.79, \$12.13, and \$18.47 per trip respectively. Public transportation pays \$1.00 per dollar cost of the trip and may only be used when equivalent to or more cost-effective than the applicable mileage range.

Only under HCBS-SLS is mileage for an individual not in a day program billed at \$5.79 per trip covering all distances up to 208 units per Service Plan Year (4 trips a week). Transportation that falls under Personal Care is billed at \$4.95 per 15 minute unit, and Personal Emergency

Response System services are billed at \$1.00 per dollar cost of the item only under HCBS-SLS as well.

Working with VR

Supported employment services under both HCBS-SLS and HCBS-DD must be applied for through the Division for Vocational Rehabilitation. Supported Employment does not take the place of nor is it duplicative of services received through the Division for Vocational Rehabilitation.

Iowa Summary

State	Individual Integrated Employment	Group Supported Employment	Facility-based Work	Community-based Non-Work	Facility-based Non-Work
Iowa	<p>Prevocational - \$10 /hr</p> <p>Career exploration - \$38.27/hr. Maximum of 34 hours of Career Exploration over a 90 day (12 week) period The intent is ~3hrs face time/wk, with estimates of time spent as follows: *1 hr Initial meeting with individual & family *2.5 hr Orientation to SE and VR and basic benefits information with individual & family *8 hr Abridged “discovery” to inform next steps *16 hr Three to five tours, job shadows, informational interviews, including set-up, preparing person & debriefing *2.5 hr Meeting with individual & family for re-education or additional education on SE (including use of reasonable accommodations & assistive technology), VR, Benefits *4 hr Writing Career Plan report</p>	<p>Ranges from \$1.26 – \$2.84/per person, per 15 minute unit depending on Tier (\$1.26 for groups of 7-8, \$1.77 for groups of 5-6, to \$2.84 for groups of 2-4)</p> <p>Total monthly cost for all supported employment services not to exceed \$3,059.29 per month</p>	<p>Prevocational - \$10/hr</p>	<p>Provided under Day Habilitation - \$6.60/15 min unit up to 16 units per day</p> <p>\$132 per full day (4.25-8 hours)</p>	<p>Provided under Day Habilitation - \$6.60/15 min unit up to 16 units per day</p> <p>\$132 per full day (4.25-8 hours)</p>

	<p>Job development: Initial authorization: \$66.13 per hour Not to exceed 40 hourly units Extended authorization: \$66.13 per hour Not to exceed 20 hourly units One initial and, if necessary, one extended authorization permitted per year not to exceed a total of 60 hourly units per year Supported employment - \$66.13/hr</p> <p>Long-term Job Coaching: Tier 1= 1 contact/month \$67.67 (pays the provider a rate equal to 1.5 hrs of service for anything from one momentary phone check-in to 1.5 hr of in-person contact. The intent is to recognize the value of maintaining routine contact).</p> <p>Tier 2 = 2-8 hours/month \$361.58 Tier 3 = 9-16 hours/month \$722.15 Tier 4 = 17-25 hours/month \$1,129.18 Tier 5 = 26 or more hours per month, \$45.16 per hour. This service must be reauthorized every 90 days.</p> <p>Job coaching - \$45.16/hr at Tier 5 (26+ hours a month) or ranges from \$67.67 - \$1,129.18 per month depending on Tier (1 contact up to 25 hours per month).</p> <p>Total monthly cost for all supported employment services not to exceed \$3,059.29 per month</p>				
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The information in this summary comes from:

1. https://dhs.iowa.gov/sites/default/files/1700_HCBSPrevocationalandSupportedEmploymentServiceProcedureCodeChanges_0.pdf
2. https://dhs.iowa.gov/sites/default/files/WaiverProgramComparisonChart_12-2015.pdf
3. <https://www.legis.iowa.gov/law/administrativeRules/rules?agency=441&chapter=78&pubDate=01-18-2017>
4. https://dhs.iowa.gov/sites/default/files/HCBS_Prevocational_and_Supported_Employment_Fee_Schedule_1.pdf
5. https://dhs.iowa.gov/sites/default/files/FAQ_HCBS_Prevocational_and_Supported_Employment_Services_0.pdf
6. <http://www.p4progress.org/our-services/habilitation-services/>
7. [Personal correspondence with Lin Nibbelink](#), Disability Employment Policy Specialist, IDHS, Division of Mental Health & Disability Services and LeAnn Moskowitz, Division of Medical Services, Iowa Department of Human Services

Background

Iowa Department of Human Services (DHS) has been keenly focused on improving opportunities for Iowans with disabilities to become employed in quality jobs in Iowa communities since 2000 when first awarded a Medicaid Infrastructure Grant (MIG), a federal program providing financial assistance to states to facilitate the competitive employment of people with disabilities. Iowa's Mental Health and Disability Services (MHDS) and Iowa's Medicaid Enterprise (IME), both divisions of DHS, have been working together along with their stakeholders, to improve employment outcomes for individuals with disabilities with a particular focus on individuals with intellectual and developmental disabilities (I/DD) in Iowa.

In 2012, Iowa asked the SELN to produce a comparison of states' funding structures for integrated employment, with the goal of revising their own funding system to support increased employment outcomes. Initially, Iowa requested information specifically on Kansas, Illinois, Minnesota, Oklahoma, South Dakota, and Wisconsin, because of key Legislators' interest in these states with geographic proximity to Iowa. Many of the states initially chosen had integrated employment outcomes that were below the national average. After reviewing this information, stakeholders in Iowa retained Oklahoma and Minnesota in the analysis because of their integrated employment service outcomes, commitment to integrated employment, and recent work to improve employment outcomes. Despite having strong integrated employment outcomes, Wisconsin was eliminated from the comparison because of the lack of standardization across the state in funding methodologies and the impact of Managed Care Organizations in the state. Additionally, Connecticut, New Mexico, and Oregon were included in the analysis as each has integrated employment outcomes greater than the national average, an explicit statewide

commitment to employment, and each has recently undertaken the process of revising their methodologies for funding integrated employment.

The payment rates for the following five services were examined: individual integrated employment, group supported employment, facility-based work (sheltered work), community-based non-work, and facility-based non-work (day habilitation). The billable activities, rate structure, unit of service, financial incentives for integrated employment, portability of funds, individualization of rates, funding for transportation, and work with the state vocational rehabilitation are described for each state. A cross-state comparison was developed.

Information presented in the cross-state summary is intended to inform stakeholders in Iowa about the various funding models that states are implementing or proposing to implement. SELN staff members conducted a cross-state analysis of the five states' funding systems. The cross-state pros and cons of different funding approaches and assumptions were summarized.

Within the context of the cross-state summary, identification of funding system pros and cons, and the development of key assumptions for a high-quality funding system, SELN staff developed a funding approach for Iowa to consider.

Approach. Project staff used a rate model that begins with the staff resources needed for implementation, and then builds additional cost factors on that expense. Factors included in a sample calculation can be modified to meet the needs and assumptions in Iowa for benefits and employee costs, program support and program administration, and available (billable) hours.

Factors the SELN Considered in Developing Recommended Rates. SELN staff considered the following factors as recommendations were developed:

- *Staff Salary.*
- *Employee Related Expenses.*
- *Mileage Cost.*
- *Program Support and Administrative Costs*
- *Adjustment for Available (Billable) Hours.*

The model proposed considers the costs of three distinct types of employment support:

Job development and job entry, job exploration and career planning services, and finally, ongoing supports are a distinct service that requires building a flexible resource base, and simultaneously encouraging fading of resources.

Based upon this information the SELN proposed new service categories, service definitions, billable activities and corresponding rates for supported employment, community-based non-work, facility-based work, and facility-based non-work services.

In order to support changes to the funding rates DHS obtained input from stakeholders and the information gained from stakeholders was used to inform strategies to handle opposition to changes in the funding rates, determine the types of information DHS clients and their families/guardians will need to move through the changes, and to work with service providers to assist them to change their business model. DHS also directly informed individuals and families on the change and did not leave individuals and families to hear the information from their Provider first. Further, these efforts were linked to other systems change efforts in Iowa such as the Iowa Coalition for Integrated Employment (ICIE) and Employment First State Leadership Mentor Program (EFSLMP).

DHS also provided training and technical assistance at the service provider level related to supporting Providers to restructure or rebalance resources and develop policy, strategy and staff expertise to increase individual employment outcomes. Over a 3 ½ year period these efforts occurred and the payment rates were adopted May 2016.

On April 1, 2016, most Iowa Medicaid programs were joined together into one managed care program called IA Health Link operating statewide with three managed care organizations (MCOs). The MCO with the largest market-share in Iowa contracted with the existing structure of case managers and integrated health homes, while the other two MCOs hired for those positions in-house, calling them community-based care managers (CBCMs).

Iowa provides Prevocational, Supported Employment, and Day Habilitation services for people with disabilities, under two of its seven Home and Community-Based Service Waivers: the Intellectual Disability (ID) waiver and the Brain Injury (BI) waiver, and also under the Habilitation program in the State Plan. Transportation is covered under the ID, BI, Elderly and the Physical Disability (PD) waivers. Habilitation is also in the Medicaid State Plan.

Billable Activities

Prevocational services take place in community-based nonresidential settings and provide career exploration, learning and work experiences, including volunteer opportunities, where the member can develop non-job-task-specific strengths and skills that lead to paid employment in individual community settings. Skills include but are not limited to the ability to communicate effectively with supervisors, coworkers and customers; an understanding of generally accepted community workplace conduct and dress; the ability to follow directions; the ability to attend to tasks; workplace problem-solving skills and strategies; general workplace safety and mobility training; the ability to navigate local transportation options; financial literacy skills; and skills related to obtaining employment.

Prevocational services also include *career exploration* activities to facilitate successful transition to individual employment in the community. These are activities designed to develop an individual career plan and facilitate the member's experientially based informed choice regarding the goal of individual employment. Activities may include: Business tours, job

shadows, informational interviews, job exploration events, assistive technology assessment, and benefits education. Career exploration may be provided in small groups of no more than four members to participate in career exploration activities that include business tours, attending industry education events, benefits information, financial literacy classes, and attending career fairs. Career exploration may be authorized for up to 34 hours, to be completed over 90 days in the member's local community or nearby communities. The expected outcome of the career exploration activity is a written career plan that will guide employment services which lead to community employment or self-employment for the member.

The expected outcome of prevocational services is individual employment in the general workforce, or self-employment, in a setting typically found in the community, where the member interacts with individuals without disabilities, other than those providing services to the member or other individuals with disabilities, to the same extent that individuals without disabilities in comparable positions interact with other persons; and for which the member is compensated at or above the minimum wage, but not less than the customary wage and level of benefits paid by the employer for the same or similar work performed by individuals without disabilities.

Prevocational services do not include: Services that are available to the individual under a program funded under Section 110 of the Rehabilitation Act of 1973 or the Individuals with Disabilities Education Act; Services available to the individual that duplicate or replace education or related services defined in the Individuals with Disabilities Education Act; Compensation to members for participating in prevocational services; Support for members volunteering in for-profit organizations and businesses other than for-profit organizations, or businesses that have formal volunteer programs in place (e.g., hospitals, nursing homes), and support for members volunteering to benefit the service provider; vocational services delivered in facility-based settings where individuals are supervised for the primary purpose of producing goods or performing services or where services are aimed at teaching skills for specific types of jobs rather than general skills; and a prevocational service plan with the goal or purpose of the service documented as maintaining or supporting the individual in continuing prevocational services or any employment situation similar to sheltered employment.

Supported employment services offers supports to participants who, because of their disabilities, need intensive ongoing support to obtain and maintain an individual job in competitive or customized employment, or self-employment, in an integrated work setting in the general workforce at or above the state's minimum wage or at or above the customary wage and level of benefits paid by the employer for the same or similar work performed by individuals without disabilities. The outcome of this service is sustained paid employment at or above the minimum wage in an integrated setting in the general workforce in a job that meets personal and career goals.

Iowa offers three models of supported employment: Individual supported employment, long-term job coaching, and small group supported employment.

Individual Supported Employment: involves supports provided to, or on behalf of, the member that enable the member to obtain and maintain individual employment. Services include but are not limited to: Career exploration, person-centered employment planning, trial work experience, job-seeking skills training, career advancement services, initial on-the-job training to stabilization, and transportation during service hours.

Individual employment may also include support to establish a viable self-employment opportunity, including home-based self-employment. An expected outcome of supported self-employment is that the member earns income that is equal to or exceeds the average income for the chosen business within a reasonable period of time. Individual supported employment services shall take place in integrated work settings. For self-employment, the member's home can be considered an integrated work setting. Employment in the service provider's organization (not including a sheltered workshop or similar type of work setting where members are paid for the production of goods or services) can be considered employment in an integrated work setting in the general workforce if the employment occurs in a work setting where interactions are predominantly with coworkers or business associates who do not have disabilities or with the general public.

Long-Term Job Coaching: is support provided to, or on behalf of, the member that enables the member to maintain an individual job in competitive employment, customized employment or self-employment in an integrated work setting in the general workforce. Services include but are not limited to: Job analysis and training, engagement of natural supports, employer negotiation, career advancement support, and transportation coordination. The expected outcome of this service is sustained employment paid at or above the minimum wage in an integrated setting in the general workforce, in a job that meets the member's personal and career goals. Long-term job coaching services shall take place in integrated work settings. For self-employment, the member's home can be considered an integrated work setting. Employment in the service provider's organization (not including a sheltered workshop or similar type of work setting where members are paid for the production of goods or services) can be considered employment in an integrated work setting in the general workforce if the employment occurs in a work setting where interactions are predominantly with coworkers or business associates who do not have disabilities or with the general public.

Small-Group Supported Employment services are training and support activities provided in regular business or industry settings for groups of two to eight workers with disabilities. Services include but are not limited to: Person-centered planning, on-the-job training and instruction, job coaching, career exploration leading to career advancement, benefits education, and transportation planning. The expected outcome of Small-group supported employment services is sustained paid employment and skill development which leads to individual employment in the community. Small-group supported employment services shall take place in integrated, community-based nonresidential settings separate from the member's residence.

Supported employment services do not include: Services that are available to the individual under a program funded under Section 110 of the Rehabilitation Act of 1973 or the Individuals with Disabilities Education Act; Incentive payments, not including payments for coworker supports, made to an employer to encourage or subsidize the employer's participation in a supported employment program; Subsidies or payments that are passed through to users of supported employment programs; Training that is not directly related to a member's supported employment program; Services involved in placing and stabilizing members in day activity programs, work activity programs, sheltered workshop programs or other similar types of vocational or prevocational services furnished in specialized facilities that are not a part of the general workplace; Supports for placement and stabilization in volunteer positions or unpaid internships; Tuition for education or vocational training; Individual advocacy that is not related to integrated individual employment participation or is not member-specific; Medicaid funds may not be used to defray the expenses associated with starting up or operating a business.

Unit of Service

For members starting prevocational services after May 4, 2016, participation in these services is limited to 24 calendar months. This time limit can be extended to continue beyond 24 months if certain criteria are met.

For members enrolled in prevocational services on or before May 4, 2016, participation in these services is limited to 90 business days beyond the completion of the career exploration activity including the development of the career plan.

A member's individual service plan may include two or more types of nonresidential services (e.g., individual supported employment, long-term job coaching, small-group supported employment, prevocational services, and day habilitation); however, more than one service may not be billed during the same period of time (e.g., the same hour).

Individual supported employment is limited to 240 units per calendar year. Small-group supported employment is limited to 160 units per week. Long-term job coaching is limited in accordance with 441—sub rule 79.1(2). Total monthly costs of supported employment may not exceed the monthly cap on the cost of waiver services set for the individual waiver program. In absence of a monthly cap on the cost of waiver services, the total monthly cost of all supported employment services may not exceed \$3,059.29 per month.

The tables on the next page list the dollar cost and unit for employment services if funded by IVRS or under the state plan habilitation or waiver instead of the Home and Community-Based waivers. See Working with VR section for more detail.

Job Development	Customized Employment	Job Coaching **
<p>IVRS</p> <p>15 minute units: \$16.53/unit</p> <p>Initial authorization: 160 units with one extension of 80 units, not to exceed 240 units</p> <p>\$66.12/hour</p> <p>Up to 40 hours with one extension of 20 hours, not to exceed 60 hours total</p>	<p>IVRS</p> <p>15 minute units: \$16.53/unit as part of SES to negotiate with employer up to 40 units</p> <p>\$66.12/hour</p> <p>Up to ten hours</p>	<p>IVRS</p> <p>15 minute units: \$11.29/unit based on the number of hours a job candidate works - to be negotiated between IVRS and team for up to a two month period of time.</p> <p>\$45.16/hour</p> <p>Up to 120 hours</p>

Job Development	Customized Employment	Job Coaching
<p>State Plan HABILITATION or WAIVER (T2018)</p> <p>15 minute units: \$16.53/unit</p> <p>Initial authorization: 160 units</p>	<p>IVRS</p> <p>15 minute units: \$16.53/unit as part of SES to negotiate with employer up to 40 units</p>	<p>State Plan Habilitation or WAIVER (H2025)</p> <p>Unit = One Month</p> <p>Payment varies depending on amount of support needed:</p>

Limit 240 units per calendar year.	<p>\$66.12/hour</p> <p>Up to ten hours</p>	<p>Tier 0: Minimum 1 contact/month Payment = \$67.67/month</p> <p>Tier 1: 2 -8 hours support/month Payment = \$361.58/month</p> <p>Tier 2: 9-16 hours support/month Payment = \$722.15/month</p> <p>Tier 3:17-24 hours support/month Payment = \$1,129.18/month</p> <p>Exception = 25 or more hours support/month</p> <p>Payment: Hourly @ \$45.16/hour</p>
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Portability of Funds

The Consumer Choices Option is available under the Home and Community-Based Services waivers and gives the individual control over a targeted amount of Medicaid dollars to develop a plan to meet their needs by directly hiring employees and/or purchasing other goods and services. The individual will choose an Independent Support Broker who will help develop an individual budget and help recruit employees. The individual will also work with a Financial Management Service that will manage their budget and pay workers on their behalf. The individual may also pool and share resources with another person. Employment supports available for purchase under the Home and Community-Based Services waivers of The Consumer Choices Option include: career preparation skills, career counseling, career placement, work place assistance, and supports to maintain a job.

Transportation Funding

Transportation is funded under the ID and BI waivers and includes: services for members to conduct business errands, essential shopping, to receive medical services, to travel to and from work or day programs, and to reduce social isolation.

A unit of transportation service is one mile or one one-way trip.

Working with VR

For job candidates under age 24 who are eligible for both IVRS and DHS State Plan habilitation or waiver and who require Supported Employment Services, IVRS implemented a *Memorandum of Agreement* with DHS to establish IVRS as the payer of first resort for individualized services

necessary to obtain and stabilize in competitive integrated employment. See services allowed in Unit of Service section.

For job candidates age 24 and above, the waiver pays for Job Development, and Job Coaching. IVRS funds may pay for Customized Employment and employment services not listed (Discovery, Workplace Readiness Assessment, etc.). IVRS also supplements waiver funds providing Job Development as deemed necessary, such as when waiver funds end. This is in accordance with the Memorandum of Agreement with DHS and IVRS.

A job candidate eligible for IVRS who is waiting for services from waiver can be served by IVRS.

Until waiver funds are available, IVRS may fund all SES employment services. Services for SES are authorized by IVRS until the time waiver funds become available. If/when that occurs, IVRS would cancel any unused authorization(s) for remaining services so that waiver funding could begin, except in IVRS cases involving SES for individuals under age 24.

An identified source for long-term job coaching services, to the extent needed by the individual, is required for IVRS Supported Employment Services. Funding (or sources) to provide these services can include county funding, natural supports, PASS, IRWE, MH worker, Independent Living, or other no-cost resources. The source providing long-term job coaching, to the extent needed by the individual, is identified on the IVRS Plan for Employment (IPE) and SES Placement Agreement. A plan for natural supports requires a detailed description of how the natural support will be trained and the agreement on how to connect with the long-term provider when difficulties arise requiring more continued involvement by the CRP.

Minnesota Summary

State	Individual Integrated Employment	Group Supported Employment	Facility-based Work	Community-based Non-work	Facility-based Non-work
Minnesota	Base rate begins at \$13.33/hour for direct staffing then increases based on Supported Employment (SE) inputs	\$13.33/hour base rate plus SE inputs if individual not on DD waiver \$13.33/hour or \$4.14/15 minutes base rate plus SE inputs, plus RN and LPN hours for individuals on DD waiver or if billed as Structured Day Services (SDS).	\$13.33/hour or \$4.14/15 minutes base rate plus SDS inputs	\$13.33/hour or \$4.14/15 minutes base rate plus SDS inputs if billed as Adult Day Care Services \$13.33/hour plus SDS inputs if billed as Prevocational Services \$15.67/hour base rate plus SE inputs if billed as Independent Living Skills Training \$11.86/hour base rate plus SE inputs if billed as Personal Support/Adult Companion	\$13.33/hour or \$4.14/15 minutes base rate plus SDS inputs

The information in this summary comes from:

1. <http://mn.gov/dhs/partners-and-providers/continuing-care/reform-initiatives/rate-setting/rate-setting-frameworks.jsp>
2. <https://www.revisor.mn.gov/statutes/?id=256B.4914>
3. <https://www.leg.state.mn.us/docs/2016/mandated/160066.pdf>
4. Personal communication with Matt Knutson, Fiscal Policy Team, Minnesota Department of Human Services, Disability Services Division

Background

In January of 2014, in lieu of published home and community-based services waiver rates, the state adopted several rate setting frameworks over the next five years, authorized in statute MN256B.4914, to be used as projections. Rate stabilization is expected at the end of the five years, but is currently banded to existing, historic rates to allow adjustment to the new system. The frameworks for day and employment services are variable depending on several inputs that include: staffing ratios, deaf and hard of hearing customization, and “regional variance factor” based on the area of the state. The rates are designed to account for wages, employee and program-related expenses, and general and administrative expenses.

Billable Activities

In Minnesota individual integrated employment, group supported employment, facility-based work/prevocational services, facility-based non-work/day services, and community-based non-work services are available.

Individual Integrated Employment Services. Individual integrated employment services are designed to support 1 person in a job of his/her choosing in the community. Funds are available through supported employment waiver services.

Group Supported Employment Services. Group supported employment services consist of six to eight individuals that travel to job sites and work in teams. Funds are available through supported employment waiver services for people not on the Developmental Disabilities Waiver; Day Training and Habilitation for people on the Developmental Disabilities Waiver; and Structured Day Services.

Facility-based Work Services. Facility-based work/prevocational services are those that occur in sheltered work settings and can be billed under Day Training and Habilitation as well as Structured Day Services

Community-based Non-Work Services. Community-based non-work services can be billed under Adult Day Care Services, Independent Living Skills Training, Personal Support/Adult Companion and pre-vocational services.

Rate Structure

Rates vary based upon individual support needs. Each of the rate frameworks incorporate the cost of direct staffing, program support, employee related expenses, and client programming and support.

An application, known as the Rates Management System (RMS), calculates rates. Individual needs, as directed by service planning, are the basis for direct service costs. Direct service wages are the primary driver for rates. Other costs values, such as staff supervision, employee benefits, taxes, program costs and other cost components also are incorporated within the frameworks. Direct wages and component values are multiplied by the required service units to provide costs related to individual needs.

Facility-based work services/prevocational services rates currently vary based upon individual needs, number of hours requiring services on a weekly basis, client to staff ratio, and need for RN or LPN services.

Currently, rates for community-based non-work services vary based upon funding source. Rates for personal care assistance services are paid under the Medicaid Authority provider rates set by legislation. For individuals who use PCA Choice supports, rates are set within the individual's state plan. All waivers in Minnesota allow a self-directed service option called consumer directed community services (CDCS). For individuals using the CDCS service option, the rate is set within the individual's support plan. Lastly, the rates paid for person-centered services provided through independent living supports vary by county. The proposed rates for personal supports services will vary based upon individual needs. The proposed rates for independent living skills will vary based on individual needs and the use of professional or direct staff.

Currently in Minnesota, facility-based non-work/day services, and structured day services are billed at: daily, partial day, and 15 minute unit rates. Frameworks vary based upon individual needs, number of hours requiring services on a weekly basis, client to staff ratio, and need for RN or LPN services.

Unit of Service

Under statute MN256B.4914, the definition of a unit of service varies depending upon the billable service. The rate frameworks provide daily, partial day, and 15-minute unit of service rates that are derived based upon the calculation of a weekly rate. Daily, partial day and 15 minute units are billable for facility-based service. 15 minute unit rates are billable for supported employment.

Financial Incentives to Encourage Integrated Employment

Currently there are no financial incentives to prioritize supported employment over other services.

Portability of Funds

Information was not available related to individuals' ability to transfer funds across service categories; however, the blending of funds and supports from the Department of Employment and Economic Development Division of Rehabilitative services (DEED) and the Department of Education (DOE) is encouraged.

Individualization of Rates

The proposed rates for supported employment, prevocational services, community-based non-work services, and structured day services provide enhanced rates for individuals that have high medical needs, high behavioral needs, high mental health needs, or are deaf/hard of hearing. Additionally, for prevocational services and structured day services additional funding is available if the individual needs RN or LPN services.

Transportation funding

Currently in non-segregated settings transportation is paid through a DT&H rate. DT&H services have a transportation component that is reimbursed based on mileage, vehicle type and individual need (lift or no lift).

Working with VR

The DHS Disability Services Division meets quarterly with the Division of Rehabilitative Services and the Division of Special Education to foster partnerships and coordinate transition and employment supports across agencies. The Minnesota Interagency Council also meets to create partnerships and consider cross-agency coordination.

Waiver funds can be used in conjunction with employment services across multiple agencies. However, any person seeking Medicaid Authority funded employment services must go through a third party determination. In this process consideration is given to individuals that choose to have their services delivered under the CDCS option. People who choose CDCS services may combine these individualized supports with support funded by the DEED Division of Rehabilitative Services or DOE transition services.

New York Summary

State	Individual Integrated Employment	Group Supported Employment	Community-based Non-Work	Facility-based Non-Work
NY	<p>Supported employment - \$56.11/hr or \$14.15/15 min for Region 3; \$64.08/hr or \$16.02/15 min for Region 2; \$70.11/hr or \$17.53/15 min for Region 1</p> <p>Pathways to Employment - \$40.58/hr or \$10.15/15 min for Region 3; \$43.64/hr or \$10.91/15 min for Region 2; \$44.23/hr or \$11.06/15 min for Region 1</p> <p>Community-Based Prevocational – Ranges from \$20.82 - \$41.65/hr depending on Region and # of individuals served (1-3+). Also available in 15 minute units.</p>	<p>Supported employment - \$22.64/hr or \$5.66/15 min for Region 3; \$25.63/hr or \$6.41/15 min for Region 2; \$28.05/hr or \$7.01/15 min for Region 1</p> <p>Pathways to Employment - \$34.49/hr or \$8.62 /15 min for Region 3; \$37.10/hr or \$9.27/15 min for Region 2; \$38.70/hr or \$9.68/15 min for Region 1</p>	<p>Individual Community habilitation – ranges from \$39.99- \$35.58/hr depending on Region. Also available in 15 minute units.</p> <p>Group Community habilitation ranges from \$17.10- \$25/hr depending on region and group size (2-4 individuals). Also available in 15 minute units.</p>	Rates vary by region and provider

The information in this summary comes from:

1. <https://opwdd.ny.gov/sites/default/files/documents/Combined-Amendment-01-Public-Comment.pdf>
2. https://www.health.ny.gov/health_care/medicaid/rates/mental_hygiene/
3. https://opwdd.ny.gov/opwdd_services_supports/employment_for_people_with_disabilities/pat_hway-employment

4. https://opwdd.ny.gov/opwdd_services_supports/supports_for_independent_and_family_living/day_services
5. <https://opwdd.ny.gov/sites/default/files/documents/site-based-and-community-prevoc-final-regs-text.pdf>
6. https://www.health.ny.gov/health_care/medicaid/redesign/nys_money_follows_person_demonstration.htm
7. Personal correspondence with Ceylane MeyersRuff, Office For People With Developmental Disabilities, Director, Employment and Meaningful Community Activities.

Background

New York bills for services based on regions. Region 1 is New York City, Region 2 is Putnam, Rockland, Westchester, Suffolk, and Nassau Counties, and Region 3 includes the rest of New York State.

There have been no new sheltered workshop enrollments since 2013. If an individual is not Medicaid eligible, they receive long-term sheltered workshop services funded by the state, and possibly some county, dollars.

Billable Activities

Prevocational services address the individual's vocational interests. They assist individuals who are interested in joining "the world of work" but whose skills are such that they may not expect to obtain competitive employment within the next year. Services include: acquiring work habits, travel training, assessing work skills and interests, benefits planning, and using assistive technology. The individual may or may not perform work for which he or she is paid while receiving prevocational services. Prevocational services include support and training related to the ability to obtain and retain employment, excluding training on job tasks.

Prevocational dollars are negotiated per provider. As of July 1st, 2015, NYS now offers community pre-voc as well as site-based pre-voc.

Supported Employment. New York State has recently redesigned their supported employment services. Whereas previously the state had an upstate and downstate monthly fee (\$5-600 upstate, \$800 downstate) dependent on two face-to-face contacts, as of July 1st, 2015, supported employment is now reimbursed in hourly and quarter hour units. Rates are now set by the Department of Health and are scheduled to change once more starting on July 1st, 2017.

Pathway to Employment offers an individualized planning process that helps individuals identify a career or vocational direction. Pathway to Employment also provides instruction and training in job readiness skills and develops a plan for achieving competitive, integrated employment at or above the New York State minimum wage. Within 12 months the outcome of this service is

documentation of the participant's stated career objective; a detailed career plan used to guide individual employment supports; and preparation for supported employment services. Career plan must be shared with Access VR. If not ready, they can do community pre-voc or skill training programs.

Community-based non-work *day habilitation services* are paid for through the HCBS waiver.

Unit of Service

Supported employment services are billed in one hour and 15-minute increments.

Financial Incentives to Encourage Integrated Employment

New York State has recently shifted service billing from monthly to hourly. This was done in the hopes that accountability to services would increase as fees for service will now increase. The state has also debated the possibility of moving towards an outcome-based payment system but those outcomes still need to be defined by the state. Access VR in New York has moved into milestone payments (payments only after an individual has been working for working 5 days, 45 days, 90 days, etc.), but that has proved challenging as providers must work for long periods of time before receiving payment for services rendered.

Portability of Funds

New York State was awarded a Money Follows the Person Demonstration grant in 2007 so that individuals may retain their funds to pay for comparable community-based services if they move within the state.

Individualization of Rates

Rates are no longer based on individual support needs, only the region in which the person lives. New York State is paying attention to how much support an individual receives as there is a cap on support hours. However, there is also a robust process to extend that service hours cap: Intensive and Extended Supported Employment. Intensive focuses on job development with the individual but also includes some discovery, and Extended Supported Employment increases the supported employment service hours allowed. Both of these processes incentivize the provider to offer more hours.

Transportation Funding

Transportation is built into the rate for most services except for supported employment.

Working with VR

New York State makes working with VR a priority. The state is currently updating their Memorandum of Understanding but Medicaid is still the payer of last resort. The main avenue to employment in the state is Access VR, which is not available to every individual. Pathways to Employment was created to fill the gap for the individual while they are on the Access VR waiting list. The focus of Pathways to Employment is on discovery leading to better job matches (see above).

North Carolina Summary

State	Individual Integrated Employment	Group Supported Employment	Facility-based Work	Community-based Non-Work	Facility-based Non-Work
North Carolina	Individual supported employment - \$7.39/15 min Long-term follow-up - \$7.39/15 min	Group supported employment - \$1.90/15 min Long-term follow-up - \$1.90/15 min	N/A	Community Living and Support - \$4.71/15 min for individual or \$3.10/15 min for a group Community Networking - \$5.35/15 min for individual or \$2.98/15 min for a group	Day supports - may be prevocational - \$24.52/hr for an individual or \$14.56/hr for a group

The information in this summary comes from:

1. <https://ncdma.s3.amazonaws.com/s3fs-public/documents/files/8p.pdf>
2. <https://www2.ncdhhs.gov/ncinnovations/>
3. Personal communication with Dawn Johnson, Project Manager, Division of Mental Health, Developmental Disabilities and Substance Abuse Services, and Paul Hogle, Department of Health and Human Services Communications Office, Public Records Team.

Background

North Carolina has three HCBS waivers. Employment services are covered under the NC Innovations Waiver.

The North Carolina Innovations Waiver Services (NC Innovations) is a resource for funding services and supports for Medicaid beneficiaries with intellectual and other related developmental disabilities who are at risk for institutional care in an Intermediate Care Facility for Individuals with Intellectual Disabilities. NC Innovations is authorized by a Medicaid Home and Community-Based Services (HCBS) Waiver granted by the Centers for Medicare and Medicaid Services (CMS) under Section 1915 (c) of the Social Security Act. This current waiver was renewed and approved to be effective, August 1, 2013 for five years. It operates

concurrently with a 1915 (b) Waiver, the North Carolina Mental Health/Developmental Disabilities/ Substance Abuse Services Health Plan (NC MH/DD/SAS Health Plan). The NC MH/DD/SAS Health Plan functions as a Prepaid Inpatient Health Plan (PIHP) through which all mental health, substance abuse, and intellectual/developmental disabilities services are authorized for Medicaid enrollees. Local Management Entities-Managed Care Organizations (LME-MCOs) are area authorities in the State of NC which are responsible for certain management and oversight activities with respect to publicly funded DMH/DD/SAS services and are PIHPs for the waiver.

Billable Activities

Prevocational Services are provided as Day Supports under the NC Innovations Waiver. Day Supports is a group, facility-based service that provides assistance to the individual with acquisition, retention, or improvement in socialization and daily living skills and is one option for a meaningful day. Prevocational services are services provided to individuals who are not expected to join the general workforce or participate in transitional sheltered workshops within one year of service initiation. Prevocational services include activities that are not directed at teaching job-specific tasks but at underlying skills that may support the individual to increase his/her ability to be able to pursue employment (e.g. attention span, attendance, and task completion).

Supported employment services provide assistance with choosing, acquiring, and maintaining a job for beneficiaries ages 16 and older for whom competitive employment has not been achieved and /or has been interrupted or intermittent. Supported Employment services occur in integrated environments with non-disabled individuals or is a business owned by the beneficiary. Supported Employment services do not occur in licensed community day programs. The intent is to assist individuals with developing skills to seek, obtain and maintain competitive employment or develop and operating a micro-enterprise. Services may include: Pre-job training/education and development activities to prepare a person to engage in meaningful work-related activities which may include career/educational counseling, active job searching, job shadowing, assistance in the use of educational resources, training in resume preparation, job interview skills, study skills, assistance in learning skills necessary for job retention; Coaching and employment support activities that enable an individual to complete initial job training or develop skills necessary to maintain employment is completed through activities such as: assistance in job tasks, work adjustment training and counseling; and technical support to potential employers regarding Federal ADA accommodations and requirements.

Supported Employment also includes assisting an individual to develop and operate a micro-enterprise. This service consists of: aiding the individual to identify potential business opportunities; assistance in the development of a business plan, including potential sources of business financing and other assistance; and identification of the supports that are necessary in order for the individual to operate the business.

Using Supported Employment services, employment positions are found based on individual preferences, strengths, and experiences. Job finding is not based on a pool of jobs that are available or set aside specifically for individuals with disabilities. Transition to long-term supported employment should occur within one year of successful competitive employment, at this time it is expected that staff time will reduce as the individual becomes more independent in her/his job duties. Long-term follow-up supports include: Coaching; counseling and guidance; employer consultation and technical support; and transportation when the individual's job does not include staff support. Feedback regarding the success and integration of the individual into their position should be obtained from the employer, through employee evaluations that provide information on the level of supervision and oversight that the individual requires on a daily basis. Part of the responsibility of the employment specialist is providing education to the employer regarding ADA accommodations, in an effort to ensure the transition from ongoing Supported Employment to Long-term follow-up is successful and the individual's needs are met.

Unit of Service

Day supports services are delivered in 1 hour units. Supported employment, Community Living, and Community Networking services are delivered in 15 minute units.

Under the Innovations Waiver, an adult living in a residential setting, including an AFL is limited to no more than 40 hours per week of any combination of Community Networking, Day Supports and/or Supported Employment Services. A child (17 or under unless 18 and enrolled in school) is limited to 20 hours per week, or 40 hours per week when school is not in session. If living in a private home, an adult is allowed no more than 84 hours/week combination of Community Networking, Day Supports and/or Supported Employment Services, In-Home Skill Building and/or Personal Care. A child is allowed no more than 54 hours/week or more than 84 hours/week when school is not in session.

Portability of Funds

The NC Innovations waiver is statewide. If an individual moves from one MCO to another, their plan and authorizations are accepted by the receiving MCO until the end of the plan year.

Individualization of Rates

As the Innovations Waiver is operated in conjunction with a (b) waiver, the MCO has rate-setting authority.

Transportation Funding

Transportation is a component of Supported Employment and Day Supports.

For individuals who are eligible for educational services under the Individuals with Disability Educational Act, personal care does not include transportation to/from school settings. This

includes transportation to/from the beneficiary's home, provider home where the individual may be receiving services before or after school or any other community location where the individual may be receiving services before or after school.

Working with VR

The waiver beneficiary is not able to receive Supported Employment under the waiver if they qualify for services under VR. Waiver services may be used when the individual does not qualify for services through VR or when long-term follow along is needed.

Oklahoma Summary

State	Individual Integrated Employment	Group Supported Employment	Facility-based Work	Community-based Non-Work	Facility-based Non-Work
Oklahoma	<p>\$22.64/hour of service assessment, intensive job development, etc.</p> <p>Post placement Job Coaching: \$16.60/per hour worked by individual</p> <p>Stabilization and extended services: \$5.16/per hour worked by an individual for up to 2 years</p> <p>Employment training specialist rate (after stabilization): \$22.64/hour of service</p>	<p>Job coaching: \$12.48/per hour individual works</p> <p>Enhanced rate job coaching: \$14.52/ per hour individual works</p> <p>Stabilization and extended services: \$5.16/ per hour individual works</p>	<p>\$4.67/hour center based services</p> <p>\$11.77/Supplemental support as needed/hour individual participates</p>	<p>\$15.13/hour individual participates in individual activity</p> <p>\$9.34/hour individual participates in group activity</p> <p>\$12.47/hour individual participates in group activity enhanced rate</p>	<p>\$4.67/hour individual participates</p> <p>Supplemental support as needed \$11.77/hour individual participates</p>

The information in this summary comes from:

1. <http://www.okdhs.org/library/policy/Pages/oac317040070001000.aspx>
2. Personal communication with Regina Chace, Programs Supervisor, Employment/Adult Day Services, Developmental Disabilities Services, Oklahoma Department of Human Services

Background

Oklahoma's Developmental Disabilities Services Division (DDSD) realized the need for increased attention towards the goal of community-based employment for individuals they served. Initially, rates were based on a vendor's costs of providing direct services such as job development and job coaching. It became increasingly apparent that claims for vocational services often times reflected staff activities (e.g., job development, client assessment, and service delivery documentation), which may have been occurring without the direct involvement of the service recipient. In some situations, this resulted in long-term job development with little success in actually acquiring a job. In 1995, DDSD elected to focus on outcome-driven rates with a strong focus on using case management services to ensure fiscal and service accountability.

Case managers are assigned a key responsibility for securing the correct services. With an average caseload of 29, case managers are responsible for a strong advocacy role, working with the provider to help the individual reach his or her outcomes as outlined in the plan. The objective review process instituted in 2002 has impacted many individuals. Third parties review the individual plans which include the employment section, ensuring that providers and case managers justify how an individual's needs are being met. Reviewers are positioned at both the area and state levels. Case managers are responsible for coordinating the plan and sending it forward for review to either the area reviewer (up to a specific dollar amount), or, if at a higher cost level, the state reviewer. This arm's length process allows funding decisions to occur outside the involvement of the provider agency.

Billable Activities

There are four different integrated employment rates in Oklahoma and each has different billable activities. Employment Training Specialist services support individual assessment and job development activities, and also are used to support individuals after stabilization funding has ended. Individual and group supported employment rates are specifically for job coaching services. There is another rate once an individual reaches stabilization and transitions to extended employment services. Additionally, community-based non-work services can be specifically used to support career exploration for individuals and small groups.

Employment Training Specialist Services. A billable unit is an hour of direct support on behalf of an individual. The employment specialist rate is used to provide ongoing support for evaluation, training, and supportive assistance that allow the individual to obtain and engage in paid employment. The services may be used for: 100% on-site intervention, for up to six weeks per Plan of Care Year, in a position that pays at least minimum wage, and where the employer is not the employment services provider; assessment and outcome development for individuals, who are new to the provider agency, for a maximum of 20 hours for initial assessment; up to 40 hours annually for job development, for a position that pays at least minimum wage and at least

15 hours of employment per week or more and where the employer is not the service provider; interviewing for a job that is eligible for services; up to 20 hours annually for participation in Team meetings, when requested by the case manager; up to 40 hours annually for development and implementation of a Plan for Achieving Self-Support (PASS); and up to 20 hours annually for the development and implementation of an Impairment Related Work Expense (IRWE).

Job Coaching (Individual and Group Supported Employment). Billable units are based on the number of hours an individual works, and not on the hours of service or support the individual receives. Individual job coaching services are for one service recipient receiving job coach services in an integrated job setting (community employer or provider agency), paying minimum wage or more, and the job coach cannot simultaneously be responsible for continuous job coaching for a group agency. Group supported employment job coaching services can be provided for two to eight individuals situated close together, who are provided continuous, long-term training and support in an integrated job site, and who may earn less than minimum wage. Service recipients may be employed by the company or by the provider agency.

Stabilization Services. Billable units are based on the number of hours an individual works at minimum wage or above, and not on the hours of service or support the individual receives. Ongoing support services needed to maintain one or two individuals in an integrated competitive employment site. Stabilization Services are provided for up to two years per job. If the individual needs job coach services after the expiration of Stabilization Services, Employment Training Specialist Services may be authorized for the hours necessary to provide direct support to the individual or consultation to the employer, however, providers are encouraged to develop natural supports by the time the individual reaches the end of the stabilization process. Stabilization Services are provided when the job coach intervention time required at the job site is 20% or less of the service recipient's total work hours for four consecutive weeks. A person receiving services from the public Vocational Rehabilitation system (VR) moves to services funded by DDS upon completion of the Job Stabilization milestone. Return to the individual placement in job coach rate after the two-year stabilization (\$5/hour rate) is based on need. When this occurs, reimbursement is based on the number of hours the job coach is present.

Community-Based Services (Individual and Group). Billable units are based upon the number of hours the individual participates in the service. Individualized work-related supports provided in sites and at times typically used by others in the community. Billable activities include volunteer activities; active participation in paid or unpaid work experience sites in community settings (e.g., job sampling and situational assessment); training through generic entities (with service providers paid for direct support); stamina enhancing programs that occur in an integrated setting; transportation to and from work; meals and breaks which must occur during the conduct of service recipient's activities; job tours and job shadowing; using Workforce OK services; and attending job fairs. Group community-based services are provided to groups of no more than five people. Individual community-based services cannot be part of a group placement.

Billable supported employment activity	Service can bill under	Actions included under billable activity	Non-included actions
Job development	Employment training specialist services	Direct and indirect supports to help an individual obtain and maintain a job in the community Transportation with the individual	Transportation for staff without the individual
Job coaching for individual jobs	Job coaching	Direct and indirect job coaching services Transportation with the individual	Transportation for staff without the individual
Job coaching for group supported employment	Job coaching	Direct and indirect job coaching services Transportation with the individual	Transportation for staff without the individual
Stabilization supports	Stabilization services	Job supports for up to 2 years for the number of hours the individual works. After 2 years if still require support payment is only for direct support of the individual.	Transportation for staff without the individual
Career exploration for individuals	Community-based services	Direct support to the individual to participate in job sampling, situational assessments, job tours, job shadowing, job fairs, use of One-Stop centers, and transportation.	Indirect services to support billable activities
Career exploration for groups	Community-based services	Direct support to the individual to participate in job sampling, situational assessments, job tours, job shadowing, job fairs, use of One-Stop	Indirect services to support billable activities

Billable supported employment activity	Service can bill under	Actions included under billable activity	Non-included actions
		centers, and transportation in a group setting of 5 or fewer.	

Rate Structure

Employment specialist and job coaching rates are used at different points in the employment process:

The employment specialist training rate is available for a maximum of six additional weeks once an individual has been placed on the job with the expectation that the job coach is with the individual 100% of the time.

The job coaching rate is to be used when the job coach provides on-site intervention for 21% or more of the individual's work time. The individual is considered eligible to move to stabilization services after four consecutive weeks of 20% or less job coach intervention. The stabilization rate is available for a 2-year period.

Unit of Service

Oklahoma's unit of service for individual and group supported employment support services, and stabilization services is the number of hours the client works. For Employment Specialist Training services compensation is based upon staff hours spent providing the service. Facility-based work, community-based non-work (including career exploration activities), and facility-based non-work are all billed based upon the hours the individual participates in the service.

Financial Incentives to Encourage Integrated Employment

Higher rates are offered for community-based rather than facility-based services and for individual employment supports versus group employment supports. The ability to bill for individual and group employment supports based upon the hours that the individual works as opposed to the number of hours of direct job support provides another financial incentive for integrated employment services. Additionally, the up-front-costs of employment assessment and job development are funded at a much higher rate than other employment services. Lastly enhanced rates are available for individuals who require additional supports to be successful in community employment.

Portability of Funds

The goal of employment services in Oklahoma is "full time employment at the prevailing wage in a business or industry at an occupation of the services recipient's choice with natural supports. (OAC 340:100-17-2)". Through the case management process each service recipient's individual plan is designed to allow the use of multiple services in the achievement of this goal. An individual can receive both Community-based and employment services on the same day if the billing covers different time periods to reflect the different service

Individualization of Rates

Enhanced rates are available for Community-based Services and Job Coaching Services. Eligibility for an enhanced rate is determined by Team assessment. Enhanced rates are available for individuals due to behavior issues, a visual impairment that requires additional support or medical, mobility support and personal care needs.

Transportation Funding

If the residential provider supplies transportation to or from work to the individual the payment is included in their Habilitation Training Specialists rate (HTS). If the employment provider supplies transportation for the individual to the job site the rate is included in the job coaching rate. If only the employment staff is being transported to the job then there is a millage rate that can be billed.

Working with VR

All individuals seeking competitive employment must first be referred to the Department of Rehabilitation Services for VR services. If the individual is eligible for VR services, VR will fund the costs of initial placement. DDS has a joint agreement with VR to provide follow-along for individuals achieving job stabilization through the six VR milestones. If there are no providers available, or if it is known that the milestone system does not meet the individual's needs, the individual can go directly to DDS to access waiver services. After achieving the milestones through VR services, the individual can receive stabilization through DDS waiver services if ongoing supports are needed. As stated previously, stabilization through the waiver is paid at a \$5 per hour rate, for each hour the individual is employed (up to two years) as needed. In the transition process, DDS is encouraging individuals to go through VR so they are in the stabilization process before transitioning to a waiver (thus maximizing the available funds when possible.)

Oregon Summary

State	Individual Integrated Employment	Group Supported Employment	Facility-based Work	Community-based Non-Work	Facility-based Non-Work
Oregon	<p>Discovery ranges from \$1,728.65 - \$2,222.55 upon completion of a Discovery Profile</p> <p>Job development is outcome based and ranges from \$1,977.20 - \$2,965.80 upon successful placement</p> <p>Job retention is outcome based and ranges from \$1,235.75 - \$1,977.20 after successful completion of 90 days of employment</p> <p>Job coaching pays \$31.02-\$64.41 based on the number of hours a member works and if the category is: initial, ongoing, or maintenance</p>	<p>Max daily billing rate varies from \$18.83-24.77/hour</p>	<p>Max daily billing rate varies from \$10.39-22.03/hour</p>	<p>Max daily billing rate varies from \$15-24.77/hour</p>	<p>Max daily billing rate varies from \$8.48-21.58/hour</p>

The information in this summary comes from:

1. <https://www.oregon.gov/DHS/SENIORS-DISABILITIES/DD/PROVIDERS-PARTNERS/Documents/Employment%20Service%20Tier%20Rates.pdf>
2. <https://www.oregon.gov/DHS/SENIORS-DISABILITIES/DD/PROVIDERS-PARTNERS/Documents/Group%20or%20Facility-Based%20Attendant%20Care%20Tier%20Rates.pdf>
3. http://ocdd.org/doc_downloads/TransitionSections6.pdf
4. <http://www.oregon.gov/dhs/dhsnews/Documents/Support-Services-draft-waiver-amendment.pdf>
5. <http://www.oregon.gov/dhs/dhsnews/Documents/Comp-draft-waiver-amendment.pdf>

6. Personal correspondence from Oregon Office of Developmental Disabilities Services, Directors Office and Acacia McGuire Anderson, Statewide Employment First Coordinator, Oregon Department of Human Services

Background

Oregon provides adult DD services through two state and federally funded Medicaid programs: The Community First Choice Option or “K Plan”; and Home-based and community-based waivers. Oregon has two Medicaid waivers that serve adults — the Comprehensive Services Waiver and the Supports Services Waiver. Both the K Plan and the waivers provide long-term services in the home and community rather than in a nursing home or a hospital. These supports also may allow the individual to receive services to keep a job while they are still in school. If eligible, the individual may receive DD services through both the K Plan and one of the waivers. Services are based on eligibility, the results of their Adult Needs Assessment, ISP contents, and the desired outcome of the individuals’ life. Supported employment and prevocational services are covered under the Medicaid waivers, while transportation, behavior support, and skill development are covered under K Plan services.

Billable Activities

The K Plan, Comprehensive Services Waiver and Supports Services Waiver allow for different billable activities.

K Plan. Attendant care; Transportation; relief (respite) care for caregiver; assistive technology (\$5,000 per year) to support a person’s independence; training on how to manage personal support workers; home modifications (\$5,000 per year); behavior support; chore services; and skill development are all billable under the K Plan.

Comprehensive Services Waiver. Job Development if not available through VR, Job Coaching, Discovery/Career Exploration, Supported Employment, Adaptations or alterations to an automobile or van that is the waiver participant’s primary means of transportation, ancillary services, and case management.

Supports Services Waiver. Job Development if not available through VR, Job Coaching, Discovery/Career Exploration, Supported Employment , Adaptations or alterations to an automobile or van that is the waiver participant’s primary means of transportation, ancillary services and case management.

Rate Structure

Individuals can purchase a combination of employment (on either waiver) and day supports (via the k-plan), but the rate structures are not the same. Individuals may have up to a total of 25 hours per week of any combination of employment services through either waiver. If an individual chooses to work solely in Competitive Integrated Employment without any other

employment or day service supports they may have a total of 40 hours of job coaching provided. Day Service hours are based on the assessment and type of service rendered.

Individualization of Rates

Currently the K Plan, Comprehensive Services Waiver and Supports Services Waiver all have identical payment rates.

Under the Comprehensive Services and Support Services Waivers rates exceeding the rate cap can be requested and exceptions are based on the support level needs of individuals.

Working with VR

Per Medicaid regulations, funds available under the Rehabilitation Act, must be used for service provision prior to use of any waiver funds. Therefore, a vocational rehabilitation referral must be made to the Office of Vocational Rehabilitation Services (OVRS) or the Commission for the Blind (OCB) for/by the individual desiring employment services for individual supported employment. Job development, early job coaching, and possibly other services, may be included in a VR Individual Plan for Employment for those eligible for VR services. When VR funding has been sought, comprehensive services funds may be authorized for employment services until funds are authorized by Vocational Rehabilitation. While OVRS is funding job development or training, ODDS funds may be used to maintain other employment or non-employment services, or may be used for a related training need. If an individual has received services through Vocational Rehabilitation in the past with a successful employment outcome, it is expected an individual will return to seek additional job placement through VR.

Virginia Summary

State	Individual Integrated Employment	Group Supported Employment	Facility-based Work	Community-based Non-Work	Facility-based Non-Work
Virginia	<p>Supported employment rates are individualized for providers by VR vendor. Medicaid bills at the individual rate set by VR.</p> <p>Workplace assistance services range from \$29.24 - \$33.53/hr depending on location (only under FIS and CL waivers)</p>	<p>Ranges from \$19.25 - \$20.99/hr if 2 or fewer members per staff</p> <p>\$13.52 - \$14.70/hr if 2-4 members per staff</p> <p>\$11.21 - \$12.18/hr if more than 4 members per staff</p>	<p>No more pre-voc or facility based employment services are being funded by Medicaid in VA. Any remaining facility-based services are currently being billed as Group Day services.</p>	<p>Community engagement ranges from \$14.29 - \$22.61/hr depending on Tier</p> <p>Community Guide ranges from \$39.19 - \$49.62/hr depending on location</p> <p>Community Coaching ranges from \$29.24 - \$33.53/hr depending on location (only under FIS and CL waivers)</p>	<p>Group day support ranges from \$8.60 - \$17.34/hr depending on Tier</p> <p>Community Guide services can act as a linking service between facility-based non-work and community-based. Guide services can provide some service delivery but that is not what it is intended for.</p>

The information in this summary comes from:

1. http://www.dmas.virginia.gov/Content_attachments/My%20Life%20My%20Community%20Rate%20File%201%20Updated%2010_28_2016.pdf
2. <http://www.thearcofva.org/wp-content/uploads/2016/10/DD-Waiver-TYPES-SERVICES-w-Descriptions-color-10.10.16.pdf>
3. <http://law.lis.virginia.gov/admincode/title12/agency30/chapter120/section754/>

4. <http://www.dbhds.virginia.gov/library/developmental%20services/dds%20navigating%20the%20id%20waiver%20for%20families.pdf>

5. http://www.vaaccses.org/vendorimages/vaaccses/MEDICAID_MEMO_DMAS_DDwaiver_Da yServiceChanges_REVISED_062216.pdf

6. http://www.vaaccses.org/vendorimages/vaaccses/POWERPOINT_DBHDS_Final_060815.pdf

7. <http://www.thearcofva.org/wp-content/uploads/2016/10/DD-Waiver-TYPES-SERVICES-w-Descriptions-color-10.10.16.pdf>

8. Personal correspondence with Heather Norton, Director of Community Support Services, Department of Behavioral Health & Development Services

Background

Virginia is redesigning its Medicaid Home and Community-Based Services (HCBS) Waivers. Virginia offers employment and day services for individuals with disabilities under three waivers:

The Community Living (CL) waiver provides up to and including 24/7 services and supports for adults and some children with exceptional medical and/or behavioral support needs through licensed services. This includes residential supports and a full array of medical, behavioral, and non-medical supports. This was formerly known as the Intellectual Disabilities waiver.

The Family and Individual Supports (FIS) waiver provides supports for children and adults living with their families, friends, or in their own homes, including supports for those with some medical or behavioral needs. This was formerly known as the Developmental Disabilities waiver.

The Building Independence (BI) waiver provides supports for adults able to live independently in the community with housing subsidies and/or other types of support. This was formerly known as the Day Support waiver.

Billable Activities

Supported employment is defined as ongoing supports that enable individuals to be employed in an integrated work setting and may include assisting the individual, either as a sole individual or in small groups, to locate a job or develop a job on behalf of the individual (Individual supported employment only), as well as activities needed to sustain paid work by the individual or individuals including skill-building supports and safety supports on a job site. These services must be provided in work settings where persons without disabilities are employed and made available to all individuals for whom competitive employment at or above the minimum wage is unlikely without ongoing supports. Only job development tasks that specifically pertain to the individual shall be allowable activities under the waiver supported employment service.

Activities covered under individual and group supported employment include: assessing the individual's needs and developing the plan; job development to achieve an appropriate job match for the individual and potential employer; on-the-job training in work and work-related skills, ongoing evaluation, supervision and monitoring of the individual's performance on the job; ongoing support services necessary to assure job retention; training in work-related skills such as the effective use of community resources, break/lunch areas and transportation/mobility training; and staff transportation between the individual's home and workplace when other forms of transportation are unavailable or inaccessible. Individual supported employment is provided at a 1:1 staff to individual ratio and group supported employment is provided in groups of 2 to 8 individuals and cannot take place in a licensed residential setting nor in the individual's residence.

In all cases, the Supported Employment provider must have an agreement with the Department for Aging and Rehabilitative Services (DARS) VR to provide Supported Employment services under the CL Waiver. This service is provided to anyone meeting eligibility and is interested in employment services.

Workplace assistance services are supports provided to an individual who has completed job development and completed or nearly completed job placement training (i.e. supported employment) but requires more than the typical employment specialist services to maintain stabilization in employment. These services are supplementary to individual supported employment services. Services include: habilitative supports related to non-work skills needed for the individual to maintain employment, habilitative supports to make and strengthen workplace connections, and safety supports to ensure the individual's health and safety. The activity is not work skill training-related and services are to be delivered in their natural setting in a 1:1 staff to individual ratio.

Community Engagement are services that support and foster individuals' abilities to acquire, retain, or improve skills necessary to build positive social behavior, interpersonal competence, greater independence, employability, and personal choices necessary to access typical activities and functions of community life such as those chosen by the general population. These may include community education or training, retirement, and volunteer activities. These activities are conducted at naturally occurring times and in a variety of natural settings in which the individual actively interacts with persons without disabilities (other than those paid to support the individual).

This service is provided in the least restrictive and most integrated settings possible according to the individual's Plan for Supports and individual choice. It does not take place in a licensed residential setting nor in the individual's residence. It should not be used to supplant expectation of community involvement of residential providers; nor should it limit the number and type of staff/others that the individual can participate in community activities with. Skill building must be a component of this service unless there is a documented reason why it cannot be, and the

service must affirmatively answer the question: Will the activity proposed facilitate and build relationships and natural supports in the community while utilizing the community as a learning environment? Services are provided at an individual to staff ratio of no more than 1:3.

Community Coaching includes services which are designed for individuals who need one to one support in a variety of community settings in order to build a specific skill or set of skills (such as: self-management, relationship building, use of public transportation, etc.) to address a particular barrier or barriers preventing an individual from participating in activities of community engagement. In addition to skill building, this service includes safety supports and is delivered in a 1:1 setting.

Group Day Services include skill building or supports for the acquisition, retention, or improvement of self-help, socialization, community integration, employability and adaptive skills via opportunities for peer interactions, community integration, and enhancement of social networks. Skill building is a required component of this service. Group day services are primarily facility-based and delivered in a group setting of no more than 1:7 staff to individual ratio.

Rate Structure

Rates for most services are structured using several factors including: the tier level required, staff members required, and whether or not the member receiving services lives in Northern Virginia. Tiers correspond to the seven levels of support needs with higher levels/tiers corresponding to more significant support needs due to medical and/or behavioral challenges.

For billing purposes, regulations require Virginia localities that are included in the Washington D.C./Virginia/Maryland metropolitan core-based statistical area used by CMS for Home Health reimbursement for its Northern Virginia (NOVA) home health rate region. These metropolitan based locations typically command a higher rate.

Supported employment rates are individualized to the provider (see below).

Unit of Service

Community Engagement, Community Coaching, and Group Day services are billed in one hour units.

The unit of service for workplace assistance is one hour and the service is limited to 40 hours per week per individual with no limit on how long the service may remain authorized.

The unit of service for individual and group supported employment is one hour and the service is limited to 40 hours per week per individual.

Combined services shall not exceed 66 hours per week.

Financial Incentives to Encourage Integrated Employment

Financial incentives are encouraged through the individualized rate structure. Rates are intentionally increased for more community integrated services.

Individualization of Rates

Reimbursement rates for individual supported employment are set by DARS. Reimbursement rates for group supported employment are set by The Department of Medical Assistance Services (DMAS). Group supported employment services are billed based on the size of the group per the DMAS fee schedule. Individual supported employment shall be billed according to the DARS provider rate schedule.

Transportation Funding

In instances where supported employment staff or group day staff are required to ride with the individual to and from supported employment activities, the supported employment staff time may be billed as supported employment or group day provided that the billing for this time does not exceed 25% of the total time spent in supported employment for that day.

VA is in the process of submitting an amendment for non-medical transportation services that allow for community access.

Working with VR

There is much collaboration between the VA Department of Behavioral Health and Development Services (DBHDS) and DARS Vocational Rehabilitation (VR). Currently, a team of five individuals from both agencies provides TA to providers around HCBS services and the Final Rule. VR has representation on DBHDS's Employment First advisory group, and VR invites DBHDS to their steering committee meetings. VR also participates in SELN calls and soon so will the Department of Education.

Individuals interested in employment must apply for VR services. If an individual is determined eligible for VR services, DARS will provide supported employment services necessary to achieve the consumer employment outcome, as contained in their Individualized Employment Plan. Individuals receiving services under DARS or IDEA (Individuals with Disabilities Education Act) cannot receive payment for supported employment through waiver services. Supported employment under the waiver is often a long-term service and generally follows time-limited DARS funding. However, if an individual is determined eligible for VR services and is placed on the Order of Selection Priority Category 1 (most significantly disabled) waiting list, a service authorization can be completed and the individual can access services through waiver funding. If an individual with a Waiver is determined not eligible for DARS VR services, a service authorization can be completed requesting employment services through waiver funding.

When DARS brings the individual off of their Order of Selection wait list, the current service the individual is receiving determines if the funding source should change to DARS or remain as waiver-funded. In cases where the individual is in Job Development or Placement and Training, funding for the services must be transferred from Waiver to DARS VR for the remainder of time limited services.

Washington Summary

State-WA	Individual Integrated Employment	Group Supported Employment	Facility-based Work	Community-based Non-Work
Basic Plus Waiver	Supported employment - \$75/hr ceiling for an individual	Supported employment - \$65/hr ceiling	Prevocational - \$55/hr ceiling for an individual	Community guide - \$20.26/hr individual \$25.68/hr Agency Community Access - \$35/hr ceiling for an individual
Core Waiver	Supported employment - \$75/hr ceiling for an individual	Supported employment - \$65/hr ceiling	Prevocational - \$55/hr ceiling for an individual	Community guide - \$20.26/hr individual \$25.68/hr Agency Community Access - \$35/hr ceiling for an individual
Community Protection Waiver	Supported employment - \$75/hr ceiling for an individual	Supported employment - \$65/hr ceiling	Prevocational - \$55/hr ceiling for an individual	
Individual and Family Services Waiver				Community engagement - \$20.26/hr individual \$25.68/hr Agency

The information in this summary comes from:

1. <https://www.dshs.wa.gov/sites/default/files/DDA/dda/documents/Basic%20Plus%20Waiver%20Renewal%20Request.pdf>
2. <https://www.dshs.wa.gov/sites/default/files/DDA/dda/documents/Core%20Waiver%20Renewal%20Request.pdf>
3. <https://www.dshs.wa.gov/sites/default/files/DDA/dda/documents/Community%20Protection%20Waiver%20Renewal%20Request.pdf>
4. <https://www.dshs.wa.gov/sites/default/files/DDA/dda/documents/DDA%20IFS%20HCBS%20Waiver%204-1-16.pdf>
5. http://arcwa.org/library/facts_about_the_four_home_and_community_based_waiver_programs
6. <http://apps.leg.wa.gov/WAC/default.aspx?cite=388-828-9325>
7. Personal communication with Terry Redmond, Megan Burr, Anne Whitehall, and Branda Matson, Washington State Department of Social and Health Services.

Background

Washington has five Home and Community-Based Waivers. Employment services are provided under the Basic Plus Waiver (BP), Core Waiver (CW), and Community Protection Waiver (CP). The Basic Plus Waiver is intended for people who live with their families, on their own, in an adult family home, in another setting with assistance or an Adult Residential Care Assisted Living Facility (ARC) and are at high risk of out of home placement. The Core Waiver is intended for people who are at immediate risk of out of home placement and need up to 24-hour residential services. The Community Protection Waiver is intended for people who need 24-hour on-site awake staff supervision and therapies to maintain their own and community safety. Community-based non-work services are primarily delivered through the Individual and Family Services waiver.

Washington currently has 8,000 individuals enrolled in employment services. And those services are primarily individual. Washington has focused its efforts on individual supported employment and community access services. There are only 164 individuals receiving facility-based prevocational services at the moment compared to around 1,200 in community access.

Billable Activities

Prevocational services offer short-term training and skill development in addition to a limited amount of time in their community to pursue employment opportunities. The focus of prevocational services is to help the individual meet her/his employment goals and facilitate integration of the individual into her/his community. Prevocational services are defined as a

group of nine or more individuals within a segregated setting. Due to attrition in Pre-vocational services WA has a few segregated shops that support eight or fewer individuals. Pre-vocational services cannot be authorized if the individual receives community access services or supported employment services. Washington stopped enrolling individuals in prevocational services as of September 1, 2015 and as of March 1, 2019 Washington will end its prevocational services.

Currently, those individuals who exit prevocational services and are eligible are given legacy payments of \$300 a month through State Supplementary Payment program (SSP) to replace the prevocational services they were receiving, for example; to pay a provider to help them better access their community or pay for on-the-job employment support or technical assistance and guidance to achieve their goals. This money is only available to those individuals who do not live in residential facilities and who exited prevocational service on or after September 1, 2015, and that do not receive WAC defined prevocational services (388-845-1400 through 388-845-1410) or DDD residential habilitation services as defined in WAC 388-845-1500 through 388-845-1515.

Supported employment services provide individualized support to gain and/or maintain employment. These services are tailored to individual needs, interests, abilities, and promote career development. These services are provided in individual or group settings. Individual supported employment services include activities needed to sustain minimum wage pay or higher. These services are conducted in integrated business environments and include the following: discovery, job development and training, job coaching, natural supports training for supervisors and peer workers, work-site modifications, employment retention, and career development.

Group supported employment services are a step on the pathway toward gainful employment in an integrated setting and include the same activities as individual supported employment plus daily supervision by an employment provider and groupings of no more than 8 workers with disabilities.

Short-term enhanced *prevocational supports* are available if a person is beginning a new job, has planned or expected change in job or job tasks, unexpected change in their condition or support is needed to maintain employment. These services are intended to be short-term and may be authorized for a maximum of 6 months.

Supported employment services are only available to individuals who do not have access to services available under the Rehabilitation Act of 1973, or the Individuals with Disabilities Education Improvement Act of 2004. Payment will be made only for the adaptations, supervision, training, and support with the activities of daily living a person requires as a result of his/her disabilities. Payment is excluded for the supervisory activities rendered as a normal part of the business setting. An individual cannot be authorized to receive supported employment services if he/she receives community access services.

Rate Structure

Rates are structured in Washington as fee for service. Most rates are set in-house depending on the service, but some are set through the legislation. Washington conducted a rate analysis that looked at what similar provider types were paying for services when determining their rates. Washington's rates are all inclusive. Hours and resources allocated towards staff and organizational training and accreditation are wrapped up in the rate.

Unit of Service

Washington currently bills for services in units of 15 minutes and 1 hour. All waiver service rates are built on an hour of service but will soon be broken out into 15 minute units to better match the state's billing structure.

Financial Incentives to Encourage Integrated Employment

Washington currently provides no additional financial incentives to encourage integrated employment other than offering favorable service rates that afford providers to pay their staff a living wage. DDA staff have shared that providers are incentivized to improve the number of individuals in integrated employment. Washington collects data on individual employment outcomes and publishes the data under the title, [Results Washington](#). A target increase of 2% in individuals earning minimum wage was set at the Governor's level and was stepped-down locally to 3% for counties. Counties ended up raising the percentage to 5% for the employment providers. DDA staff report that providers receive significant satisfaction based upon their achievement of results and that this is more powerful than financial incentive. Washington also runs an Implementation Committee group with providers and counties that meets bi-monthly to discuss service rates and ensure that payment rates are reflective of providers' real world costs.

Portability of Funds

All services are based on the individuals' ISP. If an individual moves they will still get the same service as long as it's provided locally. All Washington counties offer individual employment and community services. If the individual lives on the border of two counties, they may choose the provider in the county that offers integrated employment and community integration opportunities that best reflects their goals.

Individualization of Rates

Unit rates for prevocational as well as individual and group supported employment are negotiated between the counties and their providers within the parameters established by the County Service Guidelines and county allocations. Variations in rates are due to differences among providers related to overhead, staff wages, and the local demand for services. Rates for employment and day services may also be negotiated if the individual requires an extraordinary number of hours. In that case, the rate is more in line with the rate for community access

services. The contract between the state and counties cap the employment service and community access rates at a certain dollar amount per hour (see rate table above).

Per the BP waiver, DDA contracts with the counties for expanded habilitation, including prevocational and supported employment services. The counties in turn contract provider services directly or contract with local providers for expanded habilitation services. The DDA reimburses the counties on a monthly basis for the cost of all services provided within the county. The counties, in turn, reimburse vendors for services provided based on the negotiated unit rates contained in their contracts with the vendors.

The amount of employment support will be based on the following items:

Client Employment Acuity is determined through the DDA assessment. Acuity reflects conditions typically related to the individual's disability that are not likely to change, and are generally not impacted by outside factors. Client acuity is determined as either “High”, “Medium” or “Low”.

Support level High –

- Requires support in the community at all times to maintain health and safety.
- Experiences significant barriers to employment or community participation.
- Requires frequent supervision, training, or full physical assistance with community activities most or all of the time.

Support Level Medium -

- Independent in the community some of the time and requires moderate support to obtain or maintain employment.
- Able to maintain health and safety in the community for short periods of time.
- May need some supervision, training, or partial physical assistance with community activities.
- May need regular monitoring or prompting to perform tasks.

Support Level Low –

- Generally independent in the community and requires minimal support to obtain or maintain employment.
- Able to communicate with others effectively and can maintain personal health and safety most of the time without supervision.
- May be able to independently transport self in the community and does not require physical assistance in community activities.
- Able to perform tasks with minimal or occasional monitoring or prompting.

The range of support hours the client receives will be dependent upon the individual's Employment Acuity and work status (“working” or “in training/job development”). Those two factors determine the individual’s employment service level (A-H) and employment service hours (0-12). For example, an individual with a Low support level who is working receives 4 hours of employment support per month, where an individual with a High support level who is in training receives 12 employment service hours per month. Employment hours can be added or reduced depending upon if the individual meets one or more set circumstances (i.e. “Behavioral or physical needs that may affect the safety of you and others while at work” or “you can independently find employment.”).

Currently, the majority of individuals Washington serves fall in the “high” to “medium” support level. The algorithm for community access services is based on the Support Intensity scale.

All waivers have different funding allocations. Basic Plus is determined through an assessment that is separate from aggregate funding in order to offer higher support. Core and Community Protection waivers have no aggregate funding as long as supported employment is less than the cost of daily facility services and employment support services do not exceed \$550 a day. According to the state contract with the counties, allocations are developed based on a point in time open “service authorizations” then looking back on one year of billing and outcome data. The monthly rate is then attached and annualized.

Transportation Funding

Per the Basic Plus and Core waivers, the transportation rate per mile is based on the Collective Bargaining Agreement (CBA) with the State Employees International Union (SEIU).currently billed between \$0.56- \$0.58 per mile depending on negotiations.

Under all waivers, reimbursement for transporting a participant to and from waiver-funded services is specified in the participant's Individual Support Plan. Waiver transportation services cannot duplicate other types of transportation available through the Medicaid State Plan, Early and Periodic Screening, Diagnostic and Treatment (EPSDT), or included in a provider's contract. Waiver transportation is provided in order for the waiver participant to access a waiver service, such as summer camp (respite service), when without the transportation they would not be able to participate. Waiver transportation is different from *Personal Care* transportation in that it does not provide transportation to and from shopping or medical appointments. Whenever possible, the person will use family, neighbors, friends, or community agencies that can provide this service without charge. All waivers offer individuals mileage reimbursement to work if there are supports in place. Individuals may also receive transportation training as a part of several services including community guide.

Working with VR

Washington has a formal relationship with VR in regards to job development services. Counties maintain relationships with VR for sequenced funding for transition age youth and others. Washington does not allow for duplication of services with VR.

Appendix B

2014 State IDD Agency Data Comparison Matrix (* - Data not available)

State	Percent of individuals receiving integrated employment services	Percent of total day and employment dollars	Average spending per individual in integrated employment services
National Average	19	11	\$7,194
Florida	13	6	\$2,527
Alabama	4	4	\$11,832
Alaska	23	14	\$14,535
Arizona	22	15	\$9,783
Arkansas	*	*	*
California	12	10	\$9,012
Colorado	28	14	\$5,341
Connecticut	47	34	\$15,811
Delaware	26	14	\$10,373

District of Columbia	17	6	\$6,389
Georgia	12	6	\$3,633
Hawaii	*	*	*
Idaho	6	5	\$5,594
Illinois	6	4	\$5,691
Indiana	14	4	\$2,113
Iowa	16	11	\$3,757
Kansas	14	*	*
Kentucky	10	5	\$6,447
Louisiana	32	38	\$7,819
Maine	28	*	*
Maryland	39	34	\$14,769
Massachusetts	36	39	\$7,772
Michigan	23	17	\$6,730

Minnesota	11	5	\$5,857
Mississippi	21	44	\$324
Montana	12	11	\$10,133
Montana	24	8	\$4,500
Nebraska	4	0.5	\$6,748
Nevada	17	12	\$8,316
New Hampshire	44	41	\$19,977
New Jersey	*	*	*
New Mexico	32	16	\$6,786
New York	12	*	*
North Carolina	22	13	\$5,360
North Dakota	*	*	*
Ohio	22	12	\$12,246
Oklahoma	60	52	\$8,087
Oregon	32	12	\$3,104

Pennsylvania	18	7	\$6,849
Rhode Island	44	4	\$1,131
South Carolina	29	20	\$5,418
South Dakota	20	3	\$917
Tennessee	19	11	\$8,394
Texas	11	5	\$1,907
Utah	21	14	\$7,204
Vermont	38	28	\$9,814
Virginia	26	17	\$8,279
Washington	86	88	\$7,024
West Virginia	38	*	\$669
Wisconsin	18	12	\$7,467
Wyoming	17	4	\$3,528

Data for this comparison matrix is available at www.statedata.info. Data was pulled from the 2014 State IDD Agency survey that collects summary data on day and employment service distribution and funding at the state level. *Percent of individuals in integrated employment services* was calculated as: $(\text{total individuals reported in integrated employment services} / \text{total individuals reported served in day and employment services}) * 100$. *Percent of total day and employment dollars* was calculated as: $(\text{total reported dollars integrated employment services} / \text{total reported dollars all day and employment services}) * 100$. *Average spending per individual in integrated employment* = $\text{total reported dollars integrated employment services} / \text{total individuals reported in integrated employment services}$.

Appendix C

Summary of September Florida Supported Employment Rate Options Study

Focus Groups

Supported Employment Provider Rate Options Study

The Florida Supported Employment Provider Rate Options Study is a project of the Florida Developmental Disabilities Council, Inc. (FDDC) and will be completed by the Institute for Community Inclusion (ICI) at the University of Massachusetts Boston and the National Association of State Directors of Developmental Disabilities Services (NASDDDS). The goal of this study will be to support Florida to develop an effective rate structure for supported employment services. To inform the development of new payment rates for supported employment, information will be gathered from multiple sources including in-person and online focus groups.

Description of in-person Focus Groups

During the course of this project we conducted three in-person focus groups in three separate areas of Florida: Jacksonville, Kissimmee, and Tampa. All three focus groups were held at Career Source locations. The individuals who attended these groups represented multiple levels of provider staff including Chief Executive Officers with multiple years of experience working with the Florida disability system, to recently hired direct support staff. During each of these 2 plus hours focus groups, participants were asked to reflect upon what is working well within the current system of reimbursement for supported employment in Florida, what could be done

better, and whether there were previously successful reimbursement practices in Florida that they would like to see return. Information from the focus groups was recorded by project staff in real time and posted on poster paper in the focus group room.

Cross- focus group summary

Staff from the Institute for Community Inclusion analyzed information from the three focus groups. The following themes around the goals of raising supported employment payment rates emerged from participants discussions:

- *Building a high-quality employment infrastructure,*
- *Developing a highly qualified employment workforce,*
- *Developing billable activities to encourage best practices in employment services,*
- *Funding methodology for transportation, and,*
- *Communication that encourages collaboration with APD.*

Building a high-quality employment infrastructure. Providers want to raise the salaries of their employment service staff in order to ensure that high-quality services are available to all job seekers with disabilities. Providers spoke about their goal to hire passionate and skilled staff, but of the challenge of recruiting and retaining individuals with these skills on salaries that pay less than \$10 an hour. Participants described high turnover rates because of the low salaries that are reflected in the payment rate for supported employment services. Providers felt that the low salary sends a message to employees that providing employment services does not require an advanced skill set and even that skills may not be required at all.

Some providers are able to pay slightly higher salaries that they augment through fundraising efforts, which can lead to staff leaving one provider to work for another provider that

can offer slightly more money or better benefits. On the surface this would appear to be a typically functioning labor market, however, it erodes the quality of the service system for people with disabilities and in particular the supported employment system. High-quality local level supported employment systems rely on collaborative employment provider networks to develop relationships with business and to consistently implement best practices both in supporting individuals with disabilities but also the businesses that hire these individuals. The current system creates unproductive competition amongst providers for staff who should instead be collaborating to ensure the best job matches for individuals and business.

Developing a highly-qualified employment workforce. Providers noted that the ability to provide high-quality services depends on the ability to have highly qualified employment service staff. Providers described the current APD training requirements as lengthy and costly with little relationship to the actual skills high-quality employment services staff require. Combined with the high turnover of direct support staff because of low wages, the current training process is a disincentive to employment provider agencies expanding their employment departments. Focus group participants appreciated the ability to allow their staff to access the required online trainings through the APD training website, however, the current online system was launched without sufficient administrative structures at the state level which in September 2016 has resulted in a significant delay in newly hired provider staff being able to access the training can begin, leaving providers with staff who are unable to provide services to individual job seekers. While imperfect, respondents were discouraged that the previous ‘train the trainer’ model had been eliminated.

Developing a provider community that demonstrates “best practice”. The current rate structure has resulted in providers implementing less than best practice in the organization of

their employment services departments. For example, providers described that they do not use recognized job development practices to facilitate business relationships and connections with networks of employers, instead they focus on “selling” job seekers to businesses.

Forthcoming research from the Rehabilitation Research and Training Center for Individuals and Intellectual and Developmental Disabilities at the Institute for Community Inclusion has identified several areas to build provider capacity in order to implement best job development practices. Areas include: hiring motivated job developers who share the provider’s mission and values. People who are familiar with new technology, who either have or are willing to develop relationships within the community, and who have a variety of backgrounds, not just one rooted in social work. It is also recommended to expand the professional network of the employment consultants by having them cultivate relationships with employers without necessarily having specific job seekers in mind, attend local business events, and join Chambers of Commerce. Rather than “selling” job seekers to businesses, best practice research points towards identifying “tasks” instead of “jobs” that need performing at businesses, tasks that no one is doing that, if addressed, would add value. Or, asking potential employers if there are tasks that can be combined in different ways to develop a new job while freeing up time for other workers to focus on their core activities.

Developing billable activities to encourage best practices in employment services. Best practice in providing supported employment services requires a mix of both in-person and on-behalf of services. There is a perception that APD does not allow employment services to be conducted on behalf of the individual requiring employment supports. Even if this perception is incorrect providers reported that they were unwilling to provide services that were not face-to-face because of the expectation of the Delmarva reviewers as to how the validation that the service

has been provided is assessed. While focus group participants understood and supported the need for Medicaid Fraud prevention they also felt as though methods to do so must be revised to prioritize the provision of high-quality supported employment services.

The payment rates for supported employment services further are not adequate to support staff time to complete the case notes, engage in ongoing training and skill development, and transportation between client's worksite. Some providers also expressed concern about the upcoming Department of Labor overtime requirements. This is especially pressing for providers who are not able to scale up their supported employment departments to regularly support individuals who are working outside of the traditional work day and week.

Providers would like to see payment rates that are robust enough to cover staff and administrative costs for administrative activities, the ability to bill for time spent on behalf of the individual such as such as Skype calls and training webinars, and transportation.

Funding Methodology for Transportation. For employment to be the first option for individuals with IDD, individuals need to be able to get to work. In an ideal world individuals who do not drive would car pool with colleagues, pay a friend to drive them to work, or use the public transportation system to get to work; however many individuals with IDD require specialized transportation services, do not live in an area with public transportation, do not work a schedule that is similar to colleagues, or have the community relationships to develop ride sharing opportunities. Further the Medicaid non-medical transportation service is not given adequate weight within iBudget development. This has resulted in providers themselves providing transportation to individuals to their job without a guarantee of reimbursement. Providers expressed the desire to be able to support their clients to use non-medical transportation dollars

to pay for services such as Uber and Lyft (as is done in Washington DC and Massachusetts), and to bill for transportation to the individual's workplace.

Communication that encourages collaboration with APD. Many individuals spoke of how, prior to the regionalization of APD offices, communication between APD and providers was more collaborative. Focus group attendees spoke of the sense of collaboration and "investment" between them and state agencies (both APD and VR) that has been lost over the past 15 years. As the number of state staff have been reduced both in Tallahassee and the regional offices there has been a reliance on the use of email and internet communications to inform the field, however, these types of communication strategies are not sufficient. Today, while many providers were aware of the Center for Medicare and Medicaid Services (CMS) community settings rule, they perceived that APD would only need to make changes related to residential services and not employment and ADT services to come into compliance. This left the providers who attended the focus groups uninformed of pending changes to state policy and procedures. Providers also shared that when they are made aware of changes it is often without significant time to prepare and make the necessary changes to business practices. Providers feel that they are no longer "brought to the table" when these policy changes are being discussed, yet they are the ones who must carry them out. Consequently, many providers have created informal communication networks amongst themselves in an attempt to simply stay informed and up to date. While the providers spoke well of these inter-provider collaborations, they wished there were still formal meetings with the state where information was shared and everyone was on the same page. Having to piece information about policy together has also unfortunately led to many myths circulating around the state. Providers said they've seen this impact families the most. Schools have poor communication with providers and thus cannot provide individuals and their

families with the most current information. Private and charter schools, it was said, are especially underequipped to provide information to parents. As a result, parents are very hesitant to think about supported employment for their child due to their concerns about the safety of the infrastructure as well as potential loss of benefits. Working-age individuals as well, it was said, do not see the need to attempt supported employment when sheltered work and day habilitation already work so seamlessly within APD's service mix and social service cash and health benefits remain unaffected. What was recommended was a return to a more streamlined system of communication. Providers want to be brought to the table to collaborate with state agencies about policy changes. Providers are supportive of the goal of employment first and want to contribute to the effort, they want to be a partner with APD in making this a reality.