



**Employment First
Funding System Re-design Work Group
Thursday January 29, 2015 9:00a to 4:00p
Location: Columbus Developmental Center**

Facilitators: Allan I. Bergman (remote facilitation) and Lisa Mills, PhD

Attendance: Gary Smith (Licking DD), Caroline Westbrook (ODM), Brenda Smith (Riverview Industries/OAAS), Greg Dormer (OOD), Mary Vail (Goodwill Columbus), Greg Swart (DODD), John Pekar (Fairfield/Vinton DD), Dan Ottke (Clermont DD), Steve Koons (Goodwill Cincinnati), Vic Gable (Wood DD/APSE), Clay Weidner (DODD), Kristen Helling (DODD), Debbie Hoffine (DODD), Dave Reichert (Cuyahoga DD), Jason Umstot (OPRA), Chris Filler (OCALI), Stacy Collins (DODD), Rick Black (Butler DD), Lori Horvath (DODD), Lori Stanfa (OACB), Eric Hammer (Cuyahoga DD).

Not Present: Joe Kowalski (DODD), Laura Zureich (Champaign/Shelby DD), Pete Moore (OACB)

I. Welcome and Introductions

- a. This was completed by all in attendance.
- b. The group was provided with minor updates. Allan will attend remotely and Kristen will be attending remotely after first break.

II. Feedback on Meeting #5 Minutes

- a. Minutes were approved as presented.

III. Initial Discussion (Allan)

- a. All new attendees were welcomed to today's meeting and ground rules were reviewed for today's meeting.
Allan reviewed the overall process we have undertaken with this funding system re-design work group. He also recapped federal changes that continue to be relevant to the work of this group.

IV. Review of January 22 Versions of Service Definitions and Questions/Issues Raised through Email Feedback Process

- a. **Integrated Prevocational Services:** Allan reviewed with the work group the changes to this service definition. It was noted that Ohio's Employment First statute requires that all employment-related services be focused on the outcome of community employment.

i. Discussion:

1. Recommendation to replace the phrase "non-residential habilitation services" with "non-residential day and employment services" across all of the definition documents. Now, both phrases appear and it is confusing.
2. Discussion that the service definitions look more like a white paper (philosophy) rather than a service definition we would send to CMS. Lisa

Mills clarified that the current versions represent the entire intent of the workgroup with some of the content going into definitions, some into rule and some will be in guidance. The extent of the detail is necessary to ensure the complete intent of the workgroup is conveyed to DODD which will be responsible for implementation.

3. Kristen Helling reported that Becky Phillips –Rules Administrator for DODD – reviewed all of the proposed definitions and her edits/suggestions have been incorporated into these versions.
4. All definitions will be posted for public comment when the rate models have been developed so the definitions and rates will be posted as a complete package.
5. Page 2- 1st bullet- small discussion on whether or not this is an appropriate service for this definition. No change noted.
6. Page 2- Bullet 2: Group requested change so that Discovery and Community-Based Assessment is covered under SE-Individual but this service is expected to contribute information to these services. Language change: “Activities that can inform an individualized integrated Community-Based Assessment or Individualized Discovery process.
7. Page 3- *second section*, all of this language will be included in the general HCBS administrative rules that govern the entire waiver so it is not necessary that it be included again in each service definition.
8. Discussion on ratio 1:4- The discussion centered on the concern regarding the minimum staffing ratio of 1:4. Work group members asked that the work group reevaluate the minimum ratio due to financial implications. It was agreed that this would be noted as subject to cost projections. At present, the group has not determined the cost projections associated with the new models because work is still being done on building rates and assumptions.
9. Group agreed there will be time-limited transformation costs associated with building an infrastructure to deliver integrated services. In building cost projections, it will be important to distinguish transformation costs from on-going service delivery costs.
10. Comment was shared regarding the importance of providers understanding what services they would provide under this service definition. Goal should be to reduce confusion and duplication.
11. Page 4- second paragraph-last sentence- delete reference to transportation during service delivery being covered under non-medical transportation. Transportation during service delivery should be included in the rate.
12. Discussion on personal care vs. HPC- we need to ensure that providers understand that HPC and Integrated Prevocational Services cannot be billed at the same time.

13. Regarding bolded bullet on page 6, Kristen Helling noted that no one is currently receiving integrated vocational habilitation. The workgroup recommended that this bullet be modified to make it clear that people have 24 months to receive this service after transitioning out of facility-based services and when each person transitions depends on the phase-in plan adopted by DODD.
 14. The workgroup agreed that paid internships should remain the expectation (support for unpaid internships could not be covered under this service). While it is recognized that Medicaid funding cannot be used to pay wages to participants in any Medicaid service, there are other sources for wages that a provider could tap into so the option to use this service to support paid internships should remain.
 15. It was noted that the work group approves of the Integrated Prevocational Services definition with the above modifications.
- b. **Integrated Community Supports:** Allan reviewed with the work group the changes to this service definition.
- i. **Discussion**
 1. A question was raised on why there is a limit of hours that could be used per day? Consensus was to remove the cap to hours per week/day and only have an annual cap of 1,680 hours.
 2. Eliminate “that support socialization, education, recreation and personal development” from first sentence in the first paragraph.
 3. The group discussed the need to revise current HPC definition rather than create this service that reflects closely the current HPC service. It was noted that the current HPC definition does not talk about community integration but that is part of the service being provided through HPC. It was noted that HPC does not have the expected outcomes that are included in this service definition and it is not solely focused on community supports outside the home. A person receiving HPC may have very limited time outside the home while a person receiving this service would spend all service time in the community. Work group members discussed the importance of helping individuals connect to employment and it is going to be critical for HPC staff to understand their partnership with this. The service system should not be compartmentalized.
 4. A work group member recommended that this service be reevaluated compared to HPC because combining these services could provide increased flexibility.
 5. It was noted that changes to HPC and potential blending of these services are outside the scope of the workgroup but are being handled in other DODD workgroups. This work group is focused on the re-design of adult day supports. This is not the forum to redesign all waiver structures. The HPC discussion needs to happen, but not in the scope for this work group.

Others need to be at the table for that discussion who are not represented on this workgroup. This workgroup is expected to recommend an alternative to facility-based Adult Day. It was agreed that Integrated Community Supports should continue to be a service in the adult employment and day array, even if changes are made to HPC.

6. Regarding the age requirements for when the service is used to support retirement (page 2), there was a question of whether the Employment First rule defines an upper age limit for “working-age”.
7. Settings requirements on page 3 and top of page 4 will go into general HCBS administrative rule so remove from this definition.
8. It was noted that the work group approves of the Integrated Community Supports service definition with the above modifications.

c. Supported Employment- Small Group Employment Support: Allan reviewed with the work group the changes to this service definition.

i. Discussion

1. A question was raised to the work group. The question pertained to what is a small group and what is not. Allan provided clarity on what was intended with this definition and what makes a small group.
2. Lisa confirmed that if people are dispersed throughout a business, supported by a single job coach, would be considered SE-Individual, not SE-Small Group. This definition would not eliminate existing situations where there are more than 4 people dispersed in a business.
3. On page 3, the workgroup was asked to note the requirement of a transition plan for traditional crews or enclaves that are larger than 4. Adopting the maximum group size of 4 isn’t just a matter of adding one job coach to a group of 8 or adding two job coaches to a group of 12. The group size may be no more than 4 and maximum staffing ratio is 1:4.
4. Change “prevailing” to “competitive”.
5. Question pertaining to page one, second paragraph. The bolded sentence at end of paragraph was submitted through email feedback. The group asked that clarity be provided in rule language. Recommended rewording: In working with individuals receiving this service on transitioning successfully to community employment, the provider will ensure the individual understands any changes in income and benefits that will result from this transition, and will strive to ensure that the individual experiences no net loss of income as a result of transitioning to community employment.
6. Page 3, third paragraph, second line. Change language to “5 or more”. It is going to be important that there is a plan in place to transition larger groups to 4 or less. Leave the option of business becoming employer of record “with assistance as needed to understand how certain hiring requirements can be waived using provisions of ADA.” Remove the rest of the sentence. Also remove statement *that providers explore becoming a staffing agency*

for the business. Keep the statement, " those workers with disabilities be given support to develop and operate their own small business enterprise. "

7. Page two, second paragraph remove "should be helping" and replace with "will help". Statement will read, "*Small Group Employment Support service providers will help individuals explore, identify and pursue career advancement opportunities that will move them toward individual integrated employment at competitive wages. "*
8. Page two, third paragraph- where it states that this service may include any combination of the following services. Break out transportation to read: training in independent use of transportation, planning and arranging transportation.
9. First page, first paragraph- We need to ensure that it is clear that if this service is extended beyond 24 months for specific individuals, there is a way to confirm the person is actively engaged is seeking individual integrated employment at competitive wages. Lisa has sample language to address this. She will provide for the work group.
 - Sample Language: The twenty-four month time limit can be extended if one of the following is true:
 - Documentation is provided that community employment job development services are also being provided through an authorization from OOD, the Medicaid waiver, the workforce development system, county-funded authorization, Ticket to Work, or private pay because the person has not yet secured community employment;
 - The person is working in community employment with Supported Employment-Individual supports if needed.
10. It was noted that the work group approves of the Supported Employment-Small Group Employment Supports service definition with the above modifications.

d. Supported Employment- Individual Employment Supports: Allan reviewed with the work group the changes to this service definition.

i. Discussion:

1. Change the term prevailing to competitive wages. The guiding principles use the term "competitive wage".
2. The workgroup noted it will be important to establish in rule/policy how Service Coordinators (and any entity approving service plans) are expected to meet the requirement to maintain documentation that the service is not available to the individual through OOD or Special Education. We also want to ensure that other sources for some of the services included in this definition are sought out before the waiver is used (e.g. WIPA sought out for benefits education and analysis before waiver is used).

3. Situational Observation and Assessment- Since volunteer option was removed the work group had a discussion about who would pay for the work experience. The work group asked that the term paid be removed and just state work experiences. The concern was brought up that no one would do this service if wages were not paid. **Final decision-** The workgroup agreed that paid internships should remain the expectation (support for unpaid internships should not be covered under this service). While it is recognized that Medicaid funding cannot be used to pay wages to participants in any Medicaid service, there are other sources for wages that a provider could tap into so the option to use this service to support paid internships should remain. Add notation that wavier **cannot** be used to pay wages. Delete last sentence.
4. A question was raised on who would read and approve the profile for payment under Discovery Leading to Customized Employment. It was discussed that the billings/claims payment process would need to be modified to support this; but it is anticipated it would be approved by the SSA.
5. Job development supported employment plan. This service component is paid on an outcome basis, after the plan is received and approved. It was discussed that the billings/claims payment process would need to be modified to support this; but it is anticipated it would be approved by the SSA.
6. Job Coaching second bullet- remove reference to “the complexity of the job.” Delete “thus serving as employment retention payment to the provider.” Last sentence: Delete reference to “retention payment policy.”
7. Job Coaching payments: It was agreed to look at ways to add financial incentive/outcome payment associated with level of wage/benefits people are receiving in each acuity tier.
8. Noted that authorizations/billing/claims would need to be adjusted to implement this new model.
9. Coworker models of support- work group discussion provided clarity on the intention of this aspect of the service. The employer is reimbursed, not the co-worker.
10. Note in definition that dispersed model is part of what is included under SE-Individual.
11. It was noted that the work group approves of the Supported Employment-Individual Employment Supports service definition with the above modifications.

V. Review and Discussion of Cost Worksheet Data- Small Group Discussion and Report Out to Large Group: See chart below.

Service	Approved Provider Type	Qualifications Required of Approved Providers	Qualifications of Staff Delivering Service	Annual Wage	Notes
Career Exploration	Agency not CB	<ul style="list-style-type: none"> • DODD certification • Other requirements TBD • CARF • If both DODD and CARF, add on to rate 	Associate Degree, HS with experience in related field or employment related certificate (CESP, ACRE, VCU)	\$35,000 to \$40,000	
Supported Employment Assessment or Discovery	Agency not CB	<ul style="list-style-type: none"> • DODD certification • CARF, optional 	DODD SE Course (on-line) Employment First Training (on-line) 1 year exp. In field CESP Associates degree in related field	\$35,000 to \$40,000	
Work Incentives Benefits Analysis and Report					USE OOD RATES
Assistive Technology Assessment and Report					USE OOD RATES
Internship or Work Experience	Agency not CB	<ul style="list-style-type: none"> • DODD certification • CARF, optional 	<ul style="list-style-type: none"> • DODD SE Course (on-line) • Employment First Training (on-line) • 1 year exp. In field • CESP • Associates degree in related field 	\$35,000 to \$40,000	
Employment Planning or Self-Employment Planning	Agency not CB	<ul style="list-style-type: none"> • DODD certification • CARF, optional 	<ul style="list-style-type: none"> • DODD SE Course (on-line) • Employment First Training 	\$35,000 to \$40,000	

			(on-line) <ul style="list-style-type: none"> • 1 year exp. In field • CESP • Associates degree in related field 		
Job Development or Self-Employment Launch Phase	Agency, Individual, CB (if not other willing provider)	<ul style="list-style-type: none"> • Must be closely connected to EN 	<ul style="list-style-type: none"> • 4 year degree and 1 year exp. • DODD required training • CESP, ACRE, VCU 	\$50,000 avg.	\$70.00 per hour
Initial Job Training/Coaching	Agency	<ul style="list-style-type: none"> • DODD certification 	<ul style="list-style-type: none"> • HS Diploma/GED • Service Specific Training (EF or SE Course) • National certification as approved by DODD 	TBD	Current OOD reimbursement rate \$51.00 per hour
Extended Job Training/Coaching					NOT COMPLETED
Advancement in Existing Job					NOT COMPLETED
Career Advancement	Agency, Individual, CB (if not other willing provider)	<ul style="list-style-type: none"> • Must be closely connected to EN 	<ul style="list-style-type: none"> • 4 year degree and 1 year exp. • DODD required training • CESP, ACRE, VCU 	\$50,000 avg.	\$70.00 per hour
Re-employment Services After Job Loss	Agency, Individual, CB (if not other willing provider)	<ul style="list-style-type: none"> • Must be closely connected to EN 	<ul style="list-style-type: none"> • 4 year degree and 1 year exp. • DODD required training • CESP, ACRE, VCU 	\$50,000 avg.	\$70.00 per hour
Workplace Personal Assistance	Agency or HPC approved provider	<ul style="list-style-type: none"> • DODD certification or HPC provider 	<ul style="list-style-type: none"> • HS Diploma or GED • Meet HPC qualifications • Training on delivering PA in a workplace setting 	TBD	Reimbursement rate same as HPC

			<ul style="list-style-type: none"> • EF training 		
Small Group SE: Job Specific Employment Skills Training	Agency	<ul style="list-style-type: none"> • DODD certification 	<ul style="list-style-type: none"> • HS Diploma/GED • Service Specific Training (EF or SE Course) • National certification as approved by DODD 	TBD	<p>Current OOD reimbursement rate \$51.00 per hour</p> <p>Discussed: 1:2 \$25.50 1:3 \$17.00 1:4 \$12.75</p>
Integrated Prevocational Services: General Non-Specific Employment Skills Training	Agency	<ul style="list-style-type: none"> • DODD certification • CARF 	<ul style="list-style-type: none"> • HS Diploma/GED • Program Coordinator would need Bachelor's degree 	TBD	\$53.00/hr. include Transportation during service at a 1:1, 1:2, 1:3, or 1:4 ratio.
Integrated Community Supports: Non-Work-Related Community Supports	<ul style="list-style-type: none"> • Agency only • Maybe a legally responsible person as well 	<ul style="list-style-type: none"> • DODD certification w/ CARF add on 	<ul style="list-style-type: none"> • HS Diploma/GED • Training (TBD) • Certifications (TBD) 	Wage not determined	Current HPC rate is not enough. We need to figure out how to incentive smaller staffing ratios. Needs to be higher qualifications that HPC because what we need from staff doing this service.

VI. DODD Funding System Re-Design Individual Supported Employment Level of Support Worksheet

- a. The work group was asked to collect data for a limited four-month period to determine level of support being provided to each person in individual community employment, in relation to the length of time they have held the job and the number of hours they are working. Work group members will receive an Excel spreadsheet developed by Kristen with instructions to record DODD ID number, employment start date, hours worked and hours of support (coaching and personal care) provided each month for each individual in individual community employment, regardless of funding source. Data to be collected Feb-May 2015, with reports to be submitted to Kristen by the 15th of the following month for the month prior.
- b. Rick Black reviewed with the work group a spreadsheet developed by Eric Hammer and himself as a starting point for projecting overall costs of this systems change. Lisa proposed that the Business Managers meet with her for full day, before the next funding re-design meeting, to develop a comprehensive cost model. The results of this day will be shared at the funding redesign work group meeting on February 26-27. Rick expressed that we need

to get county board superintendents on board with this redesign and we need a model showing projected costs in order to do this. Gary, Eric, and Rick will attend the meeting with Lisa, along with Kristen and Clay. Work group members asked that the business managers have copies of the funding re-design guiding principles at this meeting.

VII. Larger Discussion

- a. Ratios vs. Rates vs. Funding availability. As we progress towards costs/rates it will be important to keep in mind the need to evaluate maximum group sizes in light of overall costs.
- b. Work group members discussed the importance of having both State and Local commitments to this re-design, for both the transition period and the long-term implementation.

VIII. Next Meeting- Location CDC

- a. February 26, 2015 9:00a to 4:00p
- b. February 27, 2015 9:00a to 4:00p