

Policy:

Palmer's Home Care will adhere to all Department of Mental Health policy and standards for our employment program funded through the Medicaid waiver.

Comments:

Palmer's Home Care, LLC, a provider certified through the Department of Mental Health, will provide exemplary employment services for individuals that have been deemed unable to receive services through the department of Vocational Rehabilitation or the individual serves does not have a provider the individual chooses.

Palmer's Home Care will develop a personalized service plan to help each individual develop quality job skills, help seek appropriate employment opportunities, obtain competitive employment, and then thrive and develop needed skills particular to the job obtained and gain independence within natural job supports.

FIRST STEPS:

When an individual has contacted the Palmer's Home Care Employment Program for employment services, the individual will be scheduled for a time to meet with an employment services agent and will go through our intake paperwork. At this time, it will be determined if the individual has been referred to Vocational Rehabilitation (VR) in the past. If the individual has never been referred, then our agent will ask them to do so. If VR has been requested in the past, and they have been closed out, the agent will request the proper documentation for this.

The Agent will also determine if the individual has a service coordinator (case manager). If there is no case manager, the agent will direct the individual to the appropriate case management entity. If they do have a case manager, the agent and individual should contact the case manager, if this has not been initiated by said case manager. A meeting should be held with the individual to determine if a Medicaid waiver is already established with the individual or if the case manager will need to request one in order for the individual to receive employment services through the waiver.

An assessment with the individual and team the individual/guardian chooses will be completed to determine the estimated services needed and the number of units for the case manager to request. Needed for the assessment will be: Any employment history, Current individualized service plan and last year's plan, any medical information pertinent to employment, behavior support plan and a valid ID and Social Security card.

Assessment will determine what supports will be needed. This will not be billed to Medicaid or the individual.

Supports that may be provided by Palmer's Home Care through the waiver can include: Career Planning, Job Development, Supported Employment, and Community Integration Individual.

NEXT STEPS:

Once an individual has chosen Palmer's Home Care for employment services, the individual has coordinated with the case manager entity, and a funding source like the Medicaid Waiver program has been obtained, the Palmer's Home Care will coordinate with the individual and team to begin services.

Our services will be fluid and may not be linear depending upon each individual served. Standard order of service will be:

1. Career Planning
2. Prevocational Services
3. Community Integration
4. Job Development
5. Supported Employment

However, each individual will come into our service with different skills, different experience, and with different objectives for community employment. Our services will be individualized and can jump from one service to any of the other services in any order needed for the individual to be successful in finding competitive employment.

Documentation and case notes will be kept for each service billed within Department of Mental Health standards.

Service Definitions and Limits (per DMH Waiver manual 3/1/21):

Career Planning:

Career planning is a person-centered, comprehensive employment planning and support service that provides consultative, evaluative, and assistance for waiver program participants to enter into, or advance, in competitive employment or self-employment. It is a focused, time limited service engaging a participant in self-discovery, identifying a career direction and developing a plan for achieving competitive, integrated employment at or above the state's minimum wage. The outcome of this service is documentation of the participant's stated career objective and a career plan used to guide individual employment support.

This service will not exceed 20 units per day, 25 hours per week.

Prevocational Services:

Prevocational Services provide one-to-one learning and group experiences to further develop an individual's general, non-job task specific skills which are needed to succeed in paid employment in competitive, integrated community settings. Services are expected to occur over a defined period of time with specific and measurable outcomes to be achieved, as determined by an individualized assessed need through an ongoing person-centered planning process. Services are intended to develop and teach general skills that lead to competitive and integrated employment including, but not limited to:

- ability to communicate effectively with supervisors, co-workers and customers;
- generally accepted community workplace conduct and dress;
- ability to follow directions;
- ability to attend to tasks;
- workplace problem solving skills and strategies;
- general workplace safety and
- mobility training.

Prevocational Services should enable each individual to attain the highest level of independence and autonomy in the most integrated competitive employment setting and with a job matched to the individual's interests, strengths, priorities, abilities, and capabilities.

Participation in Prevocational Services is not a required pre-requisite for supported employment services provided under the waiver. Prevocational services should only be authorized when an individual is otherwise unable to directly enter the general workforce as a

result of an underdeveloped or undeveloped general, non-job-task-specific skill(s). Prevocational Services include activities that are not primarily directed at teaching skills to perform a particular job, but at underlying rehabilitative goals (e.g., attention span, motor skills, interpersonal relations with co-workers and supervisors) that are associated with building skills necessary to perform competitive work in community integrated employment. Services must be provided in a community workplace setting or at a licensed, certified, or accredited facility of a qualified employment service provider. The setting for the delivery of services must be aligned with the individualized assessed need and that which is most conducive in developing the specific and measurable outcomes contained within the ISP.

Services cannot be provided within an individual's residence. Prevocational services can be provided in small groups not exceeding four (4) individuals at a time. The decision to provide services in a group setting must be based on individualized assessed need and be supported in the person-centered plan as being the most autonomous setting which facilitates the highest levels of individual learning.

Vocational services, which are not covered through waivers, are services that teach job task specific skills required by a participant for the primary purpose of completing those tasks for a specific facility-based job and are not delivered in an integrated work setting through supported employment. The distinction between vocational and pre-vocational services is that prevocational services, regardless of setting, are delivered for the purpose of furthering habilitation goals that will lead to greater opportunities for competitive and integrated employment and career advancement at or above minimum wage. These goals are described in the individual's person centered services and supports plan and are designed to teach skills that will lead to integrated competitive employment.

This service must be authorized based upon individual need not to exceed 80 quarter-hour units per week. Prevocational Services must not exceed 6 months.

Community Integration:

CI assists and/or teaches participation in community activities. CI does not include assistance with activities of daily living (ADL's), unless it is combined with a CI activity. These activities and/or skills are needed to be a participating member of a community, which may include, but not limited to, becoming a member of social events/clubs, recreational activities, volunteering, participating in organized worship or spiritual activities. The following are examples of ADL's that are not included in CI: grocery/clothing shopping, haircut, etc. CI expectations are for individuals to interact with the broader community on a regular basis, including community activities that enable individuals to engage directly, throughout the day, with people who are not paid to provide them with services. In addition, community activities should be organized for the benefit of the individuals to foster relationships with the broader community.

Transportation costs related to the provision of this service in the community are included in the service rate. This service supports naturalized involvement in order to become a fully participating member of the community.

This service is limited to 25 hours per week.

Job Development:

Job Development is a support service to facilitate competitive work in an individual integrated work setting. The service must be identified in the individual's support plan based upon an individualized assessed need which promotes the greatest degree of integration, independence and autonomy.

Job Development services are the supports to individuals who, because of the disabilities, will need assistance with obtaining individual competitive or customized employment in an integrated work setting in the general workforce at or above the state's minimum wage, 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 the acceptance of an employment offer in a job that meets personal and career goals. Job Development services may include:

- Application completion assistance with the individual,
 - Job interviewing activities with the individual,
 - Completion of task analysis with or without the presence of the individual based upon individualized need,
 - Negotiation with prospective employers and education of prospective employers of their role in promoting full inclusion with or without the presence of the individual based upon individualized need.
- Additional Information about Job Development services:
- Job Development services must be provided in a manner that promotes integration into the workplace and interaction between individuals and people without disabilities in those workplaces while maintaining the individual's rights of dignity, privacy and respect.
 - Job Development should be reviewed and considered as a component of an individual's person-centered services and supports plan no less than annually, more frequently as necessary or as requested by the individual.
 - This service should be designed to support a successful employment outcome consistent with the individual's assessed goals, needs, interests and preferences.
 - An individual's autonomy and independence to perform employment with the least amount of restrictions must be supported through the person-centered planning process.
 - Job Development activities are limited to potential employers who would compensate 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.
 - Transportation costs are not included in the Job Development fee, but specialized transportation is available as a separate service if necessary.

Job Development furnished under the waiver may not include services available under a program funded under section 110 of the Rehabilitation Act of 1973 and its amendments or section 602(16) and (17) of the Individuals with Disabilities Education Act (20 U.S.C. 1401(16 and 17)). Therefore, the case record for any individual receiving this service must document the individual is not eligible for, unable to access, exhausted services or otherwise inapplicable for the aforementioned programs as outlined in an interagency memorandum of understanding between VR and the Division of DD. Job Development can be authorized, without a referral to VR, in those instances when:

- An individual has previously been determined ineligible for VR services or closed unsuccessfully from VR as "disability too severe".
- An individual has previously accessed VR and their services were discontinued as VR established thresholds of support and/or outcomes were accomplished.

FFP is not claimed for incentive payments, subsidies, or unrelated vocational training expenses such as the following:

- Incentive payments made to an employer to encourage or subsidize the employer's participation in a supported employment program; or
- Payments that are passed through to users of community employment programs.

This service is time limited and will not exceed 240 units within the annual support plan.

Supported Employment:

Supported employment is a support service to facilitate competitive work in an integrated work setting. The service must be identified in the individual's support plan based upon an individualized assessed need which promotes the greatest degree of integration, independence and autonomy. Models of supported employment may include individual support or group support such as community business-based work groups and or mobile crews. Individual and group services are defined separately below.

For those individuals whose individualized assessed need supports self-employment, Supported Employment Individual employment supports may include services and supports that assist the individual in achieving self-employment through the operation of a business; however, Medicaid funds may not be used to defray the expenses associated with starting up or operating a business. Assistance for self-employment may include:

- Aide to the individual in identifying potential business opportunities;
- Assistance in the development of a business plan, including potential sources of business financing and other assistance in developing and launching a business; and
- Identification of the supports that are necessary for the individual to operate the business.

Supported Employment- Individual Supported Employment:

Individual Supported Employment services are the ongoing supports to individuals and their employers who, because of their disabilities, need intensive on-going support to maintain a 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, 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.

Supported Employment - Individual Supported Employment services may include:

- On-the-job training in work and work-related skills; i.e. job coaching to facilitate the acquisition, and ongoing performance, of the essential functions of the job and the facilitation of natural supports (i.e. fading)
- Ongoing supervision and monitoring of the person's performance on the job; i.e. evaluating self-maintenance strategies, work production and the effectiveness of natural supports (i.e. fading) which promote the greatest degree of inclusion, integration and autonomy.
- Training in related skills needed to retain employment; i.e. supporting and facilitating strategies which promote attendance and social inclusion in the workplace based upon individualized assessed need such as using community resources and public transportation.
- For those individuals whose individualized assessed need supports self-employment, Supported Employment Individual employment supports may include services and supports that assist the participant in achieving self-employment through the operation of a business; however, Medicaid funds

may not be used to defray the expenses associated with starting up or operating a business. Assistance for self-employment may include ongoing assistance, counseling and guidance once the business has been launched.

Supported Employment -Small Group Employment Support:

Group supported employment are services and training activities provided in regular community business and industry settings for groups of two (2) to four (4) workers with disabilities. Small group employment support does not include services provided in facility-based work settings or non-integrated work settings (i.e. settings which physically and socially isolate individuals from other employees). Examples include mobile crews and other community business-based workgroups employing small groups of workers with disabilities in integrated competitive employment in the community. The outcome of this service is sustained paid employment, work experience leading to further career development and transition to individual integrated community-based employment for which an individual 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. An annual review must occur to determine if the employment setting optimizes, but does not regiment, individual initiative, autonomy and independence in making employment choices.

Supported Employment – Small Group Employment Supports may include:

- On-the-job training in work and work-related skills; i.e. job coaching to facilitate the acquisition, and ongoing performance, of the essential functions of the job and the facilitation of natural supports (i.e. fading).
- Ongoing supervision and monitoring of the person's performance on the job; i.e. evaluating self-maintenance production and the effectiveness of natural supports (i.e. fading) which promote the greatest degree of inclusion, integration and autonomy.
- Training in related skills needed to retain individual integrated community-based employment; i.e. supporting and facilitating strategies which promote attendance and social inclusion in the workplace based upon individualized assessed need such as using community resources and public transportation.

Additional Information about Supported Employment services:

- Supported employment services must be provided in a manner that promotes integration into the workplace and interaction between individuals and people without disabilities in those workplaces while maintaining the individual's rights of dignity, privacy and respect.
- All Supported Employment service options should be reviewed and considered as a component of an individual's person centered services and supports plan no less than annually, more frequently as necessary or as requested by the individual.
- These services and supports should be designed to support successful employment outcomes consistent with the individual's assessed goals, needs, interests and preferences.
- Supported Employment Group is not appropriate for individuals who demonstrate the capacity, ability and interest to work independently.

- An individual's autonomy and independence to perform employment with the least amount of restrictions must be supported through the person centered planning process.
- Individuals must be 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.

Supported Employment furnished under the waiver may not include services available under a program funded under section 110 of the Rehabilitation Act of 1973 and its amendments or section 602(16) and (17) of the Individuals with Disabilities Education Act (20 U.S.C. 1401(16 and 17)). Therefore, the case record for any individual receiving this service must document the individual is not eligible for, unable to access, exhausted services or otherwise inapplicable for the aforementioned programs as outlined in an interagency memorandum of understanding between VR and the Division of DD.

Supported Employment (Individual) can be authorized, without a referral to VR, in those instances when:

- Individuals who in the delivery of waiver funded preparatory, planning and habilitative employment services (i.e. Career Planning or Prevocational Services) become employed.
- An individual has previously been determined ineligible for VR services or closed unsuccessfully from VR as "disability too severe".
- An individual has previously accessed VR and their services were discontinued as VR established thresholds of support and/or outcomes were accomplished.

Supported Employment (Group) can be authorized without a referral to VR as VR does not provide this service

The purposeful braiding of supports and services with VR to enhance the employment outcomes of individuals with DD is allowable under Code of Federal Regulations (CFR) for 1915(c) HCBS waivers as long as documentation supports that it is neither duplicative nor supplanting. Therefore, individuals can receive concurrent services from VR and 1915(c) funded services as long as documentation reflects VR supports and services are not otherwise available and/or exhausted.

Supported Employment supports do not include payment for supervision, training, support and adaptations typically available to other workers without disabilities filling similar positions in the business or otherwise covered under the Americans with Disabilities Act.

Additional information about Supported Employment services:

- Personal Assistance may be a component of an individual's employment retention support plan for assistance with ADL's and IADL's. However, Personal Assistance may not be used in lieu of Supported Employment services as defined above.
- Transportation costs are not included in the supported community employment fee, but specialized transportation is available as a separate service if necessary.

Individuals who receive Supported Employment may also receive other day services. An individual's support plan may include two or more types of non-residential services. Supported Employment has implementation elements which do not require an individual be present. As such, billing could occur during shared units of time with appropriate documentation.

FFP is not claimed for incentive payments, subsidies, or unrelated vocational training expenses such as the following: 1) Incentive payments made to an employer to encourage or subsidize the employer's participation in a supported employment program; or 2) Payments that are passed through to users of community employment programs.

This service is limited to 48 units per day (individual) or 32 units per day (group).

Palmer's Home Care Staffing:

Palmer's Home Care Employment Program staff will fall under the Palmer's Home Care LLC umbrella and will adhere to all training and standards set by the Department of Mental Health and Palmer's Health Care. The employment Program Employees will be overseen by an Employment Program Manager and Human Resources Coordinator, the Director of Palmer's Home Care, and the Owner.

Employment Staff Requirements

All direct-care staff must be 18 years of age and have a HS diploma or its equivalent*.

*Exemptions to HS diploma/GED requirement:

*Staff without diplomas or GEDs employed by the same provider prior to July 1, 1996 will be "grandfathered."

*Staff without diplomas or GEDs may be employed for up to one year while the person works to attain the requirement. The provider must document the staff's enrollment in school or GED courses.

*After July 1, 1996, staff without diplomas or GEDs who already have five or more years of direct working experience may be employed with the approval of the regional office. The provider is responsible for maintaining documentation of the five years of experience and of regional office agreement in the employee's file.

Employee Training Requirements

All direct-care employment staff shall have training that covers at a minimum:

* Training, procedures and expectations related to this service in regard to following and implementing the individual's support plan. Training in implementation of each individual's current support plan/addendums shall be completed within one month of the implementation date of the current plan, or within one month of employment for new staff.

* Training in preventing, detecting and reporting of abuse/neglect prior to providing direct support.

* Have current certification in competency-based Cardiopulmonary Resuscitation (CPR) and First Aid courses.

* Staff administering medication and/or supervising self-administration of meds must have successfully met the requirements of 9 CSR 45-3.070.

* Training in positive behavior support curriculum approved by the Division of DD (within three months of employment).

*Fourteen (14) hours of Division of DD approved training, as outlined in contract, plus an additional six (6) hours of supervised practical mentoring/job coaching related to Association of People Supporting Employment First (APSE) Supported Employment Service competencies within the first six (6) months of hire. Annually thereafter,

employees must complete four (4) additional hours of Division of DD approved training. Any staff member who has the following credentials are deemed as meeting all training requirements:

- Certified Employment Support Professional (CESP) by passing the national CESP examination from the Employment Support Professional Certification Council (ESPCC) or,
- National Certificate of Achievement in Employment Services from the Association of Community Rehabilitation Educators (ACRE).
- Direct Support Professional-Specialist-Employment Support credentialing issued by the National Alliance for Direct Support Professionals (NADSP).