



Employment Support Coordination for HCBS Technical Assistance and Guidance

Question	Response
<p>How do I preserve a “cost neutral” Individual Support Plan (ISP) when coordinating employment supports, as service rates are more expensive than other group and facility-based services?</p>	<p>Exceeding an individual’s previous budget cannot be a deciding factor in plan approval for coordinating employment goals and outcomes. Services are to be coordinated in a cost effective manner, which optimizes an individual’s autonomy, independence and access to community employment.</p>
<p>How can employment supports be coordinated if an individual is receiving services through a Partnership for Hope waiver and the new supports exceed the waiver cap?</p>	<p>If an individual has identified support needs with accessing employment, and the cost of accessing this support would exceed the Partnership for Hope budget cap, the individual can be transitioned to a Community Support Waiver slot with appropriate documentation.</p>
<p>How do I coordinate employment services to meet the timely needs of service providers and employers when the ISP amendment process can be lengthy?</p>	<p>The ability to authorize anticipated services for employment needs is an accepted and encouraged practice. Support Coordinators can coordinate and authorize multiple employment supports in advance of actual need.</p> <p>Additional guidance provided below.</p>

Question	Response
<p>What employment services can be authorized at the same time?</p>	<p>Employment services are designed to support a continuum of support needs. Each of these services can be authorized concurrently to eliminate unnecessary gaps in service delivery and potential impact of accepting a job offer. The following is best practice:</p> <ul style="list-style-type: none"> • When an individual has <i>Career Planning</i> authorized, <i>Supported Employment (Individual)</i> can be concurrently authorized (up to 480 units) in the event an individual is offered employment as part of the activities coordinated in Career Planning. • When an individual has <i>Job Development</i> authorized, <i>Supported Employment (Individual)</i> can be concurrently authorized (up to 480 units). • Services are individualized, needs vary person-to-person; exceptions on concurrent authorizations beyond those identified above can be submitted to the Regional Director or their designee for approval.
<p>Can an individual receive more than one employment service at a time or must they complete one prior to receiving another?</p>	<p>Depending upon circumstances and documentation, an individual can have multiple employment activities occurring at the same time. <i>For example</i>, a person could receive <i>Supported Employment (Group)</i> and <i>Job Development</i> to assist with finding an individual job setting. Similarly, an employed individual may decide he/she is better suited for another job. In this case, either <i>Job Development</i> or <i>Career Planning</i> may be appropriate, depending upon support need and supporting documentation.</p>
<p>Is billing Career Planning, Job Development and/or Supported Employment (Individual) for the same time-period as another waiver-funded service “duplicative billing”?</p>	<p>No, not necessarily. Duplicative billing applies only to those services where an individual is concurrently receiving “<i>in-person</i>” services during the same unit of time. <i>Career Planning</i>, <i>Job Development</i>, and <i>Supported Employment (Individual)</i> have elements, which do not require an individual be present. Billing could occur during shared units of time with appropriate documentation.</p>

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<p>What elements of Career Planning, Job Development and Supported Employment (Individual) do not require a person to be present?</p>	<p>Examples of elements not requiring an individual's presence in the delivery of employment services include:</p> <ul style="list-style-type: none"> • <i>Career Planning</i> – Benefits Planning activities, community outreach for planning career exploration (i.e. job shadowing, situational assessments, etc.) and discovery interviews to increase a provider's knowledge of skills, interests and abilities (i.e. teachers, family, support staff, etc.). • <i>Job Development</i> – Outreach to potential employers and completion of job analysis/task analysis. • <i>Supported Employment (Individual)</i> – Unanticipated and circumstantial communication with the employer outside of an individual's work schedule.
<p>If an individual is attending day services, a sheltered workshop or already volunteering, do I still have to discuss employment and employment services as part of the planning process?</p>	<p>Yes, HCBS and federal law require individuals with disabilities be fully affirmed and informed on their rights to seek competitive integrated employment in the community. Opportunities for contextual understanding of choices, in a manner that is meaningful to the individual, must be afforded to all individuals.</p>
<p>What waiver funded employment services could an individual access while working at a sheltered workshop?</p>	<p><i>Career Planning, Prevocational and/or Job Development</i> services can occur while an individual is a certified employee of a sheltered workshop. The planning and completion of these services should be coordinated with the sheltered workshop manager to minimize conflicts with work hours, attendance, etc. If an individual becomes employed in the community, the sheltered workshop manager should be notified to assist with transition from the workshop to community employment. Individuals cannot be employed in the community and receiving subminimum wages from a workshop.</p>

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<p>What services can be waiver funded without making a referral to Vocational Rehabilitation (VR)?</p>	<ul style="list-style-type: none"> • VR does not provide <i>Prevocational Services</i> or <i>Supported Employment (Group)</i>; therefore, these services can be authorized without a referral to VR (assuming these are appropriate with individualized assessed need). • <i>Career Planning</i> can be authorized without a referral to VR for those who are still exploring whether competitive integrated employment aligns with current individual interest and skill set. • For those who have been previously determined ineligible for VR or closed by VR as “disability too severe”, <i>any waiver employment service</i> can be authorized. • <i>Supported Employment (Individual)</i> can be authorized for individuals who in the delivery of waiver funded preparatory, planning and habilitative employment services become employed.
<p>Can waiver funded <i>Supported Employment (Individual)</i> services for extended services be authorized for those receiving services from VR?</p>	<p>Yes, for individuals receiving supports and services through Missouri Vocational Rehabilitation, up to 480 units of <i>Supported Employment (Individual)</i> can be authorized <i>at the time an approved VR Individualized Plan for Employment (IPE)</i> is developed. Waiver must not be billed until <i>after</i> VR services have been exhausted/concluded.</p>
<p>Can VR and waiver funded employment supports occur concurrently?</p>	<p>Yes, as long as they are not duplicative services. The purposeful braiding of supports and services with VR to enhance the employment outcomes of individuals with developmental disabilities is allowable under federal rules and state waivers, <i>as long as</i> documentation supports that it is neither duplicative nor supplanting.</p>

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When is a referral to VR required?	As with any other waiver-funded services, a referral is required when a comparable service is available. VR provides individual career planning, job development and supported employment services for those who it is known are <i>currently</i> able to benefit from competitive integrated employment. Waiver-funded services cannot be authorized to supplant or duplicate these services for those who are known to be employment ready; unless, the individual has been determined ineligible, unable to benefit from VR services or the VR case has been closed as “unsuccessful”. Documentation can include a letter, documented phone call or email with your local VR office.
How are service providers notified of changes to the ISP?	As required by HCBS and CSR, the person centered planning team includes the individual, guardian, support coordinator and service provider(s). Once an ISP is developed or amended, all team members must be notified by the support coordinator of both the submission of the plan to Utilization Review and the subsequent approval of the ISP.
Can ISL, Personal Assistance, Community Specialist, Community Integration or Day Habilitation services be utilized to assist with employment?	<p>If an individual has employment outcomes and goals as a support need, employment services should be authorized. Employment services and the professional skills of a contracted employment providers must be utilized when there are:</p> <ul style="list-style-type: none"> • Formal discussions with the purposeful intent of evaluating and clarifying skills, abilities, interests and job market needs; • Specific development of employment “soft skills” and career competencies; • Formal job search activities (job interviews, negotiation with businesses, resume writing, etc.); and, • Training needs on a job site to perform job responsibilities and integration into the workplace culture.

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<p>When is it appropriate to use residential services, Personal Assistance (PA), or other non-employment service providers to support an individual with employment or exploring employment?</p>	<p>If an individual is employed or exploring employment, the following is appropriate:</p> <ul style="list-style-type: none"> • Transportation from residential services to support the individual’s access to the community employer or employment service provider; • Accommodation within the workplace for those needing assistance with Activities of Daily Living (ADL) in any setting (i.e. eating, toileting, mobility, etc.). • Note: It is an employer’s responsibility to accommodate an individual’s disabilities. As such, it is not appropriate to use PA to perform job tasks, duties or responsibilities.
<p>How do support coordinators explain to individuals and their guardians the ability to work and preserve needed benefits?</p>	<p>There are several resources to assist with balancing earned income and benefits. This may be addressed using the following resources:</p> <ul style="list-style-type: none"> • Disability Benefits 101 (DB101) is a resource to assist individuals and service providers understand the connections between work and how to make work part of an individual’s plan. https://mo.db101.org • Work Incentives Planning and Assistance (WIPA) programs have Social Security certified professionals known as Community Work Incentive Coordinators (CWICs). CWICs ensure individuals understand the impact of earnings on benefits, Social Security Work Incentives, strategies to foster financial independence and dispel myths about how working affects benefits. In Missouri, CWICs are available through Paraquad and Missouri Protection and Advocacy. • Benefits planning is a billable activity in <i>Career Planning</i>. Individuals who need formal benefits planning can be referred to a contracted <i>Career Planning</i> provider with a certified benefit’s planner. • Some DD Offices and Centers for Independent Living have certified benefits planners as a community resource. Local collaboration can facilitate the development of a resource list.