



*COMMUNITY
PREVOCATIONAL SERVICES
LEADERSHIP CONFERENCE
APRIL 2018*

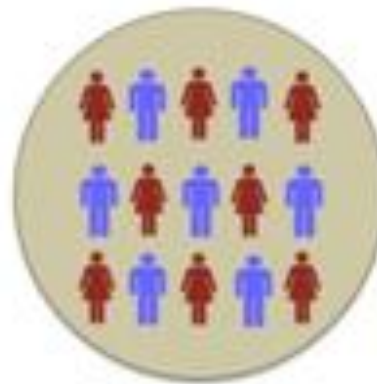


INCLUSION

QUALITY TRANSFORMATION THRESHOLD



EXCLUSION



SEGREGATION



INTEGRATION

What Will We Cover Today?

- Why is OPWDD changing Prevocational Services?
- How does CMS define Prevocational Services?
- How do HCBS Settings Requirements apply to Prevocational Services?
- How will prevocational services prepare individuals for employment and improve employment outcomes?
- What are the changes to OPWDD Prevocational Services including documentation?

Why is OPWDD changing Prevocational Services?

*Are Prevocational Services also
called Pre-Employment Services?*

OPWDD By The Numbers

The systems in our State are operating every day to ensure quality supports are delivered to the more than 130,000 people in New York State receiving OPWDD services.

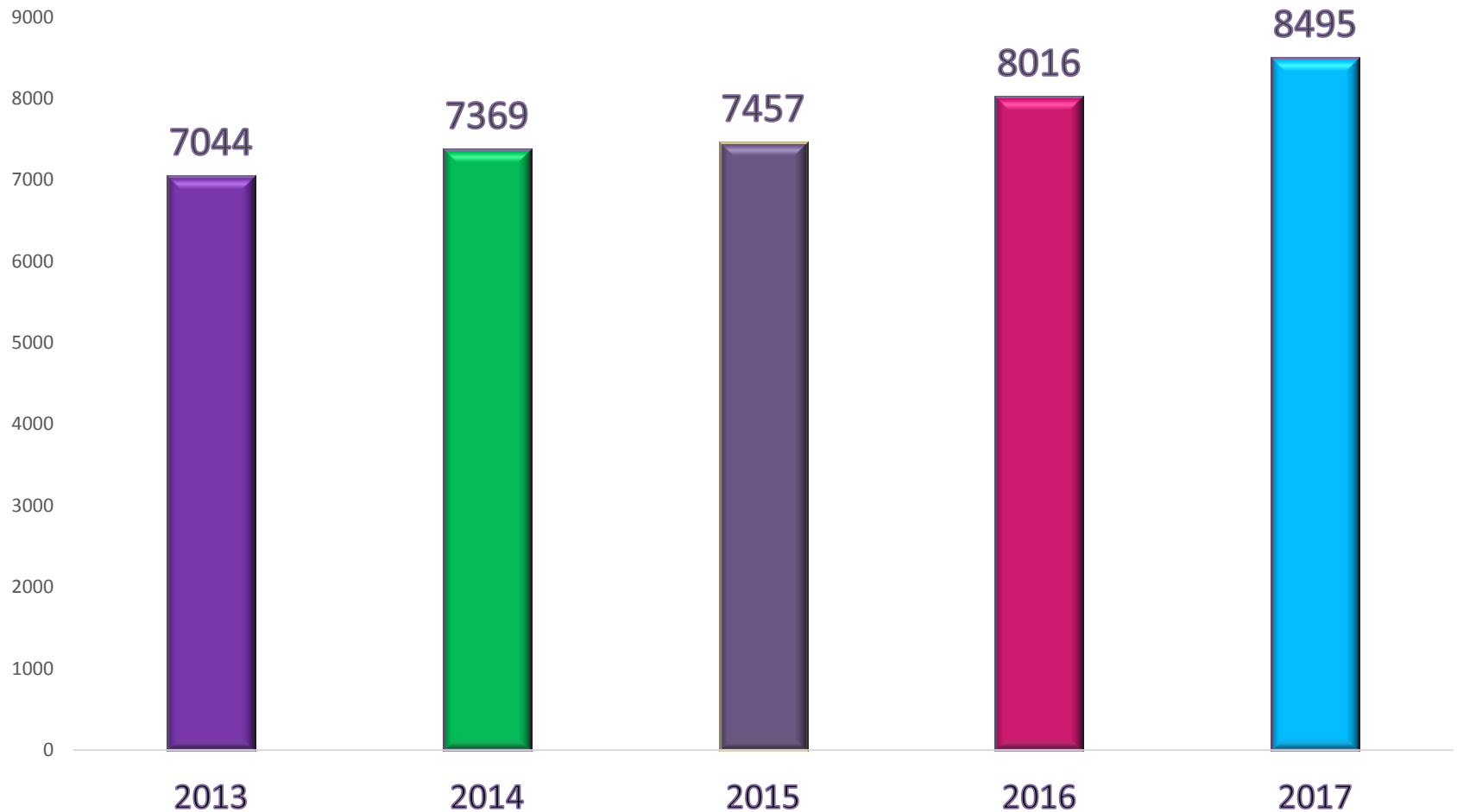
Enrollment in Services as of June 2017

Day Habilitation	52,596
Supported Employment (Competitively Employed in SEMP 8,439)	10,909
Pathway to Employment	871
Community Based Prevocational	2,577
Site Based Prevocational	6,498

https://opwdd.ny.gov/opwdd_resources/agency-data/all

***How many more
individuals in other
services could be
employed?***

Annual Number of Individuals Working in a Community Integrated Job Earning at Least Minimum Wage



OPWDD Employment and Prevocational Service Options

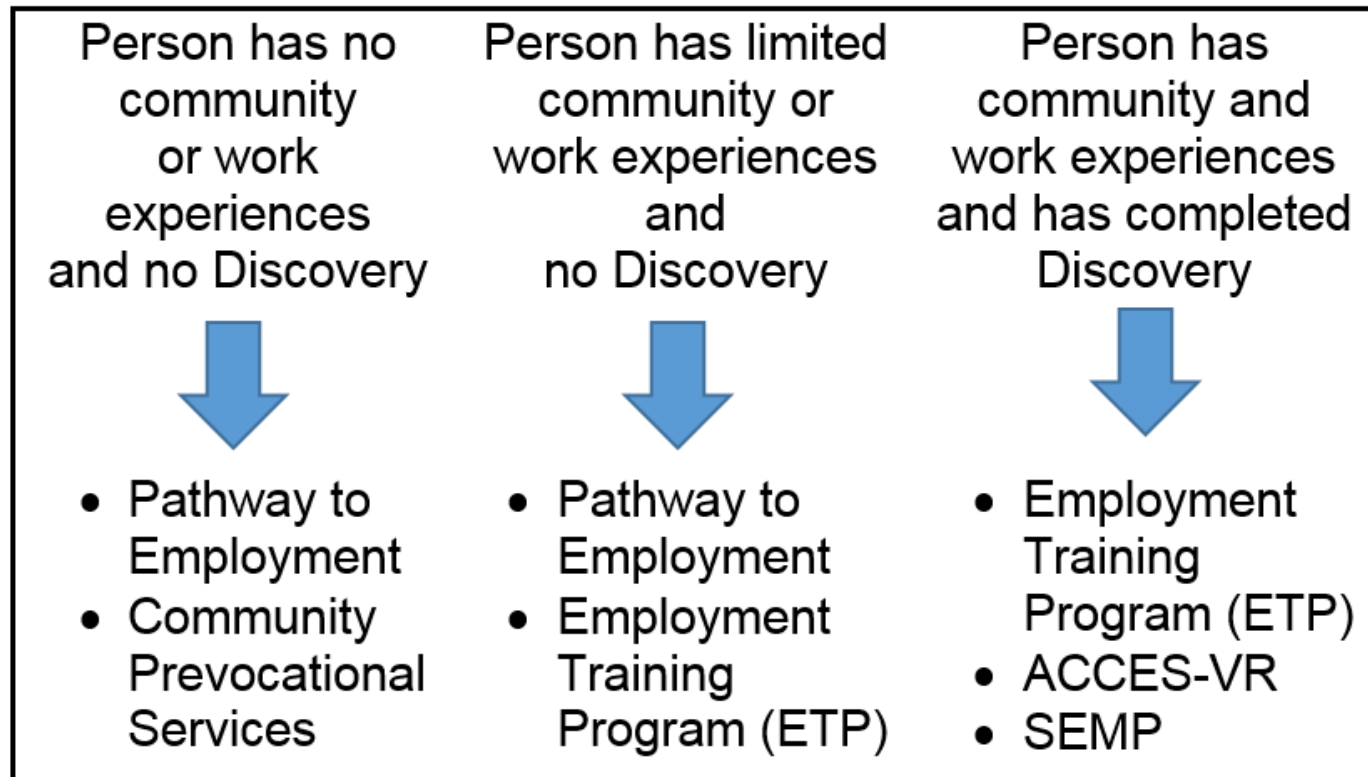
- Community Based Prevocational (CBPV)
- Site Based Prevocational (SBPV)
- Pathway to Employment (Pathway)
- Employment Training Program (ETP)
- Supported Employment – Intensive and Extended (SEMP)

Tools in the Toolbox

Prevocational	Pathway to Employment	Employment Training Program (ETP)	Supported Employment (SEMP)
Prepares people for paid community employment or more independent meaningful activities for 1 year or more (transition to Pathway or ETP/SEMP)	Creating a Career and Vocational Plan (278 hours in 1 year) to determine if job development is the right service (transition to ACCES-VR or ETP/SEMP)	Discovery, job development and Intensive SEMPServices	Job Coaching, Job Development and Life-Long Supports on a Job
Discovery, community work experiences, volunteer opportunities and career planning	Discovery, community work experiences, and develop a vocational goal	Internship opportunity at a community business	Community based, competitive, integrated employment
Unpaid or Paid Work Experiences or Volunteer	Unpaid or Paid Work Experiences or Volunteer	Wages paid by OPWDD until business hires if successful	Paid by business at minimum wage or higher

Which Services Fit the Person's Skills, Experience and Support Needs?

OPWDD Career and Employment Services Options:



*How does CMS define
Prevocational
Services?*

CMS Prevocational Core Services Definition (2011)

- Services provide **learning and work experiences**, including volunteer work, where the individual can develop general, **non job task specific** strengths and skills that contribute to employability in paid employment in integrated community settings.
- Individuals must have **employment-related goals** in their person-centered services and supports plan.

CMS Prevocational Core Services Definition (2011)

- Waiver funding is not available for the provision of vocational services delivered in facility based or sheltered work settings.
- Participation in prevocational services is NOT a required pre-requisite for individual or small group supported employment services provided under the waiver.

***How do HCBS Settings
Requirements apply to
Prevocational
Services?***



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HCBS Integrated Settings

- **Freedom to move** around the setting
- **Located in the community** and afford inclusion with the greater community
- Offer **interaction with the greater community** (aside from paid staff)
- Access to and training on the use of **public transportation**
- Access to tasks and activities **comparable** to tasks and activities that **people without disabilities** engage
- **Not co-located** with a public or private institution, or located on the grounds of a public institution (hospital, nursing facilities, ICF, etc.)

Community Settings



Criteria for Heightened Scrutiny

- Setting is **on the grounds of** or **adjacent to** a public institution
- The setting/site's **design, appearance and/or location appears to be institutional and/or isolating**
- **Multiple services/activities provided on the same site** so that people do not have to leave the setting
- People in setting have **limited to no interaction with broader community**
- People have **limited autonomy and/or regimented services**
- Setting is **more isolating than other settings** in the vicinity/broader community

Prevocational Services and the Person

- Focus on the **needs and desires** of an individual and opportunity for growth
- Regular meaningful non-work activities in integrated community settings
- Offer **sufficient supports to assist an individual in making informed choices and exercising autonomy** to the greatest extent possible
- Participates in age-appropriate activities with appropriate supports to access these activities
- Opportunities to choose schedule to the same extent as individuals not receiving services

Prevocational Services and the Person

- Opportunities to regularly review, update and **change preferences, choices and schedules**
- Opportunities to **make informed choices**
- Opportunities to discover, explore and experience a **variety** prevocational and employment-related endeavors
- Opportunities to **combine more than one service in any given day or week** (e.g. combine prevocational services with supported employment)

***How will prevocational
services prepare
individuals for
employment and
improve employment
outcomes?***

Preparing Individuals for Today's Workforce

- ❖ Learning to respond to supervision
- ❖ Learning to manage stress in the workplace
- ❖ Learning to build positive relationships with coworkers
- ❖ Learning to meet productivity standards
- ❖ Building stamina

Proactive Planning for Employment in the Community

- ❖ Transportation training and planning
- ❖ Benefits and financial planning
- ❖ Developing comprehensive job match criteria
- ❖ Career planning
- ❖ Extensive work experiences in the community

Community Prevocational Services Benefits

- Services are hourly, and therefore may ***wrap around or blend with other services***
- Offers employment planning and real work experiences ***improve community job matches***
- Offers community work experiences to ***increase informed choice***
- Services focus on ***improved social and vocational skills***
- Proactive public benefits and ***financial planning*** are provided
- Staff supports are ***flexible, person-centered*** and ***comprehensive***

***What are the
changes to OPWDD
Prevocational
Services including
documentation?***

Annual Prevocational Assessment

- Be completed annually prior to the anniversary of the service effective (enrollment) date. If individual is enrolled prior to 12/5/17, they have until 12/4/18 to complete the first annual assessment. Anyone enrolled after 12/5/17, will submit the assessment every year prior to the prevocational services enrollment anniversary date.
- Annual assessment to determine whether services are consistent with an individual's needs and valued outcomes.
- The assessment must include a situational assessment in the community (outside of agency).
- The assessment form is located at https://opwdd.ny.gov/opwdd_regulations_guidance/adm_mem_oranda/documents/sifl/annual_assessment_prevoc
 - The completed assessment is mailed to pre.voc.assessment.form@opwdd.ny.gov

Paid Wages in Prevocational Services

- To participate in paid prevocational services, the individual must have an assessed earning capacity relative to the prevocational task(s) of less than 50 percent of state or federal minimum wage, or prevailing wage and be expected to have such an earning capacity while participating in prevocational services.
- All documentation, assessments, monitoring, etc. related to subminimum wages are governed and regulated by the Department of Labor.

Unpaid Prevocational Activities

- If an individual's earning capacity is assessed at higher than 50%, and the individual has documented challenges to retaining employment in the community, they can receive unpaid prevocational services.
- Examples of unpaid prevocational services include volunteer work, community-based vocational assessments and job readiness training.
- Unpaid vocational exploration, vocational assessments and vocational training are governed and regulated by Department of Labor.

Prevocational Services Billing Limits

- The types of services and number of hours allowed for each service, in **combination** on any given day is listed in the 2015 Prevocational Regulations and still apply.

<https://opwdd.ny.gov/sites/default/files/documents/site-based-and-community-prevoc-final-regs-text.pdf>

Community Based Prevocational Services Changes and Updates

Expanded Community Prevocational Supports and Services

(xiii) documenting the delivery of prevocational services

(xiv) developing and negotiating potential community and employment experiences on behalf of the individual

(xv) communicating with family or other members of the individual's circle of support to discuss and address issues related to preparing the individual for prevocational activities

(xvi) traveling time for staff

Services Delivered On Behalf of an Individual

(Who is not physically present **but not in a different Medicaid Service**)

Examples include:

- Completing Discovery and assessment forms;
- Interviewing family member and support staff;
- Contacting and/or meeting with an organization/business that is a potential volunteer opportunity;
- Meeting with families to discuss benefits planning;
- Traveling from one community prevocational site to another where an individual is receiving community prevocational services.

Limits on Time Spent in Certified Sites

Community prevocational services shall be provided in the **most integrated setting** appropriate in the community with the follow specific exceptions only:

- 1. Health and safety risks such as unsafe conditions or public safety emergency.*
- 2. With prior approval from OPWDD based on the best interests of the individual(s).*
- 3. Up to 2 hours per day for job readiness training and scheduling/planning activities.*

Billing During Meal Time

- Community Based Prevocational Services (CBPV) may be provided directly to an individual during lunch or breaks.
- The service provider can bill if the specific services provided are listed in the individual's CBPV habilitation plan.
- This includes meals, snacks, etc.

Billing for Staff Travel

Staff travel may be with or without the individual receiving services. Examples include:

- Travel to meetings to explore or follow up on existing or potential community experiences.
- Travel to conduct assessments of vocational skills and interests.
- Travel to OPWDD Innovations Trainings.
- Travel to support an individual on-site at his or her community experience.
- A service provider can bill for staff travel to an individual, group (2) or group 3-8.

Community Prevocational Staff Training

- Prevocational Services staff are strongly encouraged to take Innovations in Employment Supports trainings.
- CBPV providers may bill for travel to, and attendance of, OPWDD Innovations Trainings.
- When multiple staff attend the same training, each staff person must bill different for CBPV participants.
- Providers must bill travel and attendance to trainings at the group fee (not individual). For example, if the provider sends several staff persons, who each support more than three individuals, the provider would bill at the serving-3-plus group fee for each staff member.

Community Prevocational Services Billing & Fees

- When services are provided to one individual the service provider can only bill at the individual fee.
- When services are provided to a group of 2 individuals the service provider can only bill at the group (Serving 2) fee.
- When services are provided to a group of 3-8 individuals the service provider can only bill at the group (Serving 3+) fee.
- A provider may bill at the group Rate for 9-15 individuals *only if* it has prior approval from OPWDD's Central Office Employment Unit.
- Community Prevocational Fees may be found at:

https://www.health.ny.gov/health_care/medicaid/rates/mental_hygiene/community_prevoc_hr_04-01-16.htm

Community Based Prevocational Services Group Size

In order promote quality learning and individual growth, community based prevocational services group size is limited to a maximum of 8 individuals per group.

However, group size may be increased to a maximum of 15 individuals if granted OPWDD approval.

- If a provider is requesting a group size increase, the request form must be submitted to the OPWDD.
- The form is located at:
https://opwdd.ny.gov/sites/default/files/documents/Form_Prevoc_Request_for_Group_Size_Increase.pdf
- The request form is submitted to
pre.voc.group.size.request@opwdd.ny.gov
- If approved, this request will expire 24 months from date of issuance.

Rounding Community Based Prevocational Units

- Community based prevocational services is hourly reimbursed in 15 minute increments.
- When there is a break in the service delivery during a single day, the service provider must combine the duration of each period for each billing code - individual, group (2), group (3-8).
- Rounding up is permitted for each billing code at the end of the day for services with a remainder of 10-15 minutes.

Rounding Units Example

From 10:00 to 10:05 am, a CBPV staff person contacts a potential volunteer site (for a specific group of 4 people) to set up a meeting. Later that same day, a CBPV staff person worked with the same 4 people in the community from 1:00 to 3:08 pm (128 mins). Because the services delivered were under the same billing code (group serving 3+), the minutes would be combined for each person and billed at the group fee.

Calculation:

$$\begin{aligned} & 5 \text{ minutes} \\ & + \underline{128} \text{ minutes} \\ & 133 \text{ minutes of group services provided that day} \\ & \quad / \underline{15} \text{ min (divided)} \\ & = 8 \text{ quarter hour units with a 13 minute remainder} \end{aligned}$$

***Because the remainder is over 9 mins, another unit may be billed*

Total = 9 units billed for the day for each person

Community Based Prevocational ISP

The ISP must identify:

- identification of the Community Based Prevocational Services category of waiver service;
- (ii) identification of the agency providing Community Based Prevocational Services;
- (iii) specification of an effective date for Community Based Prevocational Services that is on or before the first date of service for which the agency bills Community Based Prevocational Services for the individual;
- (iv) specification of the frequency for Community Based Prevocational Services as “hour” or “hourly”; and
- (v) specification of the duration for Community Based Prevocational Services as “on going as authorized.”

Community Based Prevocational Habilitation Plan

The habilitation plan must conform to the Habilitation Plan requirements found in ADM 2012-01.

The Community Based Prevocational Services Plan must:

- i. cover the entire period of the Community Based Prevocational Services claim;
- ii. be attached to the individual's ISP; and
- iii. clearly identify that the habilitation plan is for Community Based Prevocational Services.

<https://opwdd.ny.gov/sites/default/files/documents/ADM-2012-01.pdf>

Required Elements for Community Based Prevocational Service Documentation Checklist

1. Individual's name and Medicaid number (CIN).
2. Name of the agency providing the Community Prevocational Services.
3. Identification of the category of waiver service provided (i.e., Community Based Prevocational Services).
4. Documentation of start and stop times.
5. **Group or Individual.** (The number of individuals in the group does not need to be listed.)
6. **Description of services.** (*at least one allowable service* delivered during each session) Services must be identified as either face-to-face or non-face-to-face.
7. The **date the service was provided.**
8. **Verification of service provision by the staff person delivering the service** (Initials are permitted only if a key is provided.)

COMMUNITY BASED PREVOCATIONAL SERVICE DOCUMENTATION - CHECKLIST

Agency Name:							Services for Calendar Month/Year:															
Individual's Name:							Individual's Medicaid ID:															
<i>Description of Services:</i>																						
Date Services Provided	Staff Initials by Person Delivering Services	Services were provided to I-individual or G-group (2) or G (3+)	Date Services Documented	Time Start	Time Stop	Total Duration per Session	Total Number of Services Provided (At least 1 service from Habilitation Plan must be provided for each training the individual to follow directions, able to task, in this task, complete tasks, problem solve, work safely, increase productivity, adapt to work routines, and carry out assigned duties	teaching the individual to acquire appropriate attitudes and work habits	assisting the individual with adjusting to the demands of the workplace	familiarizing the individual with job production and performance requirements	providing travel training	providing transportation between activities	providing instruction in the appropriate use of job-related facilities	assessing the individual to determine his or her work interests, productivity and skills	providing instruction in benefits planning	providing instruction in the use of technology that can assist in developing job skills and meeting workplace expectations	assisting the individual to experience a variety of employment options within the community	developing the individual's service delivery plan and related documents	documenting the delivery of prevocational services	developing and negotiating potential community and employment experiences	communicating with family or other members of the individual's circle of support	traveling time for staff
(OPTIONAL) Purpose and/or Response to Services:																						
(OPTIONAL) Purpose and/or Response to Services:																						
(OPTIONAL) Purpose and/or Response to Services:																						
Staff Signature Log																						
Signature							Print Name							Initials			Title					

Community Based Prevocational Services Monthly Summary Note Must Include

- 1. A summary of the implementation of the individual's Habilitation Plan for the month;*
- 2. A description of the individual's prevocational progress;*
- 3. A description of some of the actions of staff to address prevocational challenges;*
- 4. A description of the individual's response;*
- 5. Whether the individual is paid or unpaid; and*
- 6. Any issues or concerns pertaining to prevocational services.*

The narrative monthly summary note must be completed, signed, and dated no later than the 30th day after the month of service.

SAMPLE

COMMUNITY BASED PREVOCATIONAL SERVICE MONTHLY SUMMARY

AGENCY NAME:		MONTH / YR OF SERV. DELIVERY :	
INDIVIDUAL'S NAME:		TABS ID :	MEDICAID # :

Summarize the Community Based Prevocational Services provided this month, as follows.

Summarize the implementation of the individual's Community Based Prevocational Habilitation Plan.	
Describe whether the individual participated in paid work and/or unpaid activities.	
Describe the individual's prevocational progress.	
Describe some of the staff actions to address prevocational challenges.	
Describe the individual's response to services.	
Describe any issues or concerns pertaining to prevocational services.	

The narrative monthly summary note must be completed, signed, and dated no later than the 30th day after the month of service.

<i>SIGNATURE OF STAFF PERSON WRITING THE NOTE (required)</i>	<i>TITLE</i>	<i>DATE (mth/dy/yr)</i>
<i>SIGNATURE OF STAFF PERSON REVIEWING THE NOTE</i>	<i>TITLE</i>	<i>DATE (mth/dy/yr)</i>