**OHIO DODD WORK GROUP**

**Draft Service Definition #3**

**Revised January 22, 2015**

**Integrated Prevocational Services**

Integrated Prevocational Services are time limited services of up to two years, effective January 1, 2016, that involve the provision of learning and work experiences where a person can develop general, non-job-task-specific strengths and skills that enhance employability in competitive employment in integrated, community settings. Integrated Prevocational Services are expected to advance an individual on his/her Employment Path and contribute to the achievement of competitive, integrated employment or self-employment, with supported employment services as needed, within a reasonable timeframe.

Individuals receiving Integrated Prevocational Services must have a goal to obtain or maintain competitive, integrated employment with compensation at prevailing and not less than minimum wage in their person-centered services and supports plan and Integrated Prevocational Service activities must be designed to support this goal. A person receiving Integrated Prevocational Services may pursue employment opportunities at any time to enter the general work force. Integrated Prevocational Services are intended to assist individuals to enter the general workforce.

The purpose of Integrated Prevocational Services are to enable each individual to attain the highest level of work in the most integrated setting and with the job matched to the individual’s interests, strengths, priorities, abilities, and capabilities. Services are intended to develop and teach general skills that lead to successful participation in competitive, 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; travel training. Only activities that contribute to the individual’s work experience, work skills, or work-related knowledge can be included in Integrated Prevocational Services.

Integrated Prevocational Services shall include career exploration and learning opportunities to develop skills and identify strengths for defining preliminary employment and career goals sufficient to enable the individual to voluntarily seek and qualify to obtain job development services. Other activities can include but are not limited to:

* Action Planning to Advance a Person on the Path to Employment
* Integrated, community-based assessment or Discovery activities
* Identification of marketable and transferable skills
* Community-based internships or work experiences in integrated settings, with a priority for paid internships and work experiences
* Volunteering in typical volunteer positions with individuals without disabilities in public and non-profit organizations for learning and training activities that enhance opportunities in obtaining competitive, integrated employment
* Employment-focused soft skills training opportunities that take place in integrated settings
* Employment-specific peer support and mentor-mentee opportunities
* Exploration of assistive technology that could facilitate success in competitive, integrated employment

When used as a wraparound support for part-time competitive, integrated employment, Integrated Prevocational Services shall be coordinated with any supported employment services or supports a participant may be receiving to reinforce participation in competitive, integrated employment as the priority life activity.

Participation in Integrated Prevocational Services is not a required pre-requisite for individual or small group supported employment services. This is explained to waiver participants, during the waiver service planning process, as part of making an informed choice to receive Integrated Prevocational services.

Integrated Prevocational Services are distinguishable from non-covered vocational services by the following criteria:

* The services are provided to individuals who are expected to be able to join the general work force with the assistance of supported employment services;
* The service is primarily directed at teaching non-job task specific skills that will lead to greater opportunities for competitive, integrated employment and career advancement at or above the state’s 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;
* The ISP does not define the goal or purpose of the service as maintaining the individual in prevocational services.

This service shall be provided in a variety of integrated community settings that offer opportunities for the individual to further habilitation goals that will lead to greater opportunities of competitive and integrated employment and career advancement at or above minimum wage. All settings where Integrated Prevocational Services are provided must meet all of the following criteria (no later than March 17, 2019):

1. The setting is integrated in and supports 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.
2. The setting ensures an individual's rights of privacy, dignity and respect, and freedom from coercion and restraint.
3. The setting optimizes, but does not regiment, individual initiative, autonomy, and independence in making life choices, including but not limited to, daily activities, physical environment, and with whom to interact.
4. The setting facilitates individual choice regarding services and supports, and who provides them.
5. The setting is selected by the individual from among setting options that conform to the above criteria, including at least one non-disability specific setting option.

Integrated Prevocational Services may not be provided in any of the following settings (no later than March 17, 2024, subject to the CMS approval of Ohio’s transition plan for settings):

* Settings located in a publicly or privately-owned facility that provides inpatient treatment;
* Settings located on the grounds of, or immediately adjacent to, a public institution;
* Settings that have the effect of isolating individuals receiving Integrated Prevocational Services from the broader community of individuals not receiving Medicaid-funded HCBS.

Transportation for participants to get to and from the service is covered under Non-Medical Transportation and is not included in the rate paid to providers of this service. Transportation during service delivery can either be covered under Non-Medical transportation or included in the rate paid to providers for Integrated Prevocational Services but not both.

Personal care/assistance may be a component part of Integrated Prevocational Services as necessary to meet the needs of an individual, but may not comprise the entirety of the service.

Service Limitations:

* A participant’s individual service plan may include two or more types of non-residential habilitation services (e.g. Supported employment individual, Supported employment small group, Integrated Prevocational Services, Integrated Day Supports); however, more than one service may not be billed during the same period of time (e.g. the same hour).
* Homemaker Personal Care services may not be billed during the same period of time (e.g. the same hour) as Integrated Prevocational Services.
* Working-age individuals wishing to access Integrated Prevocational Services shall confirm, at each service plan meeting or review meeting, their agreement with the following:
  + Integrated Prevocational Services are not an alternative to working in competitive, integrated employment but are appropriate supports for the time period when competitive, integrated employment is being sought and for times outside of scheduled work hours when an individual may need supports to engage in other integrated activities in the community which can contribute to a goal of maintaining and/or advancing in competitive integrated employment;
  + Engaging in activities designed to advance an individual on his/her Employment Path is something the individual is committed to doing as part of or in addition to participating in Integrated Prevocational Services.
* Integrated Prevocational Services are available at a staffing ratio not to exceed 1:4.
* Integrated Prevocational Services can be provided for up to [6] hours a day and up to [5] days a week. Time spent in transportation to and from the service shall not be included in the total amount of services provided per day.
* Integrated Prevocational Services are limited to twenty-four (24) months for new authorizations after January 1, 2016. This time limit can be extended if any of the following are true at the point prior authorization for service to continue beyond twenty-four (24) months is requested:

(1) The participant is working in competitive, integrated employment for at least the number of hours per week identified in the participant’s current ISP as his/her integrated employment goal[[1]](#footnote-1) and evidence of this employment is submitted with the request for prior authorization; or

(2) The participant is working in competitive, integrated employment for less than the number of hours per week identified in the participant’s current ISP as his/her integrated employment goal, and a written plan to increase the competitive, integrated employmenthours to match the participant’s ISP goal is submitted with the request for prior authorization; or

(3) The participant is actively engaged in seeking competitive, integrated employment through individual supported employment services under the waiver or similar services funded through OOD, Ticket to Work, Ohio Workforce system, IDEA funds, private pay or another identifiable source, and evidence of a plan to obtain competitive, integrated employment through one of these funding sources is submitted with the request for prior authorization; or

(4) The participant has had on-going, active supports to obtain competitive, integrated employment for at least eighteen (18) of the past twenty-four (24) without a successful outcome and evidence of this unsuccessful effort is submitted with the request for prior authorization.

* ***For individuals who are currently receiving integrated Vocational Habilitation, their transition into Integrated Prevocational Services will occur no later than January 1, 2016. For those currently receiving facility-based Vocational Habilitation, this transition will be phased in with all participants transitioned by March, 2024 which is end-date for the state’s HCBS Transition Plan, subject to approval by CMS.***

Service Exclusions:

Integrated Prevocational Services payment shall not be made for the following:

(1) Vocational services where individuals are supervised for the primary purpose of producing goods or performing services, including services provided in sheltered workshops or similar facility-based settings.

(2) Services that duplicate or replace education or related services defined in Public Law 94-142 that are also available to the individual.

(3) Medicaid funds may not be used to provide compensation to individuals for participating in Integrated Prevocational Services, including payments of wages or stipends for internships or work experiences.

(4) Support for participants volunteering in for-profit organizations or businesses or volunteering to benefit the Integrated Prevocational Services service provider.

(5) Activities that involve the use of sub-minimum wage.

(6) Services provided in settings that do not meet the criteria included in the service definition.

(7) Activities which are the responsibility of the waiver-funded residential services provider for the individual, such as cooking or laundry activities, skill development focused on keeping a home, food shopping, and similar activities.

1. Additional justifications will be required for prior authorization to extend Integrated Prevocational Services beyond twenty-four (24) months if the person has an integrated employment goal that is less than 15 hours per week. [↑](#footnote-ref-1)