

2013 Employment Forum Q's

SPECIFIC QUESTIONS ABOUT THE POWERPOINT PRESENTATION AND THE REPORTS

01: Did I understand correctly that the driving force of this system change is the U.S. Department of Justice? If not, who or what is?

A: *The driving force is increasing national expectation, attention, and recognition of integrated employment as a civil rights issue of the day.*

The 1999 Olmstead Decision by the U.S. Supreme Court (Olmstead) and the U.S. Department of Justice (DOJ) require States to direct their funding to integrated settings. The federal Centers for Medicare and Medicaid Services (CMS) issues guidance on how federal Medicaid HCBS Waiver funds are used. CMS, as well as the DOJ, do not support using Medicaid funds for segregated settings.

The DOJ enforces the Olmstead decision and has provided guidance for States in complying with their obligations under the Americans with Disabilities Act (ADA) and Olmstead. The DOJ states that "a public entity may violate the ADA's integration mandate when it:

(1) directly or indirectly operates facilities and/or programs that segregate individuals with disabilities;

(2) finances the segregation of individuals with disabilities in private facilities; and/or

(3) through its planning, service system design, funding choices, or service implementation practices, promotes or relies upon the segregation of individuals with disabilities in private facilities or programs."

The Iowa Department of Human Services (Department) must be clear that integrated community settings are the preferred location for the delivery of Home and Community Based employment supports. Additionally, there are economic benefits to the State of increasing the number of people with disabilities employed. Research by Robert Cimera (Kent State) indicates that there is a \$1.61 return on investment for every \$1.00 employment services.

02. Why is now the right time to consider these changes?

A: *According to the Administration for Community Living (ACL), it is more evident than ever that employment affects not only income, but also well-being and self-esteem, in powerful ways. "The confidence and growth that come with successful employment are huge, and the empowerment that comes with controlling your own resources is an important part of living a self-determined life."¹*

Additionally, the ACL states that "...the rate of competitive employment in integrated settings for people with intellectual and developmental disabilities is unacceptable, at less than 25%. Graduation rates, a key indicator for employment success, continue to hover around 30% for students with intellectual disabilities. Higher education opportunities for students with ID/DD remain extremely limited. Supports and services to ensure success in competitive, integrated employment are not always prioritized. Families may struggle with the interdependencies of facilitating and supporting a meaningful day for family members with ID/DD, while simultaneously trying to maintain their own employment. Transportation is also frequently a barrier in many communities."²

¹ AIDD website http://www.acl.gov/NewsRoom/Blog/2013/2013_03_15.aspx

² AIDD website at http://www.acl.gov/NewsRoom/Blog/2013/2013_03_15.aspx

Many organizations are working in partnership with the Department of Justice and the U.S. Department of Health and Human Services' Office of Civil Rights to ensure that Olmstead rights are enforced, so that people with disabilities have opportunities to live and work in integrated communities. Iowa has a unique opportunity now to craft how we manage this needed change, instead of waiting for a lawsuit through which the Court then dictates to us how, when, and what the changes will look like.

03: work in progress....

04: How do we get the 80%-20% ratio between community integrated employment and facility employment more equal?

A: *The intent of the recent Community Forums and the engagement of stakeholders in the Workgroup is to develop a system that emphasizes integrated community employment while providing a full array of employment opportunities for people with disabilities. The Forums and ensuing Workgroup sessions are an opportunity for local input to create ways to make the change.*

05: What is the target for rebalancing the system? 50/50?

A: *An exact target is not set at this time. We are interested in using public funds to increase the full array of employment options available to people with disabilities. We want MORE choices, not less. In 2011 we spent 80% of public funds on non-integrated employment services, and only 20% of public funds on supported employment and integrated community employment services. We would like to shift that mix so that public funds are used first to help people get and retain employment in the community.*

We anticipate that the rebalancing of the system will occur in tandem with the Balancing Incentive Payment Program (BIPP) and will be continuously rebalancing the distribution toward more participation in integrated community employment services.

06: Re: the slide with the \$\$ bars: Why is the spending for facility staying consistent but the non-work facility services jumped so much? The people decreased, but the money stayed the same; why?

A: *In part because of county funding challenges in 2011, the state began to experience a shift away from county funded work activity which included services provided in facility based programs, toward Medicaid funded Day Habilitation. Hence the increase in facility based day programming.*

SERVICE DEFINITIONS

07: What is the definition of "integrated employment"?

A: *Many consider integrated employment to be a job in a community-based setting where employees with disabilities work alongside non-disabled employees and earn at least a minimum wage. This is the definition of integrated employment found in the Olmstead decree.*

08: Where do enclaves fit, in all this?

A: *Enclaves are considered community based group employment. Enclaves have value for the job seeker in providing opportunities to gain exposure to work tasks and the work environment in a structured*

and supportive setting. Vocational Rehabilitation can't financially support enclaves as it is not competitive, integrated community employment. It can, however, be used as a stepping stone to further develop work behaviors and work skills that will lead to competitive, integrated community employment.

09: work in progress...

10: There is a gap between prevocational services and integrated employment services. Are there any types of services that can do some more work at bridging the gap?

A: *Opportunities for individuals to move from prevocational services to integrated employment can include job shadows, volunteer work, on-the-job-training (OJT), temporary employment, enclaves, plus various specific training curriculum being developed in partnership with business and/or community colleges. Two such examples present in various locations throughout Iowa are Walgreen's REDI program (retail), and Project SEARCH within the healthcare industry. The Employment Workgroup hopes to address these gaps in the service definitions during the work sessions in July.*

MONEY

11: Where is the money coming from for this change?

A: *The money that is currently spent in the system (Medicaid funds, County funds) will be funding the change. In state fiscal year 2011, the State and Counties spent a combined \$42,344,399. The rate structure that will evolve out of the work over the next few months will be cost neutral by realigning rates with integrated community employment outcomes. This isn't about adding new money into Iowa's disability/employment system; it's about rebalancing existing funding to make better, more effective use of the funds currently available in order to improve employment outcomes for workers with disabilities.*

As people become employed they will contribute to the overall economy through taxes, reduced Medicaid costs, and infusion of additional money to their communities as their spending power increases and they move out of poverty .

12: Will the funding actually be there when it comes to rate re-structuring?

A: *Current funding will be used (see the answer to question #11); we are looking at how to spend the same money differently.*

Iowa actually began this effort in 2009 with assistance from the State Employment Leadership Network (SELN). For the past four years, with consultation from SELN and assistance from other disability/employment stakeholders, information has been gathered from other states' rebalancing efforts to guide Iowa's rebalancing effort. In addition, employment service time usage data have been collected from Iowa's community of employment providers that will inform the process. Five Community Forums were held in June 2013 and an ongoing workgroup, composed mainly of providers, has been formulated and is meeting.

13: What will be the funding source to support people going to supported employment instead of prevocational services (7%)? The old code of W5019 (\$900) does not cover the cost for "Discovery" process and the slow response time from IVRS as it is frustrating to the client. Getting to know the person is important to moving forward.

A: We agree that Discovery is a key process in assisting people with obtaining employment. We anticipate that the Workgroup will address Discovery in the service definition revisions.

14: Assumption "L"³ and "M"⁴: Is there going to be a designated funder for the services? Currently, it's common to hear that DHS, County, and IVRS are each the funder of last resort.

A: One of the intended outcomes of this effort is to address the gaps in eligibility and funding availability for employment services. Employment services will continue to be funded through Medicaid, IVRS and the Regions. Not all individuals meet the eligibility requirements of the various funding sources.

15: Is it possible to fund waiver services at a more comprehensive level? (i.e., lump separately funded services into a comprehensive rate based on a multitude of services they provide?) Much like a daily rate for ICF/ID. You are paid one rate to provide whatever service the person needs.

A: At this time, the administration of the waiver services does not allow for bundling; however, as more long term services and supports are managed through a managed care organization (MCO) or administrative service organization (ASO), this type of funding structure may become a consideration.

16: Would federal money with fewer strings attached be beneficial?

A: Anytime the State enters into an agreement with the federal government to draw down federal match to fund services, the State is expected to make certain assurances regarding access, health and safety, provider network, financial accountability, and quality assurance. We are not aware of federal dollars for employment service funding that does not require the State to make such assurances.

17: Your graphs certainly appear to be about "the money"; why is it always about the money and not about the best interests of the people we serve?

A: It is about how to make the money serve the best interests of people with disabilities. The goals of ICIE, MH Redesign, and all these efforts are about providing community based services with positive outcomes for those served.

MEDICAID

18: What is "CMS"?

A: The federal Centers for Medicare and Medicaid Services is referred to as "CMS". This is the federal agency that grants authority to the States to provide Medicaid services including Home and Community Based Waiver employment services. They guide how Iowa's Medicare and Medicaid programs are operated and how funds are used.

³ **L. Funding systems need to have complementary case management systems that support the individual:** The case management structure and process needs to be responsive to changes in individual's support needs and be able to quickly fund additional supports during times of crisis. Additionally the funding and case management systems must be designed to support a whole life individual community centered approach.

⁴ **M. Funding systems must acknowledge the long-term costs:** For long-term cost management, state I/DD agencies must determine what facility-based and day services they will reduce to allow reallocation of resources for expansion of employment and employment related integrated services, for instance adding career planning/discovery to the service options.

19: Will prevocational services go away?

A: No.

20: Medicaid is a health insurance program; why does it pay for vocational services? Why can't other health insurers pay for VR? Can they? Should they? If Medicaid continues to pay for VR, how will Medicaid expansion impact numbers served, and outcomes, or will it?

A: *Employment supports were added to the 1915c Home and Community Based Waiver services as a recognition that life in the community includes how people spend their day, and when people are employed Medicaid utilization is reduced, resulting in lower Medicaid claims.*

21: How long can consumers stay in prevocational services? Are there goals that are measurable? And why does it exist with only 7% of consumers leaving prevocational services?

A: *CMS has indicated that prevocational services are to be time limited. It is anticipated that as the workgroup and public address service definitions of the HCBS programs, time limitations will be incorporated in some manner.*

22: *work in progress...*

23: What does fading entail and how quickly (specific to integrated employment)? This is great to have for a goal, but a guide can often turn into rules & backing out coaching supports too quickly for employer & client can be dangerous. It's individual.

A: *CMS has indicated that employment services are to be time limited and should fade out over time. As the workgroup and public address service definitions of the HCBS programs, time limitations will evolve into guidance regarding fading out of services over time.*

24. What are the differences between prevocational and sheltered work, and other wrap-around or day services?

A: *According to the federal regulations found at 42 CFR 440.180(c)(2)(i), prevocational services are "services that prepare an individual for paid or unpaid employment and that are not job-task oriented but are, instead, aimed at a generalized result." People who receive prevocational services may also receive educational, supported employment, and/or day habilitation services.*

The federal CMS rules for Medicaid prevent DHS from using Medicaid funds for sheltered workshop services. In addition, the DOJ Olmstead enforcement actions are clear that it is the State's responsibility to ensure people have opportunities to choose to live and work in integrated community settings.

Day programs funded by Medicaid include day habilitation, day care, supported employment, or prevocational services.

Likewise, prevocational services are designed to prepare a person for more integrated employment. As such the CMS does not allow Medicaid funding for this service to continue indefinitely without demonstrating that the person is progressing toward his or her vocational goals.

The ID and BI Waivers as well as the HCBS Habilitation program, offer other day services such as day habilitation, home based habilitation, supported community living, or adult day care for people who do not desire employment or are not working toward employment. For those who are interested in

becoming competitively employed, other individualized services, such as supported employment, are available to assist in meeting this need.

The Department's intent is to ensure that Medicaid members continue to receive services for which they are eligible and that are based on an identified need of the member. In addition, DHS must assure CMS that service plans are authorized and utilized appropriately through ongoing service plan reviews.

25: How will the information generated by the new Workgroup be used?

A: This information is being used to guide the redesign of Medicaid-funded employment services and engage the public in ongoing dialogue about improving access to employment for people with disabilities.

26: What are the next steps after the workgroups and webinars?

A: Based on the Workgroup activities and public input, the next steps are testing and piloting rate models, revising rates based on what's learned, and then drafting administrative rules, policies and procedures. The proposed rules will include the proposed rate structure and policies. Revisions to the draft rules and policies will occur based on the pilots' experience and feedback from all stakeholders.

27: Once all feedback from the Workgroup is gathered, then draft rules created-- where does this go? Who is the deciding entity to say "yes" or "no" to what is proposed?

A: The Workgroup and the public as well as the Parents /Family Coalition, guided by CMS instruction, will determine the rules and policies that will be proposed to the DHS / IME leadership for piloting. As stated in Q.#26, additional revisions will be made as needed to service definitions and rates structure based on the pilot experience. The Department's Executive Council will approve any administrative rule changes to be noticed, and State Administrative Rules Committee will review. CMS has final approval of any changes that IME proposes to make to the 1915(c) waiver applications.

28: What would the timeline be for implementation of these recommendations?

A: We envision a phase-in over 12-24 months' time, or longer. Gradually, revisions would become implemented statewide. As indicated above, we need to allow time for pilot testing of various rates, and revisions according to what's learned through the piloting.

29. What steps have been taken so far to determine sample rates for Iowa's system?

A: The Department has carefully studied the problems in its current funding methodology, has studied states that have successfully used funding to encourage integrated employment outcomes, and developed sample methodology based on best practices and on what a number of other states have done.

In collaboration with other State partners, the Department will bring in a variety of national experts to advise provider executives and policymakers on determining sample rates and implementing a new system.

FAMILY INVOLVEMENT & EXPECTATIONS

30: While this is a system activity, how are families and people with disabilities going to be included in planning, implementation and evaluation? How will changes be communicated to families and people with disabilities?

A: People with disabilities and families have already been involved and they will continue to be. As a result of one of these efforts, for example, the Olmstead Taskforce disseminated an Employment position paper. Including people with disabilities and their families is important for the success and implementation of these future changes. There will be self-advocates, parents, and family members reviewing the rules for implementation. Additionally, we'll continue to involve self-advocates and families through the ICIE Parent/Family Coalition in a feedback loop with the work of the Workgroups. We try to communicate changes through ASK Resource Center, through individual parents and people with disabilities, through groups that we communicate with and that forward our communications in their newsletters or list-serves (AMOS, Association for Persons in Supported Employment [APSE], ARC-Iowa, DD Council and ID Action, DHS Case Management, Iowa State Association of Counties' Case Management, Southeast Iowa Case Management, Iowa Behavioral Health Association, Magellan, MHDS Commission, NAMI, Olmstead Consumer Taskforce, and others.) We hope parents and people with disabilities are involved on the feedback webinars. We ask providers to speak with consumers or their families and ask them to participate.

31: How do I convince capable individuals to get out of a sheltered workshop environment into competitive employment with less favorable hours, when their mentality is "I don't need money from a job, SSI pays for everything I need."? What do I do when parents support this mentality too?

A: Parents are often afraid to try something new; they need to understand the options and how their loved one will be supported. You can do this by providing Benefits Planning early in a person's life before they get comfortable in a sheltered work environment. Integrated employment should be their first stop before they are placed in workshops. Funding for these services needs to be available earlier, for this to happen. Benefits Planning is essential to understanding how someone can receive benefits and work. By providing Benefits Planning early, parents will be able to see that their son/daughter will live a better life by earning more and still be able to have what they need. It's often most powerful for family members to see others' success stories. Watching someone work in the community is very powerful.

Iowa's Work Incentive and Self Employment Seminars have produced many successes. Six Iowans' stories are highlighted in two "Success Story" videos, produced by the Iowa Medicaid Infrastructure Grant (MIG). One video features Iowa wage earners with disabilities, and the other features Iowa business owners with disabilities: "If Everybody Works-Wage Earners" http://youtu.be/7_94Ulnr5XU and "If Everybody Works-New Entrepreneurs" http://youtu.be/AG6uru_QwiU.

32: Do parents and family members support changes to Iowa's rate structure? What about parents and families who have come to rely on center-based employment for their sons and daughters, what will happen to those folks?

A: Employment in the general workforce is the overwhelming choice for Iowa's parents of children receiving special education services. A 2009 Department of Education study found that more than 90% of Iowa parents, regardless of their child's disability, expect them to work in the community after

graduating from high school.⁵ Many parents are supportive, but they need to be made more aware of the options available. With a change in funding structure and support to providers, we hope to create more choices in our communities. “Systems change” is a slow process, and the change needs to start the day a child with a disability is born.

ATTITUDES, WORK ETHIC, CHOICE TO NOT WORK, PROVIDERS NOT ON BOARD

33: work in progress...

34: As far as Waiver services, would there be an age limit on Employment services? If a disabled person does not want to be on a waiver but would like to work, would they still be able to receive employment training?

A: *Iowa Vocational Rehabilitation Services and IowaWorks are there to serve Iowans with disabilities who may not qualify for Medicaid but need support to work.*

35: My provider (or some providers) are not on board with community-based employment; what help is available to get them on board?

A: *The most powerful thing is the voice of an individual job-seeker who has found success in community employment. Wherever possible, help those individuals to become local advocates.*

The Department is working with providers to examine possible business approaches that will permit them to be more in alignment with federal CMS and DOJ expectations. In partnership with other State agencies, DHS is bringing in nationally recognized experts to assist with this process, and is eager to work collaboratively with providers.

The Department currently is a partner in a federally funded collaborative endeavor which is gathering data on what it will take to assist facility-based service providers to transform their business models so that work in integrated settings becomes an opportunity for as many people as possible. Several provider agencies, we hope, will become peer mentors to others throughout the State.

Throughout calendar 2013 and 2014, national experts are available to providers through a federal grant, especially through the Iowa Association of Community Providers (IACP) and at the APSE Conference in October. The experts will offer leadership development, organizational support, training in Employment 1st, topical workshops, and one-to-one business consultation.

Other resources for capacity building will be available to providers statewide through the online College of Employment Service. Trainings on Customized Employment will be made available through online, print, and e-resources to all who want them. The IA-APSE ACRE-approved (Association of Community Rehabilitation Educators) Employment Specialist training series, and technical assistance mechanisms will be set up.

36: What would be the most important thing for sheltered workshops to do to move forward to ensure their doors stay open for our clients?

A: *Work with us – Iowa DHS (including Mental Health and Disabilities Services AND Medicaid), Iowa Vocational Rehabilitation Services, Iowa Department for the Blind, Iowa’s Development Disabilities Council, job-seekers with disabilities and their family members, and other disability/employment stakeholders – to arrive at a disability/employment system in Iowa that makes sense to people with*

⁵ Iowa Department of Education, Transition Survey (2009)

disabilities and increases their opportunities for self-supporting employment. We can all agree that we'd like to see more opportunities for workers with disabilities and better opportunities for workers with disabilities.

Learn about changing your business structure. Learn about Customized Employment and start doing it by setting a goal of involving a certain number or percentage of your job seekers.

PROVIDER TRAINING AND STAFF CAPACITY

37: How have Iowa's employment provider organizations contributed to this effort?

A: *Employment provider agencies and organizations throughout Iowa have come to the table to shape this process. Over the last few years, they have been involved in Employment First conferences, focus group conversations, IA-APSE conferences, activities conducted under our State Employment Leadership Network (SELN) membership, Mental Health and Disability Services Redesign, as well as in the Iowa Coalition for Integrated Employment (ICIE)⁶, and the Employment First Leadership State Mentor Program (EFLMP)⁷. They are providing consultation and data to state leaders.*

Employment providers can make sure they hire people with disabilities, have people with disabilities on their board of directors, and ask them to participate in staff recruitment and retention activities. Employment organizations can stand as a model to other community businesses for how to interact with people with disabilities.

Employment organizations can contribute by sending a consistent message to the community that people with disabilities are competent employees, and valued members of the communities in which they live and work.

38: There have been many references to "high quality employment training specialists". What does this entail? Rehab counseling degree, ACRE certification, CESP certification, etc.?

A: *This is yet to be defined at that level of detail, but it will be done through the Workgroup, Feedback Webinars, and Rules processes. At the same time, we will be looking at nationally agreed-upon competencies identified as necessary for effective employment specialists.*

39: Please make sure the pay is there for job coaches, and a job coach needs certification that one does not obtain only online! (Needs to be a skill based component required).

A: *We will try to ensure the availability and affordability of a variety of quality certifications. Right now the Iowa Association of Community Providers, through a contract with DHS, is making available the online training series DirectCourse which includes College of Direct Support and College of Employment Support Service; this is available to anyone who wants it. Other resources available are the APSE Employment Services Series which is ACRE approved and typically offered twice a year, and, Technical Assistance and Continuing Education (TACE) trainings through the University of Missouri offered as needed. Other training available includes Virginia Commonwealth University (VCU) online trainings which are offered nationally on a schedule they determine.*

40: How will we ensure providers can afford to certify staff (not just rate increase)?

⁶ funded by the US Department of Health and Human Services' Administration on Intellectual and Developmental Disability

⁷ funded by the US Department of Labor's Office of Disability Employment Policy

A: The rate models will be built taking into consideration that providers need to invest in staff development.

41: Assumption "B"⁸: Will staffings and coordination be included as billable activity? What will be included in indirect staff time? Will there be a percentage of limitations imposed?

A: Those decisions will be made starting in the Workgroup process and continuing through Feedback Webinars and the Rules process. The hope is to include items such as benefits, mileage, staff development time, program support and administration time, meetings, travel, progress notes, etcetera.

42: Assumption "L"⁹: As a case manager my job is to serve the individual, and "L" makes it seem we are not supportive. Our hands are tied in several areas, as well.

A: Case managers need to understand the role they play in promoting integrated employment for individuals with a disability. They need to be fully informed about funding and options for integrated employment. They need to be able to secure funding for additional support during a time of crisis to increase a person's success in integrated employment.

EMPLOYERS, BUSINESSES

43: Is the State offering incentives to employers to hire people with disabilities? Businesses need financial incentives to hire. Who provides this?

A: There are incentives available to employers who hire people with disabilities. One example is the Work Opportunity Tax Credit (WOTC). Another used frequently by IVRS is On-the-Job Training (OJT). An OJT is a customized program in which a business provides training but other costs (like a stipend) are covered by IVRS. Some OJT's involve a direct reimbursement of a training wage meaning the employee is hired by the business, but the business is reimbursed up to 50% of the wages during a training period. Additional tax incentives available to employers include tax deductions, such as the Barrier Removal Tax Deduction and/or tax credits like the Small Business Access Tax Credit. Every IVRS office has staff able to discuss incentives available to employers who hire individuals with disabilities (and interested parties).

If Supported Employment Services (SES) are needed to facilitate an individual's employment, IVRS is able to pay a community rehabilitation partner (CRP) to provide these services to a business. IVRS relies on CRPs to help serve our job candidates who are most significantly disabled and require SES. Businesses who hire an individual involved in SES derive a benefit in using CRP services (paid in part by IVRS) for training, job coaching and follow-up services. See also the answer to question #45.

44: How do I change attitudes of prospective employers?

A: You can connect them with other businesses and employers who have had a good experience employing people with disabilities. You can help educate them that it is "good business": A recent

⁸ **B. Service definitions must link to billable activities:** Clear service definitions must be developed that are directly linked to the billable activities allowed under each type of integrated employment service.

⁹ **L. Funding systems need to have complementary case management systems that support the individual:** The case management structure and process needs to be responsive to changes in individual's support needs and be able to quickly fund additional supports during times of crisis. Additionally the funding and case management systems must be designed to support a whole life individual community centered approach.

Gallup poll found a strong correlation between companies' diversity efforts and their employees' satisfaction (Bright Hub "Fostering Diversity by Recognizing All the Benefits", <http://www.brighthouse.com/office/human-resources/articles/90910.aspx>). Likewise other research has found that 92% of people view businesses who employ people with disabilities more favorably than those who do not.¹⁰

45: My clients at the workshop bag nails & glue & other odd jobs for an industry in our county; the workshop has met with this employer to see if the clients could be part of their workforce, on-site, as an enclave, and they have refused to allow this. Anything being offered to promote this idea to employers?

A: *This type of promotion is done at a local community level by individual organizations offering this service currently. We are not aware of any coordinated effort to develop this message statewide. This could be an interesting project for APSE and/or for the Iowa Employer's Disability Resource Network (EDRN) to explore and research how this could be marketed to businesses in Iowa as a value-added resource. Also, make sure this employer is aware of the resources discussed in question and answers number 43.*

COMMUNITY CAPACITY

46: Will there be any work on the state's behalf to bring jobs into Iowa so there will be jobs for people in prevocational services to move into, when their time in prevocational service is cut off (due to time limited services)?

A: *It seems that the better job we do in developing a talent pool of job candidates who will add value to the business (as previously discussed for retail, health care, and other models), the more interested businesses will be in working with us on referrals, on-the-job-training, etcetera.*

47: What jobs do you expect people with severe disabilities to take when they can't compete with other unemployed people who are more qualified and don't have disabilities?

A: *We understand that not everyone will be able to get jobs right away. We also need to start having an expectation – and honoring the career dreams and aspirations of people with disabilities– especially when they include working in the community. Customized Employment is an avenue to help carve out or create jobs for people with severe disabilities who may not be able to compete in the same way others compete for jobs. You can learn about Customized Employment at these websites, <http://www.dol.gov/odep/topics/CustomizedEmployment.htm> http://www.griffinhammis.com/customized_employ.asp <http://www.ruralinstitute.umn.edu/transition/>*

48: Can there be a recognized understanding of the different challenges of urban versus rural? Eastern Iowa is way different from Western Iowa.

A: *It is anticipated that differences throughout the State will be identified and addressed through Regional efforts. We recognize there are challenges. Urban areas may not offer the same opportunities regarding business relationships that rural settings enjoy. Rural areas may not offer*

¹⁰ 2005 study published in the *Journal of Vocational Rehabilitation*, cited at www.fastcompany.com/3002957/disabled-employee-amendment

public transportation. This is why we have representatives on the Workgroup from across the State, including rural, urban, and suburban, large and small providers, and a variety of service mix.

VOCATIONAL REHABILITATION SERVICES

49: Why does VR take so long to make referrals to them eligible?

A: *The federal rules under which IVRS operates require an eligibility decision to be made within 60 days from the time an individual applies for services. IVRS staff are rated on their timeliness in exceeding this standard and making eligibility decisions sooner. Eligibility decisions are made by counselors who take into account an individual's disability and its effect on work. Counselors must also ensure there are services IVRS can provide to help an individual achieve employment, as well as the severity of an individual's disability. IVRS uses existing documentation to facilitate eligibility decisions to the greatest extent possible, although there are times staff must wait for responses from hospitals, medical or legal personnel - all of which can delay eligibility decisions. It should be noted that individuals who receive SSI or SSDI are automatically eligible for IVRS; however, IVRS counselors must still determine the severity level of the individual's disabling condition.*

When a decision cannot be made within the 60 day time frame because of circumstances beyond the control of IVRS, an applicant will be asked to agree to extend the time an eligibility decision is made by 30 days. If there are outside concerns about delays related to eligibility decisions, the IVRS supervisor should be notified to help explain or expedite matters of this nature. Eligibility is an individualized, unique process that is different for every person and an effective understanding of functional limitations related to the disabling condition positively influence the development of an effective employment plan. This is individualized per job seeker and multiple variables play into it including the timely response of outside parties.

50: Why does IVRS have wait lists if money is being "sent back"?

A: *IVRS depends on state appropriations and other third-party matching funds which the federal government matches 78.7% to 21.3%. Federal dollars are allocated to every state for the delivery of vocational rehabilitation services. IVRS is not able to "draw down" all of the money the federal government has allocated to Iowa because the federal money must be "matched" by state money. IVRS does not meet the match requirement between state appropriations and other third-party funds to earn all of the available dollars allocated by the federal government. For 2013 the federal government allocated about \$26,360,000 to IVRS and this requires \$7,134,000 in match dollars. IVRS has \$5,594,000 in match dollars available which earns \$20,670,000 of federal allocation. An additional \$1,540,000 in match dollars would earn the balance of \$5,690,000 in federal allocation available to IVRS. Since IVRS is matching only \$20,670,000 of the federal allocation available, it is not able to serve all persons with disabilities who have applied for vocational rehabilitation services. It would be anticipated that IVRS could serve all of the persons with disabilities on the current waiting lists if \$1,540,000 of additional match dollars were appropriated which would earn the \$5,690,000 of available federal dollars allocated to Iowa.*

The federal dollars that IVRS does not match are returned to the federal government and are then reallocated to other states that have met their full matching requirements.

51: IVRS referrals have gone down because agencies have been given a generic denial form to use so other funds can be accessed to help our clients so referrals are not being made.

A: *IVRS wants to support and serve any individual who wants to work in an integrated setting. A generic letter was developed in response to the need to confirm that IVRS does not fund prevocational services in non-integrated settings. This letter should not affect the practice of referring individuals to IVRS who are interested in or would benefit from services.*

52: If IVRS won't open a file because client doesn't meet readiness requirements, is money available for a vocational provider to do job development etc.?

A: *To be able to provide funding for job development, IVRS has to have an individual's file open, their eligibility established, and a plan for employment in place. IVRS counselors are available to discuss an individual's job readiness. IVRS' goal is to help an individual achieve work success in their community, and staff should participate in discussions about what that involves, specific needs to address, and services IVRS provides.*

EDUCATION, SCHOOLS, AEAS

53: Schools are a stakeholder, and they are not present. The idea and funding for integrated employment should start in school.

A: *IVRS has a presence in every public high school in the state to assist with a student's transition to employment. The services provided by IVRS focus on improving educational attainment and obtaining integrated, competitive community employment. Schools are partners with IVRS to assist students with disabilities in preparing for and succeeding in vocational, academic and independent living settings. These partnerships often expand based on an individual's needs, and can definitely contribute to or enhance an individual's successful transition.*

54: How can 4+ programs and Education change our expectations and service delivery in order to better prepare students for post-secondary expectations (e.g., Career Connections at Grant Wood AEA)?

A: *There are multiple ways a 4+ program and school can change the expectations. One such suggestion would be to partner with an agency serving adults and together share how each system/agency can complement the other. Neither system/agency should operate in isolation. Schools need to invest in employment opportunities for students – Transition, Walgreens' REDI program, Project SEARCH, better partnerships with community rehabilitation providers for which there is IVRS funding available. Additionally, most schools have a vision of how their students will be successful community members. Students receiving special education services should also be part of that vision. Too often students with disabilities are not held to the same standards as students without disabilities. Also, discussions regarding work and employment should begin at an early age, and need to include parents.*

55: How can "4+ programs" join and support this effort?

A: *The "4+ programs" can be important partners in this effort. Depending on the youth involved, programs often contract with community rehabilitation providers or other adult employment programs for services. To further the efforts of this initiative, schools can first contract for services that are integrated. Only after a youth clearly demonstrates that integrated services are not appropriate should the school use segregated services. The school and adult services agency need to work closely together to ensure that a meaningful integrated experience occurs.*

MENTAL HEALTH; "SOFT" SKILLS

56: Does this group address needs and services issues specific to persons with mental illness? If not, is there a way to intersect somehow?

A: This effort is not specifically about individuals with mental health diagnoses, but they are included in the populations we're thinking about, which is anyone who is eligible for a Medicaid-funded employment service. We welcome input and feedback from those with experience serving persons with mental illness and people with lived experience.

57: Which is most likely to keep people from obtaining/retaining work: behavioral deficits? Or behavioral excesses?

A: We are not familiar with available literature or research on this topic. Chances are the answer is individual and depends on the employer, the employee, and the job.

58: Where is training on social skills coming from; before employment comes into play or after someone has been fired due to poor social skills?

A: Social skills training should be available in both instances through classroom instruction, first job, volunteering, transition services, and community colleges.

59: Is peer support employment considered integrated community employment? (Since only those with "lived experience" can apply and they work with peers)?

A: Yes because it is a job that is in a community setting and integrated with non-disabled employees.

OTHER PROGRAMS & PARTNERS...

60: Which other states Iowa are undergoing restructuring of their employment reimbursement rates?

A: There are a number of states doing this. We can learn from those in the Reports produced for us by SELN (link at <http://www.dhs.state.ia.us/mhdd/2012/Employment.html>) which includes Connecticut, Minnesota, New Mexico, Oklahoma, and Oregon. SELN also previously looked at and compared for us the similar processes gone through by Montana, Tennessee, and Washington.

61: Is this related to the Balancing Incentives Payment Program ("BIPP")?

A: Iowa started this initiative prior to the BIPP, and it compliments and supports the goal of BIPP. The goal of BIPP is to provide persons with greater access to home and community based services, and reduce unnecessary reliance on institutional services. By increasing competitive employment opportunities for Iowans, we will be increasing community based services.

62: How can we work with Ticket to Work?

A: IVRS can develop Partnership Plus agreements with businesses or agencies interested in becoming an Employment Network (EN). This would allow IVRS to hand-off cases to an EN partner for follow-up services at the time their IVRS case is closed. Benefits Planning services are provided to SSI/DI beneficiaries by IVRS staff to discuss options and incentives available under Ticket to Work. Additionally, IVRS is able to contract for benefits planning services with external vendors as needed. Business consultants who can help are also available to you through the IACP.

63: How will Magellan fit into the mix?

A: *Magellan will authorize services received through Habilitation for HCBS members in the Iowa Plan.*

64: Is the plan to push to eliminate the subminimum wages? I hope not!

A: *That is not part of this plan. However, that is an important topic being discussed across the country, and of course there are strongly held feelings and opinions on both sides of the issue. It is not simply a civil rights issue or simply a business and labor issue; it's complex, with very real implications for persons' lives as well as the businesses' financial well-being.*

65: Are Regions (MH Redesign) part of it? Regions would like to partner.

A: *We are dovetailing with Regions and Mental Health Disability Services Redesign as this process unfolds and will continue to do so.*

66: There needs to be a meeting of the local resources, i.e., if AEA offers job coaching and schools offer it and VR offers it & providers offer it-- aren't we diluting the possibilities (and the funding)? Why can't we have a system that flows with one deliverer of services & the other players are part of the support team in other ways?

A: *Once DHS implements rate changes, IVRS and the Department for the Blind have indicated an interest in doing so as well, so that all three agencies' rates are aligned as much as possible. When people move from one agency to another, they should experience less disruption in services.*

67. How can I find out more?

Feel free to contact the following Staff:

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