



SPC: 615

Provider Subcontract Agreement Appendix N

**Purpose:** Defines requirements and expectations for the provision of subcontracted, authorized and rendered services. Services shall be in compliance with the Provider Subcontract Agreement and the provisions of this service expectations document.

1.0	Definitions
1.1	<p><b>Service Definition</b></p> <p>Inclusa follows the definitions and guidelines as defined for Supported Employment in the DHS Family Care contract, standard program category (SPC) 615.</p> <p><b>Supported Employment – Individual Employment Support Services</b> are the ongoing supports provided to members who, because of their disabilities, need intensive ongoing support to obtain and maintain an individual job in competitive, customized or self-employment in an integrated work setting in the general workforce. A member receiving this service shall 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. The outcome of this service is sustained paid employment at or above minimum wage in an integrated setting in the general workforce, in a job that meets personal and career goals.</p> <p>Individual Employment Support Services are individualized and may include any combination of the following activities: vocational/job-related discovery or assessment, person-centered employment planning, job placement, job development, meeting with prospective employers, job analysis, training and systematic instruction, job coaching, job supports, work incentive benefits analysis and counseling, training and work planning, transportation and career advancement services. Also included are other workplace support services not specifically related to job skill training that enable the member to be successful in integrating into the job setting. Individual employment supports may include support to maintain self-employment, including home-based self-employment.</p> <p>Individual employment supports may also include services and supports that assist the member in achieving self-employment; however, Medicaid funds may not be used to defray the expenses associated with starting or operating a business. Assistance for self-employment may include: (a) aid to the member in identifying potential business opportunities; (b) assistance in the development of a business plan, including identifying potential sources of business financing and other assistance in developing and launching a business; (c) identification of the supports that are necessary in order for the member to operate the business; and (d) ongoing assistance, counseling, and guidance once the business has been launched.</p> <p>Individual employment support does not include payment for supervision, training, support, and adaptations typically available to other non-disabled workers filling similar positions in the business. Individual Employment Support Services may be provided by a co-worker or other job site personnel provided that the services are not part of the normal duties of the co-worker, supervisor or other personnel and these individuals meet the qualifications established below for individual providers of this service. Employers may be reimbursed for supported employment services provided by co-workers.</p> <p>Supported employment services do not include vocational services provided in facility-based work settings or other types of vocational services furnished in specialized facilities that are not part of general community workplaces. Supported employment services may not include volunteer work.</p>

Members receiving individual employment supports may also receive educational, pre-vocational and/or day services. However, different types of nonresidential services may not be billed for the same period of time.

Before authorizing supportive employment services, documentation shall be maintained that the service has already been utilized or is not available under a program funded under the section 110 of the Rehabilitation Act of 1973 or the Individuals with Disabilities Education Act (IDEA) (20 U.S.C.1401 et seq).

Coverage does not include incentive payments, subsidies, or unrelated vocational training expenses such as the following:

- a. Incentive payment made to an employer to encourage or subsidize the employer's participation in supported employment; or
- b. Wages or other payments that are passed through to users of supported employment services.

Payment for Individual Employment Support Services may be based on different methods including, but not limited to, co-worker support models, payments for work milestones, such as length of time on the job, or number of hours the member works.

The cost of transportation for a member to get to and from a supported employment site may be included in the reimbursement paid to the supported employment provider, or may be reimbursed under specialized (community) transportation, but not both. All providers of transportation shall ensure that the provider qualifications for specialized (community) transportation are met.

Personal care may be a component part of supported employment but may not comprise the entire service. Personal care/assistance provided to a member during the receipt of supported employment services may be included in the reimbursement paid to the supported employment provider or may be reimbursed under the waiver service supportive home care or self-directed personal care. All providers of personal care/assistance shall meet the supportive home care provider qualifications.

When personal care/assistance or transportation or both are a component of this service, payment may not be made for such assistance or transport under another waiver service for the same period of time.

For the individual on the job support person, the MCO shall assure that the provider has the ability and qualifications to provide this service, demonstrated in at least one of the following ways:

- Holding the Certified Employment Support Professional accreditation.
- Meeting the ASPE Quality Indicators for Supported Employment Personnel.
- Comparable experience for a qualified individual, including a minimum of two years of experience working with the target population providing supported employment. However, a member self-directing this service may employ qualified persons with less experience. In that event, the MCO and member shall ensure that the individual provider has the member-specific competencies to effectively provide the service.

In addition, the individual provider must comply with all applicable occupational health and safety standards of the federal Occupational Safety and Health Administration (OSHA) and if personal care services are provided, shall also meet the Supportive Home Care and In-Home Respite Training and Documentation Standards.

For the supported employment agency, the MCO shall assure that the provider has the ability and qualifications to provide this service, demonstrated in at least one of the following ways:

- Accreditation by a nationally recognized accreditation agency.

- Existence of a current contract with the Division of Vocational Rehabilitation (DVR) for provision of supported employment services.
- Submission of written documentation that evidences that the agency meets all DVR Technical Specifications related to supported employment.
- Comparable experience for a qualified entity, including a minimum two years of experience working with the target population providing integrated employment services in the community.

In addition, the provider must comply with all applicable occupational health and safety standards of the federal Occupational Safety and Health Administration (OSHA) and if personal care services are provided, shall also meet the Supportive Home Care and In-Home Respite Training and Documentation Standards.

**Supported Employment – Small Group Employment Support Services** are services and training activities provided in a regular business, industry or community setting for groups of two (2) to eight (8) workers with disabilities. Examples include mobile crews and other business-based workgroups employing small groups of workers with disabilities in employment in the community. Small group employment support must be provided in a manner that promotes integration into the workplace and integration between members and people without disabilities in those workplaces. The outcome of this service is sustained paid employment and work experiences leading to further career development and individual integrated community-based employment for which a member is compensated at or above the minimum wage, but not less than the customary wage level of benefits paid by the employer for the same or similar work performed by individuals without disabilities.

Small Group Employment Support Services may include any combination of the following activities: vocational/job-related discovery or assessment, person centered employment planning, job placement, job development, meeting with prospective employers, job analysis, training and systematic instruction, job coaching, work incentive benefits analysis and counseling, training and work planning, transportation, and career advancement services. Also included are other workplace support services not specifically related to job skill training that enable the member to be successful in integrating into the job setting.

Small group employment support does not include payment for supervision, training, support, and adaptations typically available to other non-disabled workers filling similar positions in the business. Small Group Employment Support Services may be provided by a co-worker or other job site personnel provided that the services that are furnished are not part of the normal duties of the co-worker or other personnel and these individuals meet the qualifications established below for individual providers of service. Employers may be reimbursed for supported employment services provided by co-workers.

Supported employment services do not include vocational services provided in facility-based work settings or other types of vocational services furnished in specialized facilities that are not part of general community workplaces. Supported employment services may not include volunteer work.

Members receiving small group employment support may also receive educational, pre-vocational, and/or day services and career planning services. However, different types of non-residential services may not be billed for the same period of time.

Before authorizing supportive employment services, documentation shall be maintained that the service has already been utilized or is not available under a program funded under the section 110 of the Rehabilitation Act of 1973 or the Individuals with Disabilities Education Act (IDEA) (20 U.S.C.1401 et seq).

Coverage does not include incentive payments, subsidies, or unrelated vocational training expenses such as the following:

	<p>a. Incentive payment made to an employer to encourage or subsidize the employer’s participation in supported employment; or</p> <p>b. Wages or other payments that are passed through to users of supported employment services.</p> <p>The cost of transportation for a member to get to and from a supported employment site may be included in the reimbursement paid to the supported employment provider or may be covered and reimbursed under specialized (community) transportation, but not both. All providers of transportation shall ensure that the provider qualifications for specialized (community) transportation are met.</p> <p>Personal care may be a component part of supported employment but may not comprise the entire service. Personal care/assistance provided to a member during the receipt of supported employment services may be included in the reimbursement paid to the supported employment provider, or may be reimbursed under the waiver service supportive home care or self-directed personal care. All providers of personal care/assistance shall meet the supportive home care provider qualifications.</p> <p>When personal care/assistance or transportation or both are a component of supported employment services, payment may not be made for such assistance or transport under another waiver service for the same period of time.</p>
1.2	<p><b>Inclusa Interdisciplinary Team (IDT) Definition</b></p> <p>The Inclusa Interdisciplinary Team (IDT) is composed of the following:</p> <ul style="list-style-type: none"> <li>• <b>Community Resources Coordinator (CRC)</b> – The Inclusa CRC is responsible for identifying member service needs using the RAD process and authorizing the service(s) needed to meet the member’s long-term care outcomes. The CRC ensures the member has the necessary furnishings and supplies for independent living and coordinates moving the member’s belongings and medications at member move-in and in the event of the member moving out. The Inclusa CRC is the provider agency’s main point of contact for member-specific or related questions, concerns, or information.</li> <li>• <b>Health and Wellness Coordinator (HWC)</b> – The Inclusa HWC is a nurse that has ongoing responsibility to assess and review how the member is doing clinically and educate the member on health-related issues. Inclusa HWCs do not provide direct care services, supervision of agency direct care staff, or supervisory visits of direct care workers for nurse-delegated tasks. Inclusa HWCs do not delegate tasks to personnel from any provider agency or self-directed support. All nursing delegation must be provided by a registered nurse employed or subcontracted by the contracted provider agency.</li> </ul> <p>The IDT may also be referred to as “Inclusa Team” or “Care Management Team.”</p>
<b>2.0</b>	<b>Standards of Service</b>
2.1	Provider must follow the standards for Supported Employment Services. This Scope of Service reflects Inclusa policies and procedures.
2.2	<p>Inclusa subcontracted providers of long-term care services are prohibited from influencing members’ choice of long-term care program, provider, or Managed Care Organization (MCO) in any way including but not limited to communications that are misleading, threatening, or coercive. Inclusa and/or the WI Department of Health Services may impose sanctions against a provider that does so.</p> <p>Per Wisconsin Department of Health Services (DHS), any incidents of providers influencing member choice in a Family Care program must be reported to DHS immediately.</p>
2.3	Service must be provided in a manner which honors member’s rights such as consideration for member preferences (scheduling, choice of provider, direction of work), and consideration for common courtesies such as timeliness and reliability.

2.4	<p>Provider must incorporate practices that honor members’ beliefs, being sensitive to cultural diversity and diverse cultural and ethical backgrounds, including supporting members with limited English proficiency or disabilities, and regardless of gender, sexual orientation, or gender identity. This includes fostering attitudes and interpersonal communication styles in staff and providers which respect members’ cultural backgrounds.</p>
3.0	<p style="text-align: center;"><b>Service Description</b></p>
3.1	<p><i>Inclusa</i> promotes and encourages individualized competitive integrated employment for members while respecting individual outcomes, preferences, and choices as part of our overall mission. Our vision is to allow members the same opportunities to seek competitive integrated employment and be self-supporting as enjoyed by all citizens.</p> <p>Employment is part of the human experience and one which we plan for from childhood. CIE is associated with <b>positive physical and mental health</b> benefits, maintaining and increasing <b>independence</b> in other facets of life (e.g. at home), having <b>more natural supports</b>, experiencing <b>less social isolation</b>, gaining <b>increased self-esteem and self-advocacy skills</b> and having a chance to <b>increase disposable income</b> significantly versus reliance only upon public benefits.</p> <p>Most importantly, employment is one of the most common ways we are recognized as <b>valuable and contributing members of society</b>. Employment provides stability in our lives. Being unemployed can have a myriad of negative effects on our lives, our health, our independence and our relationships.</p> <p><i>Inclusa</i> believes that <b>all</b> individuals, regardless of disability and age, <b>can work</b> – and work optimally when offered the opportunity, training, and support that builds on each person’s strengths and interests. Individually tailored and preference-based job development, training, and support will recognize each person’s employability and potential contributions to the labor market.</p> <p>Employment Service providers are required to have a current contract with the Division of Vocational Rehabilitation (DVR) for the provision of Supported Employment Services and/or Customized Employment services meeting all DVR Technical Specifications.</p> <p>For those members still being supported by their Local Education Agency (LEA), it would be expected that services would be utilized with IDEA funding as appropriate.</p> <p>Members receiving Supported Employment – Individual Employment Support Services must be working in a position that meets the DHS definition of Competitive Integrated Employment:</p> <p><b>Competitive Integrated Employment (CIE):</b> Work performed on a full-time or part-time basis; compensated not less than the applicable state or local minimum wage law (or the customary wage), or if self-employment, yields income comparable to persons without disabilities doing similar tasks; the worker should be eligible for the level of benefits provided to other employees; the work should be at a location typically found in the community; where the employee with a disability interacts with other person who do not have disabilities and are not in a supervisory role, and; the job presents opportunities for advancement.</p> <p>The minimum criteria that must <b>all</b> be met for employment to qualify as CIE for purposes of the Quarterly Employment Data Report described in Article XIV.C.5. and the CIE Pay for Performance initiative described in Article XVIII.E.3. include all of the following:</p> <p>a) <b>Employer of Record</b>  CIE assumes that in the vast majority of cases the employer of record will not be an employment/vocational service provider but will be the business or organization that:</p>

- i. Operates the location(s), typically found in the community (as defined below), where the individual engages in paid work; and
- ii. Benefits directly from the work done by the person with a disability.

The only exceptions to this expectation are when:

- iii. The business or organization does not typically act as employer of record for other employees without disabilities; or
- iv. The business or organization is a government entity, including tribal government, and/or a unionized workplace.

In these two documented situations, the employer of record may be a provider of services.

**b) Compensation**

- v. Wage Employment: Paid at state minimum wage (or local minimum wage if a local ordinance sets the minimum wage higher than the state minimum wage) or higher; or
- vi. Self-Employment: Yields income comparable to persons without disabilities doing similar tasks, and for those self-employed at least one (1) year, the income, when calculated on a per hour worked basis, is at least state minimum wage or the customary wage for that type of employment.

**c) Location**

The work location must be a location typically found in the community: Excludes locations leased, owned and/or operated by contracted service providers or other entities for the primary purpose of employing and/or providing prevocational or vocational training/rehabilitation to people with disabilities.

*Locations leased/owned and/or operated by contracted service providers typically known as a Community Rehabilitation Program (CRP), are not typically found in the competitive labor market.*

**d) Interactions**

When at the work location, the employee with a disability routinely interacts with co-workers and customers/patrons who do not have disabilities to the same extent as a worker without disabilities filling the same or similar position would interact with co-workers and customers/patrons who do not have disabilities.

Co-workers and customers/patrons do not include supervisors or provider agency staff providing supported employment or personal care supports to the employee with a disability.

**e) Individualized Position**

The person is employed or self-employed in a distinct position. This means:

- vii. The person is not sharing a job with another person(s) with disabilities that the business would consider to be one job, unless those sharing a position are working at different times/days.
- viii. The person is not working in a team (side by side; same work schedule; identical or virtually identical tasks and duties).
- ix. People working in teams of 2 to 8 are considered to be in Group Community Employment, not CIE. This exclusion applies regardless of the service title and billing code used for waiver-funded supports needed to work.

Members receiving Supported Employment – Small Group Employment Support Services must be paid wages that commensurate with their productivity and all local, state, and federal laws governing any aspect of employment must be followed. All new Small Group Employment Support Services sites must be approved by DHS to assure the site meets the HCBS setting rules.



Supported Employment services do not include vocational or related services provided in facility-based work settings.

Supported Employment services do not include volunteer work. Such volunteer learning and training activities that prepare a person for entry into the paid integrated workforce may be addressed through community-based pre-vocational services.

When Supported Employment – Individual Employment Support Services are funded to enable a participant to obtain or maintain individualized competitive integrated employment, the expected outcome is individualized competitive integrated employment where the business or organization, at which the participant will work, is the employer of record. To help ensure choice of provider for this service, both initially and on an on-going basis, the provider of this service should not function as the employer of record, except in very limited circumstances where this is essential to create the initial employment opportunity for the individual. In these circumstances, the provider functioning as employer of record is expected to: (1) make regular documented efforts, using any appropriate strategies, to transfer the employer-of-record role to the business or organization where the participant works, or to a third-party employer-of-record agency (E.g. generic staffing agency the business or organization typically uses) that does not provide Medicaid Waiver services to the participant; (2) maintain a policy that individuals employed through the provider may, if they desire and consistent with Medicaid free-choice-of-provider requirement, choose a different provider of Supported Employment-Individual Employment Support Services at any time and doing so will not jeopardize their continued employment.

In situations where the provider of Supported Employment – Individual Employment Support Services wishes to hire a participant, to work for an organization or entity the provider owns or operates, in a job that meets the definition of individualized competitive integrated employment, the provider shall maintain a policy, and inform individuals receiving the service of the policy, that gives a participant the option to identify a separate provider of Supported Employment-Individual Employment Support Services that can provide the on-going supports the person needs to maintain the job, if a situation arises where the participant wishes to change provider for any reason. This will preserve the Medicaid free-choice-of-provider requirement while not discouraging providers from hiring waiver participants in individualized competitive integrated employment situations.

**Partners with Business Model**

Supported Employment – Individual Employment Support Services may be provided by a co-worker or supervisor provided that the services are not part of the normal duties of the co-worker or supervisor. Employers may be reimbursed for Supported Employment Individual Employment Support Services provided by co-workers or supervisors. Inlusa calls this model “Partners with Business.” This can be a cost-effective, practical strategy that supports a member to work in individualized competitive integrated employment in businesses with the willingness and capacity to augment their commitment to natural supports by offer the member the additional supports needed through available co-worker(s) and/or supervisor(s). This model encourages employers, supervisors, and co-workers to be more directly invested in the success, independence, and performance of the supported employee.

It is recognized that some businesses may prefer this model because they prefer not to have job coaches employed by external agencies. This model may also be preferable for providers if they struggle with recruiting/retaining job coaches in certain areas, or this model of support is more cost-effective than using an agency job coach.

**Providers Paid Under SEOB Model Implementing Partners with Business**

Providers paid through the Supported Employment Outcome Based (SEOB) model have the option of establishing arrangements for supports **that would otherwise be needed by the member and provided by an agency job coach** to be provided by the employer, through a co-worker or supervisor. To implement this model for providing needed supports, the provider enters into an agreement with an individual’s employer to reimburse the employer for supports provided by one or more supervisors and/or co-workers, acceptable to the individual, to enable the person to

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maintain individualized competitive integrated employment with the employer. The provider continues to function as the credentialed Medicaid provider.

Paid employer supports do not include payment for supervision, training, support and adaptations typically available to other non-disabled workers filling similar positions in the business, nor do they supplant natural supports already available to, and negotiated with, the employer for the benefit of the member that is employed by the employer.

The provider must ensure the following as part of utilizing the Partners with Business option:

- A formal written agreement is in place outlining the nature and amount of the supports, above and beyond natural supports, to be provided to the member by the employer, the amount of time necessary for the supervisor(s) or co-worker(s) to provide this support and the cost to the employer for this support, which will be reimbursed by the provider. The agreement should include expectations regarding documentation and billing necessary for the employer to be reimbursed by the provider.
- The supervisor(s) and/or co-worker(s) identified to provide the support to the individual must pass background checks otherwise required for Job Coach. The provider is responsible for ensuring these checks are done (by the employer or provider) and for retaining copies of background check results on file.
- Providing an orientation training to the supervisor(s) and/or co-worker(s) identified to provide the support to the individual which includes the following content:
  - Basic introduction to Supported Employment
  - Explanation of the Partners with Business model of support – what is covered/not covered; expected outcomes
  - Overview of best practices for coaching to promote maximum independence and performance
  - Training specific to the member, including support plan, communication style, learning style, support needs and specific needed related to performing and maintaining his/her job that the supervisor(s) or co-worker (s) is expected to address;
  - Role and availability of the provider in supporting the member, the employer/supervisor, and co-worker(s) providing support to the member;
  - Contact information for the provider, including emergency/back-up cell phone numbers;
  - Documentation requirements necessary for the provider to invoice Includa (based on member hours worked) and make payment to the employer based on the supports provided to the member.
- The provider is available to provide back-up supports and/or additional training/technical assistance for the employer and member whenever this may be needed;
- The provider completes minimum monthly check-ins with the employer and the member.
- Based on all of the above expectations, the provider maintains records of each Partners with Business arrangement for review by Includa at any time or as a part of annual quality monitoring. Records should include, at minimum: current written agreement between the employer and provider as described above; valid copies of background checks; proof of completion of training for supervisor(s) and co-worker(s) providing supports to the member; evidence of monthly check-ins being completed; billing documentation submitted by the employer to support payments to the employer; record of reimbursements made to the employer and tax documents issued to the employer (e.g. 1099 forms) by the provider.

The Partners with Business model may be utilized from the start of a member's employment. Some members may be expected to do their job with only natural supports after a period of enhanced onboarding and training. For these members, the Partners with Business model could be



	<p>established from the date of hire and utilized to provide the supports the member needs during the initial period of employment, tapering off to the point where only natural, unpaid supports are being provided by the employer. In this example, a provider agency job coach is a resource to the member and employer rather than a source of on-the-job supports for the member.</p> <p>The Partners with Business model may also be utilized at any point during employment, if the employer prefers (or the individual prefers and the employer agrees) this type of approach. The Partners with Business model should always be considered when on-going fading of job coaching has stopped occurring, when the amount of job coaching support a member needs exceeds the target support percentage for their assigned tier/phase, and for outliers: either to avoid a member requiring outlier status or to bring an end to a member’s already approved outlier status.</p> <p>The member may receive supports including job coaching to augment, as needed, available employer supports. Job coaching would be provided by the agency billing for the member under the SEOB model and would not be authorized separately. If needed by the member, assistance with transportation and/or personal-care may be separately authorized by Includa, according to individual need.</p>
3.3	<p><b>Supported Employment – Small Group Employment Support Services (Work Crews/Enclaves)</b></p> <p>Work Crews/Enclaves are services and training activities provided in regular business, industry and community settings, not owned and/or operated by the service provider, for groups of two (2) to six (6) workers with disabilities with at least one (1) job coach. Examples include mobile crews and other business-based groups of workers with disabilities performing paid work in a mainstream business setting. Work Crew/Enclave support must be provided in a manner that promotes integration into the workplace and interaction between participants and people without disabilities in those workplaces. The outcome of this service is sustained paid employment and work experience leading to further career development and individual competitive integrated employment for which an individual is compensated at or above the minimum wage, but not less than the customary wage level of benefits paid by the employer for the same or similar work performed by individuals without disabilities.</p>
3.4	<p><b>Job Development</b></p> <p>Job Development refers to services to develop competitive, integrated job offers through direct employer contacts on behalf of specific members who need assistance in their job search. Job Development services are expected to be provided in a ratio of one service provider staff to one member, which means all Job Development efforts billed for a specific member must be for the specific benefit of that member and not a group of individuals seeking competitive integrated employment. However, all job development activities do not have to be done face to face with the individual member. Activities of development include but are not limited to:</p> <ul style="list-style-type: none"> <li>• Assistance seeking and completing business tours, informational interviews and completing applications</li> <li>• Developing a written or visual resume</li> <li>• Practicing interview skills</li> <li>• Conducting a job search with employer contacts being specific to each member</li> <li>• Presentation of the member’s individualized visual resume and negotiation of customized positions with employers</li> <li>• Identifying sustainable transportation options</li> </ul>
3.5	<p><b>Systematic Instruction/Job Coaching</b></p> <p>Systematic Instruction/Job Coaching is the provision of support to members who, because of a disability, need ongoing support to maintain competitive integrated employment (if SE-Individual Services authorized) or employment in a Work Crew/Enclave (if SE-Small Group Services are authorized). Job Coaching services are expected to be provided in a ratio of one service provider staff to one or two members when SE-Individual Employment Supports are authorized or up to 1:6 staffing ratio when SE-Small Group Employment Supports are authorized.</p>

	<p>Job Coaching includes:</p> <ul style="list-style-type: none"> <li>• Engagement of natural supports in appropriate training, support and supervision roles</li> <li>• Assisting natural supervisors, co-workers and trainers to teach the member to perform job duties, and teach the member all workplace policies and procedures, in ways that meet the employer’s expectations</li> <li>• Assisting member to learn and perform job duties, through systematic instruction and other evidence-based strategies, in ways that meet employer’s expectations</li> <li>• Assisting member to learn and follow workplace policies and procedures, and to abide by all expectations of employees established by the employer</li> <li>• Coordination of work related services (such as transportation, personal care assistance, etc.,</li> <li>• Assistance to member/employer on use of assistive technology and other disability related accommodations/resources</li> <li>• Assistance with benefits issues and reporting related to earned income</li> </ul>
3.6	<p><b>Transportation</b></p> <ul style="list-style-type: none"> <li>• In collaboration with the IDT Staff, the coordination of transportation services for a member with an established supported employment position is considered part of Job Coaching and is included in the monthly authorization for that service. This needs to be done in a cost effective, collaborative effort with IDT Staff based on the members work schedule.</li> <li>• Physically transporting a member in a vehicle to/from their place of employment, etc. should be authorized separately by the IDT.</li> </ul>
3.7	<p><b>Personal Care</b></p> <ul style="list-style-type: none"> <li>• <u>Coordination and arrangement of personal care services in partnership with IDT Staff</u> for a member while in their supported employment position is considered part of Job Coaching, and is included in the monthly authorization for that service.</li> <li>• <u>Physically providing the Personal Care (including personal assistance) to a member while on the job</u> is not considered part of Job Coaching and should be authorized separately by the IDT. (if greater than 2 hours per month)</li> </ul>
3.8	<p>To maximize success, independence, and cost-effectiveness, employment service professionals must be effective in <b>fading</b> support and understand when and how to use alternatives to job coaching support. Fading should begin prior to transition from DVR to MCO-funded long-term support. Employers should never be promised a job coach will remain in place at the worksite indefinitely. Employers should understand the expectation and goal of fading the job coach over time, while understanding necessary coaching supports will be provided as and when needed. Where best practice Supported Employment is implemented, including a good job match and effective job coaching, steady fading should be occurring over time.</p>
3.9	<p>Members must be given the opportunity to direct some or all of their Supported Employment Services whenever possible to the extent of their ability and desire. The Inclusa teams must determine the member’s ability and/or desire to direct services by assessment and by observation and address this in the member’s plan.</p>
<b>4.0</b>	<b>Units of Service and Reimbursement Guidelines</b>
4.1	<p><b>Supported Employment</b></p> <p><b>SPC 615 (Procedure Code T2019 – quarter hour)</b></p> <p>Service is billed with the indicated SPC and procedure code at the unit rate as defined in Appendix A of the Provider Subcontract Agreement.</p> <p style="padding-left: 40px;">T2019, UP – group 3-8 members, per 15 min</p>

**Supported Employment Outcome Based Model (SEOB)**

(Will be fully implemented for all providers by 7-1-21):

- One (1) Unit = 15 minutes
- Employment Personal Care
- Work Crews / Enclaves

**For Job Development** for competitive integrated employment, outcome payment is based on a tiered model created to incentive providers to service members with even the greatest challenges to obtaining competitive integrated employment. The model uses logic based on characteristics of a member’s long-term care functional screen (LTCFS), which is used to determine a member’s individual capitation amount. The range of possible individual-level capitation amounts are divided evenly into four tiers for the purpose of establishing tiered outcome payments for Job Development.

One Unit/One Time for Job Development

**For Job Coaching** payment is based on member hours worked.

Payment is authorized as One Unit/Month and paid according to the number of hours a member works per month, member acuity tier, and graduated time on the job (in months).

Provider payment is determined based on an hourly rate negotiated between MCO and provider. This rate is broken down into twelve (12) per-hour-worked rates based on target percentages for job coaching when a member at a certain acuity level has been working for a certain length of time, Member tiers are identified using logic based on the characteristics of a member’s LTCFS, which is used to determine a member’s individual capitation amount. The range of possible individual-level capitation amounts are divided evenly into four payment tiers for the purpose of provider reimbursement. Providers will maintain documentation to validate the hours the Member has worked.

Based on the length of time a member has been in their job, provider reimbursement per hour worked will decrease based on a graduated matrix.

Member acquisition of an additional community, integrated job would result in an additional authorization for job coaching.

Promotion within the current employer which increases member job duties **and** changes member job title could result in additional job coaching support from the provider. Therefore, provider may request to revert to the first payment tier (0-11 months) of the job coaching model.

Member change in job duties or tasks within the same position at the same employer is considered in the current job coaching tiered payment model.

Seasonal jobs should be tracked the same as jobs where members work year-round and tracked accordingly. For “off months”, provider should negate months worked from the total and resume “months on the job” the next season start date.

Providers need to minimally maintain monthly contact with the Member and Employer to assure both parties are satisfied. Providers will list Employer, Hourly wage and length of time on the job in the comments section of their billing form when submitting for authorizations to Inclusa.

<b>Job Development</b>			
<b>Member Acuity</b>	<b>One Time Payment</b>	<b>Code</b>	
Tier 1	\$1600.00	Y1098	
Tier 2	\$1200.00	Y2098	
Tier 3	\$900.00	Y3098	

4.2

Tier 4	\$650.00	Y4098				
<b>Job Coaching</b>						
<b>Member Acuity</b>	<b>0 – 11 Months</b>		<b>12 - 24 Months</b>		<b>25 + Months</b>	
<b>Job 1</b>						
	<b>Code</b>	<b>Graduated Matrix</b>	<b>Code</b>	<b>Graduated Matrix</b>	<b>Code</b>	<b>Graduated Matrix</b>
Tier 1	Y1000	95%	Y1012	78%	Y1025	60%
Tier 2	Y2000	80%	Y2012	60%	Y2025	45%
Tier 3	Y3000	60%	Y3012	40%	Y3025	30%
Tier 4	Y4000	35%	Y4012	30%	Y4025	24%
<b>Job 2</b>						
	<b>Code</b>	<b>Graduated Matrix</b>	<b>Code</b>	<b>Graduated Matrix</b>	<b>Code</b>	<b>Graduated Matrix</b>
Tier 1	Y1200	95%	Y1212	78%	Y1225	60%
Tier 2	Y2200	80%	Y2212	60%	Y2225	45%
Tier 3	Y3200	60%	Y3212	40%	Y3225	30%
Tier 4	Y4200	35%	Y4212	30%	Y4225	24%
<b>Outlier</b>	Y5000	Member Specific				

**Job Coaching “Outlier” Determination**

An Outlier determination will only be considered if all conditions are met on the **INCLUSA Long Term Employment Support Outlier Checklist** and one of the following criteria is met:

1. Member has been required by the court to have 24-hour supervision (as indicated on LTCFS-Protective Service Order).
2. Member has outstanding/ongoing issues involving criminal behavior which prevent the fading of support on the job without creating undue risk to safety of others who the member would typically come in contact with during employment.
3. Member’s LTCFS analysis results in a new payment tier determination which selected provider, IDT, and DVR staff (if involved) feel is insufficient to support the member to successfully maintain his/her integrated employment.
4. Member has unique support challenges, as determined by Inclusa CR/PR team, in consultation with the member’s provider and IDT, that prevent or delay fading in which case outlier status may be granted on a temporary basis, subject to the provider implementing an approved plan to fade job coaching to an appropriate level given the member’s acuity and length of time on the job.

*\*\*If a member needs additional services such as Transportation or Personal Care during Job Coaching, Inclusa will consider authorization of these services separately.*

4.3	<b>Remote Waiver Services and Interactive Telehealth</b> Provider must include modifier 95 when submitting claims for services that are delivered remotely or through telehealth.
<b>5.0</b>	<b>Staff Qualifications and Training</b>
5.1	<b>Caregiver Background Checks</b> – Providers will comply with all applicable standards and/or regulations related to caregiver background checks and comply with Appendix H from the Inclusa Subcontract Agreement.

5.2	Staff that provide services shall complete required training within six months of beginning employment unless training is needed before the staff can safely provide the service.
5.3	Provider agency must orient and train their staff on the Family Care Program, Includa, and Community™, the trademarked care management model of Includa. Support materials regarding the Family Care Program and Community™ are available on the Includa website at <a href="http://www.includa.org">www.includa.org</a> .
5.4	<p>The provider agency must ensure that staff have received training on the following subjects pertaining to the individuals served:</p> <p>Competence means possessing the knowledge, skills and attitudes necessary to perform a job properly. Necessary knowledge, skills, and attitudes are developed through an ongoing process of learning, doing, and reflection. Employment Service agency managers are directly responsible for building the competencies of their personnel. The following training framework provides a general understanding of the overall expectations of the MCO in regard to integrated employment services, as well as resources and tools that providers can draw on as they work within their organizations toward excellence in employment services. This framework calls out four primary knowledge areas for employment service professionals:</p> <p><b>Employer and Community Relations</b></p> <p>Employment service providers interact with, and rely on, a number of stakeholders, including employers, family members of job seekers, schools, funders, and the community at large. Promoting integrated employment is a value-based proposition that, to be successful, requires a full understanding of the needs, interests, concerns and potential objections of all stakeholders. To achieve successful outcomes, employment service providers must establish a vast network of connections and demonstrate excellent written and verbal communication skills.</p> <p><b>Use of Resources</b></p> <p>Job seekers with disabilities face multiple barriers to employment and generally rely upon multiple “systems” (both formal and informal) for support. To maximize and effectively coordinate the resources with a job seeker, employment service professionals must be knowledgeable about a variety of resources and understand when and how to incorporate them into a job seeker’s planning process.</p> <p><b>Assessment and Planning</b></p> <p>To achieve individualized integrated employment outcomes, an employment service professional must use objective, strengths-based assessment and planning techniques to understand the goals, interests, strengths, skills, and needs of each job seeker.</p> <p>The following chart lays out the essential knowledge areas for employment support professionals. These represent broad categories, within which employment service providers can select from available trainings or craft new learning opportunities for staff. Trainings identified with # are required for all Employment Services Agency staff.</p>

	<p><b>Employer &amp; Community Relations</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Networking and Connecting</li> <li><input type="checkbox"/> Disability Etiquette</li> <li><input type="checkbox"/> Disclosing Disability</li> <li><input type="checkbox"/> Messaging Integrated Employment#</li> <li><input type="checkbox"/> Presentation, Sales, and Negotiation</li> <li><input type="checkbox"/> Employer Incentives</li> <li><input type="checkbox"/> Customized Employment: Employer Discovery and Job Negotiation</li> </ul>	<p><b>Use of Resources</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Long-Term Care (Inclusa specifically)</li> <li><input type="checkbox"/> Division of Vocational Rehabilitation</li> <li><input type="checkbox"/> School Transition Programs</li> <li><input type="checkbox"/> SSA Work Incentives</li> <li><input type="checkbox"/> One-Stop Services</li> <li><input type="checkbox"/> Local Non-Profit and Community Resources</li> <li><input type="checkbox"/> Blending and Braiding Resources</li> </ul>		
	<p><b>Assessment &amp; Planning</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Strengths-based Assessment Methods#</li> <li><input type="checkbox"/> Customized Employment: Discovery Process</li> <li><input type="checkbox"/> Person Centered Planning Principles Self-Determination</li> <li><input type="checkbox"/> Career Exploration Techniques</li> <li><input type="checkbox"/> Effective Job Search Tools and Techniques</li> <li><input type="checkbox"/> Customized Employment: Planning Meeting, Profile, and Visual Resume</li> <li><input type="checkbox"/> Motivational Interviewing</li> <li><input type="checkbox"/> Meeting and Team facilitation</li> </ul>	<p><b>On The Job Supports</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Requesting Accommodations</li> <li><input type="checkbox"/> Workplace/Cultural Analysis</li> <li><input type="checkbox"/> Job Duty and Task Analysis</li> <li><input type="checkbox"/> Systematic Instruction</li> <li><input type="checkbox"/> Assistive Technology#</li> <li><input type="checkbox"/> Workplace Personal Assistance</li> <li><input type="checkbox"/> Facilitating Natural Supports</li> <li><input type="checkbox"/> Disability Awareness</li> <li><input type="checkbox"/> Self-Directed Supports</li> </ul>		
	<p>Provider Agency shall provide the necessary staff training and development to ensure the highest quality service is provided to members. The employment services provider shall ensure the following training is met for all staff:</p> <ul style="list-style-type: none"> <li>• Applicable regulatory/licensure training requirements</li> <li>• Member Target Group Specific training</li> <li>• Member Rights and Responsibilities training</li> <li>• Documentation/Data Collection and Reporting training</li> <li>• Confidentiality training</li> <li>• Medication Management and/or Administration Training, as applicable</li> </ul> <p>Provider shall provide and maintain adequate staffing to meet the needs of members referred by MCO and accepted by provider.</p>			
5.5	Staff shall be trained in recognizing abuse and neglect and reporting requirements.			
5.6	Services provided by anyone under the age of 18 shall comply with Child Labor Laws.			



<b>6.0</b>	<b>Supervision and Staff Adequacy</b>
6.1	The provider agency shall maintain adequate staffing to meet the needs of members referred by Inlusa and accepted by the agency for service.
6.2	Providers must have an acceptable backup procedure, including notification of member and agency when provider is unable to show for a scheduled visit.
6.3	<p>Provider agency will ensure:</p> <ul style="list-style-type: none"> <li>• Staff are supervised and assessed to assure they are working effectively and collaboratively with members by conducting adequate on-site supervision and review.</li> <li>• Performance issues with staff are addressed promptly and Inlusa teams are kept informed about significant issues that affect the Inlusa member.</li> <li>• Supervisory staff are involved in assessment, goal planning and tracking, and supervision for Inlusa members.</li> <li>• Provider staff are working collaboratively and communicating effectively with Inlusa staff.</li> </ul>
<b>7.0</b>	<b>Service Referral and Authorization</b>
7.1	The Inlusa team will provide a written service referral form to the provider agency which specifies the expected outcomes, amount, frequency, and duration of services.
7.2	<p>The provider agency must notify the Inlusa team within <b>2</b> business days of receiving a referral regarding the ability to accept the member for services. The notification should also include the anticipated start date or any delays in staffing by the requested start date.</p> <p>Providers in the Supported Employment Outcome Based Model (SEOB) must accept all referrals made for all members authorized. The authorization/agreement and resulting services can only be severed in consultation and agreement with Inlusa’s IDT staff and a team member from the Employment and Community Connections Team. Any decision not to accept a referral or sever an agreement based on an authorization of service, requires Inlusa’s Employment &amp; Community Connections Team approval. Failure to adhere could result in contract termination. (Model fidelity)</p>
7.3	The Inlusa team will issue a new written referral form when the tasks assigned, amount, frequency or duration of the service changes.
7.4	The provider agency will retain copies of the referral forms in the agency file as proof of authorization.
7.5	<p><b>Authorizations for Member Services</b></p> <p>The Inlusa Provider Portal is used by providers to obtain information about current authorizations. In addition, the provider must use the portal to acknowledge all new authorizations. The provider agency is responsible for ensuring that only currently employed and authorized staff have access to the provider portal, and for using the member authorization information available on the portal to bill for services accurately.</p> <p>For authorization needs such as new authorizations, additional units, or missing authorizations, during normal Inlusa business hours (8:00 a.m. to 4:30 p.m.) the provider should contact the Inlusa team (Community Resource Coordinator or Health and Wellness Coordinator).</p> <p>If your authorization request is an emergent need impacting the member’s health and safety and you cannot reach the Inlusa team:</p> <ul style="list-style-type: none"> <li>• During Inlusa business hours – call 877-622-6700 and press 0 for assistance.</li> <li>• After Inlusa business hours – call 877-622-6700 and press 9 to be connected to our after-hours support.</li> </ul> <p>Questions regarding billing or claims for current Supported Employment authorizations and requests for Provider Portal assistance should be directed to the Inlusa Transportation-Employment Support Team at <a href="mailto:ACS-Transportation-Employment@inlusa.org">ACS-Transportation-Employment@inlusa.org</a> or 888-544-9353, ext. 4.</p>

7.6	<p><b>Remote Waiver Services and Interactive Telehealth</b></p> <p>Provider may not require members to receive a service via interactive telehealth or remotely if in-person service is an option.</p> <ol style="list-style-type: none"> <li>1. Remote Waiver Services <p>Remote waiver services are waiver services delivered using audiovisual communication technology that permits 2-way, real-time, interactive communications between a provider and a member. Remote waiver services do not include communications delivered solely by audio-only telephone, facsimile machine, or electronic mail. The IDT cannot require the use of remote services to authorize the service.</p> <p>The IDT must first determine the service is necessary to support an outcome by using the RAD or other Department approved alternative and then determine whether it can be authorized remotely.</p> <p>To authorize a waiver service for remote delivery, the IDT must:</p> <ol style="list-style-type: none"> <li>a. Determine that the service can be delivered remotely with functional equivalence to face to face as the in-person service. Functional equivalence exists when there is no reduction in quality, safety, or effectiveness of the in-person service because it is delivered by using audiovisual telecommunication technology.</li> <li>b. Obtain informed consent from the member to receive the service remotely.</li> <li>c. Determine that the member has the proper equipment and connectivity to participate in the service remotely. The MCO is not required to provide the proper equipment and connectivity to enable the member to access the service remotely.</li> </ol> </li> <li>2. State Plan Services via Interactive Telehealth <p>Interactive telehealth is telehealth delivered using multimedia communication technology that permits 2-way, real-time, interactive communications between a certified provider of Medical Assistance at a distant site and the Medical Assistance recipient or the recipient's provider.</p> </li> </ol>
<b>8.0</b>	<b>Communication, Documentation and Reporting Requirements</b>
8.1	<p>Inclusa communicates with providers regularly in the following formats:</p> <ul style="list-style-type: none"> <li>• Vendor forums</li> <li>• Mass notifications via email, fax, or mail</li> <li>• Notices for expiring credentialing</li> </ul> <p>Notices are sent to providers via email when the provider has email available to ensure timeliness of communication.</p> <p>Provider agencies are required to ensure Inclusa Community Resources/Provider Relations (CR/PR) staff, Inclusa teams, guardians and other identified members of the interdisciplinary team for a member have accurate and current provider contact information to include address, phone numbers, fax numbers, and email addresses.</p> <p>Providers can update their information by contacting Provider Relations at 877-622-6700 (select Option 2, then Option 3) or <a href="mailto:ProviderRelations@inclusa.org">ProviderRelations@inclusa.org</a>.</p>
8.2	<p>The provider agency shall report to the Inclusa team whenever:</p> <ol style="list-style-type: none"> <li>1) There is a change in service provider</li> <li>2) There is a change in the member's needs or abilities</li> <li>3) The member or provider is not available for scheduled services (within 24 hours unless an alternate date is scheduled between provider and member)</li> </ol>
8.3	<p>Providers will notify MCO of formal complaints or grievances received from MCO members within 48 hours of receipt. Written notification of completed complaint investigations will be forwarded to the Inclusa interdisciplinary team.</p>

8.4	Inclusa interdisciplinary team will receive timely, accurate, and comprehensive information relating to the services provided (e.g. treatment plans, progress notes, etc.).
8.5	<p><b>Member Incidents</b></p> <p>Providers will communicate and report all incidents involving an Inclusa member to the Inclusa Interdisciplinary Team (IDT) – the Community Resource Coordinator (CRC) or the Health and Wellness Coordinator (HWC) within <b>24 hours</b> via phone, fax or email.</p> <p>If the reporter is unable to reach the CRC or HWC, they may leave a message reporting details of an incident that has been resolved and did not result in serious harm or injury to the member.</p> <p>If the incident is not yet resolved or resulted in serious harm or injury to the member, the provider must attempt to contact the IDT via phone. If unsuccessful, call 1-877-622-6700 and ask to speak to a Member Support Manager or Regional Operations Senior Manager to immediately make a report. If a manager is unavailable, the provider will speak with the receptionist to be redirected or leave a message.</p> <p>All reported incidents will be entered into the Inclusa Incident Management System and reported to DHS in accordance with MCO contract requirements. Providers may be asked to provide any additional information or details necessary to complete the investigation of reported incidents. The provider will inform Inclusa when notifying their regulatory authority of incidents. A copy of the report may be submitted as a form of notification.</p> <p>Both Inclusa and contracted providers must comply with all state regulations and rules as outlined in the <b>Provider Incident Reporting Policy and Training</b> document, available on the Inclusa website at <a href="http://www.inclusa.org">www.inclusa.org</a>.</p>
8.6	<p>The provider agency shall give at least 30 days’ advance notice to the Inclusa team when it’s unable to provide authorized services to an individual member. The provider agency shall be responsible to provide authorized services during this time period.</p> <p>Incident reporting resources and training are available in the Providers section of the Inclusa website at <a href="http://www.inclusa.org">www.inclusa.org</a>.</p>
8.7	<p>Employment Service Providers shall maintain documentation consistent with applicable standards of care for the profession.</p> <ul style="list-style-type: none"> <li>• The Employment Service provider must have a written policy and procedure for cancellation of service when the center is closed/service will not be operated. <u>Provider shall include procedures for notifying member and Inclusa IDT staff.</u></li> <li>• The Employment Service provider shall have a written procedure to assure that services are provided as assigned and scheduled.</li> <li>• The Employment Service provider shall have a written Complaint/Grievance procedure, which includes notification of MCO when a formal complaint is received, and its resolution when attained.</li> <li>• If a member is receiving Employment Services and displays challenging behaviors, a positive written behavior support plan must be developed and implemented in collaboration with Inclusa IDT staff.</li> <li>• Employment Providers are required to report monthly wages of Inclusa members receiving income to the local Social Security Office.</li> </ul> <p>Measuring and evaluating outcomes associated with the purchase of employment services is an essential aspect of ensuring quality and cost-effectiveness. To this end, Employment Service Providers shall report employment outcome data as requested by Inclusa for the months of March, June, September, and December. The required data is wages, hours worked and employer.</p> <p><b>Job Development</b></p> <p>Provider’s documentation file for each member shall include documentation that DVR services were exhausted before authorization of services under this agreement. This documentation file shall also include a copy of the member’s assessment, job development plan, ongoing services being provided, and monthly progress reports, if applicable.</p>

	<p>Within 2 weeks of job development completion, Provider shall prepare and submit a written report to Inclusa IDT detailing job development services rendered and progress gained/outcomes achieved. Outcome report shall contain the following elements:</p> <ul style="list-style-type: none"> <li>• Description identifying the procedures and process used during job development</li> <li>• Dates, amount of time, and description of activities provided during the past month</li> <li>• Member’s and developer’s progress towards each goal or skill related to employment</li> <li>• Reasons or suggestions for any lag or lack of progress</li> <li>• Names and dates of businesses contacted on behalf or with member</li> <li>• Dates and times of future scheduled meetings or follow-up calls on member’s behalf</li> </ul> <p><b>Systematic Instruction/Job Coaching</b></p> <p>Provider’s documentation file for each member shall include a copy of the member’s assessment, job development plan, ongoing services being provided, and monthly progress reports, if applicable. If requested, Provider shall prepare and send a written report to Inclusa IDT detailing job coaching services rendered and progress gained/outcomes achieved/ongoing goals. Progress reports shall contain the following elements:</p> <ul style="list-style-type: none"> <li>• Member name, provider agency, contact person and contact information</li> <li>• Employer Name and Location</li> <li>• Member’s job title, wage, average hours/month, and length of time on job</li> <li>• Results of Member’s most recent Employee Performance Evaluation or Most recent supervisor feedback <ul style="list-style-type: none"> <li>○ If concerns are noted, identify steps being taken by provider to address</li> </ul> </li> <li>• Identify areas of strength or concern for member regarding employment including, but not limited to: <ul style="list-style-type: none"> <li>○ Personal hygiene</li> <li>○ Transportation</li> <li>○ Timeliness</li> <li>○ Interaction with Co-workers</li> <li>○ Attendance</li> <li>○ Quality of Work</li> </ul> </li> <li>• Identify whether the member is interested in additional job duties at their current position or an additional job in the community.</li> </ul>
8.8	<p><b>Communication: What Provider Can Expect from MCO</b></p> <p>A strength-based, collaborative relationship with providers is one of the most effective means to achieve positive outcomes for Inclusa members. To ensure a true partnership with Inclusa providers, Inclusa staff are expected to:</p> <ul style="list-style-type: none"> <li>• Consistently maintain respectful communication and relationships.</li> <li>• Respond to provider phone calls and emails within one (1) business day of receipt unless staff are out of the office and an expected date of return is communicated via Inclusa’s phone or email messaging system.</li> <li>• Arrive promptly for scheduled meetings and contact providers as soon as possible when a meeting must be delayed or cancelled.</li> <li>• Identify themselves and their role with Inclusa to staff of provider agencies through an introduction and by wearing a Inclusa ID badge.</li> <li>• Communicate anticipated contacts with a member to provider staff in advance of the planned visit to ensure the member, and any staff needed to assist with the discussion, are available.</li> <li>• Show consideration and respect for facility or provider agency staff by informing them of Inclusa staff presence upon arrival when an unplanned visit is warranted.</li> <li>• Consult with providers when member-specific information is needed, especially in situations where the member may not report accurate information and family has limited</li> </ul>

	<p>contact. Many providers have daily contact with members and can readily report changes that help staff to accurately assess changes in a member’s functional abilities or needs.</p> <ul style="list-style-type: none"> <li>• Inform the member that he/she can invite representatives of provider agencies to be part of the Interdisciplinary team, if desired.</li> <li>• Encourage the member to invite appropriate providers to participate in six-month and annual review meetings or relevant portions of review meetings.</li> <li>• For members who are not receptive to provider participation in review meetings, consistently update providers of new information needed to ensure the provision of appropriate services and supports.</li> <li>• For members receiving residential services, offer the provider a copy of the Member Centered Plan and relevant updates.</li> <li>• Inclusive IDT shall inform Provider within five (5) business days if/when there is a change in the assigned Community Resource Coordinator or Health &amp; Wellness Coordinator for a member.</li> </ul>
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<b>9.0</b>	<b>Quality Assurance</b>
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9.1	<p><b>Purpose</b></p> <p>Inclusa quality assurance activities are a systematic, departmental approach to ensuring and recognizing a specified standard or level of care expected of subcontracted providers. These methodologies are established to review and inspect subcontracted provider performance and compliance.</p> <p>Inclusa will measure a spectrum of outcomes against set standards to elicit the best picture of provider quality.</p> <p style="padding-left: 40px;">Inclusa provider quality assurance practices:</p> <ol style="list-style-type: none"> <li>1) Establish the definition of quality services,</li> <li>2) Assess and document performance against these standards, and</li> <li>3) Detail corrective measures to be taken if problems are detected.</li> </ol> <p>It is the responsibility of providers and provider agencies to maintain the regulatory and contractual standards as outlined in this section. Inclusa will monitor compliance with these standards to ensure the services purchased are of the highest quality.</p> <p>Resulting action may include recognition of performance at or above acceptable standards, working with the provider to repair and correct performance if it is below an acceptable standard, or action up to termination of services and/or contract should there be failure to achieve acceptable standards and compliance with contract expectations.</p>
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9.2	<p><b>Quality Performance Indicators</b></p> <ul style="list-style-type: none"> <li>• Legal/Regulatory Compliance- evidenced by regulatory review with no deficiencies, type of deficiency and/or effective and timely response to Statement of Deficiency</li> <li>• Education/Training of staff- Effective training of staff members in all aspects of their job, including handling emergency situations. Established procedures for appraising staff performance and for effectively modifying poor performance where it exists.</li> <li>• Performance record of contracted activities-       <ul style="list-style-type: none"> <li>○ tracking of number, frequency, and outcomes of Inclusa Incident Reports related to provider performance</li> <li>○ tracking of successful service provision (member achieving goals/outcomes, increased member independence and community participation, etc.)</li> </ul> </li> <li>• Contract Compliance- formal or informal review and identification of compliance with Inclusa contract terms, provider service expectation terms, applicable policies/procedures for Inclusa contracted providers</li> </ul>
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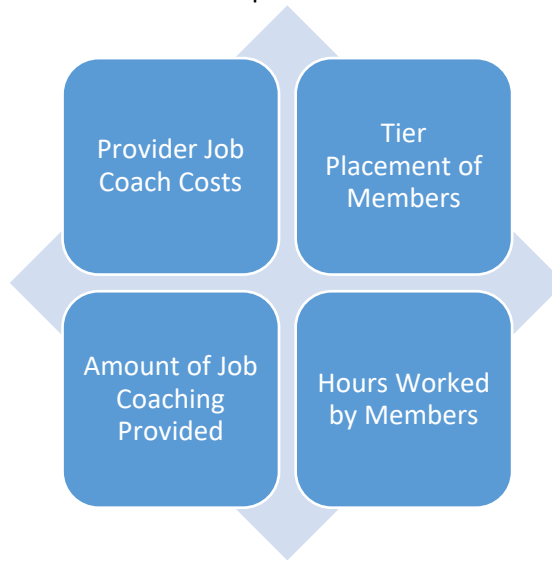
	<ul style="list-style-type: none"> <li>• Availability and Responsiveness- related to referrals or updates to services, reporting and communication activities with Inclusa staff.</li> </ul>
9.3	<p><b>Inclusa Sources and Activities for Measuring Provider Performance</b></p> <ul style="list-style-type: none"> <li>• Member satisfaction surveys</li> <li>• Internal or external complaints and compliments</li> <li>• Onsite review/audits</li> <li>• Quality Teams- as assigned based on significant incidents, trend in quality concerns or member-related incidents.</li> <li>• Tracking of performance and compliance in relation to the subcontract agreement and appendices</li> <li>• Statistical reviews of time between referral and service commencement</li> </ul>
9.4	<p><b>Expectations of Providers and Inclusa for Quality Assurance Activities</b></p> <ul style="list-style-type: none"> <li>• <b>Collaboration:</b> working in a goal oriented, professional, and team based approach with Inclusa representatives to identify core issues to quality concerns, strategies to improve, and implementing those strategies</li> <li>• <b>Responsiveness:</b> actions taken upon request and in a timely manner to resolve and improve identified issues. This may include submitted documents to Inclusa, responding to calls, emails, or other inquiries, keeping Inclusa designated staff informed of progress, barriers, and milestones achieved during quality improvement activities</li> <li>• <b>Systems perspective to improvement:</b> approaching a quality concern, trend, or significant incident with the purpose of creating overall improvements that will not only resolve the issue at hand, but improve service and operations as a whole</li> <li>• <b>Member-centered solutions to issues:</b> relentlessly striving to implement solutions with the focus on keeping services member-centered and achieving the goals and outcomes identified for persons served</li> </ul> <p>Inclusa is committed to interfacing with providers to collaboratively and proactively discuss issues identified with processes and assist with implementing improvements and reviewing the impact of the changes as a partner in the mission to serve members.</p>
9.5	<p align="center"><b>Inclusa Supported Employment Outcome Based Payment Model for Job Coaching Policy and Process for Conducting Regular Review of Outcome Payment Levels Updated April, 2021</b></p> <p><b><i>Reasons for Regular Review</i></b></p> <p>Inclusa recognizes the critical importance of competitive integrated employment opportunities for members and the vital role that Supported Employment-Individual job coaching providers play in enabling members to experience and enjoy the benefits of working in competitive integrated employment. Given this, Inclusa is committed to ensuring that Supported Employment-Individual job coaching providers have a payment model that incentivizes best practices and expansion of capacity to meet member needs, while also ensuring providers experience financial sustainability by implementing best practices and growing capacity. Evaluating payments for member hours worked is an important part of ensuring providers’ success. Additionally, federal expectations regarding outcome-based reimbursement for Supported Employment-Individual services include verification, at regular intervals, that the assumptions used to set the payments-per-hour-worked remain accurate. Finally, federal regulations require that rates for services are consistent with efficiency, economy and quality of care [SEC. 1902. [42 U.S.C. 1396a] (a) 30 (A)].</p> <p><b><i>Frequency of Review</i></b></p> <p>Based on internal staff and contracted provider input, the planned frequency of review is every third year, starting in CY2021. Based on three-year cycle, the next year after CY2021 will be</p>



CY2024. Provider participation in the review process will be required through the provider contract starting in CY2021.

***Elements of Review***

There are four essential elements of the review process:



Provider Job Coaching Costs

In the calendar year in which the review is occurring, providers will be asked to submit cost worksheets, in format prescribed by Inclusa, for each job coach they employ to support Inclusa members. These cost worksheets will be requested once during the review year, in the fourth quarter.

Amount of Job Coaching Provided

In each targeted review year, data will be collected from providers for a designated two-week period in each quarter to ensure a representative, longitudinal set of data to evaluate the appropriateness of the outcome payment levels. Providers will be asked to have their job coaches collect data on their time spent and miles driven supporting each Inclusa member in competitive integrated employment. Job coaches will use a data collection sheet prescribed by Inclusa. Providers will be asked to report cumulative data from job coaches for each member, and report total job coaching time and mileage in established categories, on a reporting form prescribed by Inclusa.

Hours Worked by Members

For the designated two-week period in each quarter, providers will also be expected to report data on the hours worked by each Inclusa member they support in competitive integrated employment through an SEOB authorization.

Tier Placement of Members

Inclusa will review all tier placements members supported in competitive integrated employment through an SEOB authorization. The analysis will include updating the Long-Term Care Functional Screen dollar ranges associated with each tier, looking at the spread of members across tiers for each provider and overall, and further identifying individual members that would change tiers as a result of implementing the updated regression model. The analysis will then identify all members that fall into each tier/phase combination, evaluating their hours worked and level of job coaching for each provider and overall.

A Note on Outliers

The SEOB model allows for the identification of individual members who, for a specific period of time, are determined to be outliers in terms of the SEOB model assumptions and therefore, are reimbursed on a fee-for-service basis, using the 15-minute unit rate that is established by Inclusa at the time of authorization. This 15-minute unit rate reflects job coach costs reported by the

participating provider pool and verified by Inlusa during the most recently completed SEOB review. Because these authorizations fall outside of the SEOB payment methodology, they are not included in the review of the SEOB payment model described in this document. Appropriate use of the outlier option is reviewed for each provider at the annual Best Practice Review completed by Inlusa.

**Analysis**

Inlusa will evaluate all data at three levels:

- Provider level
- GSR level
- Organization-Wide level

The payments-per-hour-worked will not be adjusted in the year following a review if Organization-Wide provider net income is no more than 10%, or if Organization-Wide net loss is no more than 10%. Organization-Wide provider net income will be calculated by combining each provider’s net income and determining the percentage of total Organization-wide payments to providers this net income represents. Net income is defined as gross income received through the SEOB payment model, less gross cost calculated using the total job coaching hours provided multiplied by the established fee-for-service job coaching rate, less deductions for documented and approvable provider reinvestments in their respective Supported Employment programs. An example to illustrate is as follows:

<b>PROVIDER A</b>	
Total hours worked by members supported in CIE through SEOB model during the four (4) two-week periods for which provider submitted data.	2,000
Total gross income earned for cumulative member hours worked during the four (4) two-week periods for which the provider submitted data.	\$22,000
Total job coaching hours during the four (4) two-week periods for which the provider submitted data.	500
Total cost of job coaching cost based on total job coaching hours X fee-for-service job coaching rate.	\$16,000
<b>NET INCOME OR LOSS TO PROVIDER</b>	<b>\$6000</b>
Provider reinvestment in SE program: <ul style="list-style-type: none"> <li>• 8 Job Coaches getting additional certificate-based training from expert source outside of agency.</li> </ul> <i>Note: Cannot be more than 100% of net income to provider. See page 5 for approvable examples.</i>	\$4,000
<b>NET INCOME AFTER REINVESTMENT</b>	<b>\$2,000</b>
<b>ORGANIZATION-WIDE: Net Income or Loss</b>	
Provider A (after reinvestment)	+\$2,000
Provider B (after reinvestment)	+\$8,000
Provider C (after reinvestment)	+\$4,000

Provider D (after reinvestment)	+\$15,000
Provider E (before reinvestment)	-\$2,000
Provider F (before reinvestment)	-\$6,000
Provider G (after reinvestment)	+\$1,000
Provider H (before reinvestment)	-\$5,000
Provider I (after reinvestment)	+\$1,000
<b>TOTAL NET INCOME OR LOSS</b>	<b>+\$17,000</b>
<b>Total Includa SEOB Payments</b>	<b>\$280,000</b>
<b>Organization-Wide Net Income or Loss</b>	<b>+6%</b>
<b>Change in Payments-Per-Hour-Worked</b>	<b>NO</b>

In a year where the Organization-Wide evaluation shows net income of no more than 10%, any providers showing a net loss (before reinvestment) will be offered technical assistance to identify and correct the issues; but the payment-per-hour-worked will not be changed. Similarly, in a year where Organization-Wide evaluation shows a net loss of no more than 10%, all providers showing a net loss (before reinvestment) will be offered technical assistance to identify and correct the issues; but the payments-per-hour-worked will not be changed.

In a year where Organization-Wide evaluation shows net income above 10%, the target job coaching percentages and/or the job coaching fee-for-service rate will be adjusted down the following year, based on the results of the data analysis, to bring Organization-Wide net income to no more than 10%. Likewise, in a year where Organization-Wide evaluation shows a net loss of more than 10%, the target job coaching percentages and/or the job coaching fee-for-service rate will be adjusted up, based on the results of the data analysis, to bring Organization-Wide net loss to no more than 5%. This establishes enhanced down-side risk protection for providers, as a mechanism for encouraging more providers to participate in Includa’s network of Supported Employment-Individual providers.

**Review Timeline**

<b>Milestone</b>	<b>Timeframe</b>	<b>Example Year: CY2022</b>
Providers notified of start of review year and schedule for all data collection and reporting they must follow.	January 7, 2022	January 3, 2022
Providers receive all data collection and reporting forms for review process.	January 17, 2022	January 17, 2022
Providers can access virtual training on all of the data collection and reporting forms.	January 31, 2022	January 31, 2022
Quarter 1 data collection for job coaching and hours worked.	First two weeks of March	March 1-14, 2022
Quarter 1 cumulative data report for job coaching and hours worked due to Includa	Two weeks after March data collection period ends	March 29, 2022
Quarter 2 data collection for job coaching and hours worked.	First two weeks in June	May 29 -June 11, 2022

Quarter 2 cumulative data report for job coaching and hours worked due to Inclusa.	Two weeks after June data collection period ends	June 27, 2022
Quarter 3 data collection for job coaching and hours worked.	Second and third weeks in September	September 11 - 24, 2022
Quarter 3 cumulative data report for job coaching and hours worked due to Inclusa.	Two weeks after September data collection period ends	October 7, 2022
Quarter 4 data collection for job coaching and hours worked.	Second and third weeks in November	November 13 - 26, 2022
Quarter 4 cumulative data report for job coaching and hours worked due to Inclusa.	Two weeks after November data collection period ends	December 9, 2022
Providers submit job coach cost worksheets.	4 <sup>th</sup> quarter of review year (Oct-Dec)	October-December, 2022
Inclusa pulls all member tier data for members working in CIE and reported in each provider's Quarter 4 cumulative data report.	End of CY	December 31, 2022
Inclusa conducts analysis of all data and determines any adjustments needed to the payments-per-hour-worked.	1 <sup>st</sup> quarter of year following review year	January-March, 2023
Inclusa shares results of review with providers; receives leadership approval for adjustments needed and supported by the review process.	2 <sup>nd</sup> quarter of year following review year	April-June, 2023
Inclusa adjusts payments-per-hour worked as needed and supported by the review process.	Start of 3 <sup>rd</sup> quarter of year following review year	July 1, 2023

***Examples of Approvable Provider Reinvestments in Their Supported Employment-Individual Programs***

These examples represent a non-exhaustive list of pre-approved provider reinvestment strategies. Additional strategies may be utilized if prior approved by Inclusa.

- Increasing job coach and/or job developer wages across the board or based on evidence of exceptional performance in the prior year, where criteria for measuring performance are consistently defined and fairly applied for each position type
- Investment in recruiting and hiring additional job coach and/or job developer capacity

- Investment in establishing a larger geographic footprint (service area) within Inclusa’s Geographic Service Regions where Supported Employment-Individual Services will be offered to Inclusa members
- Financing additional training for job coaching and/or job development staff, or a designated Supported Employment-Individual program manager, above and beyond training required to be qualified to provide these services
- Investment in recruiting and hiring additional Supported Employment-Individual program manager capacity in response to increase in job coaching and/or job development staff
- Funding of a “rainy day” fund for Supported Employment-Individual services, where the fund is separately established in financial records and accounting/audit reports, with policy adopted that limits use of this fund only to expenditures directly related to Supported Employment-Individual services and expenditures documented/reported to Inclusa as part of annual financial reporting by the provider
- Maintaining membership to National APSE

***Utilization of Billing and Data Audits***

Inclusa retains its authority, under existing contracts, to audit SEOB billing by providers at regular intervals and/or at any point in time Inclusa deems it necessary and prudent to conduct a billing audit. Furthermore, Inclusa will establish the right, through provider contract language starting in CY2021, to audit provider data submissions for SEOB payment model reviews at any point in time Inclusa deems it necessary and prudent to conduct an audit of the data submissions by one or more providers.