

**Pre Vocational Services**

Compliance Standards

September 2014  
Presenters: Gayla Harken  
Lisa Schwanke



Information is not intended to constitute an offer of insurance or any other financial product. The user is responsible for determining the applicability of the information and for determining the most relevant law, statute, or regulation that may apply to the user's particular situation. The Iowa Association of Community Providers does not warrant the accuracy or legality of the information contained herein.

---

---

---

---

---


---

---

---

**What we will cover:**

- Provider Accreditation/ Certification Requirements
- Scope of Pre-Voc Services
- Documentation Requirements
- Units of Service
- Effect of CMS location standards



---

---

---

---

---


---

---

---

**Accreditation/Certification**

- IAC 441 Chapter 77
  - IAC 77.25 (8) – Habilitation Services
  - IAC 77.37 (26) – ID Waiver Services
  - IAC 77.39 (22) – BI Waiver Services



---

---

---

---

---

---

---

---

**Accreditation/Certification**

- **Habilitation Pre-Voc (con't):**
  - IAC 77.25(8) Accreditation/Cerification:
    - Accredited by the CARF as an organizational employment service provider or a community employment service provider.
    - Accredited by the CQL in Supports for People with Disabilities.
    - Accredited by the International Center for Clubhouse Development.
    - Certified by the department to provide pre-voc services under The HCBS ID or BI Waiver

---

---

---

---

---

---

---

---

**Accreditation/Certification**

- **Habilitation Pre-Voc (con't):**
  - Must be enrolled as a provider of Habilitation services with Magellan of Iowa
- **HCBS ID Waiver:**
  - 77.37(26) Accreditation
    - CARF as a work adjustment service provider or an organizational employment service provider.
    - The Council on Quality and Leadership.

---

---

---

---

---

---

---

---

**Accreditation/Certification**

- **HCBS BI Waiver:**
  - 77.39 Beginning January 1, 2015, new providers and each of their staff members involved in direct consumer service must have completed the department's online brain injury training course prior to service provision. Persons trained previously do not have to retake training.
  - 77.39(22) Accreditation
    - CARF as a work adjustment service provider or an organizational employment service provider.
    - The Council on Quality and Leadership.

---

---

---

---

---


---

---

---

**Scope of Service**

Prevocational services are services that provide **learning and work experiences**, including **volunteer work**, where the **member can develop general, non-job-task-specific strengths and skills that contribute to employability in paid employment in integrated community settings. They are time-limited.**



---

---

---

---

---

---


---

---

**Scope of Service**

Services are intended to teach general skills such as:

- **Ability to communicate effectively with supervisors, co-workers and customers;**
- **Generally accepted community workplace conduct and dress;**
- **Ability to follow directions;**
- **Ability to attend to tasks;**
- **Workplace problem solving skills and strategies;**
- **General workplace safety; and**
- **Mobility training.**



---

---

---

---

---

---


---

---

**Scope of Service - Exclusions**

Pre-voc services are not:

- **Services defined in Section 4(a)(4) of the 1975 amendments to the Education of the Handicapped Act (20 U.S.C. 1404(16) and (17)) that are otherwise available to the member through a state or local education agency.**
- **Vocational rehabilitation services that are otherwise available to the member through a program funded under Section 110 of the Rehabilitation Act of 1973 (29 U.S.C. 730)**



---

---

---

---

---

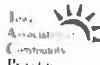
---

---

---

**Goals**

- Members receiving prevocational services must have employment-related goals.
- The general habilitation activities must be designed to support such employment goals.
- Competitive, integrated employment in the community is considered to be the optimal outcome of prevocational services.



---

---

---

---

---


---

---

---

**Goals**

- All services must be authorized in the person's services plan. Consider including an overall statement such as:
  - Larry needs prevocational services to improve his ability to follow direction, stay focused on and complete work assignment, and to learn problem solving and safety skills so that he can be competitively employed in the community.



---

---

---

---

---


---

---

---

**Scope of Service - Goals**

- Goal:
  - Larry wants to learn job skills so he can work in the community.
- Objective:
  - Larry will follow safety rules the entire day 80% of all work days for 3 consecutive months.



---

---

---

---

---


---

---

---

**Documentation of Services**

- Must show implementation of service plan goals – be skills focused
- Must justify the time billed
- Must include all requirements of IAC 79.3c(3)




---

---

---

---

---

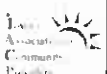
---

---

---

**Documentation of Services - Example**

- Larry arrived at work at 8:45. Staff checked to assure he was wearing safe clothing and shoes, staff praised him for wearing his work boots and jeans and asked if he had his goggles. He showed staff his goggles and put them on. Staff checked on him through out the morning to ensure he following safety rules and continued to wear his goggles. Each time he was staff praised him. When staff check on him at 11:20, Larry was using the nail gun without wearing his goggles and he was pretending to shoot it at his co-workers. Staff unplugged the nail gun and discussed the consequences of not following safety rules, Larry laughed and stated he was just having fun. . . .




---

---

---

---

---

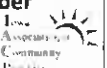
---

---

---

**CMS HCBS Setting Final Rule**

- States have 5 years to come into compliance. In anticipation of this the new HCBS provider manual states:
  - Prevocational services may be furnished in any of a variety of settings in the community **other than the member's private residence, the provider administrative offices or other settings that have the effect of isolating the member form the greater community.**




---

---

---

---

---

---

---

---

### CMS HCBS Setting Final Rule

This is not consistent with current rule but is consistent with the CMS final rule on HCBS settings in discussing this with LeAnn Moskowitz, IME Program Manager, she shared the following:



---

---

---

---

---

---

---

---

### CMS HCBS Setting Final Rule

- We have included the CMS setting requirements / language in this manual as these are the federal requirements effective March 17, 2014.
- CMS has clearly stated that the setting requirements apply to all HCBS, however CMS and the state recognizes that providers will only be required to fully comport with these requirements based on the guidance yet to be provided by CMS and the implementation dates that CMS approves within Iowa's Transition Plan.



---

---

---

---

---

---

---

---

### CMS HCBS Setting Final Rule

- The state will draft administrative rules that will coincide with those Federal requirements and the state's approved transition plan <http://dhs.iowa.gov/ime/about/initiatives/HCBS>

---

---

---

---

---

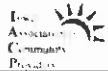
---

---

---

**CMS HCBS Setting Final Rule**

Providers should anticipate that IAC rules will be updated to comply with these new requirements within the next 6 months to a year and plan their services accordingly.



---

---

---

---

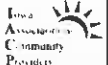
---

---

---

---

**Questions**



---

---

---

---

---

---

---

---