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DATE: April 12, 2018

FROM: Curtis Cunningham, Assistant Administrator
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Department of Health Services

A handwritten signature in black ink, appearing to read 'Curtis Cunningham'.

RE: Memo Regarding Prevocational Services in Wisconsin Medicaid Long Term Care

Recently there have been concerns expressed that Family Care managed care organizations and IRIS Consulting Agencies are implementing time limits for prevocational services. While this memo seeks to outline the current definition allowable prevocational services, I want to first confirm that there are no time specific limits for prevocational services. The Department of Health Services (DHS) has issued guiding principles and established a goal to promote and support competitive integrated employment. However, as stated in the guiding principles, this initiative does not limit or impact the provision of prevocational services compliant with home and community based services.

Under current policy and contracts, prevocational services are designed to create a path to competitive integrated employment (CIE) which an individual is 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. Prevocational services are expected to occur over a defined period of time as determined by the individual and his or her team in the ongoing member-centered planning process. Prevocational services, regardless of how and where they are delivered, are expected to help people make reasonable and continued progress toward participation in at least part-time, integrated employment.

Wisconsin follows the Centers for Medicare and Medicaid Services' guidance regarding prevocational services. The guidelines state that waiver funding is not available for the provision of vocational services delivered in facility based or sheltered work settings, where individuals are supervised for the primary purpose of producing goods or performing services. The distinction between vocational and pre-vocational services is that pre-vocational services, regardless of setting, are delivered for the purpose of furthering habilitation goals *such as attendance, task completion, problem solving, and interpersonal relations and safety*, as outlined in the individual's person-centered services and supports plan.

In both Family Care and IRIS, the individual must indicate and document a goal of competitive integrated employment in order to receive prevocational services. The team will review the progress toward this goal every 6 months. There are no time limits designated within Family Care in order to achieve the individuals' competitive integrated employment goal in prevocational services. It is up to the Interdisciplinary team staff and the member in Family Care

to determine the amount of time needed to reach their competitive integrated employment goal. IRIS however, states in their policy manual, “if the individual has not successfully achieved and maintained an integrated employment outcome within two years, although demonstrable, reasonable, and continued progress has been made, the participant and IRIS consultant must meet to determine what actions have been taken and which have been successful or unsuccessful and a new action plan must be developed that reflects the discussion.” There are no time limits designated within IRIS in order to achieve the individuals’ competitive integrated employment goal in prevocational services. It is up to the Participant and their IC to assess progress toward CIE and if revision of the goal or services is necessary. MCO’s and ICA’s are directed to follow the definition for prevocational services. If an individual does not have a competitive integrated employment goal, does not want to work in CIE, or is not making progress toward a community job, the authorization for a prevocational setting must be reevaluated. In the event that prevocational services are discontinued, the MCOs and ICAs must ensure that the individual has other programming in place that provides them with a meaningful and integrated life.

If there are decisions made that the individual or legal decision maker disagree with, both Family Care and IRIS have a grievance and appeals process. Interdisciplinary teams and IRIS consultants can assist individuals with the grievance and appeal process for their programs.