

**ADT REDESIGN QUESTIONS AND ANSWERS
PROVIDER AND WAIVER SUPPORT COORDINATOR WEBINARS**

OCTOBER 14 AND 18, 2022

PREVOCATIONAL SERVICE (LIFE SKILLS DEVELOPMENT – LEVEL 4)

What will be the daily rate for the provision for Prevocational services? It is anticipated that Prevocational rates will align with hourly Adult Day Training rates found in the iBudget Waiver Rate table.

Why limit Prevocational service to 36 months? What if the client is unable to achieve or maintain employment within that time?

The federal waiver limits Prevocational services to 36 months. If the client is unable to obtain employment during this time, they may be able to receive services through Vocational Rehabilitation to assist with employment. Additionally, clients may need to access services such as Adult Day Training, Companion, or Supported Employment, depending on their needs and personal goals.

Can a client participate in Prevocational service and Adult Day Training during different hours of a day?

Yes.

Can a client do Prevocational services and Adult Day Training on different days? For example, Adult Day Training on Monday, Wednesday, Friday and Adult Day Training on Tuesday and Thursday.

Yes. It must be based on the client's needs.

What are the criteria to receive 1:3 Prevocational service?

It is anticipated that the criteria will match Adult Day Training services. This can be found in the [iBudget Waiver Handbook](#).

Can a stipend of minimum wage be given during the training phase of Prevocational services?

The successful outcome of Prevocational services is competitive, integrated employment in the community for which the client is compensated at or above the minimum wage. A stipend that is used for services or to defray expenses, such as an internship or apprenticeship, can be allowed during the training phase of Prevocational services. Stipends cannot be used to replace existing staff. The client must be the primary beneficiary of the employment or training, not the company.

Will transportation services be billable between Prevocational services and Adult Day Training?

Yes.

Can the Prevocational service director also be the Adult Day Training program director?

Yes.

What is competitive and integrated employment in a community integrated setting?

Competitive and integrated employment is work performed on a full-time or part-time basis for which an individual is compensated at or above the minimum wage and not less than the customary rate paid to employees without disabilities, and at a location where employees interact with other individuals without disabilities.

Will providers still have to offer Career Counseling Information and Referral training (CCIR)?

Vocational Rehabilitation (VR) provides this course through specially trained providers. Questions about CCIR should be addressed with VR.

How can the Waiver Support Coordinator (WSC) receive progress notes from VR providers?

APD and VR have an Interagency Memorandum of Agreement which allows agency staff to share client information as needed.

Will APD provide curriculum for Prevocational services?

No. Providers will need to ensure they are providing Prevocational services in accordance with the client's individualized needs and support plan, and in accordance with the service description.

What are Prevocational services?

Prevocational services include offering learning and work experiences where the individual can develop general, non-job-task-specific skills that lead to competitive employment such as communication skills, problem solving skills, workplace conduct and workplace safety. This can include volunteer work.

What if a client wants Prevocational services, but upon completion they are unable to move towards Supported Employment?

Clients can receive Prevocational services for up to 36 months. After completion of Prevocational services, other meaningful day options are available based on the client's needs. This might include Supported Employment, Companion, or Adult Day Training.

What about areas that are very limited in community businesses?

VR can assist clients who are seeking jobs. If VR services are not available, Supported Employment Coaching services may be an option. Supported Employment services may include job carving and development based on a client's needs and skills.

Can Prevocational services and Adult Day Training be at the same site?

Yes. Prevocational services may be rendered in the same building as Adult Day Training only if there are two separate groups. Services may be provided in a variety of locations in the community and are not limited to fixed-site facilities.

How do Prevocational services differ from a vocational program that we already include during Adult Day Training?

Prevocational services are not the same as vocational services provided by VR. Waiver services must not duplicate vocational services provided by VR pursuant to 42 CFR §440.180(c)(2)(i), Code of Federal Regulations.

If the current facility has been approved as a non-residential setting will this transfer to Prevocational services?

No. Providers who wish to provide Prevocational services will need to follow the established process for requesting expansion.

Can Prevocational services include paid work during the skill building steps?

Yes.

Can Prevocational services include the use of 14c for paid work during the vocational skill building steps?

Yes. iBudget Florida waiver clients accessing Prevocational services will be eligible for compensation below the minimum wage. However, subminimum wage services are not available during day habilitation services such as Adult Day Training. Waiver funding is not available for the provision of vocational services (e.g., sheltered work performed in a facility) where individuals are supervised in producing goods or performing services under contract to third parties.

Will Prevocational services take clients away from Adult Day Training?

Prevocational services are an additional service option for clients. WSCs can assist clients in accessing services based on their needs and personal goals.

How does APD intend to monitor implementation of Prevocational services?

APD CMS Compliance staff will utilize the iBudget assessment tool for Non-Residential Settings to monitor the implementation of Prevocational services and provide technical assistance as needed.

Will the providers be required to employ SE coaches to provide prevocational services? Will they have specific training and competencies?

No. Prevocational services and Supported Employment services are distinct services.

ADULT DAY TRAINING (LIFE SKILLS DEVELOPMENT – LEVEL 3)

Can Adult Day Training providers offer volunteer opportunities to assist with community integration and creating valued social roles?

Yes. Volunteering can occur during Adult Day Training if it is not related to employment or prevocational services.

If an Adult Day Training provider owns a thrift store in their building, will the clients be able to work there?

An Adult Day Training provider can hire clients to work for them. However, providers cannot bill for iBudget waiver Adult Day Training services while clients are being paid to work since work experiences are no longer part of day habilitation services.

Can Adult Day Training providers continue to teach job skills, such as stocking shelves or woodworking, or is this now considered Prevocational services?

No. Job training is no longer part of Adult Day Training services. However, clients can receive job training through other services, such as Prevocational.

Is it true that clients can no longer go off site and work on mobile work crews such as a mobile car wash or lawn crew?

No. Although this is no longer part of Adult Day Training, this can be part of the Supported Employment group model if the services are at or above minimum wage.

How will APD address the Qlarant employment training requirement?

APD will work with Qlarant to update the ADT assessment tool to reflect the service changes, as well as on the development of a new Prevocational assessment tool.

Can providers that are currently billing Adult Day Training services and paying clients minimum wage to work on production contracts continue to do so in the same building using Supported Employment services?

Yes.

Are clients still able to go out for on-the-job training during Adult Day Training?

Job training is no longer part of Adult Day Training services. However, clients can receive job training through other services, such as Prevocational.

Will support plans be updated to reflect service changes?

Yes, support plans should be updated if the client's needs and goals change.

What is the effective date of service changes?

Florida has until March 2023 to come into compliance with the federal HCBS setting rule. APD will notify providers of key dates that are part of the implementation.

If clients are not capable of working in the community, will they be able to remain in Adult Day Training?

Yes, a client or legal representative can choose Adult Day Training services.

Will individuals who transition from Adult Day Training offsite to group Supported Employment need go through VR if they are already working a job in the community?

No.

Where does this leave those folks who have paid work activity and are at retirement age? Are we to end what they have taken on as their identity and self-worth after many years?

Adult clients can choose from Life Skills Development services. Adult Day Training services can provide clients who do not desire to work with meaningful day options in the community.

Will Adult Day Training providers use iConnect?

Yes. In the future, Adult Day Training providers will be able to use APD iConnect.

SUPPORTED EMPLOYMENT SERVICE (LIFE SKILLS DEVELOPMENT – LEVEL 2)

Can you explain what Supported Employment would look like in a group model?

Group Supported Employment can include models such as enclaves, mobile crews, and entrepreneurial approaches. Group models can be a bridge to individual Supported Employment based on the client's interests and goals for employment. Group models are helpful to clients particularly when constant paid supervision of a client is required.

Will clients have to go through VR to receive Supported Employment?

Clients should be referred to VR for Supported Employment services (phase 1) when they express the desire to obtain employment. However, clients can receive Supported Employment services (phase 2) from APD if they already have competitive integrated employment at or above minimum wage, have been found ineligible for VR services, or have been through the VR program, reached job stabilization, and have been closed to VR.

Does seasonal/temporary work qualify for Supported Employment?

Yes, but only if it is at or above minimum wage as part of community integrated employment.

SUBMINIMUM WAGE AND 14(C) CERTIFICATES

Many believe this rule, if implemented, will eliminate 14C programs (subminimum wage). Does APD believe they can only make a rule that eliminates Adult Day Training that have 14C programs to receive waiver funding?

APD does not make decisions regarding 14c arrangement. The HCBS settings rule does not eliminate 14c arrangements. iBudget Florida clients accessing Prevocational services will be eligible for compensation below the minimum wage. However, subminimum wage services are not available during day habilitation services, such as Adult Day Training. Waiver funding is not available for the provision of vocational services (e.g., sheltered work performed in a facility) where individuals are supervised in producing goods or performing services under contract to third parties.

Can a client receive Adult Day Training for 3 days and work on a 14c arrangement during the other two weekdays?

Yes. This arrangement should be based on the client's needs and goals and in accordance with waiver coverage and limitations.

PROVIDER EXPANSION

When adding Prevocational services to an individual's cost plan, how do we know which providers have this service available?

Effective November 10, 2022, iBudget waiver providers who meet the expansion requirements can begin to add Prevocational services to their services array. Contact the APD Regional office for a list of enrolled providers.

ACCESSING WEBINARS AND OTHER INFORMATION

Is this recording going to be shared with attendees? And will this PowerPoint be available?

Yes. All recordings and relevant webinar documents are posted on the APD website at: <https://apd.myflorida.com/providers/supported-employment>

OTHER INFORMATION

Where is the rule on the changes for Adult Day Training?

All AHCA rules (including the iBudget Handbook and Rate Table) can be found on their website at the following links.

Rules in process:

<https://ahca.myflorida.com/medicaid/review/Rules.shtml>

Main AHCA rule website for all final rules:

<https://ahca.myflorida.com/medicaid/review/index.shtml>