

EMPLOYMENT PREPARATION SERVICE (EPR)

Transition Plan

The Department of Human Services (DHS) is passionate about strengthening and supporting DHS employment services. The Employment Preparation Service (EPR) represents the efforts of DHS and our partners to support individuals who choose prevocational services as part of their service plan to develop the skills and have the experiences needed to lead their desired lives.

The Employment Preparation Service Transition Plan provides general guidance to our service partners to strengthen business operations that focus on prevocational supports in a manner that is consistent with the guidance provided by the Centers for Medicare and Medicaid Services (CMS) regarding the Settings Final Rule and prevocational services.

The transition to Employment Preparation Services does not represent a policy of closing traditional day programs. While day services will continue to be part of the DHS service continuum, future opportunities of funding and supports may become more readily available to the provider agencies increasing their supported employment efforts and services.

Terminology:

Competitive Integrated Employment:

Competitive Integrated Employment means work performed by individuals with disabilities in the community alongside people of all abilities; performed for a non-service provider or business; compensated at or above minimum wage or comparable to people without disabilities who work in the same place and perform the same or similar work; and with equal access to opportunities for advancement and benefits.

Employment First Priority:

Employment First is a national initiative that encompasses policies, legislation, and system change efforts leading to increased community-based employment for people with disabilities. Employment First is a belief that community-based, integrated employment should be the primary day activity for working age youth and adults with disabilities. It supports an overarching goal that all persons with disabilities should have access to integrated work settings most appropriate for them, including the supports necessary to help them succeed in the workplace. Employment First does not mean

employment only and does not deny individual choice, but is intended to increase employment opportunities for individuals with disabilities.

Settings Final Rule:

The Settings final rule supports enhanced quality in home and community-based programs and adds protections for individuals receiving services. The rule reflects CMSs' intent to ensure that individuals receiving services and supports through Medicaid's home and community-based programs have full access to the benefits of community living, are able to receive services in the most integrated setting, and have independence in making life choices.

Description and Purpose of the EPR Service:

Employment Preparation Service (EPR) provides individualized learning and work experience (including volunteer work) for Persons to develop general strengths and skills through training by the service provider that contribute to employability in Competitive Integrated Employment. Persons receiving EPR may also receive other employment-related services outside the time EPR is being provided. The ultimate outcome of EPR is to obtain Competitive Integrated Employment. You can view the service code description [here](#).

Planning Preparation:

The Person-Centered Support Teams (PCSTs) should meet with each individual to discuss whether EPR will provide the most appropriate type of support and to discuss informed choice through information, options, and experiences to pursue competitive integrated employment.

Goal Setting:

EPR requires the development of an employment-based goal that will prepare an individual for competitive and integrated employment (CIE). The goal should outline an individualized employment purpose for the service. The goal should also: identify a specific, time-limited outcome; strategies to build and retain one or more pre-vocational skills; and continuous steps to reach informed choice for employment. The employment-based goal for a Person shall be developed and initiated within the PCSP prior to EPR service delivery.

EPR or Vocational Rehabilitation:

Individuals who are interested in CIE should work with their PCSTs to determine the best approach to skill acquisition for their desired employment goals. This approach may include EPR, or the individual may be best supported by accessing Vocational Rehabilitation services.

Licensing EPR Settings:

As a licensed service, EPR requires all service providers to obtain and maintain the appropriate license issued by the DHS Office of Licensing, be it site-based or in the community. The DHS Office of Licensing

will work with EPR service providers delivering supports which are entirely in the community to issue a license for these situations.

Monitoring:

EPR requires particular elements of service provision to maintain compliance with the Settings Final Rule. These elements include;

- 20% of service provision must occur in the community, outside of the site-based setting, based on the Person's direction, choice, needs, and preferences for activities.
 - This percentage is calculated on a monthly basis.
 - Monitoring will include a determination of percentage of time spent participating in chosen community activities.

- Ensure compliance with [42 CFR § 440.180\(c\)](#)
 - This percentage is calculated on a quarterly basis.
 - Monitoring will evaluate compliance by comparing wages with hours worked.

Documentation:

Daily and monthly/quarterly documentation shall be pursuant to DHS Procurement No. 90743 and Medicaid requirements in a manner that can be externally validated. Additionally, documentation procedures should contain a process to:

- Determine percentage of time spent participating in chosen community activities;
- Evidence opportunities to develop/plan/participate in chosen community activities; and
- Ensure compliance with 42 CFR § 440.180(c).

Transition Requirements and Timeframe:

PCSTs should convene with sufficient time to assess, plan, and develop strategies to implement EPR or transition to an alternate service, depending on participant need, in accordance with the 6 month transition window for EPR. EPR is a daily service, recommended when a majority of activities, training, and direct support are employment-related.

Subsequent to the release of this guidance, DHS service partners will need to ensure compliance with the EPR service in approximately six (6) months to maintain consistency with CMS guidance. At the end of the six (6) month transition period DHS service partners complete this transition to ensure all individuals attending day services which are primarily focused upon prevocational or vocational activities are supported to ensure delivery of the most appropriate service code.

Referral and Authorization Process:

The authorization process is initiated by the Person's support coordinator subsequent to the person-centered choice to begin the EPR service. Referral and authorization for the EPR service is managed through the DSPD Request For Services (RFS) system.

During the 6-month transition period, PCST's can receive approval for the EPR service in two ways, depending on individual need:

- Approval into EPR that will not adjust rate from current service levels
 - PCST's can contact the DSPD Employment and Community Integration Program Administrator by email with an explanation of the change, duration of service request, and any additional documentation. (See EPR Recommendations under Resources below)
- Approval into EPR that will result in an adjustment to the rate
 - PCST's must submit an RFS for review

At the end of the 6 month transition period:

- Day Supports service codes will be adjusted to disallow service provision which is vocational in nature.
- All individuals attending services within a daily sheltered workshop model transition from utilizing the DSG code to the EPR code if choosing to continue with pre-vocational supports.
- All pre-vocational employment supports and training activities are performed by the contractor under the EPR code.

Resources:

Training Support:

-[USU Workplace Supports](#)

-[ACRE Training](#)

Informational Resources:

-[DSPD Employment First](#)

-[DSPD Training](#)

Technical Assistance:

-Monitoring:

oqdproviderquality@utah.gov

-Direct Service Provision:

Community Integration Program Administrator

Bryn Peterson (brynpeterson@utah.gov)

-Contracts:

Chandler Mentee (cnmentee@utah.gov)

Service Comparison Assistance and Fact Sheets:

-[DSPD EPR Webpage](#)

-[Comparison Day Supports vs. EPR](#)

-[Comparison: Supported Employment vs. EPR](#)

-[EPR Fact Sheet](#)

-[EPR Scenarios](#)

-[EPR Recommendations](#)

-[Requesting or Continuing EPR](#)

-[Individual and Family FAQ](#)