

## **Frequently Asked Questions for Providers and Support Coordinators: Employment Preparation Services (EPR)**

### **Section 3: General Information**

**Question:** *If someone is in SED making subminimum wage in an enclave, do they need to switch to a different code?*

**Answer:** After March 17, 2022 EPR will be the only service available to support a person in sub-minimum wage work. This includes a person making less than minimum wage working in an enclave. Preparation should be made to help every person making subminimum wages transition to EPR by that date. The service requirements, including the 24-month time limit, still apply. After the 24-month mark the person should be making at least minimum wage in a CIE job, or working in an enclave under the Supported Employment in a group Daily (SED) service code.

**Question:** *I am still confused--I understand CMS requires goals, but not time limits.*

**Answer:** EPR is a prevocational service. Prevocational services are defined by CMS in their current waiver guidance for states as follows: "Services that provide learning and work experiences, including volunteer work, where the individual can develop general, non-job-task-specific strengths and skills that contribute to employability in paid employment in integrated community settings. Services are expected to occur over a defined period of time and with specific outcomes to be achieved, as determined by the individual and his/her service and supports planning team through an ongoing person-centered planning process." As we have engaged with all of you over the last few years and the Centers for Medicare and Medicaid Services (CMS), two years was the time limit accepted in DSPD waiver services. You can find this language in the CMS Technical Guide for waivers 2019 [pages 163-165](#) (full waiver guidance can be found on the [CMS website](#) under the tab '1915 Waiver Processing Tools for States') and the [CMCS Informational Bulletin dated September 16, 2011](#).

**Question:** *There are individuals who like the work experience in the day program. Why does it have to be different?*

**Answer:** EPR was created in response to: Employment First, individual choice, and to comply with federal guidelines from the Centers for Medicare and Medicaid Services (CMS), such as the Settings Rule. Medicaid funds cannot be used for employment or vocational services in a sheltered workshop setting. Sheltered workshops are settings where individuals with disabilities work alongside other individuals with disabilities and

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are typically paid subminimum wage for their work. However, prevocational services can be provided and funded in a sheltered workshop setting if the services are: time-limited; their purpose is to prepare an individual for Competitive Integrated Employment (CIE); and the individual has full access to the greater community. The 24-month time limit was an agreed upon timeline for EPR after meetings with people in services, families, providers and other stakeholders.

**Question:** *For individuals that have community integrated employment for a few hours a week and want to go to a sheltered workshop for the rest of their day, will that still be ok?*

**Answer:** EPR would not be recommended for someone who currently has Competitive Integrated Employment (CIE). Supports should instead be focused on adjusting CIE work hours and responsibilities, finding a second job, or exploring other interests and activities outside of work with the support time. Through person-centered planning the team can work together to understand a person's unique situation, desires, goals, needs, and interests. If EPR is not recommended for the person, but the person is currently engaging in EPR activities, the person needs to make the transition to an alternative service by March 17, 2022. The team should support the person in a smooth transition to services that meet their needs. This includes identifying the reasons the person wants to continue working in the sheltered workshop, and supporting the person to find other activities that can maintain friendships, routines, and skill development.

**Question:** *We have a couple clients that have SEI in their budget and work 10-14 hours a week. When they are not at work they like to attend our program with friends and enjoy the added income to their lives doing the piece work, etc. EPR doesn't seem to fit that because they have SEI in their budget. So would that remain DSG?*

**Answer:** In this situation Day Service Group (DSG) remains a service option for the person, but work related activities will be prohibited under day service codes as of March 17, 2022. Additionally, EPR would not be recommended for someone who is currently working in Competitive Integrated Employment (CIE). Returning to or continuing work in a sheltered workshop or sub-minimum wage job would require specific justification of the prevocational skill the person wants to learn and how that setting will help the person return to CIE. DSPD directs teams to instead identify other community activities, classes, resources, volunteer work, non-vocational day service, or supported living activities as an alternative focus of skill building to meet the person's needs.

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**Question:** *Despite their desire to work, there is a segment of our population that will always require support with habilitation that is not well provided in CIE. How will this be addressed in services, especially in light of shortages of DSPs?*

**Answer:** EPR is for a defined period or time, meaning a person will need to choose a different service at some point. It is a stepping stone to Competitive Integrated Employment (CIE). The level of support needed in EPR can also be offered in CIE. We have heard from many of you that we seem to be limiting choices for people. As with any person, sometimes the options available to us change. Some people may need the opportunity to try CIE to truly understand what their support needs may be.

**Question:** *If someone has EPR in their budget and then gets a job...would we immediately take EPR out of their budget? Or would we have a timeframe to do so?*

**Answer:** When someone who is using EPR supports starts a new job, please use professional judgement on the timing of fading EPR. Having the experience of Competitive Integrated Employment (CIE) is vital to making an informed choice about working. We recognize there will be some situations where either the support team and/or the person is unsure of on-the-job success at the beginning of a new job. You can use EPR and other employment services prior to starting CIE to ensure the job is the best fit and the person is prepared as much as possible. If needed, you can continue EPR support for a few months until the job is stable. It should not typically extend more than a few months.

**Question:** *What if I have more questions?*

More information can be found on the [DSPD website](#) under the 'Providers, SCs, & Staff' tab, then under 'Providers' click on 'Employment Preparation Service (EPR)'. If you have further questions feel free to email [dspdinfo@utah.gov](mailto:dspdinfo@utah.gov), or ask your question directly to Bryn Peterson at [brynpeterson@utah.gov](mailto:brynpeterson@utah.gov) or (385) 228-3122.