



Ohio
Findings and Observations Report
State Employment Leadership Network (SELN)
October 12, 2011 Site Visit

State Agency

Division of Developmental Disabilities (DODD)

Process

- Review of the SELN State Strategic Employment Assessment responses
- Review of state policies, documents and reference materials
- Review of SELN Supplement (stakeholder) Survey responses
- Onsite meeting with state agency leaders, Developmental Disability Planning Council, service providers, families, county board staff and related trade associations
- Develop state employment-focused work plan to guide SELN technical assistance

SELN Project Team

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Introduction

Upon joining the State Employment Leadership Network (SELN), each new member state agency completes the SELN State Strategic Employment Assessment. This comprehensive self-evaluation tool provides a description and analysis of the state's infrastructure for achieving integrated employment outcomes among persons with developmental disabilities receiving publicly-financed support. The state utilizes the online SELN Supplement Survey to gather input from a wider stakeholder group. Using the State Strategic Employment Assessment and the Supplement Survey as a guide, the SELN Project Team conducts an onsite visit with key state developmental disability agency officials, Developmental Disability Planning Council staff, county board staff, providers, and trade and advocacy organizations.

Participants were invited by the state agency with the goal to develop a thorough understanding of the current system of employment supports. Information gathered through

the SELN State Strategic Employment Assessment and site visit is summarized in this *Findings and Observations* report prepared by SELN staff. This report reflects the impressions and information known at the time of the site visit.

This report is formatted to provide the results of the assessment process (Key Findings) and to offer a list of possible system opportunities for improvement (Potential Focus Areas) under each of seven key employment framework areas. DODD and others may use the report as the basis for the development of a work plan detailing the outcomes, goals, and strategies to be pursued in the months and years ahead to improve employment outcomes.

Routine support will be provided by the SELN Project Team through conference calls and onsite meetings to identify the key outcomes to be pursued through SELN participation and to develop effective implementation strategies. Key state staff will be asked to commit to these efforts and partner with the SELN Project Team so activities are both effective and meaningful to the state's efforts.

The SELN Project Team recognizes that the Department of Developmental Disabilities is already engaged in making system improvements towards increased employment outcomes particularly through the Ohio Self-Directed Waiver. These improvements may not be completely reflected in this report due to timing of activities of the new waiver approval, implementation activities and the SELN review.

Abbreviations:

DODD: Department of Developmental Disabilities (Department)

DDPC: Developmental Disability Planning Council

RSC: Rehabilitation Services Commission (state vocational rehabilitation agency)

CBDD: County boards of developmental disabilities

VRP3: Vocational Rehabilitation Public-Private Partnership

I. Leadership

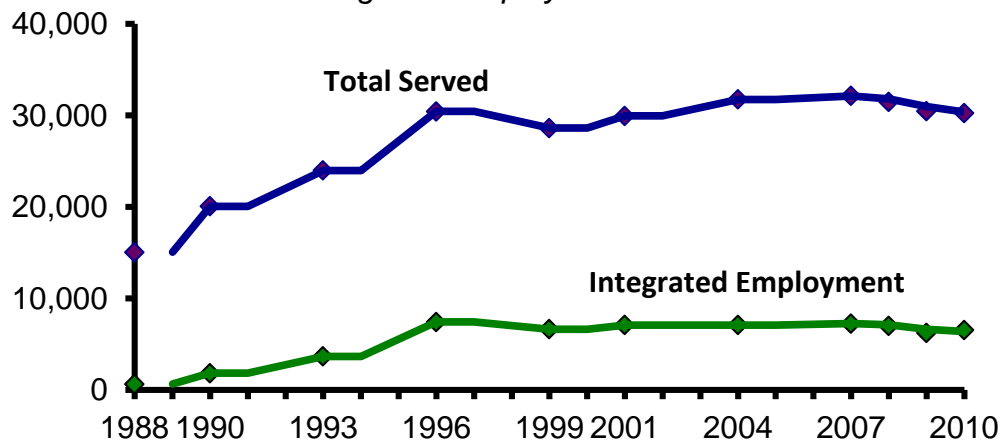
Key Findings

- Ohio's developmental disability service delivery system has long recognized the importance of employment for individuals and their families. Broad support for improved integrated employment outcomes was apparent during the site visit and in the Supplement Survey comments. While this support spans various state agencies, trade associations, individual and family voices, county boards of developmental disabilities (CBDD) and service providers, there is a lack of continuity about which employment outcomes are most important and how to achieve them. Stakeholders, including those participating in the SELN Supplement online survey, agreed on the need for a focused strategy for working together to achieve targeted employment outcomes.
- Employment supports and services vary enormously county by county. This leads to confusion about definitions of integrated employment and the types of available services. In some counties the local community identifies the CBDD and their workshop

services as the priority service option for employment. Efforts to change existing perceptions have been viewed negatively in some counties.

- The Ohio Developmental Disability Planning Council (DDPC) is a strong advocate for individual integrated employment outcomes and is supporting several funding opportunities across the state to promote effective and innovative practices. The DD Council has been researching “Employment First” efforts across the country and is involved with discussions regarding what Ohio’s position will be related to future legislation, Administrative Code (rules), and guidance to the field.
- Efforts are underway in the state to develop a more strategic approach to business engagement through the re-invigoration of the Business Leadership Network. There have been a number of other business-focused efforts, led primarily by RSC including an initiative focused on employment for individuals with Asperger’s Syndrome.
- No mention of an increased emphasis on individual, integrated employment is found in DODD’s Mission, Vision or Values statements as noted on the Department’s website.
- The recent up’s and down’s in the economy have greatly impacted the state, the counties, and service and program options. Many people are placed on a waiting list for services or agree to participate in facility-based programs as an entry point to achieving their goals and eligibility for waiver funding. Given the high unemployment rate it can be difficult to generate optimism about getting more individuals employed.
- In Fiscal Year (FY) 2010 Ohio reported that 21.5% of individuals funded or monitored by DODD participated in integrated employment services. The total reported to receive day or employment services has declined slightly since a peak in 2007, and the total participating in integrated employment services declined slightly since a peak in 1996. National data suggests that the total served across IDD agencies has continued to grow across this period, while the number in integrated employment stopped growing in 2001.

Total served and total in integrated employment: Ohio



- DODD recently hired a new staff person who is responsible for the development of employment policy, strategy and training. This commitment is critical to the Department's involvement both with other state agencies and organizations, as well as staying in sync with what is happening across the state. Providing a point person to receive feedback and keep the Department's efforts on track ensures accountability, particularly if that position has both the authority and responsibility to influence needed systems change.
- To further reinforce the Department's current goals in this area, a useful reference is the 2008 Futures Committee report which references employment-specific recommendations:
 - Create meaningful employment opportunities for individuals with developmental disabilities:*
 - a. Collaborate with private and public entities to enhance employment options.
 - b. Maximize incentives such as Medicaid Buy-In, tax credits, and wage options, for employees and employers.
 - c. Find ways to make community employment a priority and improve school-to-work transition.
- State-level leadership presented a clear interest in taking "best" practice to scale throughout the state in delivery of employment and other supportive services.
- Communication tools include the Pipeline newsletter. This provides an opportunity to highlight positive stories about individual and provider employment outcomes and initiatives.
- The recently formed Ohio Disability Employment Alliance is an emerging organization focused on public policy and advocacy efforts that will increase competitive employment.

Potential Focus Areas

- Revise DODD's Mission, Vision and Value statements to clarify message of employment as a value to Ohioans with IDD and the entire community.
- Establish a clear communication and marketing strategy to both collect and communicate the importance of individualized, integrated employment, and to share success stories and innovations.
 - Use available communication channels, such as the Pipeline and listserv/distribution lists, to communicate.
 - Establish a regular employment-specific electronic news mechanism
 - Work with service and advocacy organizations to build a platform for sharing individual voices seeking alternatives to sheltered workshops and strong paths out of poverty.

- Establish an employment committee to identify and engage local and statewide champions of employment and leadership to create a core DODD workgroup on employment-driven by accountability and commitment to integrated employment. Membership should reflect the leadership and strategic thinking needed to reach Ohio's integrated employment goals including representatives from the key service, advocacy, trade, and family organizations. A smaller committee of key representatives with the authority to implement systems change can also provide guidance to sub-committees focused on specific elements (see the seven framework elements in this report).
- Build on the interest, energies and work that went in to the 2008 Futures Committee recommendations. Many of the items in that report are still extremely relevant and would provide a starting point for developing a work plan.

II. Strategic Goals and Operating Policies

Key Findings

- Stakeholders reported a belief that the current system supports center-based day programs over integrated employment. While some counties have focused on individualized, integrated employment options, most have not. The economy and cost of supporting individuals in integrated jobs are given as reasons why day and congregate services have been utilized so heavily.
- Employment objectives appear to vary from county to county, creating confusion over what services individuals can or should expect.
- There is currently no standardized individual plan (IP) in Ohio, and the IP process does not have a clear focus on employment.
- Counties provide a complex array of services, and report that their identity for fundraising and advocacy within the county budget are often tied to their service structures. About 35 counties continue to operate county schools for children and young adults, and these may provide a direct transition into county facility-based programs. Respondents reported significant investment and political impacts of moving people from county workshop services. The workshop facility is how many know the county boards, and because the boards are significant employers, changes or reductions in staffing have generated negative reactions.
- A common definition of integrated employment is in development for both the SELF waiver and Adult Service rules.
- There is confusion related to allowable group size for enclaves or work crews in supported employment services – some respondents reported there is no group size while adult service rules reference groups would be no larger than 16. These rules can be applied to congregate employment settings such as enclaves. This is potentially an issue in maintaining accurate data on services and integrated employment outcomes,

and in contributing to a lack of clarity about preferred outcomes and the definition of integrated or supported employment.

- Because of county structures, the workshop is often the primary intake point for transition age young adults unless a strong Bridges program or other transition program is in place to educate individuals and staff on existing options.
- The understanding of work incentives varies considerably across various staff and organizations. WIPA resources are not used consistently, and counties vary widely in their expertise in supporting work incentives and the financial transition to employment. This concern is reflected in low levels of participation in work incentives in Ohio. In December 2010, the most recent Social Security Administration (SSA) data available, only 32 individuals with any disability who received SSI were using a Plan to Achieve Self Support (PASS), and 71 were using the Impairment Related Work Expense (IRWE) incentive. Work incentive use is very low across the nation. Expressed as a percent of individuals on SSI who were working, participation rates in these work incentives in Ohio are significantly lower than for the nation as a whole.

Percent of individuals on SSI who are working who use PASS or IRWE

	PASS	IRWE
Ohio	.19%	.43%
Nation	.43%	1.1%

Potential Focus Areas

- Develop a clear employment policy or goal statement that establishes Ohio intent.
- Review the Employment First Resource List (www.seln.org) which is routinely updated and provides examples from many states working to improve integrated employment outcomes through different approaches (e.g., policies, calls to action, legislation, and coalition-building). Begin with revisions to Administrative Code (rule-writing) to build the foundation and set expectations which supports community options first for all aspects of an individual’s life.
- Clarify employment service definitions to assure consistency across HCBS waiver services and adult service options. Design the employment definitions to reflect the specific, expected outcomes and reinforce with rate changes that align with the new definitions. Provide a clear distinction in definitions for individual integrated employment; group supported employment, and group employment that does not meet the standard of integrated or supported employment.
- Review CMS’ definition of group employment (excerpted from the September 16, 2011 CMCS Informational Bulletin): *Supported Employment Small Group employment support are services and training activities provided in regular business, industry and community settings for groups of two (2) to eight (8) workers with disabilities. Examples include mobile crews and other business-based workgroups employing small groups of*



workers with disabilities in employment in the community. Supported employment small group employment support must be provided in a manner that promotes integration into the workplace and interaction between participants and people without disabilities in those workplaces.

- Utilize DODD's county board Accreditation reviews to raise the bar and highlight innovative and promising practices that support higher satisfaction and more evocative employment outcomes for individuals. Placing an additional emphasis on individualized integrated employment during these reviews reinforces the message to day, employment and residential staff that individual, integrated employment is an important outcome for individuals. Further, it provides an opportunity for DODD to collect local barriers and challenges to address, future training/staff competency development ideas, as well as capturing success stories to share with others.
- Review provider development practices to assure approved providers are delivering services that the state wishes to prioritize and not just for traditional services. Consider limiting expansion of facility based services through provider approval system; also give consideration to decreasing in authorizations for facility based services as individuals exit those program models for employment or other community based services and outcomes.
- Identify options for improving access to benefits information and increasing use of Social Security Work Incentives.

III. Financing and Contracting

Key Findings

- Services are funded predominantly through county tax levies; counties receive very little in state funds or for state match, and conversely the state relies on county funds for the state portion of both Medicaid and a portion of vocational rehabilitation services in selected counties. As tax revenues fluctuate it impacts the state's ability to impact the very high number of individuals currently on a waiting list for services. Fiscal year 2012 total DD system funding (as referenced in Director Martin's March 2011 testimony): \$1.136 billion Federal funds (43% of total), \$1.124 billion total local levy funds (43% of total), \$367 million state funds (14% of total) with \$304 million State General Revenue Fund (GRF) and \$63 million State Non-GRF. \$160 mil going to waiver match, but none for day services – and mostly tied to specialized waivers. It is reported that 34% of the total is spent on day services with 66% of the budget supporting institutional services; this reflects the imbalance in funding biased toward sheltered and congregate settings.
- Over the past 5 years there has been a substantial shift from services provided directly by county boards to the use of private providers for day supports. During this period the percent of services provided by private providers has grown from 3% to 37%. This has occurred both through the introduction of new providers, and in some cases through the privatization of county programs. Private providers are more likely to specialize, but have not yet been a force for expanding integrated employment. County providers have

varied accountability In some cases they are Medicaid providers only, in some cases they provide services under contract to counties, and in some cases they do both.

- While the workshop services are viewed as more financially stable because of the settlement process and the relatively high underlying rates for services, county boards paid over \$50 million in excess of what Medicaid reimburses for sheltered workshop services. The Department questions whether the sheltered workshop model is sustainable in the future.
- Ohio supports 7,200 individuals in Intermediate Care Facility for persons with Mental Retardation (ICF/MR) beds (1,200 in state run Developmental Center sites; 6,000 in privately run programs). Day services are built in to the daily rate for these individuals which leads to the providers' choice of activities rather than individuals' choice. Individuals living in ICF/MRs also have no financial incentive to choose integrated employment.
- Rates for services are established using a complex model that considers acuity level, ratios, and location (county), as well as the cost settlement process. Some county boards supplement waiver funded ratios with additional staff using county funds. It was reported that many county boards also make a significant investment in health care and therapy personnel including nursing, physical therapy, and occupational therapy.
- While counties manage services and provider contracts they vary in the level of funding available for federal match and non-waiver services. Because counties control funding decisions these variations mean individuals in one county may be able to access services, such as additional job coaching supports to increase hours worked, while individuals in other counties may instead be directed to the sheltered environment during non-work hours. Additionally, because waiver enrollment would open the individual's access to more Medicaid services (that must be matched by local levy dollars), counties have incentives to limit that exposure by not encouraging people to enroll on waivers and instead to attend the sheltered workshop.
- There are limited funding incentives for providers to support increasing integrated employment outcomes even for individuals who state a preference for work in the community. Current rate structures provide more incentives for providers to offer sheltered services. A survey respondent reported that, "... the financial incentives and policy direction are contradictory. There is not financial incentive from a county board perspective to ... change the business model as they are likely dependent on the dollars which is complicated by the funder also being a provider."
- DODD's current Medicaid waivers have been utilized primarily for residential supports and moving people off waiting lists (through refinancing), but have not typically been utilized to provide individualized, integrated employment supports. The Self Waiver (as a self-directed waiver option) will allow individuals to have control over their own budget.

- The majority of supported employment services is funded with county levy funds and is not provided as waiver services. Concerns include that the rates are too low, that the challenges of managing waiver reimbursement are not worth the limited financial return, and that much of the service time including job development and travel is non-billable because services are required to be face to face to be billable. County boards contend that because waiver services only cover face to face time, 80% of the support provided for supported employment services is not billable. Some respondents also indicated a concern that once an individual is on the waiver it opens the door to other service expenses.
 - Funding for transportation is only available to individuals in supported employment if they are on the waiver.
 - One respondent noted that there is a county subsidizes the \$24/hour waiver Supported Employment- Community rate with county funds to match the provider's rate for the service.
- Enrollment in Ohio's Medicaid Buy-In began in April 2008 and allows individuals to keep resources up to \$10,580 (as of January 2009). The Medicaid Buy-In for Workers with Disabilities (MBIWD) program allows individuals with disabilities who are working to qualify for Medicaid with higher income and resource limits, and buy into Medicaid (health care insurance) by paying a premium based on income. As a longer-term work incentive the Buy-In allows higher resource limits as the individual increases work hours and wages and build assets, but is not well utilized by individuals with intellectual or developmental disabilities. Despite the availability of this option there is limited usage and understanding of how the Buy-In works.
 - At the time the Community Alternative Funding System (CAFS) was closed, Ohio rebuilt rates to ensure county boards would not lose income. This includes accounting for the cost of professional services, such as registered nurses, therapies (occupational, physical, speech language/audiology) which increases the rates to cover such services but which limits counties ability to expand in other areas.
 - Concern was expressed that individuals are sometimes placed in workshops in order to refinance their service package and access waiver services (via a priority on the waiting list). Waiting lists are governed by state law, although counties have a significant amount of implementation discretion. DODD is only aware of individuals on waiting lists for waiver services; no such state list exists for individuals waiting for adult services as defined in the OAC.
 - There was discussion of a trend in county board workshops to pay individuals minimum wage rather than reinforcing the option to work in the community for prevailing wage. This activity way lead down a path that maybe in conflict with the Americans with Disabilities Act, the Olmstead decision and CMS home and community waiver program in support individuals to live inclusively in the fabric of their communities.

Potential Focus Areas

- Assess the service definitions and related rates for supported employment to make it clear the priority is individualized integrated employment. Educate the field regarding strategies in existing rules that job development can be billed when the individual is not present (non-face to face time). A core goal should be to expand the use of waiver funding for supported employment.
- Review existing analyses of the current rates and reimbursement methodology for employment supports. Increase the individual integrated employment-related services rates to support the training, administration, tasks such as follow-along needed for the desired quality outcomes. Assistance with an analysis is available through SELN technical assistance to review the current rate methodology and compare Ohio's rates across service types, to what other states are establishing, and how to amend Ohio's rates. The current rate of \$24/hour for Supported Employment-Community is very low and is not reflective of the actual costs of providing the needed services as well as being impacted by the state's cost-settlement process with counties. In a system already biased toward sheltered workshops or segregated services, the low community rate also serves as a disincentive when compared to the rates for Adult Day Support/Vocational Habilitation (\$58.80) and Supported Employment-Enclave (\$51.61). Also, address the issue of adjusting for acuity level in the current supported employment hourly rate (i.e., the current rate structure does not include a mechanism to account for individuals with higher support levels).
- Work with providers, county board staff and state agency staff to reinforce the importance of prevailing wages and asset development for individuals.
- Assess barriers to expanding the use of waiver funds and develop short and long-term strategies to finance increased integrated employment outcomes
- Investigate policies that require that employment and day supports be provided by a different provider than the one that supports an individual residentially. Indiana recently implemented a policy of this kind to ensure that adequate resources were being allocated to employment and other day opportunities.

IV. Training and Technical Assistance

Key Findings

- There is not an established staff development infrastructure to address competencies and knowledge of best practices in employment service delivery. The Ohio Administrative Code does include certification standards for county board services that are general in nature, differ between service types (e.g., waiver services have different training expectations than adult services), and initial training does not include a requirement to cover competency and skill development in the employment arena. A comment was made during the site visit that the training requirements are expensive and the quality impact is unclear. Additionally it was reported some providers have worked with temporary agencies to avoid these training requirements.

- There is a growing trend in some counties to “close the front door” thus limiting enrollment in certain segregated service options. Additionally some workshops are opening or supporting new options which closely resemble the same workshop options but through privatized arrangements.
- Recommendations in the 2008 MRDD Futures Committee Report include a request to “work collaboratively to develop and implement a plan to increase wages, benefits, training, supervisory support, recruitment, and retention of quality direct support staff” as well as, “explore implementation of a competency-based curriculum for all providers/staff having direct contact with individuals receiving services.” Both recommendations acknowledge the importance and critical nature of highly skilled and appropriately compensated professional staff for all day, employment and residential supports.

Potential Focus Areas

- Provide routine learning opportunities for field staff (e.g., service and support administrators – SSA’s) to be educated on employment best practices, benefits planning, and asset development. Establish staff competency requirements within the waiver, and a process for DODD approval of employment curriculum and staff training requirements.
- Host or co-sponsor employment-focused events such as conferences, summits or forums, to generate interest across the state, and to reinforce the importance of keeping employment-related discussions front and center. These public events also provide excellent leadership opportunities to share best or emerging practices, success stories, and performance data (by county, provider and statewide), while continuing to emphasize quality improvement and raising the bar with a wide group of staff and interested parties.
- Encourage local developmental disability services staff to learn about and utilize the Work Incentives Planning and Assistance (WIPA) projects. WIPAs are authorized to serve all SSA beneficiaries with disabilities, including transition-to-work aged youth, providing benefits planning and assistance services on request and as resources permit.
- Support county boards transitioning away from traditional, segregated services with strategies to rebalance or shift toward integrated community services.
- Develop a parent/student user friendly guide to navigate the adult service system and to message an expectation of employment and asset development. Several states have or are working on a similar product which can serve as an example to get started.
- Review options and develop a statewide mechanism to build a sustainable and competent workforce to deliver quality employment services, i.e. statewide employment

curriculum required for employment providers, a percentage of employment provider staff achieving national certification of employment specialist, etc.

V. Interagency Collaboration

Key Findings

- DODD and the Rehabilitation Services Commission (RSC), the state’s vocational rehabilitation agency, have historically not actively partnered. While efforts have been made over the last two years to improve the collaboration, respondents reported that recent budget constraints and contract changes have slowed the progress. RSC experienced significant cuts in general revenue funding in recent years, and as a result has not been able to draw down its full federal allocation. In FY2011 RSC was unable to draw down \$24 million of its federal allocation. DODD and RSC leadership meet regularly. Collaboration between local vocational rehabilitation agencies and individual county boards varies widely, as reflected in the findings comments below.

These revenue challenges are reflected in a slightly lower level of engagement with individuals when compared to the total state population. While the difference in the number of closures expressed as a rate between the state and the nation has varied over the years, the data suggest that Ohio’s closures fell off in particular in the 2009 and 2010 fiscal years.

Number of VR closures/100,000 general population

	2002	2003	2004	2005	2006	2007	2008	2009	2010
All closures									
Ohio	186	200	217	235	236	237	252	232	197
Nation	252	259	254	251	252	242	241	237	244
Closures with ID									
Ohio	20	19	19	18	18	20	19	16	15
Nation	23	22	22	22	22	21	21	19	19

- It was noted that the practice of requesting a VR denial may be used to gain an individual’s access to waiver services.
- For some counties where a strong collaborative relationship exists between the CBDD and local VR staff, a discovery process may be actively used to learn more about the individuals’ strengths and job preferences, and discussions of sheltered work may occur last. RSC in these areas has supported a detailed discovery process with VR funds.
- Historically RSC services have been funded on a market-based model, with rates negotiated locally. The funding is proposed to be shifting to a standardized fee schedule.



- Only 24 CBDD are RSC vendors. RSC providers must be CARF accredited. RSC rates for supported employment are fairly competitive. It was reported that \$65/hour for supported employment is typical, although rates are negotiated at the provider level.
- RSC receives limited general revenue funding, and has struggled to draw down all of Ohio's federal allocation from RSA. RSC relies on VRP3 contracts to pull down federal allocations. VRP3 partners provide the state portion of the match, and OAC allows VR to charge local entities up to a 25% fee to support counselors and other expenses. Not all counties maintain a VRP3 relationship with RSC, and county partnership with RSC varies significantly. It was noted that in some counties RSC staff consider DODD services to be a comparable benefit and do not support DODD consumers.
- Bridges VRP3 projects support transition from school to employment in about 37 counties.
- Some concern was expressed that the job placement phase of employment services lasts too long, influenced in part by funding structures.
- There is not a consistent expectation about the county role in facilitating a transition from school to employment. Several respondents indicated that earlier engagement by counties in transition would be helpful, and that currently individuals who are in a job prior to graduation may be at risk of not being a priority for adult supports.
- Beginning in FY2013 students will have the option of taking their school resources (up to \$20,000) to another setting outside the public schools. The potential implications of certain options, such as charter schools or alternatives to the traditional public school system, are not well understood regarding transition planning.

Potential Focus Areas

- Actively pursue a collaborative relationship with RSC which includes educating staff at all levels of the system to understand: how both the DD and VR systems differ and intersect, and the intended objective of job placement activities.
- Establish joint RSC/DODD guidance for standard practices that relate to RSC/DODD coordination of services and supports for transition from school to employment.
- Develop a strategy for evenly balancing access to RSC services across all counties.
- Collaborate with education systems and monitor their implementation of the 2013 requirement changes regarding transition and the potential effects of students who exit the public school system for alternatives to assure positive employment outcomes.
- Collaborate with the ODJFS on the new Department of Labor "Disability Employment Initiative" grant.

VI. Services and Service Innovations

Key Findings

- Respondents reported that in many cases individuals exiting high school have already been told sheltered workshops are the only viable option, and that it is common for students to exit high school at age 18 without a transition plan. It was noted that students typically would not access county board adult day or waiver employment services until after graduation once the local school funding ends. Some innovative approaches, such as using an IRWE (Impairment Related Work Expense) to pay a job coach to work with an individual and to train the developmental disability provider, were shared.
- Ohio is participating in a Griffin-Hammis Customized Employment Initiative that has been funded with RSC funds. It was noted though that this project is reaching vocational rehabilitation staff, not developmental disability staff. There were also comments that “discovery” and customized employment activities have been successful in certain counties.
- There have been pockets of innovation related to transitioning from school to adult life, such as the Ohio Department of Education’s Secondary Improvement grant which included a requirement to form a regional transition council. There are mandated partners on the state committee but this representation is not necessarily trickling down to the local level or the Councils of Government (CoGs). The Bridges project pushes people to think about transition much earlier in their school years, trying certain creative funding strategies. The VRP3 projects include a cost-sharing option for transition specialists with schools and the local county boards.
- Ohio (Hamilton County) is the original home of the Project Search model now used across the country. Currently there are over 30 Project Search sites in Ohio, and there are a number of other projects representing similarly innovative relationships with employers in the state.
- DODD has written and submitted for approval to the Centers for Medicare and Medicaid Services (CMS) a new Home and Community-Based Services (HCBS) waiver, the Self Empowered Life Funding (SELF) waiver. The definition for integrated employment is different in this new waiver; and while adult day and vocational habilitation are still available, the waiver requires that if an individual selects adult day or vocational habilitation, an explanation must be document as to why a non-employment service was selected. The initial rates for integrated employment are structured to incentivize individual integrated employment as well.
- Some counties (about 18) have established initiatives to improve self-determination in the IP process, and are emphasizing more meaningful outcomes.

Potential Focus Areas

- Review and strengthen the use of the individual service plan as a vehicle for supporting employment as a priority outcome.
- Review DODD rules to assure the *Olmstead* decision is upheld. Specifically review for person centered planning principles and to assure individual plans of care regarding employment services are constructed in a manner that reflects individual choice and goals relating to employment and ensures provision of services in the most integrated setting appropriate. (Adapted from the September 16, 2011 CMCS Informational Bulletin)
- Examine other states' approaches for transition from high school to adult life that involve clear expectations for each party involved during IEP meetings, how students can gain valuable experiences related to work, and which may not involve new funds to support.
- Work with the SELN Project Team to identify and examine other states' approaches for offering alternatives to sheltered workshops.
- Educate system staff to consider other aspects of long-term supports, such as whether personal care might be more relevant than job coaching or follow-along supports. This would also include promoting the use of natural supports.
- Analyze options for revising the OAC to allow students attending local education agencies (LEA's) access to county board integrated employment services and waiver employment services for after school and summer employment for students of working age when the student is not receiving extended school year education.

VII. Employment Performance Measurement, Quality Assurance, and Program Oversight

Key Findings

- There is a focus on compliance during county board and licensed facility reviews, but no clear emphasis on integrated employment or individual outcomes. While individual reviewers may be well voiced on best or promising employment practices to share during compliance review exit interviews, this information-sharing varies by team and is not supported in Ohio Administrative Code (OAC).
- Ohio participates in the National Core Indicators (NCI) and submits data annually to the ICI for the National Survey of Day and Employment Surveys. This reporting includes total served and total funding for employment supports, but only reveals the number of people who are working, wages or hours worked on a select sample (not the system as a whole). This is an important quality measurement tool but does not replace the need for an employment data management system.
- Some participants indicated that there is a very low standard for the number of hours an individual works, and it is believed that many individuals who do work in integrated employment are working for very limited hours.
- The Department is in the process of developing a large data warehouse built on the Cognos platform, connected to billing and reimbursement for services (not the outcome of the services). It is planned to have the capacity in the next several months for county boards to access online reports for data-driven decision-making.

Potential Focus Areas

- Establish a mandatory employment outcome reporting strategy, with data collection on at least an annual basis.
- While revising certain sections of the OAC, such as the Adult Services rule, modify the data elements to be collected, such as the number of hours worked, wages and employer.
- Develop a strategy for routinely sharing and discussing employment outcomes at the provider, county, and state levels with stakeholders.