

EES Reference Materials - September 2014 - 2020

For Information Purposes Only

EES Administration 2015 - 2020

1. Review of current practices in 2015 revealed significant areas of concern:

Areas of Concern:

- **Lack of Staff in the EES program**
- **Waitlist**
- **Case Management Concerns**
- **Lack of Significant Internal Controls**

**Please note that as you review the following information, it is not linear in how these issues were addressed, but rather it is a summary over the past 5 years. This information is presented for context as to how the EES program has been administered and has adjusted over the past 5 years. This is not intended to be anything more than reference material. The IDVR Deputy Administrator was asked to oversee the EES program in September 2014 after the EES Manager left the agency.*

- **Lack of Staff in the EES program and the agency response:**
 - Only One FTE in 2015 for Daily Operation

In 2015, there was only one FTE (full-time employee) assigned to handle the day-to-day operations of the EES program. It was determined that additional staff were necessary to adequately manage daily operations. FTEs were taken from vacant VR program staff; first one additional staff, then a third staff was added to the EES program daily operations. All other IDVR staff that support the EES program are a part of the indirect cost plan and does not constitute their primary portion of their job duties.

Current Status: EES has 3 FTE that manage the daily operations of the EES program.

- **Waitlist Concern/Budget - High number of individuals waiting for services**

The agency took the following steps/actions to address long wait for services:

- Requested and received additional appropriations from Legislature during legislative session 2016 for SFY17
- Eliminated duplication of services between Medicaid Waiver and EES Supported Employment

- Reviewed the EES waitlist to determine if individuals were still interested and waiting for EES services. Closed inactive waitlisted individuals from the waitlist. Also determined if the individual was not in need of EES because they were eligible and accessing Medicaid Waiver.
- Conducted facilitated meetings to discuss Medicaid Waiver Supported Employment Services and EES Supported Employment Services.
 - **Outcome:** Comparable Services.
- A Rate Study conducted jointly with H&W.
 - **Outcome:** Medicaid Waiver Rate considerably low. EES Appropriations were reduced by \$600,000 and transferred to positively impact the Medicaid Waiver Rate.
- Current Medicaid Rate (as of 7/1/2020) for SE Job Coaching: \$33.44/hr.
- Current EES Rate for SE Job Coaching: \$40.88/hr.

Outcomes for the above steps/actions taken by the agency:

- **Appropriations/T&B is sufficient.** All individuals that were in need of EES services were moved off of the waitlist and into active service. All service needs continue to be met.
- Eliminated waitlist.
- Eliminated unnecessary paperwork processing for Medicaid verification purposes.
- Addressed ACCESS Provider concerns about case closure process. Conducted review of closures. Determined closures were handled appropriately. Repeatedly encouraged providers, families, and individuals to contact the EES program if there was a concern related to their personal closure. The agency received minimal, if any, individual complaints to review as it relates to the waitlist review process.

Current Status of Waitlist/Budget: No waitlist and Appropriations is sufficient under current operations/service delivery needs.

Case Management Concerns/Internal Controls:

Case Management system that did not easily meet administration needs.

- **Action:** Changed case management system.
- **Outcome:** Increased efficiency for administration and IT, as well as insured individual confidentiality.
- Change in Provider access and processes. Providers required to send monthly billing to EES. Providers no longer had access to EES case management system.

Individual Program Plan Concerns:

Prior to 2015, EES was not adequately monitoring required IPP processes required to be completed by Provider and individual.

Concern: Individuals rights: Some individuals were not provided the opportunity to participate in their IPP process and approval of IPP in a timely manner (as required by Provider contract obligation).

Note: Providers are responsible for the IPP process including:

1. Meeting with the individual to review IPP goals, progress in meeting those goals, and service level needs.
2. Writing the IPP with the individual as well as input from Provider and employer.

Upon review and writing of the IPP and obtaining individual's signature (and if appropriate, guardian), Provider submits the IPP to EES program for review and approval. Timeframes required for this process are outlined in the Provider contract.

- **Action:** Over two fiscal years, EES encouraged providers to meet their contractual obligations to write and submit annual IPPs (*this was a percentage of providers, but a big enough issue that it was not a one-off issue and therefore needed to be addressed globally*).
 - **Outcome:** Could not get to 100% compliance with Providers through general requests.
- **Action 2:** 3rd year, adjusted Provider contract to indicate that Providers shall not be paid for services if there is an expired IPP. EES did not obligate providers to provide services without an approved IPP and authorization. If no service was to be provided to an individual, the Provider was obligated to inform individual and guardian of the reason for no service, i.e., Provider/Individual responsibility to accomplish, not an EES staff decision.
 - **Outcome:** Some providers chose to provide services without payment.
 - **Outcome:** Providers have increased their timeliness of scheduling and submitting IPPs, upholding individuals' rights. Still not 100% compliant, primarily with one provider.

Concern: No active case management:

Prior to 2015, EES was not closing cases when an individual stopped participating in the program.

The EES program had over-inflated numbers. Needed to understand which individuals were actually working and needing services.

- **Action:** Actively managed EES to include closure when an individual was no longer working and/or was no longer interested in participating.

Note: Eligibility, Plan and Closure are typical case management processes. Eligibility can be assessed more than once during an individual's working career.

- **Outcome:** An accurate picture of current and active participants. Also provided an increased understanding and awareness of current fiscal needs.

Fiscal Impact of weak internal controls of case management:

Understanding of fiscal obligations and legal obligation to pay for unauthorized services.

Concern: Some providers did not want to follow authorization processes. EES approves services and not budgets. Services are based on approved IPP services.

Example: One provider billed several thousand dollars over the authorized amount. Although the services were necessary according to the Provider, the Provider did not engage with EES prior to providing the service. Legal counsel indicated that the agency was obligated to pay because until then the EES program had not held them accountable to their contract obligations. EES corrected this lack of internal control by requiring that all services need to be authorized in writing prior to service delivery and potential payment. This is also a typical governmental practice.

- **Action:** Only pay for authorized services.
- **Action:** Process in place for provider to request additional service hours if a need arises above current approved service level.
- **Outcome:** Mitigates agency risk.
- **Current:** EES program only pays for approved and authorized services.

Case Management/Internal Controls

Concern: EES program has not required documentation of service provision monthly.

Historically, EES program has not easily identified what services were being billed versus what was approved, or how the service provision matched the IPP goals. Previous EES internal controls were not easily managed due to the limited number of EES Staff.

- **Action:** Require EES Providers to submit monthly activity logs/progress notes documentation with monthly billing
- **Outcome:** (Note: This has just been implemented as of 7/1/2020, so we do not know the outcome).
 - Providers have for years been contractually obligated to produce documentation at the time of service delivery and retain the documentation. Only the provision of submitting the documentation to EES monthly is new for SFY 21.

EES Prepayment Option

Because of financial hardships related to COVID-19, IDVR/EES offered an option to all Providers to prepay for services to assist with offsetting their decreased service provision/monthly billing due to EES customers being temporarily laid-off by employers.

- EES offered advanced payment for future services.
- Based on a Provider's average billing for 6-8 months prior to COVID-19.
- EES offered to Prepayment option for April/May/June 2020 billing.
- Providers offered 18-months to repay through invoice reduction or direct repayment.
- 7 Providers accepted the EES Prepayment option.

EES Data

EES # of Individuals Served (per year)

EES Totals												
	2017			2018			2019			2020		
	WS	SE	n/a	WS	SE	n/a	WS	SE	n/a	WS	SE	n/a
# Made Eligible	109			117			74			51		
# People Served	329	396	113	332	392	95	318	372	74	284	339	82
Total # Served	838			817			764			705		

WS = Work Services

SE = Supported Employment

n/a = EES Eligible, Working with VR

CRP Underutilization

Quarter	2017		2018		2019		2020	
	WS	SE	WS	SE	WS	SE	WS	SE
Q1	18.33%	24.33%	22.74%	22%	23.14%	24.18%	14.92%	23.45%
Q2	23.06%	53.08%	23.25%	22.53%	24.27%	27.27%	17.76%	30.26%
Q3	22.07%	23.81%	19.97%	22.40%	25.05%	23.07%	20.35%	29.50%
Q4	17.70%	23.52%	17.71%	29.01%	17.03%	27.41%		
<u>Total average:</u>	20.29%	31.19%	20.92%	23.99%	22.37%	25.48%	17.68%	27.74%
<u>Combined average</u>	25.74%		22.45%		23.93%		22.71%	
<u>Running average</u>	23.71%							

*The underutilization percentage represents the total amount of preapproved funding for EES services (e.g., job coaching, transportation) that went unused.

EES Appropriation

	Appropriation	Reversion
2017	\$4,444,000.45	\$492,456.57
2018	\$4,752,636.49	\$866,169.09
2019	\$4,832,300.00	\$1,006,338.88
2020	\$4,267,500.00	\$1,141,475.79

CRP Payments

Sum of GL AMOUNT	Column Labels	2017	2018	2019	2020	Grand Total
Row Labels						
AFFILIATES INC		1,653.95				1,653.95
CACHE EMPLOYMENT & TRAINING CENTER		111,970.44	102,741.73	104,004.08	96,378.83	415,095.08
CAREER CONNECTIONS POCATELLO LLC		12,466.25	16,111.05	15,920.80	16,543.46	61,041.56
COMMON-SENSE SOLUTIONS LLC				4,400.00	15,478.00	19,878.00
COMMUNITY CONNECTIONS INC		36,356.06	27,880.50	33,903.20	19,577.81	117,717.57
COMMUNITY PARTNERSHIPS OF IDAHO INC		88,125.88	94,942.40	84,660.40	86,010.16	353,738.84
DAWN ENTERPRISES INC		101,758.24	97,750.83	111,480.20	101,206.15	412,195.42
DEVELOPMENT WORKSHOP INC		429,111.69	433,643.24	448,901.12	362,628.78	1,674,284.83
EXCEPTIONAL CHILD CENTER INC		83,692.98	115,560.24	102,105.85	98,753.58	400,112.65
GOOD WORK ASSOCIATES LLC				2,730.00	1,246.16	3,976.16
GOODWILL INDUSTRIES OF THE INLAND		94,284.11	97,302.79	110,292.40	88,209.28	390,088.58
HUMAN SUPPORTS OF IDAHO INC		921.05				921.05
INCLUSION INC		15,976.85	18,649.13	18,825.80	27,504.18	80,955.96
JENNIFER KIM LOSEKE		5,309.19	5,605.52	5,750.40	5,467.36	22,132.47
MAGIC VALLEY REHABILITATION SERVICES INC		352,010.05	352,360.61	210,067.25		914,437.91
MARILOU VOCATIONAL SERVICES LLC		14,527.35	40,532.30	41,145.00	78,903.04	175,107.69
NEW DAY PRODUCTS INC		310,659.92	314,932.10	342,494.52	244,584.89	1,212,671.43
OPPORTUNITIES UNLIMITED INC		149,514.54	160,012.20	173,233.64	151,573.05	634,333.43
PANHANDLE SPECIAL NEEDS INC		67,918.10	70,728.20	67,374.12	60,711.59	266,732.01
ROYAL JOURNEYS LLC		28,554.76	53,487.69	54,265.20	70,580.52	206,888.17
TESH INC		194,351.18	175,536.74	136,708.16	108,735.76	615,331.84
THE ARC INC		296,484.17	256,152.58	248,421.92	188,199.81	989,258.48
TRANSITIONS INC		152,709.74	135,708.52	146,398.80	144,369.40	579,186.46
TRI COMPANY		135,605.15	125,475.30	110,914.92	99,468.14	471,463.51
WDB INC		13,821.39	14,405.77	13,917.20	16,111.52	58,255.88
WITCO INC		765,948.30	729,918.01	784,230.55	610,718.08	2,890,814.94
Grand Total		3,463,731.34	3,439,437.45	3,372,145.53	2,692,959.55	12,968,273.87