

**Billing Guidance for IPS Supported Employment Programs
Department of Mental Health – Division of Behavioral Health
And
Office of Adult Learning and Rehabilitation Services - Vocational Rehabilitation**

This guidance will provide information on the use of Medicaid funded services while serving clients under a Vocational Rehabilitation (VR) Individual Placement and Support (IPS) Supported Employment Individualized Plan for Employment.

As a reminder, Medicaid is a program designed to fund medical services. Demonstrating the “medical necessity” of services is an administrative requirement attached to the development and documentation of an individual plan. The individual care plan must clearly demonstrate the clinical need, which provides the justification for services prescribed in the individual plan.

In general, Medicaid will **NOT** pay for:

1. Job skill training and coaching for specific job skills and job tasks (do not bill for teaching the job functions, i.e., how to work the computer, fryer, phone system, drill press, hand over hand, etc.)
2. Tuition for training programs
3. Supplies for work (boots, computers, uniforms, etc.)
4. Speeches to Rotary and other community groups seeking employer engagement
5. Job development
6. “Cold calls” to employers for generic job leads

VR Billing System, activities leading to milestone outcomes/payments:

1. Completion of Career/Vocational Profile - Appointments to learn about a person’s work history, job preferences, supports, etc.
2. Job development/Job search - Assisting with job applications, preparing for interviews, participating in job interviews, cold calls, engaging and following up with employers with and without individual served.
3. Job Supports/Coaching to include job skill training and coaching for specific job skills, on/off the jobsite.

Additionally, VR can provide secondary services needed to participate in IPS such as:

1. Transportation- bus passes, cab fare, assistance with gas for personal vehicles;
2. Licensures, background checks, food handlers, certificates, etc.
3. Maintenance-appropriate interview clothing, required uniforms, haircuts, etc.

Q1: We hired an Employment Specialist to work in our newly formed IPS Supported Employment program and it will take a while to achieve a full caseload. In the meantime, we divided the Employment Specialist's time between case management and employment services. How should we handle billing?

- A.** To bill Community Support, Employment Specialists must meet the community support specialist qualifications as defined in the [Community Support Specialist Qualifications document](#). Services must be medically necessary and the individual's plan must clearly document need.

An Employment Specialist that does not meet the professional qualifications of a Community Support Specialist cannot bill Medicaid.

Employment Specialists cannot bill as a Community Support Specialist for employment services included in VR IPS milestone payments. VR IPS employment services includes the career profile¹, job search²/placement, job supports³/coaching.

Q2: Our Employment Specialist meets the mental health professional qualifications as defined in 9 CSR 10 – 7.140.(2)(QQ). Can he or she bill VR for milestone payments and bill Medicaid for employment activities rendered to achieve the milestone?

- A.** The answer to this question is two-fold. Billing VR and Medicaid for the same service is not allowable. However, Community Support can be billed for [key service functions](#) not covered by VR IPS milestone payments.

Example: Johnny has rapid cycling manic symptoms, can be unpredictable and is not always appropriate with customers (inappropriate jokes, offers steep discounts on merchandise without manager's approval, excessive talkativeness). He has a desire to be employed and is interested in retail sales. He comes from a family of jewelers and

¹ Career Profile: A document in which the employment specialist records work preferences, work history, education history, strengths, legal history and other information pertinent to a person's employment and education goals

² Job Search: Helping with job applications, introducing people to managers, preparing for job interviews, participating in job interviews, following up with employers.

³ Job supports vary based upon each worker's preferences and needs. Generally, employment specialists are encouraged to provide intensive supports, including in-person contact, on a weekly basis for at least the first month of employment. Examples of supports are wake-up phone calls, meetings with employers to obtain extra feedback, help learning how to take the bus to work, family meetings to talk about the job, meetings with the worker to talk about how the job is going, on-the-job coaching to learn new duties, etc. Over time, most clients want and require fewer supports, and eventually transition off the IPS caseload. On average clients remain in the IPS program for about a year.

wants to have a similar job. The Employment Specialist meets with Johnny to learn about his work history, job preferences and support needs to develop a career profile (employment plan). Development of an employment plan is an employment activity covered by the VR IPS milestones; therefore Community Support cannot be billed. Submit the required documentation to the designated VR Office for payment.

A person who meets the mental health professional qualifications can bill Community Support for providing *clinical* services to the individual in an effort to support their goal of employment.

Example: The person you are working with begins hearing voices on the job, walks off the job site, and calls to tell you he does not want to work. You discuss with him that there are ways to manage increased symptoms at work, and you are willing to coordinate with his psychiatrist and/or licensed Mental Health Clinician to develop a plan that would include ways to deal with symptoms on the job site. You spend time with him planning and practicing which strategies to try when symptoms occur at work.

Q3: Is time spent helping consumers and families understand how work and earnings will affect benefits billable as Community Support?

- A.** Yes, if medically necessary. It is important that individuals and families have access to accurate information so they can make good decisions about their vocational goals, potential earnings and health insurance needs.

Q4: Is time spent helping consumers input information and understanding work incentives information provided through the Missouri Disability Benefits 101 online tool billable as Community Support?

- A.** Yes, if medically necessary and documented on individualized treatment plan. The Community Support Specialist should have received some training and be qualified to perform this function.

Q5: Can Community Support be billed when an individual is enrolled in VR IPS services?

- A.** Yes, IPS supported employment services are integrated with behavioral health treatment. The goal is for all team members (medication prescriber, therapist, community support specialist, peer/recovery specialist, etc.) to support the individual's

employment goal. Supporting individuals in crisis, reinforcing the importance of taking medications as prescribed, providing information and education in order to learn about and manage mental illness/serious emotional disturbance and/or substance use disorders including symptoms, triggers and cravings are examples of community support key service functions.

Q6: When can a Community Support Specialist bill for employment activities?

- A.** Community Support Specialists may bill for employment activities when medically necessary. The treatment plan must clearly demonstrate the legitimate clinical need, the justification for services provided, and indicate an appropriate response to that need. Progress notes must clearly state activities and interventions that are directly related to the goals and interventions described in the treatment plan. In addition, progress notes must clearly support medical necessity of a clinical service as opposed to a typical employment activity covered by a VR milestone payment.

Please note, there is a difference between typical on the job supports/coaching and medically necessary services to address a clinical issue that impacts the individual's employment.

Q7: What type of employment activities can Community Support Specialists bill to Medicaid?

- A.** Helping individuals develop skills and resources to address symptoms that interfere with seeking or successfully maintaining a job, including but not limited to, communication, personal hygiene and dress, time management, capacity to follow directions, planning transportation, managing symptoms/cravings, learning appropriate work habits, and identifying behaviors that interfere with work performance.

Please note, there is a difference between typical on the job supports/coaching and medically necessary services to address a clinical issue that impacts the individual's employment.

Example: An individual you are working with needs assistance with completing an online application as he believes the computer is controlling his thoughts. The individual care plan must clearly demonstrate the clinical need, which provides the justification for assisting the individual to complete an online employment application. An example of

providing typical job supports would be assisting someone who lacks computer skills to complete an online application.

Q8: Our organization is a Certified Community Behavioral Health Clinic. Does the above guidance apply to us?

- A.** As a Certified Community Behavioral Health Clinic your agency may continue to bill the VR IPS milestone payments for the allowable Employment Specialist client specific outcomes. Community Support, Peer Support, and clinical services allowable in the Community Psychiatric Rehabilitation and Comprehensive Substance Treatment and Rehabilitation programs will be billed to the Prospective Payment System.