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Employment funding for intellectual/ developmental disability systems

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Abstract. Funding is a central tool for improving the quality and range of employment service options. While outcome-based funding models are more common in the Vocational Rehabilitation system, there is a need for funding structures in intellectual and developmental disabilities (IDD) service systems that signal a clear preference for high-quality, cost-effective integrated employment outcomes. In an environment of increasing fiscal demands and limitations, and expansion of self-directed services and individualized budgeting, state IDD systems must engage in rate-setting and funding discussions that are rooted in their priorities and long-term goals. This paper explores rate-setting methodologies, rate structures, and incentives for integrated employment, and the relationship between funding, policies, and priorities. A detailed analysis within five states yields lessons for other state IDD systems as they contend with evolving funding structures that respond to fiscal pressures and demands. Implications include the need for funding to be seamless, goal-focused, and connected to and consistent with larger systems strategies.

Keywords: Integrated employment, funding, intellectual/developmental disabilities

Funding is a central tool for improving the quality and range of service options. While outcome-based funding models have been more common in the Vocational Rehabilitation (VR) system, there is a growing acknowledgement of the need for funding structures in intellectual and developmental disabilities (IDD) service systems that signal a clear preference for high-quality, cost-effective integrated employment outcomes. In response to this need, this paper explores several elements related to employment funding within IDD systems, including rate-setting methodologies, rate structures, and incentives for integrated employment. A detailed analysis within five states yields insights and lessons for other state IDD systems as they contend with evolving funding structures that respond to demands, fiscal pressures, and goals.

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1. Literature review

Funding for community employment for individuals with IDD flows through two major systems. The VR system funds job placement support, including supported employment services. Supported employment is defined in the Rehabilitation Act Amendments as a service option designed for people who historically have not been given the opportunity to work competitively [16], and can be supported either under Title I services (general VR services) or through a dedicated supported employment funding stream under Title VI. Individuals may also receive supported employment services under the Medicaid Title XIX Home and Community Based Waiver Services (HCBS) program. The HCBS waiver program is the largest long-term care program for people with IDD [25]. It allows states to use Medicaid funding for home- and community-based supports.

Prior to 1997, waivers had minimal impact on the growth of supported employment as compared to the impact of the VR system. The Balanced Budget Act Amendments of 1997 expanded the eligibility for integrated employment services to all people served under the HCBS waiver, by removing the requirement that participants had to be previously institutionalized (Title IV, Subtitle H, Chapter 5, Section 4743). Federal expenditures for supported employment under the waiver increased from $35 million in FY 1998 to $108 million in 2002 [1]. West et al. [25] conducted a study of waiver participation pre and post the 1997 Balanced Budget Act Amendments, and found that many states capitalized on opportunities to increase use of supported employment through waivers. Participants in all waiver-funded day services grew at a rate of 16% to 20% annually, while supported employment participation under the waiver grew at a rate averaging over 100% annually [25]. However, West et al. [25] indicated that high growth rates for supported employment occurred in a small number of states. Still, supported employment accounted for less than 16% of those receiving day habilitation services through the waiver and only 12% of day habilitation funding, with the remainder going to day support, prevocational services, and other segregated options. As is apparent in the next section, this data is indicative of an ongoing trend that favors more segregated options as compared to supported employment.

1.1. National employment trends

In Fiscal Year (FY) 2008, an estimated 550,818 individuals received day or employment supports from state intellectual disability/developmental disability (IDD) program agencies. This number grew from 287,860 in FY 1988. Despite this overall growth, the number of individuals supported in integrated employment only grew from 33,382 in FY 1988 to 120,691 in FY 2008. State investment in supports continues to emphasize facility-based and non-work services rather than integrated employment services [3]. The data also suggest that the growth seen in supported employment between the mid-1980s and mid-1990s has not continued.

The average expenditure per person for integrated employment services as reported by state IDD agencies was $7,756 in FY 2008. This figure has increased steadily since the mid-1990s, indicating that states have slowly begun allocating additional resources towards integrated employment. However, there is significant variation across states, funding sources, and spending outcomes. The differences in per-person expenditures for integrated employment are important to note but are not necessarily an indication of the quantity or quality of integrated employment services in the state. States such as Washington and Connecticut report supporting a high percentage of service recipients in integrated employment (59% and 55%, respectively); however, the two states' per-person expenditures are significantly different. Differences in per-person expenditures may more likely be due to variations within each state's economy and service models than the quantity or quality of integrated employment services, although the mix of people in individual vs. group/enclave settings may have some impact on cost data.

Between FY 1996 and FY 2008, the average state, county, and local IDD agency expenditures remained constant, while the average federal Title XIX Medicaid waiver expenditures per person for integrated employment increased 260% (from $1,604 to $4,176). This growth was likely a result of changes in federal law (1997 Balanced Budget Act) as opposed to changes in the amount of state dollars available to fund integrated employment. It is expected that more recently enacted federal policies such as the New Freedom Initiative (2001) and state budget shortfalls will continue to encourage states to make use of federal Medicaid dollars to fund integrated employment services, and will likely perpetuate these trends.

1.2. Funding: One piece in the puzzle

Research on high-performing state[1] IDD agencies, defined as states with a high percent of individuals supported in integrated employment or growth in integrated employment, suggests that several funding elements are important contributors towards better employment outcomes. Flexible funding guidelines that allow providers to meet individuals' needs, the ability to fund seamlessly across service categories, multiple funding sources, and the use of funding incentives were all strategies that were present in a sample of states with currently or historically high rates of integrated employment. The variability in approaches suggests

[1] "High-performing" is defined as: a high rate of individuals with IDD in integrated employment; a high percentage of individuals with IDD in integrated employment; and/or growth in integrated employment over time. Rate refers to the number of people in integrated employment per state population. Percentage of people in integrated employment is based on the total number enrolled in day and employment services throughout the state. Residential outcomes were an additional indicator of overall commitment to community inclusion [4].

that multiple funding mechanisms have the potential for success as long as they are accompanied by clear outcome measures and a willingness to hold providers to high standards [6].

However, funding strategies used by these high-performing states proved to be the most successful when they were embedded within the context of a solid values base, a network of dedicated stakeholders, and clarity about the system's goal. These strategies were facilitated by relationships, and a structure of local control [6]. In a study of local IDD service areas, Connolly [5] found that employment rates were higher when agencies were explicit about the preference for integrated employment and set clear outcome standards in contracting with community rehabilitation providers (CRPs). Further, the goals and values of the CRPs themselves are important to consider in the expansion of integrated employment. In a survey of CRPs who hold U.S. Department of Labor 14 (c) sub-minimum wage certificates to operate sheltered workshops, almost 89% believe facility-based programs are essential for individuals with disabilities who are having difficulty getting or maintaining work in the labor force [8]. This ongoing belief by some CRPs in the viability of facility-based programming, despite the extensive experience of CRPs in reducing and eliminating their use of such programs, has been a barrier to expansion of integrated employment. Thus, while funding is a critical variable, it is only one of the key factors which shape the supported-employment landscape among states.

1.3. *Funding models within the IDD and VR systems*

There are several major federal funding sources available for employment supports: Title I and Title VI of the Rehabilitation Act, Developmental Disabilities funds (state funds), Title XIX of the Social Security Act (which includes Medicaid Home and Community-Based Waivers) and, used on a more limited basis, the Ticket to Work and Work Incentive Improvement Act (including work incentives such as PASS and IRWE, and the Ticket to Work program). With the exception of the Rehabilitation Act funds, each funding stream can be accessed by states to fund both time-limited and long-term employment supports [23]. In some cases, these major funding streams may be supplemented by funding from the general workforce development system used by all job seekers. Additionally, a major source of funding for individuals transitioning from school to adult life, who have not graduated, is local school-district funds.

While past research shows that funding is just one facet of a multi-pronged approach a state can take towards increasing its employment outcomes, it is an indisputably important one. There is a paucity of literature describing the pros and cons of different funding systems for IDD agencies. Literature that addresses funding strategies used by VR is more common, and provides a useful backdrop for the present paper.

In many states, integrated employment services are delivered within a two-phase system, with initial job development and placement funded by the state VR agency for individuals eligible for VR services, and long-term supports by the state IDD agency through state or local dollars, or waiver funds. Ideally, state systems will encourage the use of multiple resources to support an individual's career path. Typically, an individual with IDD can be referred to VR for job development and placement services if the goal is individual competitive employment in the community. Due to funding constraints (such as an order of selection process) through the VR system, or the individual's career goals, VR services may not be available. In these situations it is common for the IDD system to utilize state/local funds or waiver funds to pay for individual job development, career exploration, and employment supports (both short- and long-term).

Partnerships between systems that integrate employment service delivery can lead to improved employment outcomes for individuals with IDD [14, 20]. For this to occur, joint investments must be made by all of the systems involved at the local level, with support at the state level through clear policies and procedures (including timely and relevant memorandums of understanding or interagency agreements) [10]. While it is challenging to ensure that funding streams are being used appropriately, both the HCBS waiver regulations and VR regulations clearly support individual integrated employment in the community.

Payment methods for time-limited supports are evolving from a process-oriented system to one that is more focused on outcomes. An hourly or daily unit of service mechanism (also called fee-for-service) pays the provider based on the number of service units being provided to the individual job-seeker. The provider agency is compensated for the costs involved in implementing the individualized service plan [24]. Alternatively, the distinctive feature of performance-based or outcome-based funding arrangements is that at least some of a provider's compensation is contingent upon reaching agreed-upon outcome performance measures [24]. Proponents of performance-based funding suggest that this method creates incentives for the swift achievement of employment goals, and reinforces the principles of rapid job placement, consumer choice, and retention through natural supports [13]. Moreover, performance-based funding has the potential to support people in finding a job of their choice; supply service providers with adequate cash flow to support quality staffing; and enable funding agencies to pay for concrete results [13]. While outcome-based funding is frequently used in the VR system, supported employment as funded through the IDD system predominantly relies upon the fee-for-service model as a payment system.

As noted, much literature has been devoted to studying payment systems within the time-limited phases of employment supports. Within the VR system, Revell et al. [15] highlight several key characteristics of successful funding mechanisms that support cost-effective and high-quality employment supports. These are: Collaboration with key stakeholders, setting payments that adequately address cost of services, tying payments to desired outcomes, an emphasis on choice and self-determination, and the avoidance of disincentives that impede access by individuals with significant disabilities. These elements also seem important in the consideration of long-term employment supports, but the literature has not yet effectively addressed how different states are funding long-term employment supports. As such, the research questions that guide this study are as follows:

- How do state IDD agencies vary in their approaches to funding integrated employment?
- What strategies are state IDD agencies using in the contracting process to communicate employment as a priority?
- How do state IDD agencies conceptualize and implement funding incentives for integrated employment?

2. Methodology

2.1. Sample selection

States were selected using a purposeful sampling strategy that ensured representation across key elements, placing particular emphasis on the design of provider contracting and reimbursement structures and processes; publication of funding incentives targeted at providers; and evidence of effectiveness.

Preliminary screening interviews and/or document review, which included past research with some of the states, were conducted with IDD staff in ten states: AR, CT, FL, IL, NC, OK, PA, SD, TN, and WI. These initial states were chosen to represent diversity in terms of geographic regions, systems of funding, and state IDD agency structure and characteristics. Data from these states were organized into a matrix and sorted by the following categories: Definition of integrated employment; measurable integrated employment goals; use of HCBS waivers; use of state general revenue funds; incentive structure; interagency collaboration; existence of a waiting list; hourly or daily rates of services; and other funding information. This matrix helped to compare the states across similar variables and allowed the researchers to choose states that had a range of funding structures and models for employment incentives.

2.2. Data collection

Researchers used document review and semi-structured interviews to collect data that provided answers to the research questions above. First, research staff conducted a review of literature and existing documentation related to states' funding policies and methodologies. The information obtained was organized within the matrix that provided a platform from which to choose the case study states.

Five states were chosen to participate in more in-depth follow-up interviews: CT, FL, NC, OK, and TN. These states were selected based on confirmation of the presence of a diversity of funding systems, and to maintain a range of state structures and experiences. In each state, IDD administrators (those who were responsible for provider contracting and reimbursement) participated in hour-long recorded telephone conversations about their state's funding mechanisms. Researchers also interviewed community rehabilitation providers to ensure that a diversity of opinions and perspectives was represented. In addition to other funding issues, interviews with IDD staff addressed conceptualization, design and implementation of funding incentives. Interviews with community rehabilitation provider staff focused on their experiences putting these incentives into practice, challenges they encountered, and the impacts on overall service cost and provider performance. In total, 14 people across the five states participated in the study.

2.3. Data analysis

Thematic analysis was conducted following the tenets of Miles and Huberman [11] which include data reduction, data display, and conclusion drawing and verification. The research team engaged in anticipatory data reduction [11] as we chose specific cases, and defined the research questions. Because the concept of "funding" is large and ambiguous, we narrowed our focus on models for contracting, rate methodologies, incentive structures for integrated employment, and inter-agency collaboration. Data reduction occurred throughout the analysis process through the use of case summaries. Individual-level case studies provided descriptive summaries of particular state-level funding practices [26] and can be found elsewhere [2]. Themes were first identified within individual case studies (states), and through a cross-case analysis, themes were verified across case studies. Data display techniques, such as the development of a matrix that outlined salient features across cases, also aided in data reduction. Conclusion drawing and verification was done through careful review and comparison of the case-specific summaries, and ongoing dialogue among research team members and a key stakeholder group (the State Employment Leadership Network, which is a joint program of the Institute for Community Inclusion and the National Association of State Directors of Developmental Disabilities Services). Findings were verified through extensive member-checking and having key respondents review the individual level summaries. Respondents provided feedback on the themes and provided clarification and expansion when necessary. In addition to individual follow-up interviews, case- (state-) specific webinars were also conducted that solicited feedback on the data from key stakeholders, such as state IDD administrators.

3. Findings

The findings presented below relate to the development and implementation of five state IDD systems of funding for employment. They are organized thematically within each of the three major research questions.

How do state IDD agencies vary in their approaches to funding integrated employment?

Approaches to employment are dependent on a variety of factors. These include: How states tie priorities to funding, the use of explicit and intentional values in rate setting, and how key stakeholders are involved in the decision-making process. Table 1 provides an overview of states' individualized approaches to funding.

3.1. Tying priorities to funding

Key in establishing a purposeful approach to funding is to identify a system's stated priorities and goals. Despite differences between state populations and unique demographics, each state's IDD administration grapples with how to reflect system priorities and goals in relationship to funding rates. States that show a relationship between funding and agency objectives can create an environment for long-term success. It was apparent in the five case-study states that funding decisions and their impact on the administration's overall planning had to be taken into consideration simultaneously for a state to effectively communicate employment as a priority. Thus, "funding philosophies" have been developed which in some cases drive methodology and rate setting.

Several states modified their rates based on system-wide priorities. Tennessee implemented its Employment First policy, setting the standard that employment is the first day service of consideration for adults with intellectual disabilities. Funding rates were restructured to support this vision. Connecticut's funding structure is driven by the mission of consumer choice and self-determination, and recently evolved to introduce more portability (funding more easily moves with the individual across service providers or service types) into the system. While Connecticut developed a new rate structure in response to a new HCBS waiver, it was rooted in the goal of providing individuals and families with sufficient choice in services.

In tandem with funding changes towards outcome-driven rates, Oklahoma instituted a series of policy changes in the Oklahoma Administrative Code stating that the goal of service delivery for Employment Services funded by the state is full-time employment. The revised code also lists expectations as well as options and contingencies to ensure that an individual is moving toward his or her desired employment outcomes. In the year before it announced its five-year Employment Initiative, Florida developed a more uniform rate structure to drive the individualization of funding and service delivery.

Individually, states' priorities are supporting the vision of greater employment, choice, and individualization for people with IDD. Moreover, many of these states linked changes in their funding structure to efforts to sustain intended changes in employment outcomes.

Table 1
Approaches to funding for integrated employment

	Tying priorities to funding	Rate setting	Partnering in funding
NC	Two new waivers have been designed to flexibly support individuals to live and work in their communities.	Multiple cost models factored in direct labor costs, supervisory labor costs, supply costs, and administrative costs.	Ongoing discussions between IDD and VR for better transition between initial and long-term supports.
TN	Employment First policy; sets the standard that employment is the first day service considered. Funding rates restructured to support this vision.	IDD system developed rates with the input of the Tennessee Employment Consortium.	Can braid funding for support throughout a day (e.g., VR-funded job assessment combined with IDD funding for other hours in the day).
OK	Outcome-driven rates and a series of policy changes in Oklahoma Administrative Code that explicitly state the goal for Employment Services as full-time employment; lists expectations as well as options and contingencies.	Job coaching rates based upon direct staff support, program management, staff mileage, and general administration expenses. Once an individual reaches stabilization, reimbursement based on hours worked rather than hours of service.	State IDD agency has a joint agreement with VR to provide follow-along for those who achieved stabilization through VR's six milestones.
CT	Driven by consumer choice and self-determination, evolving for more portability in the system.	Main components of rate setting is salary of DSPs. Rates include indirect support time, benefits, supervision and administrative and general costs. Reimbursement only for face-to-face time with participant.	No blanket agreement with VR; occurs on a case by case basis.
FL	Five Year Employment Initiative; developed a more uniform rate structure to drive individualization.	Standardized rate system was developed that would allow for the development of individualized budgets. Two new assessment tools being used (QSI and SIS).	Collaboration with VR can vary based on local partnerships.

While there may have been multiple reasons why the funding changes were made, there was an emphasis on the goals driving the action, as well as a purposefulness in decision-making around funding changes. Even when employment as a value was more implicit, and secondary to goals such as choice and portability (Connecticut), the design of the funding system reflected what the system valued and would pay for.

3.1.1. Rate-setting: Use of explicit values about outcomes and quality of services

Rate setting in these case-study states often had specific intent, although states took varying approaches to determining pricing methodology and setting their rates. In some instances, such as the case of Connecticut described below, data showed that state agencies were thinking strategically about rate setting, specifically by considering direct-support staff salaries. The focus was on a fair rate and included the acknowledgement that different skill requirements, such as those of an Employment Training Specialist (ETS) position, require greater pay, and that the ETS position typically has fewer billable hours than a more traditional job-coach position.

Each state's rate-setting discussions were an attempt to mirror the state IDD agency's priorities. Oklahoma's rate-setting process for job coaching accounted for elements such as training and education for employers, natural supports, and required professional development. Attention to these elements, which other states do not necessarily include in their approach to rate setting, shows a specific emphasis on employment. Whatever the approach, rate setting may be more effective when it is supported by a foundation of priorities that reflect the state's overall goals.

The main component in the development of rates in Connecticut is the salary of direct support workers, using data from the service providers as a starting point. In addition, Connecticut's IDD agency also examined the Department of Labor salary survey to gain a sense of hourly wages for direct-support staff, looking at both the mean and median salary ranges, and then choosing the higher of the two for its rate basis. This was validated using salary survey data from its providers. This is an example of strategic intent, as planners thought about the type and quality of staff they wanted to deliver services. Connecticut rates also include indirect support time, benefits, supervision, and administrative and general costs. Providers are only reimbursed for face-to-face time with service recipients. However, the rates established were based on every hour of direct-support staff work (i.e., even though providers may bill only for face-to-face contact with service recipients, the rate accounts for hours in the service provider's day that do not include face-to-face contact). Rates are further adjusted by the number of face-to-face contact hours that staff is expected to be able to deliver. This reflects attention to changing service models, as the assumed billable direct contact hours are typically lower in supported employment than in other types of services.

Job coaching (individual placement) rates in Oklahoma are also based upon direct staff support, program management, staff mileage and administration general expenses. Within direct staff support, salaries and benefits are included. Program management provides compensation for supervision of direct-support staff, marketing and advocacy, employer education and training, and development of natural supports. Staff mileage provides compensation for non-billable mileage for the direct-support staff to travel between job sites. Administration and general expenses include reimbursement for required job-coach training and agency overhead.

A unique aspect of Oklahoma's rates is that reimbursement is based on the hours the individual works rather than hours of service the job coach provides. This creates an incentive for the job coach and employment specialists to help build in a variety of natural supports on the job (including adaptive devices, modifications to the work environment, and relationships with coworkers) to ensure the individual is successful.

Reimbursement occurs at two levels. During initial job placement, and for as long as an individual requires support for more than 20% of his or her work hours, the employment provider receives $16 for each hour of employment in an individual job. When a job coach is present less than 20% of the time the individual is working, the individual transitions to a stabilization and extended services rate of $5 for each hour the individual is employed. The Oklahoma IDD agency provides funding for stabilization and extended services for up to two years (i.e., payment for every hour a person works for two years), at which time the reimbursement changes and is paid at the ETS hourly staff rate for the time the job coach is present, as long as the support is needed. The funding does not stop at the end of two years; services may continue at the ETS rate. Progress notes are reviewed to verify the correct reimbursement.

3.1.2. *Obtaining input from stakeholders: Another indication of intentionality in rate setting*

The rate methodology in Connecticut was established by a work group consisting of state IDD agency regional and central office staff and representatives of three trade associations (although the group created the method, it did not establish the actual pricing). Families were not included, and in retrospect representatives of Connecticut's IDD agency felt this was a mistake. In Tennessee, while the IDD agency was developing its pricing methodology, the Tennessee Employment Consortium, which is composed of providers, families, VR, the state IDD agency, and the Council on Developmental Disabilities, offered basic recommendations to guide the creation of the funding system so that it was aligned with the state's priorities around employment. The consortium suggested that an individual supported employment rate category be established that paid a higher rate for integrated employment than for facility-based or community-based non-work services. This would provide an incentive for provider agencies to transition individuals into employment and facilitate the appropriate fading of job coaching without financially penalizing provider agencies.

3.2. *Partnering in funding varied considerably across states*

As a funding approach, interagency collaboration has the potential to ease the financial burden on individual agencies, enable shared resources and expertise, reduce duplication, and contain costs. In several states a defined relationship and process between funding and interagency partnerships was able to make the transition process between funding sources much more fluid.

The Centers for Medicare and Medicaid Services (CMS) regulations indicate that all individuals who are eligible to receive Medicaid waiver services may be also able to access services through a local VR agency for initial job development and individual placement in the community. VR services may be accessed more than once during a person's career, for instance in the case of job loss or other job changes. It is important for state systems to understand one another's regulations and how a shared funding role can satisfy the missions of each system, as well as individual job seekers' career goals. It is critical for the systems to educate staff at all levels on shared integrated-employment expectations and related funding to support those goals.

3.2.1. *"Typical model"*

If an individual receiving waiver-funded services is also able to access VR services, CMS expects the state to use VR resources to fund initial placement activities. If it is determined that VR services are not available due to funding constraints or if the individual's employment goals are not appropriate for VR funding, initial placement costs may be funded with Medicaid waiver funds. States may also elect to use state-only resources to fund employment supports. Those individuals determined eligible for VR services would typically receive initial job development and job coaching through VR, with a focus on competitive employment in the community and with follow-along support from the state IDD agency. Evidence indicates significant variation from state to state, and even within states, regarding the stringency of the requirement that individuals be referred to public VR for initial job development and placement. For instance, in Florida, some providers have long-standing agreements with the state VR agency, and VR funds Phase 1 (initial placement and support) services for the people they support, with the state IDD agency providing follow-along dollars. In other areas in Florida, VR dollars are not as widely accessed for Phase 1 services, and the state IDD agency provides funding if for whatever reason VR funding is not available. In Florida, one of the barriers discussed was the long wait in eligibility determination once a referral is made. In Connecticut, there is no blanket agreement with the VR agency for supporting the initial cost of placement. Funding for the initial cost of placement occurs on a case-by-case basis at the regional and local level as deemed necessary. In Oklahoma, the state IDD agency has a joint agreement with VR to provide follow-along for individuals achieving job stabilization through the six VR milestones. If there are no providers available, or if it is known that the milestone system does not match the individual's needs, the individual can go directly to the state IDD agency to access waiver services.

Tennessee provided an example of how funding can be braided between VR and the IDD agency. To support an individual throughout the day, the VR agency pays for the achievement of milestones such as job-site assessments, placement, and stabilization, and the state IDD agency funds the other hours in the day. For example, if a person participates in a VR-funded job-site assessment that lasts four hours, the provider can receive payment for the achievement of that milestone while simultaneously billing the IDD agency for supports received in the remaining hours.

Beyond the variation across and within states with respect to collaboration with VR, there have been some other barriers identified. For example, Florida respondents noted that there is a disincentive for providers to move people out of adult day training (which includes sheltered workshops), and into Phase 1 VR services, because they will not be paid until the individual obtains a job, due to VR's milestone payment system. This could involve a substantial gap in payment to the provider, who must incur the upfront cost, whereas if the person was maintained in a sheltered workshop, this gap in payment would not occur. Another barrier cited in North Carolina was the requirement that an individual be "considered and have been found inappropriate for" VR services before waiver services are initiated (North Carolina's Manual for the 2008 CAP-MR/DD Comprehensive Waiver). This is perceived as cumbersome and a deterrent for some to access waiver funding. There have been ongoing discussions between North Carolina's IDD agency and the state VR agency about a better transition from up-front supported employment services to long-term supports.

What strategies are state IDD agencies using in the contracting process to communicate employment as a priority?

3.3. *Different approaches in rate structures can all support competitive employment outcomes*

The search for a clear definition of what services cost and how to account for variations across programs, providers, and services has created new questions for state administrators. Answering these questions often involves bringing together key budget and service/program staff, by force at crucial times or voluntarily well in advance of crises. In each of the five states a clear employment goal or directive was necessary to move strategy-setting to the funding arena. Lacking this focus, funding and rate discussions can quickly be derailed by competing interests or opponents, and once off the table might not resurface again until a crises erupts down the road. With an employment goal and leadership charge in place, service definitions and rate decisions were grounded in a value set which is critical in the decision-making and priority-setting process to follow.

Discussions among state IDD agencies included questions of the most effective payment unit (payment per day, hour, or month) and how those decisions were related to policy and service definitions. States considered whether a change to daily rates from hourly rates, or from monthly rates to hourly rates, improved employment outcomes, and whether a tiered system based on need would best meet demand. Unanticipated consequences were weighed in these considerations.

For example, an hourly rate structure may encourage providers to maximize their billable hours, while a flat day-rate structure that does not have a relationship to the level of service provided may encourage efficiency but discourage working with people with more complex needs. An unanticipated consequence in Oklahoma is related to paying providers for the hours individuals work as part of a group-employment setting. This has created an incentive for providers to support group placements as opposed to individual placements. It is important to note, though, that some individuals may accept a group placement opportunity to gain work experience and wages, while they wait for an individual placement to become available.

As time passes, each state must continually reevaluate how those unit decisions are working within the larger framework of a service delivery system. While the funding structure is important, so is the actual reimbursement level of providers. While states vary widely in their hourly and daily rates from a pure dollar standpoint, when analyzing these rates, the focus cannot simply be on the actual rate itself. Analysis must include consideration of the context in which these rates are used. Each state has a multitude of variables that impact the actual compensation that service providers receive, often with wide variation in terms of what are billable and non-billable services. For example, a state may have what appears to be a high hourly rate (such as in Connecticut). However, when such a rate is understood within the context of the large number of non-billable service hours that an individual receives, the actual compensation to a service provider may be no different from in a state with a much lower hourly rate, but with more individual service hours that are billable.

Acknowledging the potential dynamics of different funding strategies allows a state to anticipate issues in advance and plan accordingly. While different funding strategies have both pros and cons, given clear policy, quality assurance, and other controls, states can use a variety of funding structures successfully. Table 2 details funding rates and structures among states.

3.3.1. Daily rates

In 2005, Tennessee's state IDD agency transitioned from an hourly rate to a daily-rate system. The current rate structure not only pays more for individual jobs than for group jobs, but generally pays more for any community employment outcome than for sheltered employment and community-based activities. Transportation is included in this daily rate.

Tennessee has three types of day services: Supported employment, facility, and community. Facility-based rates and community-based rates can only be provided between 7:30 a.m. and 6:00 p.m. on weekdays. Supported employment may be provided at any time during the day and may be provided on weekends. However, providers may only bill a total of five days a week for day services (supported employment, community, or facility), for a maximum of 243 days per year. If a person works at least two hours per day, the provider may claim the integrated employment rate for the entire day. This circumvents the rule that billing must reflect the way in which time was spent for the majority of the six hours of the state-agency-funded day services. In this situation, a job coach must be available to come to the work site immediately upon request from the worker or the employer.

3.3.2. Hourly rates

Several of the states used hourly rates, but defined and counted an hour quite differently. In Connecticut, providers are reimbursed only for face-to-face time with service recipients. Rates were established based on every hour of service that a direct support staff works (thus the rate accounts for the fact that not every hour of the staff's time is face-to-face). Because Connecticut includes factors such as the need for a skilled staff member and high levels of non-billable time such as job development in the rate calculation for job placement services, the rates appear very high for this service ($58.11/hr in 2009); however, this rate covers a significant amount of service time that is not billable. As Connecticut transitioned to a new rate system in 2005, it became clear that the administrative burden of hourly billing was important to address. As the state IDD agency implements a new rate system based on three levels of need, service providers will be given the option of using a day rate based on the hourly rate calculation.

In 1995, Oklahoma's IDD agency elected to focus on outcome-driven rates. Reported costs were aggregated and divided to determine the cost of the outcome for an hour of work with the consumer. Vendors provid-

Table 2
Rates and funding structures

	Daily vs. hourly rates	Tiered funding structure	Incentive structures
NC	Hourly rate; billable hour includes any activity designated in the service definition.	No explicit relationship between level of need and the existing funding structure.	Higher rate for employment services compared to facility-based or non-work services.
TN	In 2005, transitioned from an hourly rate to a day rate.	Needs of an individual determine the employment-based rate that is authorized.	Awarded Integrated Employment Incentive Grants to fund stipends of $1,000 per successful integrated job placement.
OK	Outcome-driven rates; providers paid on hourly rate based on number of hours the individual is employed.	Enhanced rates for people with more involved needs.	Higher rates for community-based, and individualized supports. Hourly rate structure intended to create incentive for good job match, high work hours, and fading of support.
CT	Hourly rate; providers reimbursed for face-to-face time with recipient.	Each region in CT has a team that reviews level of need and allocates funding based on assessment.	Higher rate for employment services than for facility-based or non-work services.
FL	Hourly rate; billable hour is any employment-related activity directly related to a specific individual.	No explicit relationship between level of need and the existing funding structure.	Higher rate for employment services than for facility-based or non-work services; considered a headhunter approach but was not implemented because of budget limitations.

ing supported-employment services are paid an hourly rate based on the number of hours that an individual is employed. The only exception is the Employment Training Specialist rate which is paid based on staff time. Staff mileage provides compensation for non-billable mileage for the job coach to travel between job sites. The annual cost of this component is estimated to be $2,600 per year on average, based on $10.40 per day mileage reimbursement for five days per week for 50 weeks, and is built into the hourly rate.

In Florida, the rate structure pays staff on an hourly basis depending upon the type of activity (supported and sheltered employment, adult day training). In general, a billable hour is any employment-related activity that is directly related to a specific individual, including job development, work-site training, and employer training or contact, whether or not the person is present. It does not include transportation or documentation. Florida's IDD agency has considered paying a monthly rate, based on severity of disability, for Phase 2 (follow-along) services while staying with an hourly rate for Phase 1 (job development and job stabilization) services.

Hourly rates are the norm in North Carolina, where a billable hour includes any activity that is designated in the service definitions (Supported Employment – Community Alternatives Program waiver, Supported Employment – Innovations waiver, state-funded Supported Employment, and Sheltered Employment).

3.3.3. Tiered funding structures as a strategy for promoting employment for all

The level of supports that an individual requires affects hourly and daily rate models differently. Developing rates that include a tiered structure for those with greater support needs is a strategy that can communicate employment as a priority to providers under a daily rate model, and address a potential disincentive for supporting individuals with more intensive support needs or who may have a longer job search. This is specifically an issue for daily or monthly rates. For hourly rate structures, level of need should influence individual allocation (personal budget) but not specifically the rate itself. A tiered funding allocation recognizes that more resources may need to go into supporting someone with more intense needs to get a job, and does not penalize those providers who seek employment for those with more complex disabilities. Respondents in both North Carolina and Florida noted that there is not an explicit relationship between level of need and the existing funding structure. However, a Florida IDD agency official noted that when providers are working with someone with greater challenges, they often spend more time with that person, and can then bill for more hours. Thus, there is no disincentive to provide employment services to a person with greater support needs. Also important to consider is the role of VR, particularly with a milestone payment system, and the role of capitated payments which may restrict the level of funding for individuals with more complex needs. One provider expressed that there is a need for a differentiated rate for Phase 1 supported employment services that are typically funded by VR. With each of the different types of rate systems discussed, it is important to understand the model in use and to be clear about the distinction between rate and personal allocation.

In Tennessee, the need of an individual determines the employment-based rate that is authorized. The Special Needs Rate funds constant 1 : 1 job coaching. As a person gains experience and confidence on the job, ideally the provider would decrease the level of support from the Special Needs Rate to the Individual Rate (requiring three contacts per week). Conversely, due to circumstances such as learning a new skill or acquiring a different job, a person may need to increase his or her level of support for a time. However, in practice, there may be an incentive for providers to hold an individual at a certain level of job coaching to maintain the higher rate.

Oklahoma's state IDD agency developed "enhanced rates" for people with more involved needs in community-based services and job-coaching services. Discrete eligibility requirements are outlined to ensure monitoring of the payment rate (see Oklahoma Administrative Code: http://tiny.cc/h0co5). At the time the job coaching enhanced rate (group) was identified ($14/hour), a $2/hour difference between the regular job coach rate and the enhanced rate was identified from the documentation as the amount needed to help agencies provide additional supports (such as personal or behavioral services). The state IDD agency ensures a fair amount of reliability across the system as to who is designated eligible for the enhanced rate.

Connecticut has a standardized approach to linking level of need with level of funding. Each DDS region in Connecticut has a Planning and Resource Allocation Team (PRAT). The PRAT reviews each individual's Level of Need assessment and allocates funding accordingly. A standardized methodology, developed by a research consultant from the University of Connecticut, is used to determine level of need. The state formerly had a five-part assessment that provided a rough estimate of need. Replacing that assessment process with the current Level of Need tool was considered essential for conversion to the new, individually-based funding mechanism. The process used by the PRATs includes the following steps: 1) assessment of need, 2) comprehensive planning, and 3) link with services. The PRATs meet on a weekly basis.

How do state IDD agencies conceptualize and implement funding incentives for integrated employment?

While one of the original goals of this research was to identify states with successful incentive structures in place, few of these states could point to incentives beyond a higher rate for employment services compared to facility-based or non-work services. Tennessee, Connecticut, and Oklahoma have enhanced or tiered rates for all day and employment services. Florida's IDD agency had considered a headhunter incentive approach in which the IDD agency would pay a person (e.g., a neighbor or community member) $75 for helping an individual find a job and $125 if the individual kept the job. This incentive was to be paid using general state funds but was not implemented because of budget limitations.

Through the Tennessee Employment Consortium (TEC), the state IDD agency, VR, and the Developmental Disabilities Council partnered to provide funding that drives the development and implementation of best practices. In 2005, TEC allocated $100,000 to create the Integrated Employment Incentive Grants. These grants fund stipends of $1,000 per successful integrated job placement. A stipend was awarded to any person who or organization that assisted an individual receiving state IDD funding to secure integrated employment. Additionally, the stipend award is contingent upon VR's successful closure of the case. The stipend applicant, either an individual or an organization, has to have a signed letter of understanding with VR. The goals of these requirements are: To emphasize the importance of working with both the IDD agency and VR; to ensure a seamless transition between the two state agencies; and to encourage providers to access inter-agency funding for integrated employment. In 2006, TEC increased the stipend amount to $1,500.

TEC has been instrumental in the development of policy, such as the creation of a seamless transition process from VR to waiver-funded employment supports, the development of job-coach training, and projects designed to assist provider agencies in making a transition from sheltered workshops to supported employment.

4. Implications

As data increasingly reflects the gap between employment opportunities among people with IDD and those without, we turn to the infrastructure that supports employment services, specifically policies and funding, and the relationship between the two. Employment-centric funding strategies communicate the importance of a job in the community that pays real wages. These strategies can also result in a decreased reliance on public supports, and an increased state tax revenue from newly employed citizens with IDD. While states are grappling with day and employment funding mechanisms and rate methodologies, what is missing in this discourse is the reality of poverty or near-poverty for many individuals served by our systems. Rolfe [17] acknowledges the need for policy to address underemployment, unemployment, and persistent poverty for people with significant disabilities. Employment as a means of increasing economic self-sufficiency should be a powerful driver in these conversations, and yet states may lose sight of this in response to other priorities and pressures that vie for attention.

In an environment of increasing fiscal demands and limitations, and expansion of self-directed services and individualized budgeting, there is a growing need for state IDD systems to engage in rate-setting and funding discussions that are rooted in their priorities and the system's long-term goals. This paper highlights the important elements of each of these states' funding systems. It is not intended as a "best practice" approach; rather, it is intended to provoke thought in other states about their own rate methodology and how it supports (or hinders) policy goals related to employment.

In light of the findings, several important considerations emerge for states as they plan contract and reimbursement processes that support a vision for greater employment. These recommendations reflect that no system is perfect and that every action or decision does have some problematic consequences within the schemes currently in use. However, we conclude that funding must be:

– goal-focused,
– connected to and consistent with larger systems strategies, and
– seamless.

4.1. Funding must be goal-focused

4.1.1. There is no one-size-fits-all approach

Our research suggests that there is no "best" approach in terms of funding methodologies, but there are several elements that are key. Rate structure needs to be selected with a clear underlying intent regarding the goals of the system. Along those same lines, unambiguous definitions and service categories should also reflect these priorities. States with policy and funding alignment pay more for desired outcomes (a job in the community) and less or not at all for outcomes that are not a priority. States must think cogently about their expectations, and then align them with the types of supports they want to pay for. Tying rates and other funding decisions, such as who gets funding, to the ultimate goals of the system sends an unequivocal message to stakeholders about the expectations of the funder. This includes issues of supports that are covered and are not covered by a rate. For example, including volunteerism within a definition of employment sends an incongruous message about the desired outcomes of the system. Not directly or explicitly funding time spent in person-centered job development may devalue the importance of a careful and creative job search and career planning. States need to clearly define their expected outcomes, and then develop rates and methodologies that adequately compensate providers for achieving these goals.

4.1.2. Incentives and disincentives for providing employment

Keeping funding strategies goal-focused includes not only developing incentives but eliminating disincentives to achieving policy aims. In a study of systems-change efforts of VR agencies [12] the authors found that slightly over half the states reported having incentives for providers to support individuals in integrated employment. These included higher rates for integrated versus facility-based services, cash stipends to providers, and policies that all new service funding be allocated towards community employment. However, 20% of respondents in Novak's study reported financial incentives to provide facility-based services. These incentives included a more stable funding source for segregated services, and the avoidance of risk and greater predictability for the individual, family, and the provider. The higher cost associated with integrated employment as compared to segregated was also cited. In the current study of these IDD systems, the predominant incentive identified in the states was a higher hourly rate for community employment versus facility-based employment. However, a Florida respondent pointed out inconsistencies in the rates between time-limited and long-term supports. This can create disincentives for providers to transition people from segregated to integrated services. Providers being funded by VR for initial, time-limited services experience a gap in billing during the job-search process. When an individual moves into extended or follow-along supports, even though the rate is higher than for facility-based services, it is less lucrative for the provider because of number of units billed. Thus, the presence of specific incentives, such as those targeting providers who have not previously been engaged in community employment services, must be coupled by a removal of disincentives for providing employment supports.

Along the same lines, it is important that disincentives to serve those with the most severe disabilities are eliminated as well. Revell et al. [15] work in the VR system advocates a tiered payment level based on need, whereby individuals are assigned to a Level of Support Need based on the intensity of supports needed to find and maintain a job [22]. Within the VR system, a tiered system refers to how much the system pays for an outcome, while within the IDD system, tiered payments can result in personalized budgets, or individual allocations based on level of support need. However, these systems must be accompanied by oversight and monitoring to ensure that outcomes and goals are being achieved in a reasonable amount of time.

4.2. Funding must be connected to and consistent with larger systems strategies

4.2.1. Funding and data

Previous research has found that high-performing states in integrated employment developed structures through training, collecting data, and reporting outcomes back to CRPs [6]. This allowed for explicit transmission of their goals of including people with disabilities in the workforce. Similarly, this study points to the importance of collecting and reporting information to be used in funding discussions. States considered basic rate information and how it should be tracked. State IDD agencies are unable to respond to requests for information, or increased pressures for transparency, without a reliable data management system in place.

4.2.2. Funding and the direct support workforce

The quality of direct support staff directly impacts the quality of employment supports that individuals with IDD receive. Yet in a 2004 study, approximately half of the organizations responding said they had difficulty finding adequate funding for training activities for their staff [19]. Despite the significance of robust training initiatives [6], many providers are unable to provide essential training because of funding issues. One way to address this issue is through incorporating training dollars into the employment rate. For some of the states studied, an important aspect in determining the state's rate for integrated employment was the cost of staff competencies. Connecticut was explicit about building in training dollars and an enhanced level of compensation into their rate methodology.

Employment support staff recruitment and retention issues have deleterious effects, both for community rehabilitation providers and the individuals whom they serve. The combination of direct support turnover averaging 50% or more annually and substantial vacancy rates has negative effects on the quality of supports provided. High turnover can result in higher training costs and increased workload for the remaining direct support professionals; chronic vacancies can be very stressful for overworked staff [21]. For the individuals being supported, this research points to profound negative effects of workforce challenges. Importantly, a lack of direct support workers could affect whether supports are even delivered, as high turnover and vacancy rates challenge the system's capacity and increase the number of individuals on waiting lists for services [21]. The relationship between compensation (pay and benefits) and staff turnover and vacancy rates is well-established [9]. In addition to low wages, high vacancy rates have also been attributed to increased demand for direct support staff, and a shrinking labor pool of qualified and interested candidates [7, 18]. Building supplemental funding into the employment rate that a state IDD agency reimburses providers can also help to ensure that organizations are able to pay fair wages to employment professionals in order to attract and retain qualified staff.

4.3. Funding must be seamless

4.3.1. Variation in role of VR

State IDD agencies enter into collaborative partnerships with the state VR agency to further shared employment goals and coordinate funding needs. It is critical for IDD agencies to remember the differences between the two systems as they pursue partnerships. A successful outcome in VR is employment in an integrated setting at minimum wage or higher with a priority placed on full-time work. Individuals served must intend to achieve an employment outcome as defined by VR. It is imperative for state IDD agencies to understand these priorities and consider them in light of their own employment goals, when approaching a partnership with VR. Common employment outcomes can aid the two agencies in aligning roles across local, state, and federal funding. Joint vendors between the systems may also be crucial in ensuring the administrative and programmatic goals are achieved. Clear staffing assignments encourage both IDD staff and VR staff to be familiar with each system's nuances, and approach a collaborative relationship with defined roles and responsibilities.

VR services must be provided in the most expeditious manner (national average: 24 months), compared to the long-term nature of IDD services. Additionally, VR services are not intended for ongoing, long-term supports; VR funding terminates once employment has been achieved. Though most cases are closed 90 days post-placement, they can be extended if employment is not stable; cases can also be reopened post-placement.

The CMS requirement of referral to VR prior to the utilization of HCBS waiver funding has been implemented unevenly throughout states. To clarify shared funding decisions between IDD and VR systems, some states have implemented rules stating that VR funding must be formally denied before HCBS waiver resources can be used for supported employment, while other states have a more informal process in place. Some states use form letters or other procedures to document a denial of service. These processes also have led to reported significant waits for determining eligibility, delaying service delivery. As the number of individuals interested in community employment expands, the ability of public VR to conduct eligibility determinations on all individuals served by IDD agencies may exceed the capacity of state VR agencies. Some state IDD agencies are considering ways to assist individuals to approach VR with a career plan in hand, signaling they are ready to work and potentially avoiding the long wait for additional assessments.

What is lost in this process is the need for a strategic role for VR in meeting the employment needs of people served by IDD systems. Each of the five case-study states detailed a collaborative arrangement with the state VR system, mainly for funding Phase 1 or initial job development and job coaching services. Given VR's relatively limited capacity and order of selection status in many states, state IDD systems should approach the partnership with realistic expectations.

The goal of seamlessness in the transition from job development and stabilization services to longer-term supports is an elusive one in many states. Moving through VR's eligibility and assessment process and then back to long-term supports can create a bottleneck in the system and vastly increase the waiting time for service delivery. The data from this study suggest the need to re-evaluate the CMS requirement of referral to VR before utilization of HCBS waiver funding. While studies support the value of interagency collaboration with VR generally [10, 14], respondents from these five states focused on the deleterious effects of this requirement (as well as the avoidance of the requirement) rather than the advantages that referrals to VR can provide for people with IDD.

Perhaps the most central implication from the data is that there is no one perfect funding system. These systems must be understood within the context and the variables impacting them. Most important is adequate compensation for services providers, and that funding strategies positively impact employment outcomes.

5. Conclusion

The lens we used in this paper focuses on the details of each of these states' funding systems. The broader picture includes the need for states to develop policies and funding mechanisms that communicate the importance of work and economic self-sufficiency for people with IDD. While unintended consequences of rate decisions were apparent throughout the data, examples from these five states suggest that different types of rate methodologies can be effective as long as they are supported by clear policies, effective quality-assurance mechanisms, and goals that support the vision of greater employment opportunities for individuals with disabilities.

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