



To: Personalized Recovery Oriented Services (PROS) Programs
From: NYS Office of Mental Health (OMH)
Date: 01/11/2023
Subject: PROS Employment Initiative & Individual Placement and Support Guidance

Introduction

As an integrated model, Personalized Recovery Oriented Services (PROS) delivers rehabilitation, treatment, and employment services in one location. The PROS Employment Initiative (previously called the PROS Vocational Initiative) provides state aid funding to offset the provision of employment services that are not eligible for Medicaid reimbursement, such as job development and job coaching. Enhanced funding was added in 2022 to support full implementation of the Individual Placement and Support (IPS) approach. IPS “is a model of supported employment for people with serious mental illness.... IPS supported employment helps people living with behavioral health conditions work at regular jobs of their choosing. Although variations of supported employment exist, IPS refers to the evidence-based practice of supported employment” (IPS Works, 2022).

Employment status and socioeconomic status are two key social determinants of health and mental health. The intent of the PROS Employment Initiative is to focus programs on employment as a primary outcome, with an emphasis on evidence-based practice as a tool for helping participants choose, get, and keep jobs. As of late 2022, over 40% of PROS participants are employed, actively seeking employment, or are interested in employment. The full implementation of IPS is a significant opportunity to support these individuals with meeting and sustaining their goals.

This guidance is intended to describe key program requirements and deliverables related to the PROS Employment Initiative. This memo replaces programmatic guidance and requirements previously described in PROS Clarification #14.

PROS Employment Initiative Funding

The PROS Employment Initiative is funded through state aid (net deficit funding). In New York City, programs receive these funds through a direct contract with OMH. In Western New York, Central New York, Hudson River, and Long Island, programs receive these funds through their local government unit, or county, via a contract with the county.¹ The exact funding amount that any program receives is tied to their average census, and this amount is rebased annually to account for changes in their census.

This funding is used for a variety of purposes to support employment services in PROS, including but not limited to:

¹ Counties receive the funds directly from OMH via the State Aid Letter.

- Competitive salary and fringe for at least 1.0 FTE well-qualified employment specialist(s) per PROS program,
- Staff time and agency resources needed for participation in IPS training and the Center for Practice Innovation's IPS Learning Collaborative,
- Staff transportation costs related to off-site employment activities,
- Employment services under the IPS model that are not covered by Medicaid, including job development and short-term job coaching, and
- New York Employment Services System (NYESS) training and implementation.

Note: This state aid funding may not be used for any costs *unrelated* to the provision of supported employment. This includes capital expenditures, program fees, and wages for PROS participants.

Competitive, Integrated Employment

The term "competitive, integrated employment" means work that:

- is performed on a full-time or part-time basis, including self-employment, for which an individual is compensated at a rate that shall be not less than minimum wage;
- is reimbursed at no less than the customary rate paid by the employer for the same or similar work performed by other employees who are not individuals with disabilities, and who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills;
- in the case of an individual who is self-employed, yields an income that is comparable to the income received by other individuals who are not individuals with disabilities, and who are self-employed in similar occupations or on similar tasks and who have similar training, experience, and skills;
- is eligible for the level of benefits provided to other employees;
- takes place in an environment where the employee interacts with other persons who are not individuals with disabilities (not including supervisory personnel or individuals who are providing services to such employee) to the same extent that individuals who are not individuals with disabilities and who are in comparable positions interact with other persons; and
- presents opportunities for advancement that are similar to those for other employees who are not individuals with disabilities and who have similar positions, as appropriate.

Note that seasonal temporary jobs, jobs through temporary agencies that are open to other community members, and positions through Javits-Wagner-O'Day (JWOD) and New York Industries for the Disabled (NYSID) are considered competitive, integrated employment.

IPS & PROS

IPS is characterized by practices which support and enhance the philosophy of PROS. IPS and PROS share several common principles, including:

- Recovery-oriented, strength-based outcome focus
- Individualized and person-centered foundation
- Commitment to integration of services with treatment
- Emphasis on partnerships with community-based resources
- Provision of services to participants at any point in the recovery process.

Implementing Key Principles of IPS in PROS²

As an evidence-based model, IPS has eight key principles which can be supported through PROS:

- 1) **IPS is based on zero-exclusion.** IPS supports the PROS principle of working with the participant at any point in his or her recovery, regardless of previous employment history or current barriers. Access to IPS is not dependent upon psychiatric history, substance use history, job readiness factors, personal presentation, or other factors.
- 2) **IPS integrates employment services with mental health treatment.** PROS assures optimal treatment by integrating evidence-based practices, clinical treatment, recovery, and rehabilitation in a single, person-centered environment. Employment specialists are members of the PROS multidisciplinary team.
- 3) **Competitive, integrated employment becomes an agency goal.** Implementation of IPS in a PROS program requires the development of agency-wide strategies to encourage and engage participants around competitive, integrated employment. IPS is most successful when all levels of agency staff, including the executive team, focus on and support competitive employment as an essential component of recovery.
- 4) **Systematic Job Development.** Successful implementation of IPS involves a high level of partnership with local employers through systematic job development and networking by the employment specialist.
- 5) **Benefits Counseling.** Benefits and Financial Management is a service provided through the Community and Rehabilitation Supports (CRS) component of PROS. Employment specialists may also connect participants to outside benefit navigators when needed.
- 6) **Rapid Job Search.** It is an expectation that employment specialists will immediately begin working with those participants who have identified employment as a goal.
- 7) **Follow-along supports are time-unlimited and continuous.** The Ongoing Rehabilitation and Support (ORS) component of PROS aligns with the IPS principle of time-unlimited, individualized, follow-along support. Participants can remain in ORS for as long as necessary to address mental health barriers related to sustained employment.
- 8) **Participant preferences.** IPS and PROS are person-centered models, meaning that each participant is engaged in a person-centered planning process to identify their preferences related to jobs and employment.

IPS and Medicaid Reimbursement

IPS include services and activities that are eligible for Medicaid reimbursement as well as services that are *not* eligible for Medicaid reimbursement. Employment services and attaining competitive employment are integral parts of the recovery focus of PROS. It is the expectation that each PROS will offer IPS as an ongoing part of the PROS program. Whether IPS interventions are eligible for Medicaid reimbursement should have no bearing on the frequency and consistency of opportunities available to PROS participants to participate in IPS vocational services.

² Note that the below key principles and standards for PROS programs were previously released in PROS Clarification #14 (Individual Placement and Support), which has been replaced by this memo.

PROS is authorized under the federal Rehabilitative Services Option, which funds services such as counseling, psychosocial rehabilitation, and other therapeutic interventions, which may have a secondary benefit of enabling individuals to obtain or maintain integrated, competitive employment opportunities. For example, PROS programs deliver services that assist participants to restore functioning, manage stress, and cope with symptoms – all of which can support goals related to obtaining and maintaining employment.

IPS practices are considered eligible for Medicaid reimbursement when the interventions are focused on helping the participant overcome a mental health barrier that prevents the participant from attaining their goal of becoming or remaining employed. In such cases, IPS practices implemented through a Medicaid-billable service must be medically necessary rehabilitative services.

Program costs for to implement IPS practices that are *not reimbursable* under Medicaid are offset by net deficit funding under the [PROS Employment Initiative](#) (Program Code 8350).

The below table can help programs with determining whether a specific intervention or service is billable or non-billable:

Type of Service or Intervention	Billable as PROS Service	Non-Billable (Funded by PROS Employment Initiative)
Engagement	CRS – Engagement may be appropriate for engaging with the participant to talk recovery and their goals, including as it relates to employment	Brief engagement interactions with a participant that do not meet the minimum duration or threshold for a billable service or engagement focused primarily on employment generally or job tasks that are unrelated to the individual’s interests, abilities or rehabilitative goals.
Vocational or Career Assessment	The Comprehensive Psychiatric Rehabilitation Assessment includes a section on employment	Any vocational or career focused assessment that is not part of the overall mental health assessment
Benefits Counseling	CRS – Benefits and Financial Management may include instruction related to income and benefits, including incentives for returning to work.	Completing benefits paperwork or applications on a participant’s behalf, without instruction and support to the participant.

Table continues on next page.

Type of Service or Intervention	Billable as PROS Service	Non-Billable (Funded by PROS Employment Initiative)
Job Development & Rapid Job Placement	CRS, IR, and Clinical Treatment services that support the participant with managing their mental health challenges and barriers as they work toward achieving their employment goals (e.g., coping skills training, building workplace social skills)	<p>Systematic job development and networking with employers</p> <p>Direct support with helping a participant find and procure a job (e.g., resume writing, completing applications, or scheduling or participating in interviews)</p> <p>Interventions with prospective employers to develop employment opportunities specifically tailored to an individual's abilities.</p>
Follow-along support (job retention support)	<p>ORS and Clinical Treatment services that help the participant manage their mental health challenges and barriers as they work toward sustaining their employment goal</p> <p>CRS, ORS, IR, and Clinical Treatment services that help the participant improve their functioning at work and in the community</p>	<p>Job coaching and other interventions that are targeted to helping the participant succeed in a specific job-related task (i.e., "hard skills")</p> <p>Intervention with an individual's employer to resolve an issue regarding the individual or the workplace</p>

IPS and Ongoing Rehabilitation and Support (ORS)

IPS and ORS are not synonymous. IPS may be delivered through a number of billable and non-billable services and interventions. When a PROS program implements IPS, they should be using a variety of CRS, IR, and other non-billable services to support the participant with *choosing* and *getting* a job. ORS focuses on helping the participant with *keeping*, or sustaining, a job and best aligns with the IPS principle of time-unlimited supports, providing individualized follow-along mental health supports after a participant has attained competitive, integrated employment.

IPS and Intensive Rehabilitation Goal Acquisition

Intensive Rehabilitation Goal Acquisition (IRGA) is an excellent tool for implementing Medicaid billable IPS interventions.

Using IRGA, the employment specialist helps the participant to explore the various topics within the context of how mental health challenges have created barriers to employment. The focus is on discovering the participant's unique abilities, talents, skills and resources, as well as supporting the participant to consider what they believe would be the best possible employment situation.

After the participant identifies a potential job match based on his or her strengths, talents, and interests, there are additional areas to examine. What steps must the person take to attain

employment in this area? What mental health barriers must they overcome to take these steps? What supports will they need to participate in an interview? How will they manage the challenges they experience because of mental health challenges and continue to be successful on the job?

The employment specialist can use IRGA to support the participant in navigating the job application, interviewing, and hiring process. At times during the rapid job search process, the employment specialist may need to provide the participant with a level of direct employment support that is not billable under Medicaid (see chart on pgs. 4-5 of this guidance).

Examples of IPS in Medicaid Billable PROS Services

Below are some additional examples of how IPS practices are effectively delivered through PROS services. This list is not meant to be all inclusive but rather offers a framework for considering how IPS practices can be smoothly and effectively implemented into PROS service delivery.

- *CRS – Individual Recovery Planning (CRS)*: The participant and employment specialist work together to identify barriers that are preventing the participant from attaining competitive, integrated employment and the steps that can be taken to overcome these challenges. (IPS Principles: Work Incentives Planning and Zero Exclusion)
- *CRS – Benefits and Financial Management (CRS)*: The employment specialist and participant learn more about and explore how to balance benefits with competitive employment and fiscal self-sufficiency. (IPS Principles: Work Incentives Planning/ Benefits Counseling)
- *CRS – Basic Living Skills Training, Structured Skill Development and Support, and Wellness Self-Management*: Psychosocial rehabilitation services under the CRS component may be used to support participants with building and developing soft-skills related to employment, including but not limited to social skills necessary for workplace interactions, coping skills for anxiety in the workplace, organizational and time management skills, etc. It is important that under the IPS framework, programs do not operationalize these services as a “prevocational” prerequisite to employment, but rather offer individualized and group-based services to participants *while* they are actively seeking employment. (IPS Principle: Rapid Job Search)
- *IR – Intensive Rehabilitation Goal Acquisition*: The participant and employment specialist work intensively to assist the participant to attain his or her employment goal by overcoming/managing mental health barriers; this service may be provided at any time as part of employment services and may include intensive work on developing and implementing the participant’s Individualized Recovery Plan (IRP). (IPS Principle: Rapid Job Search)
- *Ongoing Rehabilitation and Support*: The employment specialist continues to meet with the participant at least twice per month to address mental health barriers in the workplace. (IPS Principles: Time-unlimited follow-along supports)

IPS Fidelity

Higher-fidelity implementation of IPS is associated with improved outcomes for program participants. The Center for Practice Innovations (CPI) trains PROS staff in completing fidelity self-assessments, *and PROS programs conduct annual (once per year) self-assessments using*

the [IPS Fidelity Scale](#). This tool can be used to support continuous quality improvement. Results of the IPS Fidelity Scale should be made available to OMH upon request.

It is noted that on some items, PROS programs may not be able to achieve the highest level of fidelity. For example, smaller programs would likely not employ a vocational unit including multiple staff. Technical assistance related to use of the IPS Fidelity Scale is available through CPI.

Employment Specialists in PROS

Employment specialists play an important role in PROS programs, contributing significant value to the multidisciplinary team.

- Each PROS program must employ at least one Full Time Equivalent (FTE) employment specialist. The employment specialist(s) are fully dedicated to employment.
- Programs with more than 100 participants enrolled must prorate additional employment specialist FTE per each 100 participants enrolled (e.g., a PROS program with 150 enrolled participants would need 1.5 FTE Employment Specialists).
- Programs may utilize multiple staff to meet the FTE requirement for the Employment Specialist(s).

Employment Specialists must have status as an equal member of the multidisciplinary team, with compensation at a level commensurate with their education and experience. As such, Employment Specialists should take part in all staff meetings, IRP reviews, and clinical team meetings for their assigned caseload.

Employment Specialists must meet the minimum qualifications for a paraprofessional staff in PROS, meaning they must be at least 18 years of age and have a high school diploma or equivalent with 1-3 years of relevant experience in a behavioral health or supported employment setting.

Employment Specialist Time in Community Standard

PROS Employment Specialists *must* spend at least 50% of their work hours off-site, in the community. However, in keeping with fidelity to the IPS model, OMH *recommends* that Employment Specialists spend at least 65% of their work hours off-site, in the community.

- Off-site, community locations include, but are not limited to ACCES-VR offices, businesses, libraries, schools and colleges, coffee shops, participants' homes, training sites, and time spent traveling to different community locations.
- Off-site activities may include direct service provision including collaborative documentation, as well as job development activities, like networking with community employers.
- The time in community standard is not meant to include time spent in meetings at an agency's satellite offices or completing non-collaborative documentation outside of the program space.

The time in community standard does not imply that employment services cannot be provided at the program site. During their 35-50% of work hours when Employment Specialists are at the PROS program site, they may deliver any number of employment-related services. Examples of on-site employment services include, but are not limited to resume writing, career exploration,

work-related social skills development, motivational interviewing focused on work and school related goals, etc. In keeping with the IPS model, such services are not intended to be “pre-vocational” in nature and must be necessary to support competitive, integrated employment.

Development of Job/Employment Network

It is noted that the job development activities carried out by the Employment Specialist in PROS should result in a network of employers and job opportunities, which can be shared with other rehabilitation programs within the provider agency (e.g., Assertive Community Treatment or Community Oriented Recovery and Empowerment Services).

PROS and the New York Employment Services System (NYESS)

New York Employment Services System, or NYESS, is a computer-based case management tool that is used by PROS programs and other employment services providers across the state. NYESS facilitates collaboration between participating New York State agencies to help participants find and keep jobs and will also enable agencies to participate in the Social Security Administration (SSA)’s Ticket to Work initiative more effectively. Agencies partnering in NYESS include the Office of Mental Health (OMH), Department of Labor (DOL), Office of Addiction Services and Supports (OASAS), Commission for the Blind and Visually Handicapped (CBVH), Office for the Aging (OFA), and Office for People with Developmental Disabilities (OPWDD).

NYESS provides employment specialists with a useful tool in providing vocational services to participants and can be an important resource in job development. Staff providing IPS services can use NYESS to work with people individually to provide job-related supports including benefits management, resume-building, Ticket to Work and accessing tax credits. NYESS will enhance and expand the individualized services that the Employment Specialist is able to provide to the people on his or her caseload.

Data entry in NYESS is required by the PROS Standards of Care (PROS SOC 5.4.1). Additional details are described below under [Documentation and Reporting Requirements](#).

CPI Learning Collaborative

The Center for Practice Innovations (CPI) offers training and support to PROS programs in the Individual Placement and Support (IPS) approach to supported employment via the IPS Learning Collaborative. *All PROS programs must be enrolled in the Collaborative by 01/31/2023.*

The IPS Learning Collaborative will involve a varying time commitment from the program’s employment specialist(s), of 2-5 hours per month on average based on where your program is in implementation of the model. This will include completing initial training, including online training modules; attending statewide webinars, regional technical assistance meetings, and in-person and virtual programmatic technical assistance; and submitting annual fidelity self-assessments and monthly performance indicator data.

Staff Training Requirements

All PROS program staff and supervisors are required to complete the below training on the IPS model through the CPI Learning Community, an online learning management system:

- [IPS: Introduction to the Individual Placement and Support \(IPS\) Model of Supported Employment ©2012 \(csod.com\)](#) – 45 minutes

Current PROS staff and supervisors must complete this training by **04/11/2023**. Any PROS staff or supervisor hired after **01/11/2023** must complete this training within 3 months of hire.

In addition to the introductory training above, *PROS employment specialists* are also required to complete the below trainings:

- [IPS: Job Development ©2013](#) – 30 minutes
- [IPS: Using the Employment Resource Book ©2015](#) – 60 minutes

Current PROS employment specialists must complete this training by **04/11/2023**. Any employment specialist hired after **01/11/2023** must complete this training within 3 months of hire.

These trainings are found in the [CPI Learning Community](#), which is available to PROS programs and staff at no cost. The CPI Learning Community will be used to track completion of these trainings. Provider-specific information (staff, completion dates, etc.) will be available upon request. It is the responsibility of the provider agency to ensure training requirements are met.

Documentation & Reporting Requirements

Participant Case Records

Assessment Requirements

All participant case records must include a Comprehensive Psychiatric Rehabilitation Assessment which includes an assessment of the participant's employment goals and needs.

Children and Adult Integrated Reporting System (CAIRS)

Programs are required to enter information about the employment status of each participant at admission, during each 6-month follow-up, and at discharge.

New York Employment Services System (NYESS)

Each participant who expresses an interest in employment must be entered in [NYESS](#), which includes at minimum:

- Active NYESS record
- All employment and related activities (billable and non-billable) are entered via the Activities Module
- All employment experiences, including volunteer, work-based learning, and standard job placements, must be entered in the Jobs Info tab

NYESS offers regular trainings and technical assistance regarding data entry and how to use the systems. For more information, please contact the NYESS team at the email provided below.

Program-Level Reporting

Employment Specialist Vacancy Report

The [PROS Employment Specialist Vacancy Report](#) is an OMH report which must be submitted monthly by all PROS programs, whether they have a current vacancy or not, beginning January 2023. This report is submitted electronically to the Rehabilitation Services Unit at OMH Central Office through Microsoft Forms *on the last business day of each month*. If you have difficulty accessing or submitting the report, please contact the [PROS mailbox](#) for technical assistance.

Consolidated Fiscal Reporting

Your organization submits the Consolidated Fiscal Report (CFR) annually. It is noted that expenses and revenue related to the PROS Employment Initiative are now reported under Program Code 8350.

Revenue generated from Medicaid-billable services should continue to be reported under the Comprehensive PROS program codes: 6340 – PROS with Clinic and 7340 – PROS without Clinic.

Additional Reporting Requirements

OMH and your Local Government Unit may add new or additional reporting requirements at a later date.

Connection to Outside Employment Resources

Successfully supporting a participant's employment goal often means collaboration with other service systems and existing regional infrastructure. Upon request, OMH can provide support and assistance in linking PROS programs to employment resources available through other state agencies, for example the Department of Labor and Adult Career and Continuing Education Services - Vocational Rehabilitation (ACCES-VR). OMH Employment Liaisons are uniquely equipped and available to PROS providers to facilitate these and similar connections, as well as providing technical assistance for effective systems coordination.

Additional Guidance Related to ACCES-VR and Employment Services in PROS:

When available and appropriate, services and support through ACCES-VR may be helpful for PROS participants. However, ACCES-VR services are not essential for a PROS program to successfully deliver IPS services. PROS programs should refer to the below Clarifications for additional guidance related to Ongoing Rehabilitation and Support (ORS) and the relationship between PROS and ACCES-VR:

- [Clarification 8: ORS Services](#)
- [Clarification 10: Relationship between Adult Career and Continuing Education Services-Vocational Rehabilitation \(ACCES-VR\) and PROS Regarding Employment Support Services](#)
- [Clarification 11: Transitioning Individuals from ACCES-VR Intensive Services at a Non-PROS Agency to Employment Support Services at a PROS Agency](#)

Resources & Technical Assistance

For questions related to this guidance, please contact the OMH Rehabilitation Services Unit at PROS@omh.ny.gov.

For questions regarding NYESS, please contact their mailbox at NYESS@omh.ny.gov.

For questions related to the IPS Learning Collaborative, please contact the CPI Helpdesk at cpihelp@nyspi.columbia.edu.