



Assertive Community Treatment (ACT) and Community Oriented Recovery and Empowerment (CORE) Psychosocial Rehabilitation (PSR)

Individual Placement and Support Initiative Guidance

Issued 11/16/2023, Effective 01/01/2024

Introduction

Individual Placement and Support (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.”¹ The New York State (NYS) Office of Mental Health (OMH) IPS Initiative is aimed at increasing the use of evidence-based supported employment in OMH licensed and designated outpatient rehabilitation programs, including Assertive Community Treatment (ACT) Teams and Community Oriented Recovery and Empowerment (CORE) Psychosocial Rehabilitation (PSR) designated providers.

Rehabilitation services are widely used to support individuals with employment-related goals, but federal rules related to Medicaid reimbursement for employment-related interventions and supports have historically limited the ability of these programs to fully implement IPS. The IPS Initiative includes funding to support non-billable employment-related services and the salary for an IPS Employment Specialist to improve employment outcomes.

Employment status and poverty are two key social determinants of health and mental health. The full implementation of IPS is a significant opportunity to support individuals with mental illness in meeting and sustaining their employment goals and working towards greater financial security. There is a direct correlation between employment and improved mental/physical health and reduced need for more service interventions.

This guidance is intended to describe key program requirements related to the IPS Initiative. For the purposes of this guidance, ACT Teams and CORE PSR designated providers will be referred to collectively as “rehabilitation programs.”

IPS Initiative Funding

The IPS Initiative is funded through state aid (net deficit funding). In most cases, organizations receive these funds through their local government unit, via a contract with the county² or through direct contract with OMH.

¹ “What Is IPS?,” The IPS Employment Center, July 13, 2022, <https://ipsworks.org/index.php/what-is-ips/>.

² Counties receive the funds directly from OMH via the State Aid Letter.

Eligible Providers

Organizations must have at least one of the below programs or services to qualify for funding:

- ACT
- CORE PSR

All agencies with at least one (1) ACT team will receive this funding and are *required* to participate in this initiative.

ACT agencies who receive funding as a requirement, and also have CORE PSR, will share the IPS Employment Specialist amongst both ACT team(s) and CORE PSR.

Eligible CORE PSR providers must have served at least 50 unique recipients over the previous year based on the date of application, as identified by OMH through claims data. Funding for organizations that provide CORE PSR, but not ACT, is available on a first come, first serve basis through a Request for Applications (RFA). The upcoming RFA and any future RFAs that may be issued can be found on the [OMH Upcoming Procurement Opportunities website](#).

This funding is to support ACT and CORE PSR and is not a stand-alone service.

Appropriate Use of Funds

This funding is used to cover program costs and non-Medicaid reimbursable employment-related services and activities, including but not limited to:

- Competitive salary and fringe for at least one (1) fulltime, well-qualified IPS Employment Specialist,
- Staff time and agency resources needed for participation in IPS training and the Center for Practice Innovation's (CPI) IPS Learning Collaborative,
- 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 individuals.

Implementing Key Principles of IPS in OMH Rehabilitation Programs

As an evidence-based model, IPS has eight (8) key principles which align with the recovery principles of ACT and CORE PSR Services:

- 1) IPS is based on zero-exclusion.** IPS supports the principle of working with the individual at any point in their 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.** This initiative assures optimal treatment by integrating evidence-based practices, clinical treatment, recovery, and rehabilitation in a single, person-centered environment. IPS Employment

Specialists will work closely with rehabilitation and vocational staff in programs across their organization.

- 3) **Competitive, integrated employment becomes an agency goal.** Implementation of IPS requires the development of agency-wide strategies to encourage and engage individuals 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 IPS Employment Specialist.
- 5) **Benefits Counseling.** IPS Employment Specialists will receive training to provide benefits counseling for individuals in rehabilitation programs, supporting them with navigating work incentives.
- 6) **Rapid Job Search.** It is an expectation that individuals who have identified employment as a goal will immediately be linked with employment supports, whether through rehabilitation staff in the program or through the IPS Employment Specialist.
- 7) **Follow-along supports are time-unlimited and continuous.** Rehabilitation services like psychosocial rehabilitation and skill building can be used to implement the IPS principle of time-unlimited, individualized, follow-along support. Individuals should receive support for as long as necessary to address mental health barriers related to sustained employment.
- 8) **Individual preferences.** IPS is a person-centered model, meaning that each individual is engaged in a person-centered planning process to identify their preferences related to jobs and employment.

Competitive, Integrated Employment

It is the expectation that each organization that receives IPS Initiative funding will make competitive, integrated employment a primary outcome in their existing rehabilitation program(s). The IPS Employment Specialist will work with individuals served within the organization's rehabilitation programs to gain competitive 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 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. When a rehabilitation program implements IPS, they should be using a variety of psychosocial, clinical, and other non-billable services. Whether IPS interventions are eligible for Medicaid reimbursement should have no bearing on the frequency and consistency of opportunities available to individuals to participate in IPS.

IPS practices are considered eligible for Medicaid reimbursement when the interventions are focused on helping the individual overcome a behavioral or mental health barrier that prevents the individual from attaining their goal of becoming or remaining employed. IPS practices will only be deemed medically necessary rehabilitative services when this criterion is met.

Services that are eligible for Medicaid reimbursement may be provided by the IPS Employment Specialist or by the program and billed under ACT or CORE PSR. Organizational and program costs related to IPS that are *not reimbursable* under Medicaid will be offset by net deficit funding under the IPS Initiative (Program Code 8360). Note that agencies will not “bill” for non-reimbursable expenses but will allocate them appropriately on the Consolidated Fiscal Report (CFR).

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

Type of Service or Intervention	Medicaid Billable	Non-Billable (Funded by IPS Initiative)
Engagement	Engagement may be appropriate for engaging with the individual to talk recovery and their goals, including as it relates to employment.	Brief engagement interactions with an individual that does 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	Any comprehensive assessment or intake process that is typically completed at admission and may include a discussion of employment-related strengths, barriers, or goals.	Any vocational or career focused assessment that is not part of the overall mental health assessment.

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Type of Service or Intervention	Medicaid Billable	Non-Billable (Funded by IPS Initiative)
Benefits Counseling	Skill building and psychosocial rehabilitation that includes instruction related to income and benefits, including incentives for returning to work.	Completing benefits paperwork or applications on an individual's behalf, without instruction and support to the individual.
Job Development & Rapid Job Placement	Psychosocial rehabilitation or clinical counseling interventions that support the individual 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 an individual 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>Psychosocial rehabilitation or clinical counseling interventions that help the individual manage their mental health challenges and barriers as they work toward sustaining their employment goal.</p> <p>Psychosocial rehabilitation or clinical counseling interventions that help the individual improve their functioning at work and in the community.</p>	<p>Job coaching and other interventions that are targeted to helping the individual 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>

Employment Specialists in ACT and CORE PSR

IPS Employment Specialists play an important role in rehabilitation programs, contributing significant value to multidisciplinary teams. Though IPS Employment Specialists are fully dedicated to employment-related work, they should take part in ACT/CORE PSR staff meetings/ daily team meetings, service and treatment plan reviews, and other clinical team meetings when appropriate.

IPS Employment Specialists must meet the following minimum qualifications:

- Must be at least 18 years of age and have a high school diploma or equivalent (GED or TASC)
- Six (6) months of personal or professional experience in human services
- An ability to travel independently, or with reasonable accommodations, throughout the community and outreach with local employers

Employment Specialist Time in Community Standard

IPS 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 IPS 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, employment settings, libraries, schools and colleges, coffee shops, individuals' homes, training sites, and time spent traveling to different community locations.
- Off-site activities may include, but are not limited to, direct service provision including collaborative documentation and job development activities, such as 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.

Development of Job/Employment Network and Partnership within the Participating Organization

It is noted that the job development activities carried out by the IPS Employment Specialist should result in a network of employers and job opportunities, which can be shared with other programs within the provider agency (e.g., PROS, State Aid Funded Employment Services, Clubhouses/Psychosocial Clubs, Housing/Residential).

When a participating organization has other program models which also use employment specialists (e.g., PROS or ACCES-VR funded services), the IPS Employment Specialist should work closely with their colleagues to coordinate job development activities. Doing so will ensure resources are spread across programs and participants, while minimizing confusion to employers and the community. Depending on the size of the organization, the IPS Employment Specialist may be supervised in an existing vocational/employment division or department.

IPS Employment Specialist as a Member of the ACT/CORE PSR Team

The IPS Employment Specialist is not a full member of the ACT or CORE PSR Team. As an agency employee, they may support multiple rehabilitation programs, ensuring that individuals served in ACT and CORE PSR have full access to IPS.

The IPS Employment Specialist has an active role in service plan reviews and is a regular attendee on team meetings/case conferences to coordinate efforts with vocational staff of the ACT/CORE PSR team and avoid duplication.

ACT Team Vocational Staff and the CORE PSR staff will provide Medicaid reimbursable interventions, while the IPS Employment Specialist provides the non-billable IPS services and activities. This work will be closely coordinated with regular communication between the IPS Employment Specialist and the vocational/rehabilitation staff. For example, the ACT Vocational Specialist or CORE PSR staff would provide psychosocial rehabilitation interventions that support the individual 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), while the IPS Employment Specialist could work with prospective employers to develop employment opportunities for the individual, provide job coaching and benefits counseling to the

individual. The IPS Employment Specialist shares progress updates with the ACT/CORE PSR team during team meetings and case conferences or service plan reviews.

New York Employment Services System (NYESS)

New York Employment Services System, or NYESS, is a web-based case management tool that is used by rehabilitation and employment services providers across the state. NYESS facilitates collaboration between participating NYS agencies to help individuals find and keep jobs as well as enable agencies to participate in the Social Security Administration (SSA)'s Ticket to Work initiative more effectively. Agencies partnering in NYESS include 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 rehabilitation program staff with a useful tool in providing vocational services to individuals 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 ACT and CORE PSR providers are able to provide to the people on their caseload.

Data entry in NYESS is required for participating organizations; additional details are described below under [Documentation and Reporting Requirements](#).

Connection to Outside Employment Resources

Successfully supporting an individual's employment goal often means collaboration with other service systems and existing regional infrastructure. Upon request, OMH can provide support and assistance in linking rehabilitation programs to employment resources available through other state agencies, for example DOL and Adult Career and Continuing Education Services - Vocational Rehabilitation (ACCES-VR). OMH NYESS Employment Liaisons support employment-related initiatives and are uniquely equipped and available to participating organizations to facilitate these and similar connections. OMH Employment Liaisons focus on providing technical assistance for effective systems coordination.

Training Requirements and the IPS Learning Collaborative

CPI offers training and support to participating organizations in the IPS approach to supported employment via the IPS Learning Collaborative. *ACT Teams and CORE PSR designated providers participating in the IPS Initiative must enroll in the IPS Learning Collaborative.*

The IPS Learning Collaborative will involve a varying time commitment from the IPS Employment Specialist(s), approximately two (2) to five (5) hours per month on average based on where your program is in implementation of the model. This includes 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

Programs are required to have IPS Employment Specialists and all ACT and CORE PSR staff trained on the IPS model.

All ACT and CORE PSR staff must complete the below training 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

IPS 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 staff must complete this training by **03/31/2024**. Any staff hired after **03/31/2024** must complete this training within three (3) months of hire. Note that if staff have previously taken this module and have a certificate of completion, they do not need to retake it.

These trainings are found in the [CPI Learning Community](#), which is available to all OMH 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.

IPS Fidelity

Higher-fidelity implementation of IPS is associated with improved outcomes for program individuals. CPI will train participating organizations and IPS Employment Specialists in completing fidelity self-assessments. *Participating organizations must 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.

Documentation & Reporting Requirements

IPS interventions provided by IPS Employment Specialists must be supported by the individual's identified employment needs and goals as outlined in their ACT/CORE PSR assessments and individualized service plan. Participating organizations should ensure IPS Employment Specialists have access to member records to aid service provision and collaboration with the ACT/CORE PSR team. Certain IPS interventions - such as job development with community employers - may not be specifically indicated in an individual's service plan but should be made clear in the individual's record if/when efforts of the IPS Employment Specialist contribute to a job placement for the individual. Documentation to describe all interventions provided by the IPS Employment Specialist shall be maintained and are subject to audit by the State and/or Local Government Unit (LGU).

New York Employment Services System (NYESS)

Each individual 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) must be 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.

Employment Specialist Vacancy Report

The IPS Employment Specialist Vacancy Report is an OMH report which must be submitted monthly by all ACT programs and CORE PSR who have received funding, whether there is a current vacancy or not, beginning January 2024. This report is submitted electronically on the last business day of each month. If you have difficulty accessing or submitting the report, please contact your corresponding ACT Field Office liaison or the Employment Services mailbox at EmploymentServices@omh.ny.gov for technical assistance.

Consolidated Fiscal Reporting (CFR)

Your organization reports expenses and revenue on the the CFR annually. This initiative will be reported under Program Code 8360.

Additional Reporting Requirements

OMH reserves the right to revise or add reporting requirements at a later date.

Your LGU may have additional reporting requirements as part of their monitoring of local state aid funding contracts.

Resources & Technical Assistance

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

For questions regarding NYESS, or to connect with an OMH Employment Liaison, 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.