

Comment: Many commenters expressed that the 1:1 employment path rate would be extremely beneficial to ensure people have an opportunity to participate in community-based work experiences while exploring employment (individualized internships, job shadowing, informational interviews, etc).

Response: ODDS is very excited to have this new rate for employment path approved, and appreciates all the feedback from stakeholders that has made it possible.

Comment: Many commenters expressed concern with the 50 hour annual cap.

Response: ODDS has updated guidance to remove this hard cap. Services will be monitored by ODDS to ensure they are time-limited, and being used for community work experiences that lead to Competitive Integrated Employment. It will also be subject to the 25 hour weekly limit for a combination of Employment and DSA services.

Comment: As a provider we have been delivering 1:1 Employment Path and it has always been coded as a group service.

Response: Many providers have historically provided 1:1 Employment Path using the existing rates as a time limited short-term service.

Comment: Case managers do not understand this service and could use additional training and examples.

Response: ODDS will increase training and information for case managers regarding 1:1 employment path services. Additional examples have been added to the worker's guide.

Comment: Can 1:1 Employment Path be delivered remotely?

Response: Yes. Requirements for remote Employment Path Services during the Federal Public Health Emergency are outlined in the ODDS COVID-19 Worker's Guide. Requirements for remote employment services after the Federal Public Health Emergency ends will be outlined in the worker's guide for remote Employment Services.

Comment: The guidance needs to clarify that the limit of 25 hours, for a combination of Employment Services, is a weekly limit.

Response: ODDS updated guidance to clarify this.

Comment: Clarification regarding billing procedures would be helpful, particularly when there are multiple service providers. Sometimes providers are not able to bill for services because

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another provider has billed for the weekly limit of services. What process can a team follow, or what tool can a team use, to communicate about claiming hours?

Response: ODDS will address this in training to help clarify.