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*Equity, Opportunity, and Inclusion for People with Disabilities since 1975*

July 27, 2015

David Mank, Chair

Advisory Committee on Increasing Advisory Committee on Increasing Competitive Integrated Employment for Individuals with Disabilities

Dear Chairman Mank,

I am writing on behalf of TASH, a non-profit research and advocacy association, with a mission to advance the inclusion of people with the most significant disabilities in all aspects of life. TASH is a cross-disability, cross-sector membership association that acts on our mission through research, professional development, family and self-advocate engagement, and advocacy.

I am writing to express our sincere thanks to you and the members of the Advisory Committee on Increasing Advisory Committee on Increasing Competitive Integrated Employment for Individuals with Disabilities (ACICIEID) for your visionary and thoughtful reports, which provide a blueprint for a way out of nation-wide, systemic over-reliance on sheltered work and subminimum wage employment. For too long, individuals with disabilities, particularly those with complex support needs, have been thought of as unable to work, and have languished in sheltered work or non-work facilities, away from the rest of society and without say in their life trajectory. TASH has called for an aggressive end to subminimum-wage employment, sheltered work, and chronically low expectations for decades, and we are impressed with the ACICIEID's work in both substance and scope.

Specifically, we would like to highlight the following recommendations in the Committee's draft reports:

- a. We strongly support the recommendation to prioritize individuals with intellectual and developmental disabilities (I/DD) for employment-related services from both vocational rehabilitation (VR) and American Job Centers (AJCs). We are also pleased to see the committee recommend that this population be eligible and prioritized as recipients for PELL grants for vocational preparation.
- b. We applaud the recommendation to add Competitive Integrated Employment (CIE) as a data element for Indicator 14 of the Office of Special Education Program's Results Driven Accountability system, while at the same time ensuring that placement in a sheltered workshop, enclave, or a job that pays less than minimum wage is not allowed as an outcome for this purpose.

- c. We find the recommendations for additional research identified throughout the report to be important, and emphasize recommendation # 5 (Transition to Careers Subcommittee), calling for research to understand the link between K-12 education services, placement and supports to post-school integrated employment outcomes. Too often, students with I/DD spend their entire school careers in segregated schools and classrooms with no access to the integrated world or to academic instruction and little regard or preparation for what the future may hold.
- d. We urge the adoption of student-led IEPs, as per recommendation #12 (Transition to Careers Subcommittee), as an important part of college and career readiness for ALL students with disabilities, and from the very earliest ages.
- e. We applaud all recommendations to adopt and/or strengthen regulations that will result in an alignment of federal funds flowing to states be directed to incentivize competitive integrated employment outcomes for people with I/DD. Joint guidance on the use of funds from RSA, CMS and OSEP would be especially helpful to the field in order to eliminate confusion and stimulate blending and braiding of funds, found to be so important to the realization of employment outcomes for young adults with I/DD.
- f. We found the report from the Complexity Working Group to be particularly sophisticated regarding its understanding of the interrelatedness of federal funding and the issues caused by benefits limitations, inconsistencies across federal systems, eligibility requirements, and differences from state-to-state. For many years, the disability community has been calling for an overhaul of all federal programs to ensure that people with disabilities can work, work full-time, and have the confidence to do so without losing the security of income, health insurance, and other necessities of adult life. The recommendations from this report respond to these identified needs.

We respectfully suggest the following enhancements or changes to the recommendations included in these reports:

- a. The State and Local Subcommittee Report would be strengthened by adding a recommendation for VR and the adult service system to strengthen its workforce. For decades, the employment outcomes of people with disabilities have been determined by people with little experience, knowledge, or demonstrated expertise in facilitating a successful employment result. For people with I/DD, it is critical that the service system workforce is vastly improved, particularly in terms of building skills in utilizing Discovery and Customized Employment with transition age youth and with adults transitioning out of sheltered workshops. These tools are especially effective for people at risk of sheltered employment and for those without a history of CIE. Both Discovery and Customized Employment are acknowledged as allowable services for the first time in WIOA. TASH's testimony at the July 13<sup>th</sup> meeting of ACICIEID focused on this need.
- b. Recommendations related to Job Coaches and Direct Service Providers, also in the State and Local Subcommittee Report, would be strengthened by an expectation that job coaches fade over time for most individuals. We have learned from business that job coaches can "get in the way," have low expectations, and are inefficient. In addition to the recommendations to strengthen this workforce, we urge the Committee to recommend the provision of incentives and supports to businesses to provide any necessary training and ongoing supervision of employees with I/DD internally. For example, the Partners

with Business program operated by the Dane County (WI) Medicaid office is a model to consider.

- c. Recommendation #5 of the Marketplace Dynamics Subcommittee report recommends that AJCs partner with Centers for Independent Living (CILs) to enhance employment service delivery by AJCs to people with I/DD. There are additional potential partners that would be useful for building the capacity of AJCs beyond CILs, particularly as it relates to employment expertise for people with I/DD. Therefore, we urge an expansion of a potential partner list to include University Centers on Excellence in Developmental Disabilities, DD Councils and chapters of national non-profit organizations with expertise in CIE, such as APSE and TASH.

We suggest the following addition for the Transition to Careers Subcommittee:

- a. Provide culturally responsive and detailed information to parents and students with I/DD about supported decision-making, and multiple opportunities to experience it as a student matures, as a tool for navigating life decisions and as a replacement for guardianship. As a student approaches the age of majority, IDEA requires IEP teams to notify a family that they'll no longer have a say in decisions related to a student's IEP without the student's consent after the age of 18. New research shows that teachers and adult service professionals most often recommend full guardianship to parents of students with I/DD as they approach the age of majority. This loss of civil rights and decision making authority has profound and life-long consequences for employment of an individual with disabilities.

TASH is most appreciative of the months of study, discussion and hard work represented by these reports and urges their adoption by the ACICIEID and implementation by the various Departments of the Administration. We pledge our support to advance these efforts.

Sincerely,



Barbara R. Trader  
Executive Director