



APSE's Public Testimony to the Advisory Committee in Increasing Competitive Integrated Employment for Individuals with Disabilities October 14, 2015

My name is Allison Wohl and I am the Executive Director of the Association of People Supporting Employment First (APSE). APSE is the only national membership organization focused exclusively on integrated employment with 39 chapters that are the driving force for implementing Employment First policies and practices nationally. Through advocacy and education, APSE advances employment and self-sufficiency for all people with disabilities.

APSE applauds the bold Advisory Committee on Increasing Competitive Integrated Employment for Individuals with Disabilities (ACICIEID) for making concrete recommendations on the use of subminimum wages, better oversight of the 14(c) programs, and the use of limited federal funding for programs that actually increase competitive, integrated employment for individuals with disabilities.

Perhaps the most critical impact that the Workforce Investment and Opportunity Act (WIOA) will have on our country's workforce systems is that it turns the assumptions that our current system is predicated on upside down; our public systems of support for people with disabilities often presume that people can't work, and WIOA presumes that they can. Every program must be viewed via a clear and simple lens: whether it supports competitive integrated employment. If not, then our public policies and scarce public dollars should not be used to support it. As stated in the proposed regulations for WIOA: "...individuals with disabilities, including those with the most significant disabilities, are capable of achieving high quality, competitive integrated employment when provided the necessary skills and supports." It is no longer a cogent argument to insist that people should be supported in ways that segregate, isolate, and condemn individuals with disabilities to lives of poverty and low expectations.

The Committee's recommendations highlight the idea that we cannot have both strong public policies supporting competitive integrated employment, while simultaneously allowing antithetical provider practices that pay subminimum wages and segregate individuals with disabilities in settings that isolate them. The series of recommendations on service provider capacity highlights the importance of building on competitive integrated employment in terms of national and state standards, leadership development, staff development, and technical assistance as well as the removal of inherent provider conflicts of interest.

Now, the system itself must be transformed to support people under a standard definition of Competitive Integrated Employment. Viewed through this lens, changing "what is" must mean preparing to discard these outdated practices.

APSE is pleased to see strong recommendations regarding federal agency collaboration with respect to guidance and funding. Specifically, we strongly support the recommendations that ask federal agencies to:

451 Hungerford Drive Suite 700 | Rockville, MD 20850
Phone: 301.279.0060 | Fax: 301.251.3762
www.apse.org



- Collaborate to issue guidance to states on how to use, braid and/or blend their respective funds to support best practices and/or evidence-based models that result in competitive, integrated employment
- Make federal support and incentives available to help people move from segregated day programs to competitive integrated employment, using existing model programs
- Tie efforts to specific, measurable outcomes in the reduction of the number of people in segregated day programs and increases in competitive integrated employment outcomes would be effective.

We appreciate that the Committee took into consideration the important role that the Department of Education plays in managing employment expectations and creating transition opportunities for youth with disabilities. One of the most critical pieces of WIOA in terms of limiting segregated, subminimum wage services, and chronic lack of workforce participation of adults with disabilities, is focusing on youth with disabilities in transition. APSE would like to see Transition recommendations emphasize paid employment in high school and throughout Transition rather than simply preparation for employment. Students must learn that their time and skills have value and that any kind of prevocational training should be time-limited.

Recommendations for using real outcome data that would be widely disseminated will help people with disabilities, their families and other stakeholders make informed decisions about employment; where work may be available; and which agencies are most effective in supporting people to obtain competitive integrated employment.

The AbilityOne program is in need of real, sustainable reform. In order for the program to align with WIOA and its definition of Competitive Integrated Employment, it must be completely overhauled to protect significant taxpayer investment that go to the program and to assure that it is brought in line with 21st century expectations. Without real structural and financial and change, the AbilityOne program will continue to reward the status quo by awarding contracts to segregated, subminimum wage providers and those who pay our system's beneficiaries by outdated and discriminatory productivity standards. Taxpayer dollars should instead be reinvested in a system that rewards the facilitation of real jobs in typical work settings with the rest of society.

Both 14c and the AbilityOne program continue to reinforce a violation of rights and segregation. The workforce system must align policy and practice through common definitions that are understood across both service systems and federal agencies.

APSE has clearly and emphatically stated its position on sub-minimum wage and segregated employment and the need to phase it out.

We thank the committee for its time.