



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

TASH Testimony on Integrated Employment

Provided to the National Advisory Committee on Increasing Integrated Employment for Individuals with Disabilities – October 14, 2015

Good afternoon. My name is Barb Trader, and I'm the Executive Director of TASH. Celebrating our 40th anniversary this year, TASH was founded by researchers working with people with severe disabilities who believed that *research* should drive practice, policy and advocacy, and that all people with disabilities should have access to a full life – at school, at work and in their communities. The vision of a full life includes a WORKING life, and TASH members have developed practices, supported by research, which make integrated employment a possibility for all people, regardless of the perceived severity of disability, the attributes of the communities people live in, or the economic pressures of the times.

I am here today to express TASH's sincere thanks to the members of the Advisory Committee 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. For decades, TASH has called for an aggressive end to subminimum-wage employment, sheltered work, and chronically low expectations, and we are impressed with the Committee's work in both substance and scope.

TASH wrote a letter dated July 27th to specifically highlight segments of the report and provide additional comment. Today, I want to emphasize 4 specific points:

- a. We urge federal funding for additional research, a need which was identified throughout the report to be important. TASH is especially concerned with the need 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.
- b. 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.

- c. The Complexity Working Group's report is especially responsive to long-standing concerns regarding 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.

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, including an overhaul of professional preparation programs at the university level. For people with I/DD, it is critical that the service system workforce is vastly improved, with an emphasis on 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 13th 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 program, or the Pathways to Careers Program implemented by the Institute for Economic Empowerment, are models to consider.

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 means for protecting individual autonomy. New research shows that teachers and adult service professionals most often recommend full guardianship to parents of students with I/DD as they approach and cross into 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.

Finally, TASH fully supports the recommendations of Chapter 3 of the Committee's Interim Report on Ability One. The recent Ability One scandal has focused on alleged fraudulent use of federal funds, which, if proven true, are serious. However, our concerns are focused on the program's structural limitations which are long overdue for reform. The AbilityOne Program must be brought up to contemporary standards of practice for supporting people with disabilities to access competitive integrated employment. When these reforms are adopted, an inspector general should be appointed to provide rigorous oversight to ensure that the days of exploitation and fraud are brought to an end.

The continued segregation of people with disabilities in employment is unjust, and the payment of subminimum wages is discriminatory and demeaning. Americans with disabilities must be freed from the overwhelming control of the entities that simultaneously determine their eligibility for services, administer those services, and function as their employers. The concentration of power in community rehabilitation programs and sheltered workshops is a fundamental flaw in the AbilityOne Program. Any federally-sanctioned program must be a positive force for workers with disabilities by providing them freedom, self-determination, and real employment and career development opportunities.

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.