



APSE’s Public Testimony to the Advisory Committee in Increasing Competitive Integrated Employment for Individuals with Disabilities

Currently many of our nation’s students are leaving school without any significant work experience or a clear career plan. This problem is even more significant for students with disabilities. Youth with disabilities are more likely to drop out of high school, not receive adequate job training, become involved in the juvenile justice system, and remain on government programs resulting in a life of poverty and cyclical dependence. Evidence-based research has conclusively documented that youth with significant disabilities who were educated in inclusive settings, exposed to work experience and career exploration, and participated in a paid work experience during school had better postsecondary outcomes and higher rates of sustainable employment. However, our current system does not provide language or policies that promote integrated, competitive employment with the potential of career growth. This is largely a result of low expectations.

There are many opportunities within WIOA to mandate that transition-age youth be diverted from a path of segregated, subminimum wage services to competitive, integrated employment. WIOA mandates that 15% of Title I funds be used for “pre-employment transition services”, and that states ensure that any young person eligible or potentially eligible for VR services be provided pre-employment transition services. However, particularly given that WIOA provides no additional funding, it is unclear how VR is going to fulfill this service mandate under WIOA. In addition, for this effort to be successful, VR counselors must be trained on how to provide Customized Employment services as part of Supported Employment Services. APSE makes the following recommendations that will enable VR counselors to successfully support the youth that now fall under Section 511:

- VR counselors should have training in core competencies: customized and supported employment, including discovery a key component of the customized employment process.
- VR should create meaningful Memoranda of Understanding with other agencies as to whom exactly will both provide and fund the additional transition services as required in WIOA, to ensure clarity at the service delivery regarding the responsibilities of education authorities, VR, other disability agencies, and workforce development.
- Issue joint guidance from RSA and ODEP that clarifies to Local Education Authorities how IDEA funds can be spent for students with intellectual disabilities who are dually-enrolled and interested in pursuing post-secondary education.

APSE has a number of concerns with some of the language in WIOA under pre-employment transition that, if clarified, can make a substantial difference in both the quality and level of services that youth in transition are eligible for:

- “Work-based learning experiences” needs to be very clearly defined with an emphasis on settings that are fully integrated within the community, typical of employment settings



for students without disabilities, and aligning with the definition of “competitive integrated employment”. Guidance should also state: a) Work-based learning experiences should be based on an individual’s interests and preference; b) Use of in-school work experiences, particularly those that emphasize stereotypical roles (e.g., cleaning cafeteria tables), should be limited. c) Use of segregated facilities (e.g., sheltered workshops) for work-based learning experiences is absolutely not permitted.

- “Workplace readiness training” must be clearly defined in terms of permitted activities. Given the research that clearly shows that individuals with significant disabilities (like most individuals) best learn through actual on-the-job experience, there is concern that this “workplace readiness training” will result in activities that are of limited benefit, and result in “readiness criteria” that students must comply with before becoming employed, which is at odds with the situational nature of job readiness in general. As such, “workplace readiness training” should emphasize experiential activities, and avoid “readiness training” as a gateway to employment. Finally, guidance and regulations should absolutely prohibit use of segregated facilities (e.g., sheltered workshops) for “workplace readiness training.”
- Performance measurement for “pre-employment transition services” is critical. Such measurements should include the percentage of students with disabilities receiving these services, demographic information regarding type of disability, etc., actual paid working experience resulting from these services, whether students enter/maintain employment after leaving school, and post-secondary education experience and outcomes.
- Related to the previous item, guidance must clarify in general that individuals are eligible for VR services prior to leaving school, and specify the types of services that VR may pay for while an individual is still enrolled in school. Too often there is still a belief that individuals are not eligible for VR services until they leave school. The inconsistency and lack of capacity of school systems to do effective job placement is a major issue, and stronger roles and partnerships with VR and schools are critical in addressing this.
- Many states are already spending 15% of their VR funds on transition age youth. Implementing regulations and guidance should emphasize the changed role and expectations of VR in terms of transition, beyond simply dedicating at least 15% of their budget to transition.
- The youth services available via the general workforce system can play a significantly positive role in transition, and guidance should be issued that encourages the active participation and utilization of these youth services as part of the transition process.

One of the most critical pieces of WIOA in terms of limiting segregated, subminimum wage services its focus on youth with disabilities in transition. APSE would like to see this committee seize the unprecedented opportunity to “close the front door” for these individuals and prepare them for a life of independence and integrated, competitive employment.

Thank you for your time