



**FEDERAL JOINT COMMUNICATION TO STATE AND LOCAL GOVERNMENTS:
Resource Leveraging & Service Coordination to Increase Competitive
Integrated Employment for Individuals with Disabilities**

August 3, 2022



Dear Colleagues:

As part of our commitment to a diverse and inclusive workforce, the U.S. Departments of Labor, Education, Health and Human Services, and the Social Security Administration, as well as the undersigned subagencies below, are providing this joint communication to promote the leveraging and coordination of resources (e.g., funds, staff, equipment, services) by State and local government systems to increase competitive integrated employment (CIE) outcomes for individuals with disabilities.¹ We recognize across agencies that we often serve job seekers with disabilities jointly. Our goal for each shared job seeker with a disability is for them to receive effective, efficient, and seamless government-funded services.



Our respective Federal departments and agencies are collectively encouraging State and local partners to proactively implement resource blending, braiding, and sequencing strategies, as appropriate, across systems to maximize resources while simultaneously tackling our shared goal of improving CIE outcomes for youth and adults with disabilities. Our purpose, through this joint communication, is to drive innovation and effectively disseminate best practices across systems that share a common goal, which is to increase CIE outcomes for job seekers with disabilities.



Through collaborative efforts, State and local entities providing employment support services can maximize employment, inclusion, and economic advancement outcomes for individuals with disabilities. This communication also highlights examples of resource leveraging through the blending, braiding, and sequencing, as allowable, of resources and service coordination strategies across Federally financed systems to improve employment outcomes.



What is blending, braiding, and sequencing of resources?

Multiple efforts at the local and State levels of government bring an unprecedented focus on the importance of resource leveraging and service coordination across various public systems to increase CIE outcomes for job seekers with disabilities. Numerous innovative strategies are available to maximize the efficient and effective use of Federal funds across systems for supporting individuals with disabilities to secure and maintain CIE. These strategies include, as appropriate, the blending, braiding, and sequencing of funding, resources, organizational functions, and services, often resulting in cross-system processes that are streamlined and more user-friendly for job seekers with disabilities and families.



- **Blending** occurs when dollars from multiple funding streams are combined to create a single “pot” of commingled dollars that is then used to fund an initiative or purchase one or more specific services that support an individual with a disability in pursuing, obtaining, or maintaining CIE. Blending refers to the mixing together of funds from multiple sources to support a common goal, such that each individual funding source loses its program identity. Typically, States or regions need explicit authorization by statute or regulation to allow the blending of funds.ⁱⁱ However, [Ticket to Work Outcome and Milestone payments](#) do not require separate tracking and can be blended with other fund sources that do not require such tracking, based on program authorization. [Performance Partnership Pilots \(P3\)](#) for disconnected youth allow considerable flexibility in using discretionary funds across multiple Federal programs. Ticket to Work payments can be blended in a P3 project under a P3 agreement if the P3 project participates in the Ticket to Work program under a Ticket Program Agreement.
- **Braiding** occurs when multiple funding streams separately and *simultaneously* provide specific services that support an individual with a disability in pursuing, obtaining, or maintaining CIE. Because braiding involves simultaneous service delivery by two or more systems, it may require interagency coordination and collaboration with this specific goal in mind. Unlike blending, braiding resources enables programs to track and maintain separate accountability for each funding stream. In other words, with braiding, resources do not lose their program identity and, thus, agencies do not need specific statutory authority to engage in the braiding of resources. For instance, the Centers for Medicare & Medicaid Service (CMS) has clarified that Ticket to Work Outcome and Milestone payments funded through the Social Security Administration may occur simultaneously with payment for Supported Employment services funded through the Medicaid Waiver program to create a more robust support system for individuals seeking sustained CIE.
- **Sequencing** occurs when multiple funding streams separately and *sequentially* provide specific services that support an individual with a disability in pursuing, obtaining, or maintaining CIE. For instance, an individual may begin the journey toward sustained CIE through funding available under the Individuals with Disabilities Education Act (IDEA). When they age out of educational services, they may continue with funding through Vocational Rehabilitation and progress to Medicaid funding through a Home and Community- Based Services (HCBS) waiver for sustained job coaching over an extended period of time.

NOTE: Sequencing of funds may be an important strategy when one-time additional funding is provided, such as through the American Rescue Plan or funding as a result of disasters.

Federal policy guidance on providing and delivering services to support CIE for individuals with disabilities often involves multiple Federal, state, and local agencies. Further, across different states, local agencies vary in the services they provide using multiple Federal funding streams. For example, a state workforce agency may finance training and job placement services for an eligible participant under one core program while the Vocational Rehabilitation agency may provide transportation support,

assistive technology, and the services of a job coach for that same individual who is also eligible under the Vocational Rehabilitation program. When these services are provided in a coordinated and simultaneous manner, this is an example of the braiding of resources at the state level.

Through blending, braiding, and sequencing resources, all partners can share in the achievement of successful employment outcomes, while ensuring a seamless experience for the job seekers receiving services.

The undersigned agencies promote and support the leveraging of resources, as applicable, across their systems to further encourage strategic collaborations and maximize efficiencies in the pursuit of CIE and economic advancement of individuals with disabilities. Our agencies continue to work together to issue additional informational resources (such as those attached) and technical assistance to support systems in these efforts.

Sincerely,



/s/

Alison Barkoff
Acting Administrator and Assistant Secretary for Aging
Administration for Community Living
U.S. Department of Health and Human Services



/s/

Miriam E. Delphin-Rittmon, Ph.D.
Assistant Secretary for Mental Health and Substance Use
Substance Abuse and Mental Health Services Administration
U.S. Department of Health and Human Services



/s/

Carol L. Dobak
Acting Deputy Commissioner, delegated the authority to perform the functions and duties of the
Commissioner, Rehabilitative Services Administration
Office of Special Education and Rehabilitative Services
U.S. Department of Education

Stephen Evangelista

Digitally signed by Stephen Evangelista
Date: 2022.08.10 13:05:08 -0400

/s/

Stephen Evangelista
Acting Deputy Commissioner,
Office of Retirement and Disability Policy (DCRDP)
Social Security Administration

/s/ 

Katherine Neas

Deputy Assistant Secretary, delegated the authority to perform the functions and duties of the Assistant Secretary for the Office of Special Education & Rehabilitative Services
U.S. Department of Education

/s/ 

Brent Parton

Acting Assistant Secretary, Employment & Training Administration
U.S. Department of Labor

/s/ 

Daniel Tsai

Deputy Administrator and Director Center for Medicaid and CHIP Services
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Taryn M. Williams

Assistant Secretary, Office of Disability Employment Policy
U.S. Department of Labor

/s/ 

Valerie C. Williams

Director, Office of Special Education Programs
U.S. Department of Education

Enclosures

ⁱ Pursuant to [34 C.F.R. § 361.5\(c\)\(9\)](#) for purposes of the Vocational Rehabilitation program, competitive integrated employment means work that:

(i) Is performed on a full-time or part-time basis (including self-employment) and for which an individual is compensated at a rate that-

(A) Is not less than the higher of the rate specified in section 6(a)(1) of the [Fair Labor Standards Act of 1938 \(29 U.S.C. 206\(a\)\(1\)\)](#) or the rate required under the applicable [State](#) or local minimum wage law for the place of employment;

(B) Is not less than the customary rate paid by the employer for the same or similar work performed by other employees who are not individuals with disabilities and who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills; and

(C) In the case of an individual who is self-employed, yields an income that is comparable to the income received by other individuals who are not individuals with disabilities and who are self-employed in similar occupations or on similar tasks and who have similar training, experience, and skills; and

(D) Is eligible for the level of benefits provided to other employees; and

(ii) Is at a location -

(A) Typically found in the community; and

(B) Where the employee with a disability interacts for the purpose of performing the duties of the position with other

employees within the particular work unit and the entire work site, and, as appropriate to the work performed, other persons (*e.g.*, customers and vendors), who are not individuals with disabilities (not including supervisory personnel or individuals who are providing services to such employee) to the same extent that employees who are not individuals with disabilities and who are in comparable positions interact with these persons; and

(iii) Presents, as appropriate, opportunities for advancement that are similar to those for other employees who are not individuals with disabilities and who have similar positions. (34 CFR 361.5(c)(9))

ⁱⁱ Butler, S., Higashi, T., and Cabello, M. (2020). [*Budgeting to promote social objectives—A primer on braiding and blending*](#). Brookings Institution and LEAD Center (2013). *Building a Progressive Vision for a Policy and Service Delivery Framework that Promotes the Effective Leveraging of Resources to Improve Employment & Socioeconomic Advancement of Youth and Adults with Disabilities*. Office of Disability Employment Policy, U.S. Department of Labor. <https://leadcenter.org/resources/2013-lead-center-policy-roundtable-report-making-collaboration-real/>