

Complexity and Needs Recommendations

Funding Recommendation

The Department of Labor (DOL) should lead a collaboration of federal agencies to identify, align, and develop clear policies and practices across all federal agencies that make Competitive Integrated Employment (CIE) a funding priority for all individuals with significant disabilities. Collaborative efforts should include WIOA committee members including DOL departments currently on the Committee; the Social Security Administration (SSA); the Centers for Medicaid and Medicare Services (CMS); the Department of Education (ED) represented by Rehabilitation Services Administration (RSA); the Health and Human Services (HHS) Administration on Community Living (ACL). Other agencies participating should include ED representation from the Office of Special Education Programs (OSEP) and the Department of Justice (DOJ). From this collaboration, participating agencies should agree on common principles that align cross-agency funding priorities and develop guidance for states on policy, practice and accountability measures that establish competitive integrated employment as the priority.

Rationale/Detail

To inform the recommended collaboration effort federal agencies should:

- Identify states/state programs that are currently most effective in delivering CIE to people with significant disabilities, including funding strategies they are using.
- Develop guidance on how to braid, blend and fully leverage available federal funding to improve employment outcomes for people with significant disabilities. This recommendation is relevant to the Centers for Medicare and Medicaid Services (CMS) and its funding of CIE through all Medicaid authorities, including Waivers, State Plans, and Managed Care authorities. CMS should issue specific guidance on how to use the various Medicaid authorities (especially Section 1905(a) of the Social Security Act) for funding supported employment for people with severe mental illness, as many of the Medicaid authorities commonly used to fund supported employment for other populations are not always a viable option for individuals with mental illness. This recommendation is also relevant to the Rehabilitation Services Administration (RSA) as WIOA requires a focus on competitive integrated employment and development of strategies that avoid use of center-based, group or other segregated employment settings.
- Make available financial support and incentives to help individuals with significant disabilities gain access to CIE including strategies that provide an enhanced federal match rate to CIE over other day services and to help move from segregated settings to

competitive integrated employment. Develop demonstration or other pilot efforts with robust data collection requirements to determine what is effective in assisting states to launch effective efforts to improve employment outcomes. These demonstration or pilot efforts should include pay for performance strategies for increasing access to CIE and initial outcome measures (including milestones) that could be included in these strategies.

- Develop technical assistance plans that offer internal agency expertise to states as well as provide funding for use of external expertise from states and programs that are successfully financing and implementing competitive integrated employment.
- Make technical assistance available to states to improve capacity and professional competence in delivering competitive integrated employment.

For effective implementation of WIOA and best use of funding that leads to improved competitive integrated employment outcomes, ED and RSA should clarify the importance of the following practices:

- ED, in implementing WIOA, should require for all youth with significant disabilities
 - Career track development at or prior to age 14;
 - Opportunities for an integrated work experience, access to assistive technology, job coaching and other supports for a period of not less than 24 months;
 - Presumed eligibility for vocational rehabilitation (VR) services for anyone considering center-based or segregated employment.
- RSA, in implementing WIOA, should clarify:
 - That youth with disabilities must first apply for VR services; and
 - If eligible, work toward a competitive integrated employment goal through a supported employment Individual Plan for Employment (IPE) or a regular IPE for a reasonable period of time which must be at least 24 months;
 - That extending the time limit of Supported Employment Services from 18 to 24 months refers to ongoing support services provided after a person has been successfully placed in a job that meets the WIOA definition of Supported Employment.
 - Presumed eligibility for vocational rehabilitation (VR) services for anyone in 14(c) employment who expresses interest in using VR services to obtain CIE as a result of mandatory VR outreach to 14(c) workers required under WIOA.
- Together ED and RSA should require close working agreements between their agencies including at the state and local levels that identify the requirements that students with significant disabilities:
 - Leave school either employed or with a post-school employment plans that leads to employment;

- participate in transition programs that include integrated work experience, internships, apprenticeships or similar job experiences; and
- That state education and VR agencies report results of state and local efforts to their respective federal agencies.

Data/Outcomes Recommendation – Capacity Building and Complexity

Subcommittees

Federal agencies that provide funding to support people with disabilities to obtain competitive integrated employment (CIE) should establish a common definition of CIE and develop common outcome data points on which states that receive funding must regularly report to ensure accountability.

Rationale/Detail

- The common definition of CIE should be derived from the Workforce Innovation and Opportunity Act (WIOA) and Home and Community Based Services (HCBS) definitions and be consistent with the goals described in WIOA and the Americans with Disabilities Act.
- The task of defining CIE should be led by the Department of Labor (DOL) and include representatives from the Department of Education (ED), the Department of Health and Human Services (HHS), and the Social Security Administration (SSA).
- The task of developing outcome data requirements should be led by HHS, the Center for Medicare & Medicaid Services (CMS) and include other relevant agencies in HHS, DOL, ED and SSA.
- Regular collection and reporting by states of individual outcome data should be required to ensure accountability of funding and at a minimum include:
 - number of people employed in jobs that meet the definition of CIE,
 - wages earned,
 - hours worked
 - length of time in CIE, and
 - benefits (e.g., paid days off)
- Additional consideration should be given to also collecting data on:
 - Income level over time
 - Taxes paid
 - Reduction of public income support (cash benefits from SSA, TANF, SNAP, and the reduction of medical coverage resulting from primary insurance through the employer)
- The studies that link employment to other social and health benefits for people with severe mental illness have been helpful in demonstrating the importance of employment. The federal government should study and/or provide support to study the impacts of employment on all people with severe disabilities. The studies should look at the impact of employment on:

- Utilization of healthcare services, including institutional long term services and supports utilization of acute services such as hospitalizations, emergency rooms, and crisis services
 - Housing stability
 - Use of public benefits, including public income supports
 - Employer-based health benefits that offset public health benefits.
- Federal funding agencies should provide guidance, technical assistance and resources to states to implement data systems that will collect and report the minimum individual CIE data including number of people employed in CIE, wages received, hours worked and paid days off. Congress should ensure states have sufficient funding to build effective data collection infrastructures.
- Data on wages, hours, and other employment information is collected in various programs such as TANF, SSA, VR and others. Those data systems should be examined to determine if they can contribute to building the recommended State data collection process. The review should be led by the DOL and include HHS, ED, and SSA.
- Federal agencies should ensure that data and outcomes are publicly reported so that the impact of CIE can be assessed and people with disabilities and their families can make good decisions about choosing the best pathway to employment.

Going the Distance from Fear to the Freedom to Succeed Recommendation:

Informed by the findings of previous SSA demonstration projects pertaining to employment and loss of benefits and using the ACCESS (Autonomy, Confidence, Connection, Equality, Status/Skilled, and Safety) framework, SSA should collaborate with Federal partners, state governments, and other key stakeholders (advocates, researchers, disability service providers, employment networks, and foundations) to develop and coordinate the implementation of a comprehensive, longitudinal research, systems-change, and policy reform initiative designed to increase the number of SSI/SSDI beneficiaries that become optimally employed¹ in CIE while simultaneously preserving cash and health benefits, long-term supports and services (LTSS) necessary for self-sufficiency, and maximum socioeconomic advancement. The initiative would include the following components:

- SSA and its Federal partners should develop and institute policy reforms to better clarify, strengthen, and expand upon work incentives so that SSI/SSDI recipients and other stakeholders can more readily utilize them to promote and support competitive integrated employment goals.
- SSA, in partnership with Departments of Education, Health & Human Services, and Labor should launch a national education campaign that focuses on the dissemination of user-friendly informational resources/activities and specific examples of how SSI/SSDI recipients can work and still maintain cash and health benefits and/or publicly-financed LTSS necessary to achieving partial independence.
- Through the development and dissemination of technical assistance, SSI and its Federal partners should build the capacity of localities, states, and employment networks to bring to scale and sustain the provision of effective practices (peer mentoring career coaching, apprenticeship, professional development opportunities, financial planning, self-determination, self-advocacy, resource leveraging and systems navigation support) that assist SSI/SSDI recipients in seeking optimal employment while simultaneously preserving ongoing public benefits and LTSS necessary for attaining partial self-sufficiency.

Rationale/Detail

- Research indicates that even among individuals receiving SSDI or SSI who express a desire to become employed and perhaps become self-sufficient someday, many of their decisions and actions related to if and to what extent they work and earn money are heavily influenced by their fear of the real or perceived consequences of doing so. Typically, the fears individuals experience is described as solely that of fearing the loss of

¹ Optimally employed meaning employed at the maximum number of hours an individual is able to work and at the highest possible wages he or she can attain.

cash and health coverage benefits. While this is a major factor, it is far from the only one.ⁱ These can include the fears of:

- **Losing** cash and health benefits, financial stability and personal security.ⁱⁱ
 - **Falling** deeper into poverty, debt, dependency, depression, etc.ⁱⁱⁱ
 - **Mistrust of SSA** and work and earnings rules that are seen as complex, arbitrary and punitive.^{iv}
 - **Scarcity of Resources**, or having “less than” adequate money, time, health and wellbeing, education, skills, work history, options, supports, accessibility, fair chances, friends and other resources.^v
 - **Unpredictability and instability** in terms of having little control over one’s life and no room for taking risks.^{vi}
 - **Nonconformity**, or going against the cultural norms of what it means to be “disabled”.^{vii}
 - **Success**, and as a result, leaving the familiar behind and exposing oneself to new pressures and demands.^{viii}
 - **Failing**, or not measuring up or achieving a goal and being ridiculed and humiliated.^{ix}
- In certain instances, an individual’s disability can cause/exacerbate these responses. SSA and in some cases VR, Medicaid and others fund work incentives planning and assistance (WIPA) projects and related activities that help individuals better understand and use provisions meant to incent their employment and reduce their reliance on cash benefits. When evaluated, WIPAs have proven modestly effective at dispelling fears surrounding loss of benefits.^x For the most part, however, current efforts address such fears in a circuitous manner by providing information on work incentives. While providing information is necessary, information sharing alone is insufficient in effectively helping address the legitimate and at times perceived fears and barriers experienced by individuals with significant disabilities
 - If we want individuals to be free of living in fear of what might happen if they work and earn “too much”, however, we must equip them with the knowledge, skills, abilities and tools they need to succeed at doing so. This starts with working with individuals to develop, master, nurture and sustain essential attributes and building blocks to ACCESS^{xi} Success, including:
 - **Autonomy:** Exercising the power to make sound decisions and improve your life
 - **Confidence:** Believing and trusting you have what it takes to succeed
 - **Connection:** Belonging to and valued as an integral part of a larger whole
 - **Equality** Having the fair chance of succeeding at what you work hard to achieve
 - **Status/Skilled:** Possessing the knowledge, skills and abilities that others demand
 - **Safety:** Free of fear and free to take acceptable risks, change, grow and thrive

- Steps that could move us in this direction include tasking SSA to work with Federal partners, States, the disability community, researchers, foundations and others to develop and coordinate the implementation of a comprehensive, longer-term research and development system change/capacity strategy (5-10 years) that will increase knowledge about, access to and the effectiveness of:
 - Peer mentoring and support offered by a peer who has successfully navigated returning to, or beginning competitive integrated employment^{xii}
 - Career coaching, apprenticeship and development opportunities (including but not limited to accessing apprenticeship programs offered through America's Job Centers)
 - Financial planning, self-determination, self-advocacy, confidence and resiliency skill-building activities
 - Assuring ongoing continual access if/as needed to support navigation through rough patches, relapses and other barriers that may impede optimal self-sufficiency.
 - Sending a clear message to the public, applicants and beneficiaries that receiving SSDI or SSI does not need and should not become a lifetime occupation for those able to earn a better living.
 - Consistently demonstrating that the government supports and has the backs of those who earn their way off the SSI/SSDI public rolls.
 - Conducting research and pilots to identify barriers and promising practices for equipping individuals with the abilities, skills, accessible resources and resilience to anticipate, prepare for, adapt to and effectively manage a range of minor and major shocks, changes and events.
 - Gaining a better understanding and accentuating the positive effects that access to health coverage through the Affordable Care Act can have on the employment, independence, health and economic well-being of individuals with significant disabilities.
 - Nudging, incenting and requiring VR agencies, ENs, WIPAs, PABSS and others to explicitly focus on building the self-confidence, reliance and capabilities of current and former working beneficiaries to take control of their lives, careers and financial independence over the long haul.
 - Tracking the employment and economic status of these workers via a longitudinal survey and using the findings and insights to improve on the job their prospects.
 - Engaging federal, state, business, philanthropic and disability community stakeholders in framing and carrying out these efforts

Ticket-To-Work Model for Transition-Age Youth Recommendation

Congress should authorize the creation of a Ticket-to-Work demonstration focused on youth with disabilities in transition, to be co-managed by the Administration on Community Living and the Social Security Administration, in partnership with U.S. Departments of Labor (DOL), Health and Human Services (HHS), and the Department of Education (ED). With Congressional approval, the Office of Management and Budget should provide authority for SSA and the other Federal partners engaged to waive certain eligibility requirements for participants in the Ticket-to-Work youth demonstration so they can access services across systems with the goal of maximizing the potential of these transition-age youth with disabilities to achieve CIE and financial independence.

Rationale/Detail

- Transition is the period of time when adolescents (irrespective of disability) need focused support to plan for postsecondary education, careers, health care, financial benefits, housing and evolution to adulthood.
- Based on lessons learned from the Social Security Administration's Youth Transitions Demonstration as well as results from other youth-focused employment systems-change initiatives led by other federal agencies, research shows that there is a need to provide continuity of support for youth as they transition from youth-specific systems to adult-service delivery systems.²
- Expanding the Ticket-to-Work model to include transition-age youth and younger adults could substantially improve employment outcomes for young people.
- Access to supports that advance competitive integrated employment outcomes (including but not limited to pre-employment transition services, integrated work-based learning experiences, career planning and job placement services, benefits counseling, and financial capability) for youth with disabilities in transition could increase the probability of youth receiving SSI benefits will eventually transition out of SSI as opposed to remaining enrolled for a lifetime.
- The pilots should permit youth ages 14-16 to participate and allow continued participation in the demonstration for the duration of the pilots or up to age 30. The demonstration should also evaluate the age range of youth to be included in the expanded Ticket-to-Work program based on lessons learned from the pilots regarding what works best for youth both when starting to work and supports needed after transition.

² Altschuler, 2005, Davis, n.d.; Davis & Sondheimer, 2005; Hoffman, Heflinger, Athay, & Davis 2009, Manteuffel, Stephens, Sondheimer, & Fisher, 2008, Stewart et.al, 2010

- Participating Employment Networks (EN) serving youth in the children’s SSI program will have the opportunity to receive bonus payments based on their success in working collaboratively with schools to place students in part-time and/or summer jobs prior to leaving school and on successful transition to CIE after leaving school. Payments should be calculated based on the achievement of milestones calculated by SSA specifically for transitioning youth. Schools will be allowed to participate as Employment Networks under the proposed program.
- Youth who are eligible only for the children’s SSI program and will never enter the adult SSI program will be eligible for this youth-focused Ticket to Work.
- In addition to the requirements already set forth for all Ticket-to-Work employment networks (ENs), entities wishing to participate as a transition EN under the pilot must demonstrate both expertise in providing integrated work-based learning experiences and pre-employment training services as defined under WIOA for youth with disabilities, as well as be youth-based organizations or entities that possess established relationships and cooperative agreements with youth-based organizations, local school districts and/or institutions of higher education. As Vocational Rehabilitation (VR) agencies possess an existing statutory obligation under WIOA to serve transitioning youth, an emphasis will be placed on establishing other entities beyond the VR system as transition ENs in order to help expand capacity beyond VR to serve these individuals within the children’s SSI program who are participating in the youth-focused Ticket to Work program.
- Allowing youth-serving organizations, with adequate employment support experience, to become employment networks may help reach a new and critical youth population.
- The expanded Ticket-to-Work demonstration for youth should, at a minimum, include:
 - o Assistance with developing an Individualized Career Plan that focuses on CIE
 - o Career Coaching to assist in exploring career options and making good decisions about the best career plan for each individual
 - o Counseling and guidance on navigating adult systems such as employment supports and healthcare
 - o Successful career planning to include education on work incentives and financial capability strategies to help youth learn about financial independence and workforce participation
 - o Waivers of certain Federal program requirements as necessary (such as the provision of stipends to offset SSI benefit changes during pilot participation)
 - o Use of “pay-for-success” payments or other financial incentive models if the right conditions exist
 - o Consider a “race to the top” approach for states with graduated payments for high performing sites.

Wrap-Around Supports & Integrated Day Recommendation

HHS, in collaboration with DOL/ED/DOT/HUD/SSA, should convene a cross-agency working group to provide policy guidance and provide technical assistance on integrated day services and other wrap-around supports³ that can help people with significant disabilities access competitive integrated employment. At a minimum, the policy guidance should:

- a) Clarify that the purpose of successful integrated day and wrap-around supports is to **maximize (as opposed to displace or limit) CIE, improve socioeconomic status, and facilitate authentic community involvement for people with significant disabilities.**
- b) Identify the key components, and examples, of effective practices in integrated day services; describe funding strategies available to expanded integrated day services; and suggest methods and metrics for collecting and using data on integrated day services to improve accountability and outcomes over time.
- c) Clarify allowable uses of federal funds for promoting **natural, that is, non-professional, supports that help achieve the desired outcomes of CIE and socioeconomic advancement.**
- d) Describe how funding sources and service mandates can be coalesced across systems to assure continuity in the provision of seamless wrap-around supports needed to **maximize the employment and earning potential of individuals with significant disabilities.**
- e) Clarify that integrated day options include, but are not limited to, services that include regular opportunities for community-based recreational, social, educational, cultural, and athletic activities, including community volunteer activities and training activities, as well as other regularly occurring non-facility based activities of a person's choosing that are provided in settings which allow individuals with disabilities to interact with individuals without disabilities in a community setting to the fullest extent possible for the individual, and that **such services should not include an overall facility or program schedule for the individuals receiving such services.**

Rationale/Detail:

- Assisting people with significant disabilities to enter CIE and improve their socioeconomic status requires that public funding that prioritizes integrated day

³ Integrated day services refers to community-based pursuits determined by individual choice that complement CIE and that provide a meaningful set of activities outside of scheduled work hours. Wrap-around supports refers to those complementary services that enable individual to find and sustain employment such as affordable housing, transportation, and other supports necessary to facilitate individual availability to pursue CIE.

services-- also called non-residential Long Term Support Services (LTSS)-- and **wrap-around supports that lead to these desired outcomes over other service options.**

- o For individuals with significant disabilities who have not obtained competitive integrated employment, non-residential LTSS should **focus on activities aimed at increases chances of achieving competitive integrated employment (including integrated work-based learning experiences, networking to develop contacts for career advancement, career-planning and job development).**
- o For individuals with significant disabilities who have achieved competitive integrated employment, non-residential LTSS should continue to focus on **activities aimed at expanding and sustaining CIE outcomes (including but not limited to increased hours, increased wages, benefits, and opportunities for career advancement) and at socioeconomic advancement (including but not limited to financial capability and maximum community integration).** Examples of priority service areas that could be linked to furthering the desired outcomes of CIE and socioeconomic advancement may include career planning/exploration, transportation, financial literacy training, benefits planning, and community-based recreation or skills-building activities.
- Targeting funding across systems at these desired outcomes requires leveraging resources, coordinating services, and comingling the various processes across systems that help determine an individual's eligibility for receiving supports. Such a **vision is predicated on the creation of a holistic, comprehensive, and unified person-centered planning process that transcends systems for providing long-term services and supports to individuals with significant disabilities, with a priority focus on CIE and optimal socioeconomic advancement.**
- Performance measurement and cross-systemic accountability protocols must be established to assure that data on supports being provided to supplement and advance CIE outcomes is being collected. Such data should include metrics aimed at measuring the impact of various non-residential LTSS services, wrap-around, and natural supports in yielding optimal integration, maximum number of work hours desired, highest earning potential, and long-term socioeconomic security.

Notes:

ⁱ SSA, National Beneficiary Survey Fact Sheet 4: *Reasons SSA beneficiaries with disabilities reported for not working in 2004, 2009.*

ⁱⁱ John Kregel, [Making SSDI Work Better for Beneficiaries -- Testimony before the U.S. House of Representatives' Ways and Means Committee, July 9, 2015.](#)

ⁱⁱⁱ Ibid.

^{iv} Ibid.

^v Sendhil Mullainathan and Eldar Shafir (2013), [Scarcity: Why Having Too Little Means So Much](#). Also see: [Boston Globe Review](#). Eldar Shafir, Sendhil Mullainathan, Christopher Bryan, Crystal Hall, Anandi Mani and Anuj Shah. [On the Psychology of Scarcity](#), Columbia Business School and the Robin Hood Foundation, 2012. Morgan Kelly, [Poor concentration: Poverty reduces brainpower needed for navigating other areas of life](#), Princeton News, August 29, 2013. See study: Anandi Mani, Sendhil Mullainathan, Eldar Shafir and Jiaying Zhao, [Poverty Impedes Cognitive Function](#). Science, August 30, 2013.

^{vi} Ibid. Also see: Seligman, M. E. (2006). *Learned Helplessness*. Random House : Vintage Books; and, (2011). *Learned Optimism*. Vintage Books; Random House; and Richard H. Thaler and Cass R. Sunstein, [Nudge](#). Penguin Books, 2009.

^{vii} NBS Fact Sheet 4, op cited. See also: Jennifer Engle, ["Fear of Success" Revisited: A Replication of Matina Horner's Study 30 Years Later](#). ERIC, 2003.

^{viii} Engle, op cited.

^{ix} Timothy A Pychyl Ph.D., [Fear of Failure](#). Psychology Today, February 13, 2009.

^x See Kregel, op cited.

^{xi} Kristen Hansen, Presentation to the SSA Senior Staff on the Neuroscience on Leadership. November 6, 2015.

^{xii} Shery Mead & Mary Ellen Copeland (2000), [What Recovery Means to Us](#), Plenum Publishers, New York, NY; Helene L. Povencher, Robin Gregg, Shery Mead & Kim T. Mueser (2002) [The Role of Work in the Recovery of Persons with Psychiatric Disabilities](#), Psychiatric Rehabilitation Journal 26 (2).; Oscar Jimenez, Peggy Swarbrick, Mathew Mathai, Lara Wojcik and Jay Yudof, [Building A Cross Disability Peer Employment Support Model – Report to the New York State Medicaid Infrastructure Grant](#), Office of Mental Health 2009.