# **Achieving Employment First:**

# A Roadmap for Expanding and Improving Community Employment in Connecticut

A report completed in fulfillment of a contract with Disability Rights Connecticut

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# A Roadmap for Expanding and Improving Community Employment in Connecticut

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# **Achieving Employment First:**

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# **EXECUTIVE SUMMARY**

In late 2020, Disability Rights Connecticut (DRCT) engaged Wise, a private not-for-profit training and consulting firm, to develop a comprehensive report on Competitive Integrated Employment (CIE) in Connecticut. Wise's mission is to promote equitable employment for people with developmental disabilities through innovation, training, and technical assistance. The current report is the result of research and review of the current conditions in Connecticut related to CIE. This wide-ranging review led to developing a foundation for building capacity, including short and longer-term recommendations for achieving high quality CIE services and outcomes that are available to all persons with intellectual and developmental disabilities in Connecticut.

The project is based on a series of national policy directives related to providing employment services to persons with intellectual and developmental disabilities. Thus, the paper reviews the impact of three twentieth century legal foundations: the Americans with Disabilities Act of 1990, the Supreme Court's 1999 Olmstead Decision, and the Fair Labor Standards Act of 1938. More recently, the Individuals with Disabilities Education Act of 2004, the 2014 Home and Community-Based Settings Rule, and the 2014 Workforce Innovation and Opportunity Act have changed the landscape of employment services in every state. Emerging from these legal foundations along with shifting expectations of persons with disabilities, families, professionals, employers, and others, Employment First has become a national movement promoting real jobs for real wages for individuals with disabilities.

Wise accomplished its research through multiple methods: (1) reviewing documents related to the Department of Developmental Services (DDS), Bureau of Rehabilitation Services (BRS), and State Department of Education (SDE); (2) exploring data, including published reports from Connecticut state agencies as well as national data sources; and (3) interviewing stakeholders who represented state agencies, service providers, the school system, families and individuals with disabilities. Throughout *The Roadmap Project*, Wise worked with a Project Leadership Team sponsored by DRCT to refine project strategies, provide introductions to many of the potential interviewees, and gain feedback on drafts. All of our work with persons from Connecticut was completed by phone or through a virtual format. In addition, DRCT arranged for two experts in employment to conduct a set of interviews on site.

Because the DDS data system tracks services rather than placement outcomes, the project was unable to determine the number of individuals in Connecticut with significant intellectual and developmental disabilities who have achieved an individual job in an integrated community setting for minimum wage or higher. Little data exist related to earnings, hourly wage, hours worked, benefits received, integration level of the setting in which they work, or employer of record. Post-school outcome surveys suffer from an inadequate response rate. A more robust data collection and

employment evaluation system is needed to effectively share and analyze information across agencies, and to monitor and improve employment outcomes over time.

Wise organized its work around a state change framework which summarizes the major system components needed in any state that seeks to promote community employment for working age adults with intellectual and developmental disabilities: A) State Leadership, including Partnerships, Infrastructure, Resources and Systems; B) Community Support and Participation, including Communications, Consensus, and Community Advocacy; C) System Capacity and Skills, including Resources to Support Change; Training and Technical Assistance, and D) Employment Opportunities, including state initiatives related to expanding employment opportunities in both the public and private sectors.

It is clear from the project's analysis of stakeholder input, data, and documents in comparison with the components of the state change model, that there are critical deficits in Connecticut's capacity to serve individuals with intellectual and developmental disabilities who require skilled support to achieve employment. Connecticut needs to make cultural and systemic changes in many areas to: (1) expand access to skilled person-centered services, (2) increase the number of individuals working in competitive integrated employment jobs, (3) make subminimum wages unnecessary, (4) decrease investment in non-employment services, and (5) ensure compliance with federal and state requirements.

As a result, this report includes a comprehensive set of recommendations to increase competitive integrated employment and establish an evaluation system to effectively improve performance. Table 1 presents a summary of these recommendations as a Roadmap for achieving Employment First in Connecticut.

From this lengthy list of recommendations, *The Roadmap* identifies the following systemic transformation priorities to be addressed first:

- 1) Invest in expanding system capacity and skills, including prioritizing funding for expanding individual employment over non-employment services, and developing a training and technical assistance infrastructure that delivers a tiered training system to significantly improve system skills. Supporting the development of a skilled workforce and expanding the number of available services, including dedicated funding for competitive integrated employment for students leaving school needs to be the highest priority. Training needs to be consistently and readily available to service providers, as well as to BRS, DDS and school staffs, and should include competencies in person-centered planning for employment, supporting informed choice, job discovery, job development and placement as well as evidence-informed strategies for supporting individuals in community employment.
- 2) Overcome disconnects across agencies responsible for transition from school to work and adult service delivery. State agencies must prioritize and take action to lead the way in learning how best to redesign their systems to support competitive integrated employment. For example, state partners immediately can work cooperatively to determine how to restructure implementation of Section 511, and to integrate the results with DDS systems, including improving person-centered employment planning, informed choice, and job discovery. In doing so, the State must develop strategies to

overcome individual challenges to employment and to help individuals and their families better understand their employment options and opportunities. Simultaneously, and equally as important, the State must also focus on transition from school to adulthood to design for an effective transition system that achieves the aim of exiting school with a job at minimum wage or higher with skilled support, rather than transitioning into subminimum wage jobs, group employment services, or non-employment day support options.

3) Establish a robust employment data collection and evaluation system to effectively analyze and share information publicly as well as across agencies to monitor and improve employment outcomes over time. Little data exist in DDS or BRS to paint a comprehensive picture of Employment First in Connecticut, including the number of people in jobs, their earnings, hourly wage, hours worked, benefits received, employer of record, or the integration level of the setting in which they work. State agencies don't have an effective system for sharing data on common customers, nor for tracking the experience of students transitioning from school to adult services. No data on outcomes are regularly publicly available to allow stakeholders to evaluate system performance. This lack of data limits consumer ability to have informed choice regarding services, and limits community employment agencies and State agency leadership's ability to identify deficiencies and make critical decisions for system improvements.

# **Culture of Urgency**

It is critically important that state agencies, providers, and other system stakeholders develop a Culture of Urgency informed by Employment First principles and an understanding of the importance of meaningful, integrated work. Achieving competitive integrated employment outcomes for all individuals with intellectual and developmental disabilities in Connecticut can be a reality, but not in the absence of this cultural change. Ultimately it will require taking bold action now, as well as long-term and ongoing investment that is guided by a joint strategic plan and fueled by the energy, focus, and belief of leadership to maintain the system-wide commitment.

Achieving Employment First: A Roadmap

## Table 1

A Roadmap for Achieving Employment First in Connecticut<sup>1</sup>

# A. State Leadership

# A-1. Leadership & Infrastructure: Agency Coordination

- A-1.1 Responsibility and Authority—Partnerships
  - 1. Maintain Active Strong State Partnerships
  - 2. Promote Common Compelling Vision and Expectations
  - 3. Establish Champions
- A-1.2. Responsibility and Authority--Policy
  - 1. Form a Cross-Agency Policy Workgroup

# A-2. State Leadership: Aligned Infrastructure and Resources

- A-2.1 Data, Quality Assurance, Outcomes and Performance Improvement
  - 1. Launch a Five-Year Joint State Plan
  - 2. Design and Use a Robust Evaluation System
- A-2.2 Funding—Revenues
  - 1. Maximize Agency Resources for Employment
- A-2.3 Service Standards and Required Qualifications
  - 1. Maintain Common Standards
  - 2. Develop a Prioritized, Equitable, and Simplified Rate System
  - 3. Agree on Core Competencies
- A-2.4 Agency Coordination—Case Management & Service Monitoring
  - 1. Coordinate Individual Service Systems
  - 2. Establish Local Employment First System Demonstrations—Pockets of Excellence
  - 3. Require a Service Plan Employment Goal for All
  - 4. Protect Individual Budgets for Employment
  - 5. Overhaul Section 511 Meetings and Process
  - 6. Resolve BRS Eligibility Issues
  - 7. Extend Benefits Counseling
  - 8. Expand Individual and Family Information
  - 9. Provide Joint Letter to Clarify Access to Long-term Funding
- A-2.5 Funding—Budgeting Priority
  - 1. Prioritize State Agency Budgeting for Community Employment
  - 2. Plan Annual State Agency Funding Goals

# **B.** Community Support and Participation

# **B-1.** Community Support and Participation: Coordinated Communications

# B-1.1 Joint Communications Plan

 Create a Joint Communications Plan: Why, Picture of Success, Branding and a Tag Line, Stakeholder Concerns

<sup>&</sup>lt;sup>1</sup> The structure of this *Roadmap* is based on the Framework for Change available <u>here</u>. The Roadmap summarizes the specific recommendations included in the Recommendations chapter of this report. To facilitate using this as a key to locating a recommendation in a specific area, the numbering of items reflects the numbering used in that chapter.

# B-1.2, B-1.3, & B-1.4 Community, Business, and Professional Consensus

- 1. Convene Stakeholder Forums
- 2. Find Frequent Opportunities to Dialogue on Employment
- 3. Launch a Dedicated Website Rich in Information and Resources

# **B-2.** Community Support and Participation: Community Advocacy

- B-2. 1. Budgets and Communications
  - 1. Promote Employment First in State Level Communications
- B-2.2. Stakeholder Leadership
  - 1. Invest in Believers and Champions
  - 2. Reinvent Self-Advocate and Parent Coalitions

# C. System Capacity and Skills

# C-1. Training and Technical Assistance Infrastructure and Delivery

- C-1.1. Training and Technical Assistance Infrastructure
  - 1. Establish a Centralized Training and Technical Assistance Infrastructure
- C-1.2 Training and Technical Assistance Delivery
  - 1. Offer Sufficient Access to Introductory Training
  - 2. Maximize In-Person Training
  - 3. Advance Peer-Supported Learning
  - 4. Promote Advanced Training and Development
  - 5. Present Market Training
  - 6. Deliver Technical Assistance
  - 7. Maintain Core Education for Counselors, Case Managers, School Personnel and Others

# C-2 Resources to Expand System Capacity

- C-2.1 Expand Provider Capacity
  - 1. Invest in Expanding Provider Capacity
- C-2.2 Resources to Support Organizational Development
  - 1. Support Organizational Change
  - 2. Improve Individual Transition and Transition Systems

# C-2.3 Resources to Address Barriers

1. Address Transportation

# **D. Employment Opportunities**

# **D-1** Private Sector Jobs.

- 1. Build Relationships with Large Employers
- 2. Establish Regional Blue-Ribbon Committees
- 3. Partner with National and Statewide Service Clubs
- 4. Reduce Use of Tax Incentives
- 5. Engage the Perspectives of Employer Leaders
- 6. Form a Partnership with Economic Development

# D-2 Public Sector Jobs.

- 1. Establish a Public Sector Employment Initiative
- 2. Become a model employer

# **Achieving Employment First:**

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# INTRODUCTION

The term "supported employment" was first defined in 1984 by the United States Office of Special Education and Rehabilitative Services (OSERS) (Office of Special Education and Rehabilitative Services, 1984; 34 CFR, Part 373) with the aim of promoting opportunities for community employment for individuals with developmental disabilities. At that time, adults with intellectual and developmental disabilities were largely served in congregate sheltered work and day habilitation programs or in state-run institutions. Since then, federal and state attention to strengthening and expanding the supported employment program has both waxed and waned. Federal funds and national technical assistance centers supported statewide change efforts in the late 1980s and early 1990s. During that time, the U.S. Department of Education provided federal grants to over 40 states to promote supported employment implementation. Universities, private consulting firms, and associations developed supported employment models and curricula for professional development. Despite a strong beginning, community employment failed to flourish and become the preferred outcome nationwide for working age adults with intellectual and developmental disabilities.

Since then, changes in federal laws, rules, regulations and guidance have promoted employment as an outcome across the country. The 1990 Americans with Disabilities Act, 1999 Olmstead Decision, and, in 2014, both the Home and Community Based Services (HCBS) Settings Rule issued by the Centers for Medicaid & Medicare Services (CMS) and the Workforce Innovation and Opportunity Act (WIOA) passed by Congress, signaled that the United States would be focused on supporting persons with disabilities to live and work in integrated settings. These four federal policy directives are described in more detail below. This chapter also includes two other federal laws—the Fair Labor Standards Act (FLSA) and the Individuals with Disabilities Education act (IDEA)—both with direct impact on the focus of this project.

# **Federal Policy Directives**

The Americans with Disabilities Act (ADA). Originally signed into law in 1990, the ADA is a comprehensive piece of civil rights legislation that prohibits discrimination and guarantees that people with disabilities have the same opportunities as everyone else to participate in the mainstream of American life—to enjoy employment opportunities, to purchase goods and services, and to participate in State and local government programs and services. Modeled after the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, religion, sex, or national origin—and on Section 504 of the Rehabilitation Act of 1973—the ADA is an "equal opportunity" law for people with disabilities.

Among its other provisions, the ADA prohibits private employers, state and local governments, employment agencies, and labor unions from discriminating against qualified individuals with disabilities in job application procedures, hiring, firing, advancement, compensation, job training, and other terms, conditions, and privileges of employment. The law also includes a requirement for "integrated setting": "A public accommodation shall afford goods, services, facilities, privileges, advantages, and accommodations to an individual with a disability in the most integrated setting appropriate to the needs of the individual." (https://ada.gov)

For more than 30 years, the ADA has provided a powerful foundation for later legal action, legislation, and federal policy.

The Olmstead Decision. Olmstead, or Olmstead v. LC, is the name of the most important civil rights court decision for people with disabilities in our country's history. Two women with mental illness and developmental disabilities filed suit against the state of Georgia and a regional hospital for continuing to confine them in the institution, failing to move them to a community-based program several years after professionals stated each was ready to move. In 1999, the United States Supreme Court ruled in their favor, based on the Americans with Disabilities Act. In 2009, the Civil Rights Division of the Department of Justice (DOJ) launched an aggressive effort to enforce the Supreme Court's decision in Olmstead v. L.C. that requires states to eliminate unnecessary segregation of persons with disabilities and to ensure that persons with disabilities receive services in the most integrated setting appropriate to their needs. As of June 2019, 20 years after the landmark decision, the Department of Justice was enforcing 11 statewide Olmstead settlements, and actively litigating others. A speech delivered to celebrate the 20th Anniversary highlighted employment services:

"The Department's settlement agreements with Rhode Island and the City of Providence offer individuals with disabilities opportunities to receive services designed to prepare them for competitive, integrated employment. To date, 786 individuals have obtained competitive, integrated employment over the course of these agreements. In Oregon, another agreement has produced similar results. According to Oregon's data, over 5,000 people have received new employment services, and over 600 former sheltered workshop workers have newly obtained competitive, integrated employment."

Clearly, the Department of Justice is using the Olmstead decision as a foundation for actively pursuing ways to improve integration in employment services for individuals with intellectual and developmental disabilities.

<sup>&</sup>lt;sup>2</sup> www.olmsteadrights.org/about-olmstead/

<sup>&</sup>lt;sup>3</sup> https://www.ada.gov/olmstead/

<sup>&</sup>lt;sup>4</sup> https://www.justice.gov/opa/speech/assistant-attorney-general-eric-dreiband-delivers-remarks-20thanniversary-celebration

<sup>&</sup>lt;sup>5</sup> Ibid

Home and Community-Based Services (HCBS) Settings Rule. The HCBS Settings Rule<sup>6</sup>, effective March 17, 2014, established requirements for the qualities of settings that are eligible for reimbursement for home and community-based services provided under certain sections of the Medicaid rule. Among other requirements, the rule requires that all home and community-based settings be integrated in and support full access to the greater community. This rule applies to all settings where HCBS are delivered, including non-residential settings such as day programs and prevocational training settings.<sup>7</sup>

Under the HCBS Settings Rule, CMS acknowledges individuals' rights to have "opportunities to seek employment and work in competitive integrated settings" and is founded on offering informed choice. Informed choice, related to employment, involves having discussions about what employment possibilities and support options exist, and includes hands-on experiences, connected to the person's interests, to fully investigate possible work options. Although an individual does not need to be actively pursuing a job in the community if they aren't interested, they do need to continue to be given opportunities, information and experience to make an informed decision.<sup>8</sup>

For states, the new HCBS Settings Rule combined with the expanded Olmstead enforcement by DOJ regarding access to employment services for people with intellectual and developmental disabilities drive increased federal focus on both sheltered work and congregate day programs. Previously, Olmstead-related enforcement by the DOJ focused on people who lived in institutions and were not able to leave without appropriate HCBS services. Now, the DOJ and private disability rights organizations are focusing on the day programs where people with disabilities may be unnecessarily segregated from people without disabilities, and, in turn, in states where those same people may not have enough access to support in order to gain community employment instead of going to day programs or sheltered workshops. As a result, states are working to address barriers to employment services, developing new HCBS services that require service delivery exclusively in integrated community settings (settings where people without disabilities routinely access community services) and evaluating actual service delivery in facility-based service settings.<sup>9</sup>

States still have time to achieve full compliance with the HCBS Settings Rule. Due to the COVID-19 public health emergency, in 2020 CMS extended the deadline for full compliance to March 17, 2023.

The Fair Labor Standards Act and Subminimum Wages. Overcoming both judicial and congressional opposition, the United States Congress passed the Fair Labor Standards Act of 1938 29 U.S.C. § 203 to ban oppressive child labor, set the right to a minimum hourly wage, and establish a maximum workweek

<sup>&</sup>lt;sup>6</sup> 79 Fed. Reg. 2948 (Jan. 16. 2014)

<sup>&</sup>lt;sup>7</sup> https://www.medicaid.gov/sites/default/files/2019-12/hcbs-setting-fact-sheet.pdf

<sup>8</sup> hcpf.colorado.gov/sites/hcpf/files/FAQ 4-Employment Final 1-31-19.pdf

<sup>&</sup>lt;sup>9</sup> https://www.ancor.org/resources/publications/links/cms-home-and-community-based-services-hcbs-settings-rule-part-iii

in certain industries.<sup>10</sup> Amendments since then have clarified or extended aspects of the law. It is Section 14 (c) of the FLSA that authorizes employers to pay individuals with disabilities less than the Federal minimum wage—i.e., pay workers who have disabilities for the work being performed. Important aspects of Section 14 (c) include:

- The employer in a covered business must provide required supporting documentation to obtain a certificate from the Wage and Hour Division which allows them to pay subminimum wages. Certificates covering employees of work centers and patient workers normally remain in effect for two years. Certificates covering workers with disabilities placed in competitive employment situations or School Work Experience Programs (SWEPs) are issued annually.
- Section 14 (c) does not apply unless the disability actually impairs the worker's earning or productive capacity for the work being performed. The fact that a worker may have a disability is not in and of itself sufficient to warrant the payment of a subminimum wage.
- Subminimum wages must be commensurate wage rates, i.e., based on the worker's individual productivity, no matter how limited, in proportion to the wage and productivity of experienced workers who do not have disabilities performing essentially the same type, quality, and quantity of work in the geographic area from which the labor force of the community is drawn.
   All subminimum wages must be reviewed and adjusted, if appropriate, at periodic intervals. At a minimum, the productivity of hourly paid workers must be reevaluated every six months and a new prevailing wage survey must be conducted at least every twelve months.
- Each worker with a disability and, where appropriate, the parent or guardian of such worker, shall be informed orally and in writing by the employer of the terms of the certificate under which such worker is employed.<sup>11</sup>

WIOA also defines a set of requirements related to the use of subminimum wages with workers with disabilities. The Wage and Hour Division of the Department of Labor is responsible for the administration and enforcement of the FLSA, and as of July 2016, has authority to administer and enforce requirements related to subminimum wages imposed by WIOA, described below. Persons with disabilities and their advocates have worked for more than a decade to phase out the use of subminimum wages with individuals with disabilities.<sup>12</sup>

**IDEA and Transition.** The purpose of the Individuals with Disabilities Education Act (IDEA) is "to ensure that all children with disabilities have available to them a free appropriate education that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment and independent living." [Section 1400(d)] The emphasis on effective transition services is new in IDEA 2004. Section 1400(c)(14) describes the need to provide

<sup>&</sup>lt;sup>10</sup> https://www.dol.gov/general/aboutdol/history/flsa1938 drawn 11/1/2021

<sup>&</sup>lt;sup>11</sup> Fact Sheet #39: The Employment of Workers with Disabilities at Subminimum Wages. Available from: http://www.wagehour.dol.gov

<sup>&</sup>lt;sup>12</sup> https://apse.org/wp-content/uploads/2019/11/Christensen-APSE-Testimony.pdf

"effective transition services to promote successful post-school employment and/or education. (See "Findings and Purposes" in <u>Wrightslaw: Special Education Law, 2nd Edition</u>, pages 45-48).

IDEA 2004 included a legal definition of "transition services":

- "(34) Transition Services The term `transition services' means a coordinated set of activities for a child with a disability that-
- (A) is designed to be a results-oriented process, that is focused on improving the academic and functional achievement of the child with a disability to facilitate the child's movement from school to post-school activities, including post-secondary education, vocational education, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation;
- (B) is based on the individual child's needs, taking into account the child's strengths, preferences, and interests;
- (C) includes instruction, related services, community experiences, the development of employment and other post-school adult living objectives, and, when appropriate, acquisition of daily living skills and functional vocational evaluation." (See "Definitions" in Section 1401, Wrightslaw: Special Education Law, 2nd Edition, page 56)"

Both the IDEA and WIOA make clear that transition services require a coordinated set of activities for a student with a disability within an outcome-oriented process. This process promotes movement from school to post-school activities such as postsecondary education, vocational training, and competitive integrated employment.

The Workforce Innovation and Opportunity Act. WIOA is the most significant federal legislation to address employment concerns of individuals with significant disabilities in recent years. Among other provisions, WIOA includes: (1) Efforts intended to limit the use of subminimum wage; (2) Required agreements between state Vocational Rehabilitation (VR) systems, state Medicaid systems, and state intellectual and developmental disability (IDD) agencies, as well as between the state VR systems and the state educational agency; (3) A definition of "customized employment," and an updated definition of "supported employment" that includes customized employment; and (4) A definition for "competitive integrated employment" as an optimal outcome.<sup>13</sup>

Each state's public vocational rehabilitation program now has a much larger role as youth with disabilities make the transition from school to adult life. Fifteen percent of public VR funds must now be used for pre-employment transition services. VR agencies, under WIOA, may provide up to four years of extended support services for a youth with a most significant disability, or until age 25. WIOA also prohibits schools from contracting with entities "with the purpose of operating a program for a youth under which work is compensated at a subminimum wage." <sup>14</sup> VR agencies must complete a set of

<sup>&</sup>lt;sup>13</sup> Hoff, D. (2014, August). WIA is now WIOA: What the new bill means for people with disabilities. *The Institute Brief*, Issue No. 31. Boston: University of Massachusetts, Institute for Community Inclusion.

<sup>&</sup>lt;sup>14</sup> CFR 34 § 397.31

requirements before an individual under the age of 24 can be placed in a job paying less than minimum wage. These are:

- 1) Receipt of transition services under IDEA or VR Pre-ETS services.
- 2) Application for the VR program with the result that:
  - a. the youth was found ineligible; OR
  - b. the youth was found eligible and
    - i. had in individualized plan for employment (IPE);
    - ii. worked toward an employment outcome, as described in the IPE, with appropriate supports and services for a reasonable period without success; and
    - iii. The VR case was closed;
- 3) Receipt of career counseling and information and referral services to Federal and State programs and other resources in the individual's geographic area that offer employment-related services and supports designed to enable the individual to explore, discover, experience, and attain competitive integrated employment.

Another provision of WIOA is that all workers, regardless of age, who are employed at a subminimum wage every six months during the first year of employment and annually thereafter must be offered career counseling and the opportunity to apply for vocational rehabilitation services to assist them to attain a job paying at least minimum wages. This provision includes information and referrals, as well as information on self-advocacy, self-determination, and peer mentoring training opportunities available in its local area. These services must not be provided by an entity that holds the subminimum wage certificate. These requirements are included in Section 511 of WIOA and thus are often referred to as "Section 511 requirements.<sup>15</sup>

WIOA revises the definition of "employment outcome" to specifically identify customized employment as an employment outcome under the VR program and requires that all employment outcomes achieved through the VR program be in competitive integrated employment or supported employment, thereby eliminating uncompensated outcomes, such as homemakers and unpaid family workers, from the scope of the definition for purposes of the VR program. The Rehabilitation Act previously used the term competitive employment extensively, but never defined it (although it was defined in regulations). WIOA now defines competitive integrated employment as full-time or part-time work at minimum wage or higher, with wages and benefits similar to those without disabilities performing the same work, and fully integrated with co-workers without disabilities. This is considered the optimal outcome under WIOA.

WIOA also modified the definition for supported employment. The adapted definition makes it clear that supported employment is integrated competitive employment, or an individual working on a short-term basis in an integrated employment setting towards integrated competitive employment. In

<sup>&</sup>lt;sup>15</sup> CFR 34 § 397.40

addition, customized employment is now included within the definition of supported employment. Also, the standard post-employment support services under supported employment have been extended from 18 to 24 months.

Under WIOA, part of the money that states receive under the supported employment state grants has to be used to support youth with the most significant disabilities (up to age 24), and these youth may receive extended services (i.e., ongoing supports to maintain an individual in supported employment) for up to four years. An "individual with the most significant disabilities" is defined in Connecticut as, "An individual with a significant disability who has serious limitations in a total of four or more functional areas (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance or work skills) in terms of an employment outcome."

WIOA reinforces the principle that individuals with disabilities, including those with the most significant disabilities, are capable of achieving high quality competitive integrated employment—the same kinds of competitive integrated employment as non-disabled individuals—when provided the necessary and appropriate services and support.<sup>16</sup>

# **Employment First: A Movement**

Employment First has become a national movement promoting real jobs for real wages for individuals with disabilities. According to the Association of People Supporting Employment First, a national membership organization, Employment First means that employment in the general workforce should be the first and preferred option for individuals with disabilities receiving assistance from publicly-funded systems. Their vision is that all people with disabilities have a right to competitive employment in an inclusive workforce. The Employment First effort has expanded to virtually every state. As of January 2020, forty states had adopted legislation or an official state policy stating that employment in the community is the first and preferred service option for people with disabilities.<sup>17</sup>

Connecticut's Department of Developmental Services implemented its Employment First Policy and Procedure, discussed later in this document, in 2011. DDS provides an Employment First Overview, including a set of fundamental beliefs and other Employment First information, on its website: https://portal.ct.gov/DDS/EmploymentDayServices/Employment-First/Employment-First-Overview

Throughout the last 40 years, states have had to struggle with a myriad of issues, including changes in tax structures, variation in economic status, often decreasing funding levels, lawsuits that demanded a focus outside of employment, a world-wide Pandemic, and differing political agendas. These influences are among those that have affected Connecticut and its ability to grow a strong program in which all working age adults could work in individual jobs, with pay and benefits as available to other employees. However, federal directives issued over more than 30 years make it clear that working in

 $<sup>\</sup>frac{16}{https://www.federalregister.gov/documents/2016/08/19/2016-15980/state-vocational-rehabilitation-services-program-state-supported-employment-services-program$ 

<sup>&</sup>lt;sup>17</sup> https://apse.org/legislative-advocacy/employment-first/

community settings is a valued and possible outcome for all working age adults with intellectual and developmental disabilities.

Based on the DDS Employment First Policy (see Results chapter) and the DDS Employment First Overview, individuals with intellectual disabilities and their families in Connecticut can expect:

- All DDS staff members will recognize that employment opportunities in fully integrated work settings are the first priority.
- These employment opportunities will be the first option explored in the service planning for working age adults.
- The employment planning process will begin during the child's school-aged years, and may even begin prior to school.
- Community employment will be a more valued outcome than non-employment, segregated employment, facility-based employment, or day habilitation.
- For individuals who have achieved community employment, future service planning will focus on maintaining employment and considering additional career or advancement opportunities.
- For individuals who have not yet achieved employment, service planning will include and reflect employment opportunities.

For these to be a reality, individuals and families also should expect that DDS will collaborate with other state agencies on employment goals, will ensure that state staff and service providers have the capacity and skills to facilitate and maintain employment opportunities, and will work with public and private sector employers to promote employment opportunities. There also should be a statewide communications effort supporting all of these strategies.

# **The Roadmap Project**

In an effort to determine strategies to increase access to competitive, integrated employment, in late 2020 Disability Rights Connecticut (DRCT) engaged Wise to develop a comprehensive report on community employment in Connecticut. Due to the level of resource dedicated to the project, Wise agreed to a focus on the experience of individuals with intellectual and developmental disabilities who are eligible for services funded by DDS, particularly related to their experience with DDS and Aging and Disability Services<sup>18</sup> (ADS) Bureau or Rehabilitation Services (BRS). The project included interviews with organizations that have facility-based services, as well as organizations that do not, and completed abbreviated reviews of the use of, subminimum wage certificates and the school to work transition process. In addition, in late 2021 DRCT contracted with two employment experts to conduct in-person interviews of individuals receiving services from several agencies viewed as including large sheltered workshops. These interviews sought to determine individuals' preferences concerning work and their exposure to information about and opportunities to explore competitive, integrated employment. The reviewers conducted all interviews on-site at provider locations in Connecticut. The consultant reports

<sup>&</sup>lt;sup>18</sup> Aging and Disability Services includes the Bureau of Rehabilitation Services (BRS) and the Bureau of Education and Services for the Blind (BESB).

of these interviews are available at the following locations: <u>report 1</u> and <u>report 2</u>, and their findings are discussed in other sections of this report.

To complete the project, Wise researched and reviewed the current conditions related to employment for people with intellectual disabilities based on examining data, reviewing published documents, and completing 48 individual and group interviews with 70 individual stakeholders (a total of 75 duplicated count stakeholder interviews), to provide a context for developing recommendations. This report includes a brief description of the methods used, the findings, a framework that describes the components of a state system that supports community employment for all working age adults with intellectual disabilities, and a "roadmap" of recommendations for achieving those employment outcomes in Connecticut. Work on the project began November 1, 2020, with the final report initially due October 31, 2021. The project was extended to February, 2022 to allow additional data collection and analysis. The Disability Rights Connecticut website can be found <a href="here">here</a>, and the project description (including a description of Wise) is available <a href="here">here</a>. Definitions of terms used in this report are available <a href="here">here</a>.

Achieving Employment First: A Roadmap

Table 2

Employment First Overview on DDS Website

# DDS Connecticut Department of Developmental Services Employment First Initiative

# We Believe...

• Everyone can work and there is a job for everyone. Our job is to be creative and persistent in providing supports that help people with intellectual disabilities to find, get and keep real pay.

**Real Work for Real Pay** 

- Not working should be the exception. All individuals, schools, families and businesses must raise their expectations.
- People will be hired because of their ability not because they have a disability.
- Communities embrace people who contribute.
- Everyone has something to contribute and needs to contribute.
- People are healthier, safer and happiest with meaningful work.
- True employment is not a social service.
- Employment is a win/win for everybody.

# Why Employment First?

Employment is a means to higher wages and provides opportunities for people to be part of their local community. Work gives all people a greater sense of competence and self worth. Supported employment assists people served by DDS to obtain and maintain jobs through the provision of ongoing support, offers people opportunities to work in the community for real wages and to build relationships with non-disabled co-workers. Employment can result in increased individual income and less dependence on the service system for supports. In addition, employment provides the rest of the community the opportunity to experience the capabilities and contributions made by people who receive supports from DDS. Everyone benefits when individuals also contribute to their communities through taxes, productive work and involvement with employer sponsored community projects.

Optimally, each worker with a disability should have his or her own job and receive the necessary individualized supports to maintain the job. When a worker has his or own individual job, they are hired by the company and paid the prevailing wage and receive the same benefits as other employees. Group supported employment options such as small work crews or enclaves provide community-based work for several workers with disabilities in the same setting. Workers in group supported employment are typically hired and paid by the DDS adult service provider and may or may not receive benefits. In all cases, employment may be full or part time based upon individual preference and availability.

The key features of supported employment are:

- **1. Real work:** Work that is needed and valued by the employer and is performed in a competitive integrated setting.
- **2. Real wages:** Wages are commensurate to wages paid for comparable work performed by someone without a disability and are paid by the employer.
- **3. Integrated work environments:** Most co-workers are people without disabilities who work in close proximity and regularly interact with employees with disabilities.
- **4. On-going support:** Supported employment assumes that people will need support over time and that support can be provided by the employer, co-workers or the adult service agency. Supports are individualized and therefore can range in their type and frequency.

https://portal.ct.gov/DDS/EmploymentDayServices/Employment-First/Employment-First-Overview

# **Achieving Employment First:**

# A Roadmap for Expanding and Improving Community Employment in Connecticut

# **METHODS**

# **Project Leadership Team**

Beginning in November 2020, and throughout this project, Wise worked closely with a small group of leaders from Disability Rights Connecticut (DRCT) to guide project activities. This group became the Project Leadership Team (PLT). The role of the PLT was to provide background information and materials on the service system in Connecticut for people with intellectual and developmental disabilities, recommend individuals to be included in data collection, provide introductions to those individuals, discuss findings and recommendations, and, in general guide the work of the project. The team met at approximately three to six-week intervals for most of the project.

# **Focus Population**

The project's central focus was to understand the experience related to gaining and maintaining employment for individuals with intellectual and developmental disabilities who are eligible for DDS-funded services. Thus, the project sought interviews with BRS and DDS personnel, schools related to transition services, service providers, employers, and persons with intellectual and developmental disabilities and their family members who had experience with BRS, DDS or both agencies related to gaining and maintaining individual community jobs.

However, to give a broader context, the project included gathering a limited amount of information about the experience of persons (or their families) who were not eligible for services from DDS, including a few people with autism and other people with intellectual and developmental disabilities who did not meet eligibility requirements for DDS services. These individuals and family members provided a valuable perspective to enrich the project. The project did not seek interviews with individuals who are blind who are served through the Bureau of Education and Services for the Blind (BESB) or their family members, or people with autism who are served through the Department of Social Services (DSS).

The project sought perspectives related to transition from school to adult services from each of the stakeholder groups interviewed. However, Wise did a limited review of how schools in Connecticut interface in that system.

# The Framework for State Change

With the support of the PLT, Wise developed a comprehensive structure to guide project work. This *Framework*<sup>19</sup> is available <u>here</u> and presents the major components of a state system that promotes community employment for working age adults with intellectual and developmental disabilities. Each major component includes accomplishments that would need to be in place to achieve that component. Wise used the *Framework* both to guide information-gathering and to give structure to this report.

The Framework includes four major components that need to be in place to support state change:

- A. **Leadership & Infrastructure**: Strong State leadership and systems support development and ongoing program success for transition youth and adults.
- B. **Community Support & Participation**: The Community organizes around the common vision and statewide goals for Employment First and participates in the program.
- C. **System Capacity & Skills**: State personnel, schools, provider organizations and employers have the capacity and skills to provide and maintain high quality individual employment for all who want to work.
- D. **Employment Opportunities**: Public and private sector employment opportunities at or above minimum wage are available throughout the state.

The first component, "Leadership and Infrastructure", includes two sections:

A-1. Agency Coordination: Relevant state departments partner to champion the program & provide strong leadership to achieve an inspiring common vision.

Making a significant system change at a state level requires the alignment of many moving parts. An inspiring common vision gives energy to this goal and provides direction to stakeholders for aligning their work. An inspiring vision supports action. Promoting it across partner agencies clarifies roles at both the state and local levels.

Leadership is more than vision, however. Thus, this part of the *Framework* focuses on partnerships and commitment across state agencies with responsibility and authority for the program and embedding Employment First language and directives throughout state policy. The work of state change begins with work at this level to actively support the goal of Employment First.

<sup>&</sup>lt;sup>19</sup> The current *Framework* is based on the "State Change Model: Managing the Development of Supported Employment Options, Strategies for Statewide Change" (University of Oregon, unpublished manuscript, November 1990). This state change model was developed by the National Technical Assistance Center on State Change at The Employment Network, University of Oregon and the Supported Employment Technical Assistance Center, Virginia Commonwealth University, and was used as a guide to supporting states to expand and improve supported employment options.

As a generic guide for change, the *Framework* does not define specific agencies for this partnership. Most states require a partnership at least among its developmental disability agency, its vocational rehabilitation agency, and its state education agency. However, in some states, it may be helpful to include additional partners in the Employment First goal, extending the target population. For example, in several states the mental health agency also has been an equal partner in this effort.

A-2. Infrastructure: Partner agencies' infrastructure and resources align with and promote the program.

To achieve individual employment in community settings for all adults with intellectual and developmental disabilities who want to work, partners need to align a large array of state systems and resources—both within and across agencies—to support that goal. This work includes establishing specific state goals, backed up by a resourced state plan that includes strategies and responsibilities for achieving joint goals, addressing both transition and the adult service system.

This change to expand community employment also requires state policies, systems, and processes that are aligned with and facilitate the effort related to both transition and the adult service system. Therefore, this section of the *Framework* addresses many systems and processes, including quality assurance and data systems; waiver applications and renewals; service contracts, funding formulas, service rates, and payment systems; referral, planning, case management, and service monitoring systems related to individuals with intellectual and developmental disabilities; and agency policies and other state systems.

The second *Framework* component reflects the need for relationships with stakeholders in the community: **"Community Support and Participation."** 

B-1 Coordinated Communications: Coordinated communications strategies promote participation in Employment First.

This component includes building consensus among State agency personnel, schools, service providers and other organizations around the vision of Employment First and their roles in it; using strategies to encourage individuals, families and significant others to understand and participate in the program; and ensuring that businesses and other community members are aware of and support Employment First. To achieve this level of consensus will require a coordinated communications plan addressing increasing awareness and knowledge of employment and its benefits, including providing accessible information to students and parents well before leaving school.

*B-2 Community Advocacy: Employment First stakeholders advocate for program expansion and improvement.* 

This part of the *Framework* addresses advocacy at two levels: by the State agencies and others with the Governor and legislature to ensure adequate state support for the program, and by individuals, families and other stakeholders to work with their peers related to understanding the benefits of Employment First and what they can expect from their participation.

The third component of the *Framework* focuses on **System Capacity and Skills** within state personnel, schools, provider organizations, and employers to ensure they have the knowledge and skills to provide and maintain high quality individual employment for all who want to work.

C-1 Training and Technical Assistance (TA) Infrastructure & Delivery: Partners establish and maintain an infrastructure that provides coordinated training and technical assistance.

The *Framework* recommends establishing a central organization to coordinate all training and technical assistance provided in the community. Such an infrastructure ensures that limited resources may be used most effectively by assuring alignment across capacity-building events, based on comprehensive planning to address the breadth of state training and technical assistance needs. Thus, this component includes regular availability of expert coordinated training and technical assistance to stakeholders to gain knowledge and skills to support employees with intellectual and developmental disabilities.

Finding the *right* job that matches each individual's strengths and interests is critical. Finding the right job requires up-front investment—in discovering individual interests and aptitudes, finding the right employer, and matching potential job duties with the best fit with the individual. The benefit is lower turnover, reduced training and support time, and longer job duration for individuals. Providing in-depth, multi-level, effective training so that school personnel and provider staff become highly skilled in the methods of supported and customized employment leads more efficiently to jobs that last.

C-2 Resources to Expand System Capacity: Partners identify and provide resources to support efforts to expand employment programs.

Changing from facility-based or group services to individual supported employment involves extra costs for retooling. Service providers usually need to revise their structure and staff support methods, revise data collection and compilation systems, revise communications plans and materials, and develop consensus within their stakeholders—a few examples of aspects of the organization that need change. Typical service fees are insufficient to cover such organizational development efforts. Thus, it is important for state partners to find ways to grant extra funds to community service providers during this period of change. Grants may be used to expand service capacity and as an incentive to systematize change, in addition to supporting the costs. Schools also need to identify resources for transition program staff to

do Discovery processes to learn about student interests and aptitudes, develop a variety of work opportunities both in school and in the community, and provide support to students in those experiences. Finally, resources may be needed to address community barriers, such as transportation, including working with other government agencies.

The fourth and final *Framework* component addresses **Employment Opportunities**. State efforts may include establishing programs within state and local government that address barriers and promote employment of people with intellectual and developmental disabilities and developing statewide employment initiatives with private sector businesses.

This Framework provides the structure to organize the Recommendations chapter of this paper.

# **Data-Gathering Methods**

#### Methods to Gather Documents and Published Data

Based on the *Framework*, Wise identified documents and data that would be helpful in reviewing the current reality of employment outcomes in Connecticut. The project used several strategies: received some documents and data from members of the PLT; requested some documents and data from state agency leaders; and researched Connecticut state government and other websites. These websites included DDS (<a href="https://portal.ct.gov/DDS">https://portal.ct.gov/DDS</a>) the federal Rehabilitation Services Administration (<a href="https://rsa.ed.gov">https://portal.ct.gov/DDS</a>) (<a href="https://portal.ct.gov/AgingandDisability/Content-Pages/Bureaus/Bureau-of-Rehabilitation-Services">https://portal.ct.gov/AgingandDisability/Content-Pages/Bureaus/Bureau-of-Rehabilitation-Services</a>), National Core Indicators (<a href="https://www.nationalcoreindicators.org/states/">https://portal.ct.gov/AgingandDisability/Content-Pages/Bureaus/Bureau-of-Rehabilitation-Services</a>), State Department of Education (SDE), (<a href="https://portal.ct.gov/SDE">https://portal.ct.gov/SDE</a>) and its Bureau of Special Education (<a href="https://portal.ct.gov/SDE/Special-Education/Bureau-of-Special-Education.">https://portal.ct.gov/SDE/Special-Education/Bureau-of-Special-Education.</a>)

## **Methods Related to Interviews**

**Nominations and Process for Scheduling Interviewees.** The project worked with the PLT and persons interviewed to obtain nominations for interviewees.

Stakeholder Groups to be Represented in Interviews. Wise and the PLT determined that interviews should include relevant leadership from ADS, DDS, and the State Department of Education; family members and individuals with intellectual and developmental disabilities who had received transition, DDS and/or BRS services; community rehabilitation programs (CRPs) and other service providers; BRS

Counselors and Supervisors, including Level Up<sup>20</sup> Counselors; DDS Case Managers; Special Education personnel from local school districts, and Private Sector Employers. For the interviews, the project sought individuals who believed that employment is an appropriate goal for working age adults and who had direct experience with some aspect of community employment for individuals with intellectual and developmental disabilities.

Nominations and Scheduling Process. The project used a nominations process to identify potential interviewees. Wise initially requested nominations from PLT members who suggested individuals in nearly every planned stakeholder group. The project did not screen nominations received but tracked them to ensure that the mix of interviewees satisfied project evaluation objectives. In February and March 2021, the project requested that PLT members communicate with their nominees to inform them of the project and determine their interest in participating. If the individual agreed, the PLT member sent an introductory email, usually including a project summary, so that Wise staff could follow-up to schedule the actual interview. Wise contacted the potential interviewee up to two times; at that point if there was no response, the project contacted the person who had made the nomination to determine next steps. Interviews were conducted between March and December 2021.

PLT members completed this introduction process with all identified leaders of state agencies. Either during or after their interviews, Wise staff invited those leaders to identify others within their agencies for interviews, including regional staffs, BRS counselors and supervisors, other administrative personnel, and DDS Case Managers. Although not directly interviewed, the DDS Commissioner nominated agency directors and two individuals with disabilities. Usually, agency leaders did not obtain an agreement from their staff for participation prior to referring them to Wise. Wise requested nominations for employers primarily from service providers.

Several nominated interviewees invited a second person to join them in the interview. These individuals were added to the list of interview participants within the appropriate stakeholder group, but not counted as "nominees". When necessary, the project emailed or arranged to complete follow-up interviews with a few of the interviewees from BRS and DDS to clarify or expand information received from them or other interviewees.

# **Interview Questions**

The project developed an overall list of topic areas and sample questions within each topic area, and based on those, developed question guides for each stakeholder group or, in a few cases, individuals. All interviews included questions about the individual's role and experience related to employment for persons with intellectual and developmental disabilities, along with a selection of additional topic areas depending on the interviewee's role and the flow of the conversation:

- Vision
- Overall (How is it working?)

<sup>&</sup>lt;sup>20</sup>"Level Up" is a BRS transition services program, working in collaboration with local school districts, DDS, families and the community. Level Up provides students aged 16-21 who have an IEP, 504 plan or related challenges with the tools, training and resources to work competitively and forge a path to independence.

- Partnerships
- Quality Management
- Culture within Agency and Partners
- Provider Capacity & Quality
- Service Planning and Case Management
- Transition from School to Work
- Professional Development
- Governor's Initiative
- Impact on growth of Employment First

# **Methods for Conducting Interviews**

Project personnel conducted all but one of the interviews<sup>21</sup> virtually via Zoom or Microsoft Teams. Each interview included one Wise staff facilitator and one or two other project personnel whose role was to listen carefully to the responses and record data for later analysis. In most cases, the interviewees were visible to project staff, based on the interviewee's choice. The project scheduled most interviews for 30 minutes; a few interviews, primarily groups, were scheduled to last 45 minutes or one hour.

The facilitator led the interview, asking most of the questions. The facilitator had the freedom to choose topic areas, questions, question wording, and order during each interview. In addition, the facilitator could ask other questions not in the interview guide for that stakeholder group, based on the flow of the interview and answers provided by the interviewee. In each interview, data collector(s) were invited to ask follow-up questions for clarification or to address a topic area that had not been discussed. The facilitator also invited the participant to add any additional information they had not had an opportunity to share.

# **Data Analysis Methods**

# **Documents**

Project staff reviewed written documents downloaded from websites or provided by interviewees for information related to the current reality of community employment and school to work transition in Connecticut. The project, in particular, sought policies, procedures, and informational materials and considered their content with respect to current recognized best practices and project experience with other states.

### **Numerical Data**

The project reviewed published data from state and national sources that were most relevant to describing the current level of community employment in Connecticut. In addition, the project requested data on specific indicators from BRS. The project followed up with both BRS and DDS staff to

<sup>&</sup>lt;sup>21</sup> One interview was conducted by phone

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clarify the meaning of data reviewed. The project used data provided, with no analysis other than providing descriptive statistics such as computing sums or percentages.

# **Interview Data**

Wise maintained separate files for each interview, available only to project staff in a secure on-line Project Management System. Staff reviewed files to discover individual important comments, as well as to identify common themes both within stakeholder groups and across all interviewees. These results are presented in the following Results chapter.

# Achieving Employment First:

# Roadmap to Expanding and Improving Community Employment in Connecticut

# **RESULTS**

### Table 3

DDS Employment First Initiative Policy

# A. Policy Statement

In order for individuals with an intellectual disability to achieve full citizenship, employment opportunities in fully integrated work settings are the first priority. This shall be the first option explored in the service planning for working age adults. This process will begin during the child's school aged years and may even begin prior to school.

While all options are important and valued, integrated employment is more valued than non-employment, segregated employment, facility-based employment, or day habilitation in terms of outcomes for individuals.

For those individuals who successfully achieve the goal of employment in an integrated setting, future service planning will focus on maintaining employment as well as the consideration of additional career advancement opportunities.

For those individuals not yet achieving employment, annual service planning will include and reflect employment opportunities.

B. Applicability: This procedure applies to all staff members of the Department of Developmental Services.

State of Connecticut

Department of Developmental Services

Policy No: I.C.5.PO.001

Subject: Employment First Initiative Section: Services and Supports: Employment and Day Supports

Issue Date: April 13, 2011 Effective Date: Upon release

Approved: /s/ Terence W. Macy/KdP

This chapter summarizes the results drawn from each of the data review processes—that is, the review of documents, published data, and stakeholder interviews. Through these reviews, Wise staff discovered both positive steps that have been taken in Connecticut, and areas which require changes to make individual employment in community businesses a reality for all adults with intellectual and developmental disabilities who wish to work. The chapter organizes the interview results based on the components of the *Framework for Change*. The following chapter, Recommendations and Discussion,

presents extensive recommendations based on these results and again organized according to the *Framework*.

# **Results of Document Review**

Documents reviewed were drawn primarily from materials available on websites for the three agencies, in addition to a few documents provided directly by state agency staff.

## **DDS Document Review**

The DDS Website (<a href="https://portal.ct.gov/DDS">https://portal.ct.gov/DDS</a>) contained a wide variety of materials, including policies and procedures; general information on employment and Employment First, along with links to resources for additional information; 5-Year Plans and waiver documents. Unfortunately, some of the documents we needed to review were difficult to find on the website; some materials were labeled as drafts, and some were out of date. This review, however, was mostly conducted using information obtained from the website, along with several more up-to-date documents received directly from DDS staff.

**DDS Policy and Procedures.** The State of Connecticut's Employment First Initiative policy provided above (No. I.C.5.PO.001) has been in effect since April 13, 2011. The policy states that employment opportunities in fully integrated work settings shall be the first option explored in the service planning for working age adults and beginning at least during the child's school-aged years. A related procedure found <a href="https://example.com/here">here</a> outlines responsibilities for DDS staff in particular roles, providers and others responsible for the allocation, development and implementation of day supports related to employment. Table 4 summarizes these procedural requirements. This procedure requires an employment outcome goal for persons with a Level of Need between 1 and 3. Although in interviews, DDS staff indicated that these requirements apply to individuals with a Level of Need between 1 and 5, the project was unable to obtain that written procedure.

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Table 4

Summary of Procedural Requirements Related to Employment First in Procedure Number I.C.5. PR.001 issued April 13, 2011

Role	Situation	Individuals with:	Requirement
Regional Planning and	When reviewing	Level of Need: 1-3	Written justification
Allocation Teams	requests for group employment or group day services	Age: Not specified	that outlines the reasons for not requesting individual employment supports. Justification may include significant health or behavioral concerns
Case Managers	Individual Plans	Level of Need: 1-3 Age: 18-21	Include an employment outcome which contains reference to minimum or competitive wages
Case Managers	Individual Plans, receiving group day supports	Level of Need: 1-3 Age: Under age 62	Include an employment outcome which contains reference to minimum or competitive wages. Plans for consumers with significant health or behavioral concerns can be exempted.
Case Managers and Private Providers	DDS Employment Information Profile/ Career Assessment Plan completed during the funded career assessment period	Level of Need & Age: Not specified	Use to document employment services provided to the individual
Operations Center and Resource Administration	Each day service provider's continuous quality improvement plan	Not specified	Address goals for enhancing the employment outcomes of individuals served by an agency

The implementation of this procedure may be measured at least in part by the percent of service plans reported to have an employment goal. Based on NCI data, described below, 39% of 360 responses had a community employment goal in the service plan, compared with 29% in the full NCI dataset (17441 responses)<sup>22</sup>. Although Connecticut reported a higher proportion of people with employment

<sup>22</sup> https://www.nationalcoreindicators.org/upload/core-indicators/CT\_IPS\_state\_508.pdf; Drawn June 4,2021

goals than the national data, there is no compiled information on the assessed Level of Need of those with or without an employment goal, nature of the employment goals, the level of their implementation, whether goals were achieved, nor, as a result of those actions, if anyone actually obtained a job in competitive integrated employment.

There is an important discrepancy between this procedure and the policy statement: The policy does not indicate that requirements related to employment planning are limited only to a subset of individuals served. However, the procedure's requirements related to requesting group services or individual planning only apply to individuals assessed with a Level of Need between one and three (or one and five, based on interviews). The effect of this limitation on the procedure requirements is supported by service providers interviewed who indicated they seldom receive referrals for Individual Supported Employment services for individuals with a Level of Need higher than 3.

The website also includes an interim procedure on Administration Requests for Day and Residential Supports and Services on Service Delivery, Planning and Resource Allocation (No.: I.B.2. PR.001, available here). Originally issued February 28, 2003, its most recent formal revision is dated July 23, 2015, after the issuance of the Employment First policy and procedure, but prior to the 2019 agreement between DDS and BRS (This agreement is available here but is discussed in greater detail under "Interagency Agreements" below). This DDS procedure delineates a standardized process to ensure that individuals are treated fairly and equitably in the allocation of resources when requesting day or residential supports or services and applies to all individuals determined eligible for DDS services, their families, advocates and guardians. In addition, it applies to all department staff, particularly those responsible for making and processing requests for residential and/or day supports and services. This is a well-defined procedure with definitions of terms, team and individual responsibilities, timelines, data and documentation requirements, and referral and review procedures. However, the procedure does not speak to processes related to individuals referred to DDS by BRS or others to assure long-term support funding for employment. In interviews, service providers, BRS Counselors and family members referred to delays between obtaining a job and receiving long-term supports through DDS.

**DDS Waiver Documents**. DDS also has posted a waiver manual, waiver applications and renewal requests on the DDS website, as well as informational materials about the waivers. These include a combination of current and out-of-date documents.

Connecticut holds Home and Community-Based Services (HBCS) Waivers issued by the Centers for Medicare and Medicaid Services (CMS) to permit the state to obtain federal reimbursement for providing supports in the community rather than institutional settings—either by moving individuals from an institution or preventing entry to an institution. The current adult waivers held by DDS are Individual and Family Support Waiver, Comprehensive Supports Waiver, and Employment and Day Support Waiver. The Department of Social Services holds a waiver for services for persons with autism. Each waiver has an annual cap on the number of individuals who may be served through the waiver and the total amount of funds authorized. Persons on a waiver have an Individual Budget to meet needed services and supports. Individuals may obtain services through Qualified Enrolled Vendors, Agencies that permit choice of their staff, and Self-directed services in which the individual directly hires and manages

the staffing. Each of the three adult waivers includes authorization for specific types of employment services, along with a variety of other supports.

As part of their applications, DDS is required to propose performance measures related to each HCBS Waiver it holds. In an application that went into effect 9/1/21, DDS proposed aligning the measures reported for each of the waivers, making it easier to evaluate the performance of DDS waiver services as a whole. These indicators, however, are largely document- and process-oriented (e.g., reflecting policies and records content; or adherence to process requirements such as timely individual plans, timely updates, or completion of Level of Need assessments) and do not yield information on employment outcomes.

DDS Website Information on Community Employment and Transition. The DDS Website (https://portal.ct.gov/DDS) includes extensive materials searchable by key words. The site includes a great deal of information for families, service providers, and others, including information on Transition to Adulthood, Employment and Day Services, Employment First, Technology Supports, Programs and Services, DDS Eligibility, Waiver Services, and staff contact information. Within the site it is possible to find Waiver applications, DDS Five-year plans, and quarterly Management Information Reports. The Families section of the site is organized by age group, with links to many resources on transition, including a brochure on accessing eligibility-based benefits and supports (2/2021), and a fact sheet (10/2007) explaining aspects of the transition process and the role of regional transition coordinators. Some of the information and links need to be updated, but in general there is good information available.

DDS Five-Year Plan. December 21, 2021, DDS posted on the website a draft of a five-year plan covering the years 2022-2027 and invited public comments at planned community meetings to be held in January 2022. Rather than reviewing an older approved plan, the project reviewed this draft plan to identify DDS' most current thinking on strategic priorities related to community employment services and outcomes. The overall Five-Year Plan addresses the full breadth of DDS services—including, for example, Family Support and Community Living as well as Employment and Day Services—within a structure drawn from Charting the LifeCourse.<sup>23</sup> The plan prioritizes innovative programs, community engagement, integration and communication throughout its components. Specifically related to employment-based services, the plan describes a stakeholder engagement process to create a workplan that focuses on increasing capacity and improving the services offered through the state. The plan recommits to the Employment First policy, and will "consider flexibility in both the job opportunities and the supports, including elements such as transportation..." (p.24). Another critical element described in the plan is improved communication across multiple sectors—i.e., improving information available to individuals and families about programs and services, more sharing of best practices across the service system, and better communication with the community and businesses. In another component, Safety and Security, the plan identifies staff retention as a major source of concern to stakeholders related to ensuring safety and security of individuals. The Social and Spirituality component includes reference to

<sup>&</sup>lt;sup>23</sup> Charting the LifeCourse Nexus; Curators of the University of Missouri | UMKC IHD, UCEDD, <a href="https://www.lifecoursetools.com">https://www.lifecoursetools.com</a>

stakeholder input related to the need for better networking for various affinity groups. In the plan's Closing (p.32) DDS emphasizes information accessibility—to stakeholders, to the Department, and to the community. This will include modernizing DDS data systems, including incident reporting, case management, and other administrative systems, to improve efficiency and communication. Many of these issues and priorities parallel those discovered during interviews conducted by this project.

State Employment Leadership Network Findings and Observations Report (July 2021). The Supported Employment Leadership Network (SELN)<sup>24</sup> is a partnership of the National Association of State Directors of Developmental Disabilities Services (NASDDDS) and the Institute for Community Inclusion at the University of Massachusetts Boston (ICI). The network includes state intellectual and developmental disability agencies committed to making changes in their respective service systems. States receive customized technical assistance to meet the unique needs of their state based on the current system of supports and goals for improvement. SELN's emphasis is around building capacity to improve and expand the employment infrastructure. SELN consultants from the NASDDDS and ICI used methods similar to those of the current project—meeting with DDS core team members, analyzing the state's SELN State Strategic Employment Full Assessment, considering National Core Indicators data, reviewing state policy documents and resource materials, and holding feedback and discussion sessions with several stakeholder groups. The report, available <a href="here">here</a>, summarizes "Key Findings" and suggests opportunities for improvement in "Potential Focus Areas" to support development of a workplan including desired outcomes, activities, and strategies. The Roadmap Project's findings and recommended actions are closely aligned with the SELN report.

SELN praised Connecticut's DDS for its full array of service types; its investment in employment-related positions across the central office, regions, case management and self-advocates; and its testing of outcome-based funding models for employment supports, although the report states that the funding system is viewed as complicated. SELN's comprehensive findings for improvement and priority actions include addressing:

- Expectations of a full-time weekday service by students leaving school (p. 3) and the perception that people are "safe" in facility-based supports. (p. 4)
- Inconsistent and, at times, confusing communication about Department priorities and emphasis on Employment First. (p. 3 and 4)
- The need for interagency coordination and development of shared goals and processes with key partners. (p. 3)
- Conducting a thorough analysis of all employment and day services including definitions, funding, and utilization. (p. 3 and 12)
- Developing a more comprehensive and coordinated infrastructure for capacity-building, including an ongoing investment in training and technical assistance across multiple stakeholders (p. 3), as well as coaching and mentoring supports and a pathway for problemsolving. (p. 9, 10)

<sup>&</sup>lt;sup>24</sup> https://www.nasddds.org/projects/state-employment-leadership-network/

- Establishing more robust strategies for collecting and transparently reporting employment outcome data to drive decision-making. (p. 3 and 14)
- Concerns or differences in understandings about several service issues, including the relative ease of entering a facility-based day support option versus community-based options (p.4) and the use of the Level of Need Assessment. (p. 6)
- Opportunities for a clear place for employment-related central office and regional DDS staff members to come together for planning and coordination. (p. 4)
- Improving engagement with local school systems. (p. 10)
- Establishing a collaborative understanding across BRS, SDE, and DDS of each other's system demands, policies and procedures when addressing Employment First. (p. 11)
- Developing a coordinated interagency strategy for implementation of Section 511 career counseling. (p. 11)
- Working with BRS to strengthen the provider network. (p. 11)

This comprehensive report of findings and recommended actions can provide a strong foundation for a DDS workplan to improve community employment for individuals with intellectual and developmental disabilities in Connecticut.

## **BRS Document Review**

Connecticut PY2020-2023 Workforce Innovation and Opportunity Act (WIOA) State Plan. The federal Rehabilitation Services Administration requires each state to submit its plans for implementing WIOA within its vocational rehabilitation system. The plan includes State Rehabilitation Council (SRC)'s recommendations, most of which reflect issues reviewed by *The Roadmap Project*: Strengthening communication between counselors and consumers, particularly with Pre-Employment Transition Services (Level Up), transferring to an adult counselor, and requested information regarding the processes and timelines (p. 168); Reporting on the progress and outcomes of BRS multi-state agency collaborative agreements including ...the Department of Developmental Services (DDS)... (p. 168); and Providing semi-annual updates on the effectiveness of Community Rehabilitation Providers (CRPs) to determine if the number of vendors and scope of existing contracts results in an effective service delivery model. (p. 168)

Information reported from the Comprehensive Statewide Needs Assessment (CSNA) indicates people with the most significant disabilities have greater barriers to employment and require more support in the community, service network and workplace (p. 182), and the system's capacity to serve this population is extremely limited. The report identifies insufficient funding, inconsistent policy and programming across state agencies, and limited staff proficiency as causes for the limited service available. The CSNA also identified individuals with psychiatric and developmental/intellectual disabilities, those with autism spectrum disorder, and those transitioning from school to post-secondary education or work as most frequently identified as unserved or underserved by BRS. (p. 185) The CSNA found that only about two-thirds of survey respondents felt that CRPs meet the employment needs of individuals with disabilities. (p. 186)

The PY 2020-2023 plan (Program Years, beginning July 1, 2020 through June 30, 2023) identifies five goals which are intended to be five-year goals. With WIOA itself signed in July 2014, and its final regulations published in June 2016, BRS has had the responsibility to determine how to implement the new provisions of WIOA. Since its 2016 plan, BRS has included a broad goal to implement the provisions of WIOA specific to the VR program and with it, a general set of "Priority Areas". The plan also includes activities and methods--such as personnel training, partnerships, materials, and support to employers—that will be used.

BRS Website Information on Vocational Rehabilitation, Community Employment and School to Work Transition. The BRS section of the ADS website provides a summary of BRS eligibility and list of services, information and contacts for applying for vocational rehabilitation services; a link to a page on Benefits Counseling with information and regional contacts; and a link to the RSA website for additional information on the vocational rehabilitation program. A search of the ADS website found information on the BRS State Rehabilitation Council, along with links to surveys, reports and state plans. A search of the website for terms related to community employment yielded links to many items, including service contracts with qualified BRS vendors, and a manual for these providers. This Community Rehabilitation Program manual (January 2019) includes information about vocational rehabilitation, definitions of services, roles, and billing procedures. The site also included a Policy Manual (July 2018) for use by BRS Counselors which includes definitions for terms including, Competitive Integrated Employment, Employment Outcome, Extended Services, Individual with a Most Significant Disability, Integrated Setting, Ongoing Support Services, and Supported Employment. The manual also includes legal requirements for each topic area (e.g., Application, Eligibility, Individual Plans for Employment), along with guidance for use by the counselor for how to implement the policy. The manual is clear, wellorganized, and contains the fundamental information about how BRS is required to do its work. A Consumer Choice Guide (August 2018) to assist consumers in their selection of Community Rehabilitation Programs includes information about each provider and its service area, although it probably needs to be updated at this time. A website page on Level Up includes brief information and contacts for more information on the program or to apply for that transition program. The website also provides links to School to Work brochures and brief videos introducing BRS to youth, families, and schools, including how to access its services.

# **SDE Document Review**

**SDE Website Information on Transition and Community Employment.** The SDE Website for the Bureau of Special Education provides access to the FY20 IDEA Part B Annual State Application, guidance on the extension of IDEA eligibility to age 22, and several materials and training modules related to secondary transition. The "<u>Transition Bill of Rights for Parents of Students Receiving Special Education Services</u>" provides parents with a description of the rights of students with IEPs regarding transition programs in Connecticut. These 12 rights include:

 "Receive public secondary transition services through their IEP starting at least at age 16, or younger if desired and recommended by the student's PPT." (Planning and Placement Team)

- "Receive secondary transition services and related supports to help them prepare to meet their
  post-school goals in postsecondary education/training AND employment, and independent
  living skills if appropriate."
- "Identify, explore, and connect with outside agencies as appropriate, including but not limited
  to the following adult service agencies: Department of Developmental Service (DDS),
  Department of Mental Health and Addiction Services (DMHAS), Department of Public Health
  (DPH), and the Department of Rehabilitation Services (DORS), which includes the Bureau of
  Education and Services for the Blind (BESB) and Bureau of Rehabilitation Services (BRS)."
- "Request consideration for receiving transition-only services between the ages of 18 and 21 ...."
   (includes list of conditions.) "In addition, the following should be considered: ...Transition-only services should be based in the local community to the greatest extent possible in order to prepare students for life after high school."
- "Receive...transition resources and other information regarding IEPs developed by the Connecticut State Department of Education (CSDE) and their school..."

## Transition resources on the website include:

- Easing into Secondary Transition: A Comprehensive Guide to Resources and Services in Connecticut (April, 2019)
   (https://portal.ct.gov/SDE/Special-Education/Easing-into-Secondary-Transition)
- Building a Bridge from School to Adult Life: A Transition Manual for Students (Connecticut Transition Task Force, 2009) (<a href="https://portal.ct.gov/-/media/SDE/Special-Education/BuildingABridge.pdf">https://portal.ct.gov/-/media/SDE/Special-Education/BuildingABridge.pdf</a>)

**Interagency Agreements.** DDS, BRS and SDE have several agreements related to employment for individuals with intellectual and developmental disabilities. The project received five agreements from agency staff, initiated between 2017 and 2021.

ADS and DDS Agreements. The most recent agreement, found <a href="here">here</a>, is referred to as a "Customized Employment Agreement" between ADS and DDS, related to defining their respective roles in establishing and operating a Competitive Employment Training Program at ADS that teaches contracted community rehabilitation provider personnel a Competitive Employment curriculum<sup>25</sup>. Under this agreement, ADS is responsible to deliver the training program, provide two staff trainers and purchased training services, manage certificates of completion and a registry, and report results and costs. The program will provide training to a negotiated number of trainees, up to 180 per year, combined across DDS and ADS. DDS responsibilities include referring trainees, monitoring their progress, communicating with ADS, and paying training fees to ADS based on per-person training costs. The agreement became effective July 1, 2021 and continues through June 30, 2024.

The 2016 regulations for the 2014 WIOA requires formal cooperative agreements between the state vocational rehabilitation and developmental disabilities and other agencies (§361.24). ADS and DDS in December 2019 signed a memorandum of understanding, found here, "to establish a consistent

<sup>&</sup>lt;sup>25</sup> This on-line training system is discussed in greater detail later in this chapter.

statewide system of coordinated and cost-effective employment services for people with intellectual disabilities with minimal overlap of responsibility and maximum utilization of resources between ADS and DDS." The agreement will be evaluated every two years and remain in effect until it is amended or replaced. This MOU recognizes that "individuals with developmental disabilities may be joint consumers" of both agencies and promotes coordination at both administrative and service levels, based on a defined set of beliefs drawn from Employment First. The agreement includes joint responsibility for establishing a system and streamlining shared processes and procedures protocols for referrals, employment planning, combined resources, and ensuring smooth transition from short-term to long-term funding or supports. In addition, the agencies agree to share individual file information, follow an outline of the specific processes related to individual consumers based on identified roles, and ensure benefits counseling, the Ticket to Work program and other services are made available. A few other notable specific areas of the agreement include:

- Establish administrative coordination, including semi-annual executive meetings, quarterly regional coordination meetings, and annual data reports with defined content from each agency;
- Collaborate on joint training for agency staff related to the MOU and each other's agency;
- Help families and individuals understand their roles in achieving employment;
- Promote use of shared vendors with consistent standards across agencies related to Competitive Employment outcomes;
- Identify best practices, pursue pilot projects and grant opportunities;
- Promote "Charting the Life Course" principles and practices.

This agreement is comprehensive in defining steps that need to be taken to ensure a coordinated, effective system that yields employment outcomes. However, while some steps have been taken, it appears that the agencies have not yet implemented several of its provisions.

ADS and SDE Agreements. WIOA also requires an agreement between a state's vocational rehabilitation agency and state educational agency. The project received two relevant agreements, one MOU between the Department of Rehabilitation Services (DORS) and the State Department of Education effective November 17, 2017 until terminated can be found <a href="https://nexess.ps...between-ADS">here</a>; the other an MOA between ADS and the Connecticut State Board of Education (CSBE) effective March 1, 2020 through October 31, 2022, which must be reviewed within 90 days prior to termination with a written letter within 30 days to document extension, can be found <a href="here">here</a>. Both agreements define cooperation in a "shared commitment to coordinate the timely provision of necessary transition services for youth with disabilities throughout Connecticut." The 2020 agreement defines a subcontract from CSBE to the State Education Resource Center to provide 11 Associates and one Coordinator to "complement the work of Level-Up<sup>26</sup> Counselors by providing Pre-ETS" services, along with a Resource Mapping Tool. According to the BRS Director, this portion of the 2020 agreement was terminated. Therefore, it appears that the 2017 MOU, which includes a detailed list of responsibilities for both DORS (ADS) and SDE, is likely still in effect.

<sup>&</sup>lt;sup>26</sup> Level-Up is Connecticut's Pre-Employment Transition Services program and is discussed later in this report.

DDS and the Connecticut Department of Labor (CTDOL). In 2021, DDS entered into an agreement with the CTDOL to permit exchange of confidential information to allow DDS to provide reports required by the federal government, and to identify individuals who are competitively employed with a higher level of reliability than third party reporting. The agreement, found <a href="here">here</a>, specifies quarterly reports from DOL on wage and benefit information, use of the data, and confidentiality and security requirements. The effect should be to allow DDS to reduce the burden on service providers associated with the requirement that providers gather employment data including hours and wages. The agreement became effective in March 2021 and will be reviewed every two years, remaining in effect until it is amended or replaced.

# **Results of Numerical Data Analyses**

The project reviewed data from state and national sources to learn about both the types of data available and the results achieved by engagement with services.

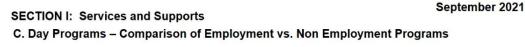
### **DDS Connecticut Data**

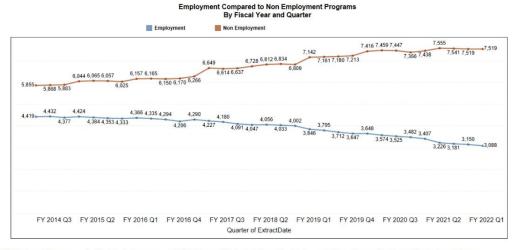
State of Connecticut DDS Management Information Reports. Connecticut's data shows that the percent of persons served in its DDS-funded employment programs has consistently decreased over the last 17 years. See Figure 1, below. DDS has a strong record of posting public data reports—Management Information Reports (MIR)—on the DDS website each quarter (https://portal.ct.gov/DDS/Media/Publications/MIR-Management-Information-Reports). These reports date to June 2005, permitting reviewing trends across time. However, their utility for evaluating performance in employment is limited, as the data most relevant to employment summarize the number of people in each service type but include no outcome information nor any information on the work environment (facility-based or community -based), compensation (sub-minimum wage or minimum wage or above), the extent of contact with non-disabled persons (segregated v. integrated), or the employer of record (private employer, public employer, or provider employer) . Thus, for example, the number of individuals listed in Individual Supported Employment (ISE) are receiving that type of service in their primary day placement. It does not indicate how many of those people are actually working in a competitive integrated employment job, for how many hours per week, nor the level of wages they are receiving. It should be noted that during our interview with staff from the DDS Business Intelligence and Analytics office, staff had several ideas and potential solutions for improving this aspect of the data system.

Based on the September 2021 MIR, of 17,206 individuals who are active with DDS, 10,937 receive Employment and Day Supports. Of these individuals receiving Employment or Day Supports from DDS, only 28% (3088) are in Employment Programs<sup>27</sup>, while the remaining 72% or 7849) are in Non-

<sup>&</sup>lt;sup>27</sup> Employment Programs as listed in the 9/2021 MIR consist of the following program types: Individual Supported Employment, Competitive Employment, and Group Supported Employment. (Prior to 3/19 Group Supported Employment was categorized as Non-Employment). Non-Employment Programs consist of Prevocational, Day Service Options, Individualized Day (all types), Small Enterprise, Senior Supports, and Transitional Services. Earlier reports also included Sheltered Workshops, categorized as Non-Employment Programs.

Employment Programs (See Figure 1. Drawn 12/30/21 from: https://portal.ct.gov/-/media/DDS/mir/mir September 2021 with attachment.pdf ). Of the 10,937 individuals receiving Employment and Day Supports, the report lists 608 (5.6%) individuals receiving ISE services, 270 (2.5%) individuals counted in Competitive Employment (CE), and 2210 (20.2%) receiving Group Supported Employment (GSE) as their primary day service placement—about 28% of those receiving an Employment and Day Support.<sup>28</sup> In all cases, these figures represent the type of service individuals receive rather than actual employment outcomes. Thus, this portion of the MIR is reporting number of payments by service type for the primary day service placement rather than information about the results of those services. The CE numbers are more confusing, however, as these are individuals who may have case management service but are receiving no annual funds for employment or day supports and no supports provided by DDS, a private provider, or a self-directed service. There also is no clear definition of the criteria for a person being identified as in CE. Presumably they have a job, but there are no data on whether it is a paid job, the number hours or the nature of the setting, including any employer of record or the level of integration. Thus, it is not possible through the MIR data to evaluate performance on achieving CIE for individuals with intellectual and developmental disabilities.





NOTE: Employment Programs consist of the following program types: Individuals Supported Employment, Competitive Employment, and Group Supported Employment. Non-Employment Programs consist of the following program types: Pre-Vocational, Day Service Options, Individualized Day (all types), Small Enterprise, Senior Supports, and Transitional Services.

The data does not include Other placement types not included in the descriptions above

These are primary day placements and do not include the non-primary day program information. Prior to the March 2019 MIR Group Supported Employment (GSE) was categorized as Non-Employment

Figure 1. DDS day programs—comparison of employment vs. non-employment programs, FY2014 Q3 through FY2022 Q1. (Source: DDS Management Information Report, September, 2021)

Unfortunately, as shown in Figure 1, the percent of persons served in Employment Programs has shown a consistent downward trend, while the number in Non-Employment Programs has consistently

<sup>&</sup>lt;sup>28</sup> Additional individuals may receive ISE, CE or GSE services if they are funded for multiple services, but are not counted here unless that service is considered their primary day placement.

increased. The June 2005 report lists 9127 individuals in Employment and Day Supports. Of these, 48% (4414) were served in Employment Programs. Of those 4414 people served in Employment Programs, 992 were receiving ISE services, 548 "receiving" CE, and 2874 receiving GSE services.

**National Core Indicators.**<sup>29</sup> NCI is a voluntary effort by state developmental disability agencies to track their performance using a standardized set of consumer and family/guardian surveys with nationally validated measures.<sup>30</sup> Data reported are based on a representative sample (n) of the population of people served.

NCI reports employment measures in four service categories: individual job without publicly funded supports, individual job with publicly funded supports, group supported (with or without publicly funded supports), and community job in a business that primarily hires people with disabilities but where the employees with disabilities interact with the non-disabled population. In NCI reports, therefore, the phrase "community job" includes all four categories.

In the 2018-2019 report<sup>31</sup>, 42% of valid survey responses from Connecticut (n=326) reported a paid community job, as compared with 19% (n=16,193) in the full NCI data. A total of 58% of survey responses (n=258) indicated the individual attends a day program or workshop.

Figure 2 presents the distribution across types of employment reported in the NCI report. This graph depicts Group Employment as the most frequent category of Community Job in Connecticut, at 80%, followed by Individual Jobs with publicly funded supports (about 20%), Paid work in a community business that primarily hires people with disabilities (about 10%), and Individual Jobs without publicly funded supports (about 5%).

<sup>&</sup>lt;sup>29</sup> https://www.nationalcoreindicators.org/upload/core-indicators/CT\_IPS\_state\_508.pdf; Drawn June 4,2021

<sup>&</sup>lt;sup>30</sup> The NCI effort is coordinated by the National Association of State Directors of Developmental Disabilities Services (NASDDDS) and the Human Services Research Institute (HSRI). In 2018-19 a total of 37 states reported survey data, including Connecticut. To assure that results are representative, NCI asks that states randomly sample service recipients over age 18, resulting in at least 400 valid surveys. Connecticut submitted 391 valid surveys. The DDS Office of Business Intelligence Analytics reports that in Connecticut, 370 surveys yield representative results given the population size.

<sup>&</sup>lt;sup>31</sup> NCI has chosen not to generate reports for 2019-2020 due to issues related to the Pandemic.

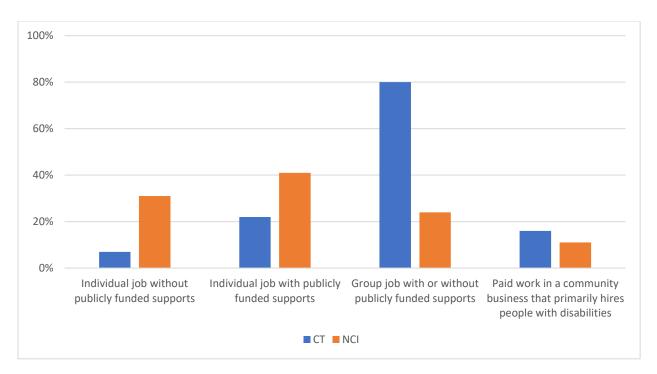


Figure 2. Type of paid community job (of those with paid community jobs, n=320), National Core Indicators.

There is a potential inconsistency between NCI, which reports 42% of individuals served are in a "community job" by NCI's definition, as compared with the 28% reported in the 9/21 quarterly MIR. This inconsistency can be explained in large part by a clearer understanding of the definitions of the measures and the data collection methodology of the two sets of data.

Measures Used. The NCI definition of "community jobs" reflects actual jobs in four different
categories of types of job placements. The MIR data collected by DDS reflects the type of
services provided, rather than the existence of a job. In addition, there is no category in the MIR
data for the fourth NCI job type, "Paid work in a community business that primarily hires people
with disabilities" as DDS has no service type that reflects that job category.

There are no data on actual jobs gathered and compiled by DDS as a regular course of business for their quarterly reports. Thus, valid data on NCI's definitions of community jobs could not be drawn from existing MIR data, and, as a result, MIR data are not the source of the jobs data provided to NCI.

Methodology for Collecting and Compiling the Data.
 MIR data are drawn from the DDS data system for tracking services received by individuals. As specified by NCI, DDS collects the NCI data on a randomly selected sample of people through in-person interviews or reviews of records. DDS-designated surveyors collect data based on the NCI definitions of

The NCI reports included the only DDS-related data the project found that reflected actual jobs rather than services.

community jobs—not on services provided. Thus, the NCI reports included the only DDS-related data the project found that reflected actual jobs rather than services.

The NCI report included no Connecticut data on the average number of biweekly hours or the average hourly wage by type of community job for three of the four NCI job categories. Group jobs with or without publicly funded supports reported 28.0 biweekly hours (compared to 26.0 in the national NCI data) and \$8.83 in hourly wages (compared to \$8.32 in the national NCI data).

It is interesting to look at if the likelihood of having any of the four types of paid community jobs defined by NCI varies with an individual's type of living environment. NCI reported that 64% of those in the survey who live in their own home or apartment have one of these four types of community jobs; 50% of those reported who live in a parent's or relative's home have one of these types of community jobs, and 29% of those who live in a community-based residential setting have a community job.

NCI also presented the percent of responses that were reported to have a community employment goal in the service plan (39% of 360 responses in Connecticut, compared with 29% in the full NCI dataset; Connecticut's result ranked 9<sup>th</sup> in NCI states). The presence of a community employment goal, like having a community job, varied with where the individual lives: 64% of those reported who live in

39% of survey responses in Connecticut reported to have a community employment goal in their service plan
--National Core Indicators based on a random sample

their own home or apartment had a community employment goal, 49% of those reported who live in a parent or relative home, 27% of those reported who live in a community-based residential setting, and 5% of those reported who live in an ICF/institutional setting. As discussed previously, these data, however, do not reflect the number of people who actually had a job in the community that paid them a competitive wage.

#### **National Data Source on Vocational Rehabilitation**

The project also reviewed another source of national data, StateData.info<sup>32</sup>, to give a context to data reported about Connecticut. Table 5 summarizes State Vocational Rehabilitation Agencies data on closures for people with intellectual disabilities.

<sup>&</sup>lt;sup>32</sup> StateData is a Longitudinal Data Collection Project of National Significance, funded in part by the Administration for Community Living, US Department of Health and Human Services. StateData.info allows users to find, sort, and analyze data related to employment for people with intellectual and developmental disabilities (IDD). The site includes data from state IDD agencies, and vocational rehabilitation outcomes and services from the Rehabilitation Services Administration. It also features data from the Social Security Administration, state mental health agencies, the U.S. Census Bureau's American Community Survey, the National Core Indicators Project, and the U.S. Department of Labor. This project promotes Employment First and systems change efforts nationwide by supporting outcome-based management and planning.

Table 5

2019 State Vocational Rehabilitation Data, Closures People with Intellectual Disabilities <sup>a, b</sup>

Variable	Connecticut	US Total <sup>c</sup>	
Rehabilitation Rate	37.0%	46.0%	
Status 26 Successful Closure	32.7%	35.2%	
Average Cost per Status 26 Closure	\$7441	\$6231	
Average Hours	20	22	
Weekly Earnings	\$227.62	\$229.51	
Average Days to Status 26 Successful	700	714	
Closure			

<sup>&</sup>lt;sup>a</sup> Data Source: Statedata.info. (2021). *State Vocational Rehabilitation (VR) Agency Data, VR Closures with an Intellectual Disability (ID)*. Retrieved 12/16/2021 from http://www.statedata.info/data/

### **BRS Connecticut Data**

Data Provided by BRS. BRS administrators initially referred the project to the Rehabilitation Services Administration (RSA) website for state-specific data from the RSA-911 Case Report. This report summarizes a standardized set of measures collected for each person who has applied for vocational rehabilitation services throughout the country. The RSA-911 report could include data elements related to applications, eligibility, disability, trial work experience, Individualized Plan for Employment, services provided, employment outcome, exit data, and post-exit data. The project was only able to find some Pre-Employment Transition Services data and limited RSA-911 data on the website. On July 9, 2021, the project followed instructions on the RSA website to request access to data. RSA quickly responded to that request with a required application requesting information on our research project. If approved, RSA indicated it would send Wise a disk with Connecticut data. However, no data were received from RSA as of December 31, 2021.

When Wise discussed the project's difficulty in obtaining RSA data, BRS offered to pull together a set of data based on our specific data requests. BRS subsequently provided data reported below in Tables 6, 7, and 8, and later responded to questions about the data.

<sup>&</sup>lt;sup>b</sup> Data retrieved from Statedata.info include data reported as 2020, but includes data through 2018.

<sup>&</sup>lt;sup>c</sup> US Total reported may include data from fewer than 50 states, based on individual state reporting.

Table 6

Summary of Calendar Year 2019 BRS Data Related to Individuals with Intellectual Disabilities <sup>a</sup>

Data Question <sup>b</sup>	Calendar Yr 2019 °	Comments
Number of people with intellectual disabilities who applied for BRS services.	303	Values are approximate as disability information is not officially recorded until the time of Eligibility Determination
Number of people with intellectual disabilities who were found eligible for BRS services.	143	May include individuals who applied for or were found eligible for services during the prior calendar year.
Number of people with intellectual disabilities who were identified as most significantly disabled found eligible for BRS services.	128	BRS Priority Levels are determined at the time of eligibility: Most Significantly Disabled (MSD), Significantly Disabled, Non-Significantly Disabled. Count reflects people determined eligible for VR had a Priority 1 MSD identification.
Number of people with intellectual disabilities who had an Individualized Plan for Employment (IPE) developed.	133	May include individuals who applied for or were found eligible for services during the prior calendar year.
Number of people with intellectual disabilities with a signed IPE who achieved a successful closure into employment.	66	These data do not differentiate between closure into supported employment or competitive employment.

The data reported here must be interpreted with care, as each data element is measured within the calendar year and may represent people who, for example, were found eligible or had a plan developed in the previous year—i.e., not only those who applied during that calendar year. Thus, although 133 people with intellectual disabilities had an Individualized Plan for Employment developed in calendar year 2019, that number could include people who had applied for services prior to 2019. Thus, it is not appropriate to compare 133 plans to 303 applicants.

Despite these caveats, it is clear that less than half of all persons with intellectual disabilities who apply for BRS services are found eligible, and less than half of those are successfully closed, meaning they have obtained a job that meets the federal standard for Competitive Integrated Employment.

In other data received from BRS, only 44 people with intellectual disabilities were reported as having received benefits counseling during calendar year 2019. Given family concerns about the effects of paid

b Definitions for data elements match those within the BRS data system. Thus, for example, counts related to individuals with intellectual disabilities most likely overestimates those who would be eligible for DDS services.

<sup>&</sup>lt;sup>c</sup> The project requested and received data from BRS for calendar years 2019, 2020 and partial 2021. Because data reported varied from previous years, due to effects of the Pandemic, only 2019 data are included here. Both BRS staff and the project viewed 2019 data as most representative of BRS data from a typical year.

work on benefits received described under Interview Results, below, this appears to be a low number of people who received benefits counseling within a year. It would seem that many more individuals with intellectual disabilities would have taken advantage of the opportunity to receive benefits counseling. This figure could be affected by data entry error.

Table 7 reports total closures for individuals with disabilities during calendar year 2019 in Connecticut, along with the number and percent of successful and non-successful closures. According to these data, 19% of individuals with intellectual disabilities who applied for BRS services eventually achieved a successful closure. The next table, Table 8, summarizes reasons for exit for individuals with intellectual disabilities during calendar years 2019 as reported by Connecticut BRS.

Table 7

Connecticut BRS Closures, Individuals with Intellectual Disabilities Calendar Year 2019 a

Calendar Year 2019	Count	% Total Closures	Average Months Open
<b>Total Closures</b>	346	100%	
Achieved Employment Outcome (successful closure)	66	19%	23
Total Exited, non- successful closures, calendar year	280	81%	See below

<sup>&</sup>lt;sup>a</sup> Includes all exits during the calendar year for people with intellectual disabilities, from the time of application, for any closure categorized as successful or not successful. Therefore, "Total Exited" includes individuals who after completing an application were not found not eligible for BRS services, as well as those who were exited at any point after being determined eligible.

As reported in Table 8 below, approximately 38% of all applicants with intellectual disabilities were determined as having a disability too significant to benefit from vocational rehabilitation services. By far, that is the highest frequency exit reason across all persons exited at any point in the vocational rehabilitation process. It is likely that these individuals were exited after application during eligibility determination. The data related to "Refused further services" and "Unable to locate or contact" support interview comments by BRS staff noting they are having difficulty keeping people engaged in services. However, having only one person identified as exiting due to "Transportation not available" and one for "Extended services not available" is surprising, given interview results. These again could be data entry issues. In any case, further exploration would be warranted to determine whether these two reasons for exit are more frequent—as suggested through interviews—and require action to address.

Table 8

Exit Reasons for Non-Successful Closures, Individuals with Intellectual Disabilities Calendar
Year 2019

Exit Reason	Count	% Total of Non- successful closure	Average Months Open	Comments
Disability too significant to benefit from VR services	105	37.5%	2	This exit reason was most likely selected during the eligibility determination process, rather than plan development or service provision
Unable to locate or contact	63	22.5%	15	
Refused further services	55	19.6%	13	
Transferred to another agency	33	11.8%	33	Includes individuals who, typically, moved on to (or continued with) DDS for long-term support
Transportation not available	1	0.4%	14	
Extended services not available	1	0.4%	10	This code refers to "Extended Services" that may be available through BRS itself or from any other program
All other reasons	22	7.9%	12	
Total %		100.0%		

WIOA Statewide Performance Report. The WIOA Statewide Performance Report, dated June 2020, (drawn 7/6/2021 from: <a href="https://rsa.ed.gov/sites/default/files/publications/annual-reports/2019/ETA-9169%20AnnualReport-PY2019%20CT.pdf">https://rsa.ed.gov/sites/default/files/publications/annual-reports/2019/ETA-9169%20AnnualReport-PY2019%20CT.pdf</a>) listed 4,790 individuals with disabilities (including youth) who received BRS services, and 1,741 who exited. The data in that report reflect the total caseload for BRS for the reporting period and is not useful to analyze information related to individuals with intellectual and developmental disabilities.

### Data Systems and Sharing Across SDE, BRS and DDS

Based on interviews with data management staff from BRS and ADS, neither agency is able to track joint customers served by the other. Although BRS is able to sort data for individuals with a primary or secondary intellectual disability, these data include individuals who are not eligible for DDS services and thus offer only an estimate of the status and achievements of those served by DDS. According to the BRS Director, BRS has not provided specified data to DDS although listed as an annual responsibility in the 2019 agreement. Based on this project's experience, BRS does respond to requests for data summaries, however.

BRS data on youth in transition provide information related to the youths' eligibility category and services provided. As with data from the adult VR program, the system does not allow sorting for youth who are eligible to receive DDS services. DDS is able to estimate over a 3-year period the number of youth expected to age out of other services or transition from school to adult services, however is not able to access other data on the experience of youth projected to enter the DDS system. Although DDS tracks the case management data for expected school leavers in its quarterly MIR reports, there is a need to identify and track student services and outcomes as they transition from the school to adult service systems but this important data is not tracked. Access to basic data on individuals served jointly by the agencies, their status and outcomes would help the agencies to deepen their collaboration and permit more effective joint planning for improved results.

# **Use of Subminimum Wages in Connecticut**

Workers on Subminimum Wage Certificates. DOL reports from April and October 2021 include a total of 30 unique CRPs with active 14C certificates or certificates pending renewal permitting payment of subminimum wages; 29 of these CRPs are DDS-qualified providers. The total number of CRPs listed on the DOL reports dropped from 30 in April 2021 to 25 in October. This reduction in the use of 14C certificates also is reflected in the total number of workers included in certificates at each report: 1519 in April and 1006 in October (1501 and 988 respectively served by DDS-qualified providers), a reduction of approximately 34% in workers on 14C certificates across the two reports.

Based on the comments of several *Roadmap Project* interviewees about the effects of the Pandemic, this decrease in CRPs holding certificates and the number of workers on those certificates may have been the result of effects of the Pandemic and may be time-limited. Some providers may not have sought certificate renewal because: (1) many individuals with intellectual and developmental disabilities were at home, not working or attending programs, and (2) during the worst of the Pandemic many businesses closed or reduced their businesses so that it was difficult for providers to continue having the level of work opportunities needed to offer work, whether or not under subminimum wage certificates. Both of these potential causes suggest that the number of people on subminimum wage certificates, and the number of service providers holding those certificates may eventually return to near pre-Pandemic levels as things return to normal. While it is possible that some of the providers could have joined the national movement to phase out subminimum wages, and reduced their reliance

on 14C certificates as a result, there were no comments in the interviews that supported that as a potential cause.

In the April 2021 DOL report, seven of the 30 CRPs held more than 100 14C certificates (ranging from 117 to 296 each), totaling 1081 certificates. This represents 71% of all 14C certificates held in Connecticut. Thus, the use of 14C certificates in April was highly localized by just a few providers—23% of the total providers with certificates in April held over 70% of 14C certificates in the state. The effects of the Pandemic clearly impacted this group: In October only three CRPs (12% of October providers) held more than 100 14C certificates (ranging from 101-139), representing about 35% of total certificates in that report. Figure 3 presents a histogram depicting the distribution of the number of certificates held by individual providers as listed in the April and October 2021 DOL reports. In April, the DOL report included nine providers holding between 0 and 50 certificates, four holding 51-100 certificates, six holding 101 to 150 certificates, and one holding between 251 and 300 certificates. By October, these figures changed to 11 providers holding 0-50, six holding 51-100, and three holding 101-150 certificates. In the October report, no provider held more than 150 certificates.

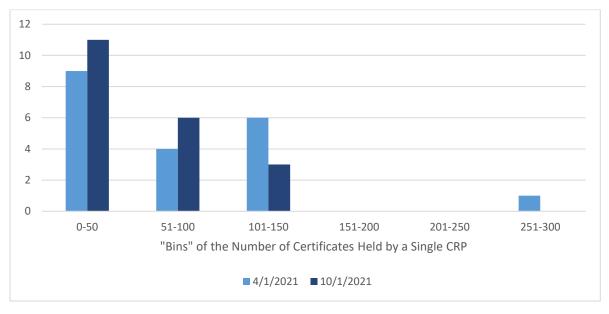


Figure 3. Histogram of the Number of CRPs with 14C Certificates in April and October 2021, organized by "bins" or groupings of the number of certificates held by CRPs.

#### **Results Related to School and Transition**

**SDE EdSight Portal.** EdSight is an "information delivery portal" that provides demographic and performance data at state, district and school levels (<a href="https://edsight.ct.gov/SASPortal/main.do">https://edsight.ct.gov/SASPortal/main.do</a>.) EdSight

lists 205 districts and 513,079 students statewide with 2706 total students with intellectual disabilities (drawn 12/3/21). The school districts operate as independent programs. The site includes a listing of 165 transition programs, with districts/towns offering between one and four programs. Each listing includes the name of the program or the certified service provider and a link to that program or the district. Not all school districts offer a transition program.

School Performance Report. Schools are required by federal law (Individuals with Disabilities Education Act, IDEA, Part B) to report on 16 performance indicators related to their services for students with disabilities. Indicator #14 seeks Post-School Outcomes for students who are no longer in secondary school and had Individual Education Plans (IEPs) in

Indicator14: Post School Outcomes Instructions and Measurement Monitoring Priority: Effective General Supervision Part B/Effective Transition Results indicator: Post-school outcomes: Percent of youth who are no longer in secondary school, had IEPs in effect at the time they left school, and were:

- --Enrolled in higher education withing one year of leaving high school
- --Enrolled in higher education or competitively employed within one year of leaving high school -Enrolled in higher education or in some other postsecondary education or training program; or competitively employed or in some other employment within one year of leaving high school. (20 U.S.C. 1416(a)(3)(B) (P 52)

effect at the time they left school. Not all students who leave schools with IEPs are eligible for long-term support services through DDS, so the data overestimate that population.

Two of the four mutually exclusive measures required are relevant to this report: (1) Competitively employed within one year of leaving high school (but not enrolled in higher education), and (2) In some other employment within one year of leaving high school (but not enrolled in higher education, some other postsecondary education or training program, or competitively employed.) Instructions for compiling these data include definitions for "competitively employed" and other terms.

Table 9 summarizes the data on these measures drawn from the most recent online *State Performance Plan/Annual Performance Report: Part B*, which was due 2/1/21 (Drawn 7/17/2021: <a href="https://portal.ct.gov/SDE/Special-Education/State-Performance-Plan-SPP-and-Annual-Performance-Report-APR">https://portal.ct.gov/SDE/Special-Education/State-Performance-Plan-SPP-and-Annual-Performance-Report-APR</a>.

Table 9

Post-School Outcomes for Students with an IEP who were "School Leavers" (2/21/21)

Measure	FFY 2019
Number of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school	2,100
Number of respondent youth who were competitively employed within one year of leaving high school	58
Number of respondent youth who are in some other employment within one year of leaving high school (but not enrolled in higher education, some other postsecondary education or training program, or competitively employed)	28

The Connecticut 2020 Post-School Outcome Survey Results (March 2021, <a href="https://portal.ct.gov/-/media/SDE/Special-Education/Secondary-Transition/2020-CT-PSOS-Final-Report.pdf">https://portal.ct.gov/-/media/SDE/Special-Education/Secondary-Transition/2020-CT-PSOS-Final-Report.pdf</a>) includes data on the use of adult agencies and services after leaving high school. Based on 398 survey responses (7.45%) response rate, 23.3% of 387 respondents did not know there were services available, 27.4% indicated no services were necessary while 41.6% indicated they had used at least one of the listed services. Of the 161 respondents who indicated they had used at least one of the services, the most frequently identified was "Services at my college or university for students with disabilities" (50 respondents) followed closely by DDS (49) and the Social Security Administration (47). Of 386 respondents, a total of 32 individuals (8.3%) indicated they were taking part in an adult day service program, while 10 (2.5%) were taking part in an adult day vocational program. Fifty percent of 30 respondents with an intellectual disability indicated they were not engaged in higher education, other post-secondary education, competitive employment, or other non-competitive employment. These and the data reported in Table 10 must be interpreted with caution as the survey response rate may not be sufficient to provide data representative of the total population of school-leavers with IEPs.

Table 10

Specific Adult Agencies and Services Used as Reported by Respondents to 2019-2020 Post-School Outcomes Survey

Adult Agencies and Services Used <sup>a</sup>	Number of Respondents	Percent of Respondents
(1) Bureau of Education and Services for the Blind (BESB)	*	*
(2) Bureau of Rehabilitation Services (BRS) (e.g., Level Up, VR-Vocational Rehabilitation)	41	25.5%
(3) Department of Developmental Services (DDS)	49	30.4%
(4) Department of Mental Health and Addiction Services (DMHAS)	*	*
(5) Department of Labor (DOL) (e.g., American Job Center (AJCs), CT Hires)	17	10.6%
(6) Department of Public Health (DPH)	*	*
(7) Department of Social Services (DSS)	42	26.1%
(8) Social Security Administration (SSA)	47	29.2%
(9) Services at my college or university for students with disabilities	50	31.1%
(10) Other - Please specify	15	9.3%
Number of respondents in the denominator	161	

a Respondents were instructed to select all that apply, so data reflect duplicate counts

# **Results of Interviews**

## **Interview Nominations**

The project received a total of 59 nominations of state agency personnel (DDS, ADS, and SDE), family members and individuals with disabilities, schools, and service providers<sup>33</sup>. PLT members selected school districts for interviews, seeking a range in total student population, level of diversity, and both urban and suburban schools. Within ADS and DDS, nominations included both state agency leadership and counseling/case management personnel. Despite specific requests to service providers, no nominations were received for employers. Although the project sought nominations of youth currently in transition from school to adult services, none were received. However, a few individuals nominated had very recently completed the transition process.

Table 11 summarizes basic demographic data comparing the eight nominated school districts with statewide totals. The percent eligible for free or reduced lunch is included as a rough indicator of poverty levels. One district nominated (and interviewed) was not included in the EdSight list of transition programs.

<sup>\*</sup> Indicates use of data suppression in the SDE data report to protect personally identifiable information

<sup>&</sup>lt;sup>33</sup> A nomination was counted if the project received an introductory email connecting the person, school or organization with Wise.

Table 11
Summary of Nominated Districts Compared with Statewide Data

	Nominated Districts	Statewide	% of Statewide
School Districts	8	205	4%
Total Students	53,403	513,079	10.4%
Total Students with Intellectual Disabilities	348	2,076	16.8%
% Eligible for Free or Reduced Lunch	Ranged to over 75% of students	43.3%	NA
Transition Programs	11	165	6.7%

Source: EdSight (<a href="https://edsight.ct.gov/SASPortal/main.do">https://edsight.ct.gov/SASPortal/main.do</a>)

The project requested nominations of individuals who would be supportive of a goal of employment for individuals with intellectual and developmental disabilities, establishing a selection bias. Perhaps in part because of this, only one parent did not have employment as a goal for their child. Table 12, below, summarizes nominations received and the interviews conducted from those nominations.

Table 12

Nominations and Project Interviews

Stakeholder Group	Number of Nominations Received	Number of Original Nominations Interviewed	Response Rate based on Original Nominees	Total Persons Interviewed <sup>a</sup>	Total Persons Interviewed	Total Interviews
				Unduplicated Count	Duplicated Count	
ADS/BRS	10	10	100%	11	12	6
DDS	18	13	72.2%	14	18	14
Employer	0	0	NA	0	0	0
Family/ Individual <sup>b</sup>	13	11	84.6%	15	NA	11
School District	8 <sup>c</sup>	7 <sup>c</sup>	87.5%	14	NA	7
SDE/RESC Alliance	2	2	100%	3	NA	2
Service Provider	8 <sup>d</sup>	8 <sup>d</sup>	100%	13	NA	8
Totals	59	51	87.9%	70	75	48

<sup>&</sup>lt;sup>a</sup> Occasionally, persons nominated invited others to join their interviews. "Unduplicated count" reflects unique interviewees. "Duplicated count" counts each interview with each person, including when the project conducted multiple interviews with the same person.

#### **Interviews Conducted**

Of 59 original nominations of individuals and organizations received, 51 completed the scheduling and interview process, resulting in a response rate of 87.9%. The project conducted a total of 48 interviews between March 23, 2021 and December 16, 2021, representing participation by 70 different people (unduplicated count). The number of people interviewed does not match the number of nominations received because of non-responses and that on occasion parent, state agency, school, and service provider leadership included additional persons in their interviews.

Most interviews were conducted with a single participant; nearly all other interviews included no more than three individuals. One group of BRS Counselors had five participants. Interviews of the stakeholder group "Family/Individual" typically included one or two parents, and sometimes their son or daughter. Two of these interviews were conducted with individuals without family present. These participant interviews included individuals with intellectual and developmental disabilities with service funding from DDS, and others with experience with BRS. Interviewees also included individuals on the Autism Spectrum (and their family members) who received no long-term supports from DDS or DSS.

<sup>&</sup>lt;sup>b</sup> When the project received nominations for both an individual with disabilities and their family member they are counted as one nomination but two people interviewed. The project interviewed a total of 10 parents and 5 individuals with disabilities. Three interviews included one or two parents and one individual with disabilities.

<sup>&</sup>lt;sup>c</sup> Number of school districts nominated or interviewed

<sup>&</sup>lt;sup>d</sup> Number of service provider organizations nominated or interviewed

Service Providers interviewed represented those with contracts with BRS, with DDS, or with both agencies. A few had contracts with schools. Some included Level Up—a collaborative transition program of BRS and schools described below—however an agency might be contracted to provide only small group training rather than do Level Up work experience. For DDS, agencies interviewed varied in the types of service purchased and provided—Individual Supported Employment (ISE), Group Supported Employment (GSE), or Day Services (including Individualized Day Services-Employment). Some agencies sponsored "Social Enterprises," other small businesses, and services categorized as "non-employment". The most common service for DDS providers interviewed was Group Supported Employment, which included options such as janitorial crews, landscaping crews, food service catering, coffee carts, document conversion, warehouse and fulfillment, assembly, and retail. More than one provider praised the utility of a true social enterprise.

To obtain the perspective of schools, the project interviewed two representatives from the State Department of Education, Bureau of Special Education; one person from the statewide Regional Education Service Centers (RESC) Alliance; and 14 persons representing seven local education agencies of the approximately 200 districts included on the EdSight website (<a href="https://edsight.ct.gov/SASPortal/main.do">https://edsight.ct.gov/SASPortal/main.do</a>). These school personnel included a variety of roles, including special education teachers, transition specialists, directors of pupil services, and supervisors. School district interviews included from one to four participants.

Each of the school districts<sup>34</sup> interviewed discussed the nature and scope of their transition program. School districts varied in the location of their programs—some were located on school grounds, while others were off campus or at a mixture of on and off campus locations. All but one of the school districts interviewed offered work opportunities for their transition students that were supported by school personnel. School transition programs varied in the number and disability characteristics of students served; most served ages 18-22. In addition, school interviewees ranged significantly in their experience working in transition programs.

While interviews conducted included no students or families actively in the transition process, a few individuals had very recently completed transition and others who had completed transition several years before usually were able to give a retrospective perspective on their experience with transition.

In addition to these interviews, Wise conducted follow-up meetings with agency leaders from both DDS and BRS to provide them with an update on project progress, to request nominations of staff for interviews, and to seek additional information needed for the report.

## **Interview Results: Common Themes**

Across the 75 people interviewed (duplicated count), the project heard common themes drawn from stakeholder individual perspectives and experiences related to employment for people with intellectual and developmental disabilities in Connecticut. Nearly all interviewees recognized the impact of the Covid-19 Pandemic on both the ability to provide and participate in services. While some

<sup>&</sup>lt;sup>34</sup> One district did not operate its own transition program but partnered with another district.

respondents did speak directly about things that happened during Covid-19, many perceptions recorded also appeared to be about how things were prior to the Pandemic quarantine. In addition, interviewees often spoke about things that are working well, or efforts being made, as well as things that need improvement.

Interviews resulted in an extensive set of comments on far-ranging topics. To facilitate understanding, the results are presented organized by the major components of the *Framework for Change*: Leadership and Infrastructure, Community Support and Participation, System Capacity and Skills, and Employment Opportunities.

**Leadership and Infrastructure**. This component of the *Framework* emphasizes the importance of strong state leadership and systems to support development and ongoing success of Employment First. This includes coordination and partnership across state agencies to provide strong leadership to achieve a compelling vision.

*Interagency Collaboration*. Interviewees described the nature of the collaboration among BRS, DDS and SDE.

Working Relationships: DDS and BRS. DDS and BRS staff members recognized the "very positive working" relationship they had with the other agencies, whether it be related to an individual receiving services or the cooperative development and implementation of the on-line training system. One BRS staff emphasized the importance of relationship-building, so that the DDS, BRS and provider staff feel free to call each other to brainstorm. BRS counselors indicated that it worked well when a Case Manager was involved or came to appointments with the individual as they all could get on the same page.

Systems are in Siloes. Service providers commented that their interaction with one or the other agency was limited. Understandably, a service provider contracted by BRS had limited if any contact with DDS Case Managers. One provider felt that DDS and BRS do not work well together at the community level: "They don't have the appreciation for each other. They could do more, but they have siloed funding. They don't share efforts to reduce costs and get more job opportunities." That provider had seen little movement from BRS to DDS funding for supports. Another

"They (BRS and DDS) don't have the appreciation for each other. They could do more, but they have siloed funding. They don't share efforts to reduce costs and get more job opportunities."

--Service Provider

provider described a "Long-term Sign-off MOU" that has been used with individuals eligible for DDS services--for DDS to sign-off that long-term funding would be available after 90 days of BRS post-placement service. The provider indicated this supported a fairly smooth transition from BRS to DDS funding, and BRS would not move forward in serving a person until they had the long-term sign-off. Another provider said the process is not as fluid as it could be, with the gaps in time. They felt one challenge was that Case Managers are not familiar with BRS and its paperwork and requirements.

A more subtle finding drawn from interviews with DDS, BRS, SDE, and RESC Alliance staffs suggests that while each spoke highly of the other and reported good relationships, interviewee comments

indicated how separately staff from each agency operate. There was not a sense of how the agencies actually work together on obtaining employment for people. This siloed approach was demonstrated most clearly in the joint on-line curriculum project. The curriculum development is done by the RESC Alliance, seeking feedback from BRS and DDS. A truly collaborative approach would have included DDS and BRS staff experienced with customized employment—and even expert service providers— directly on the curriculum development team. Rather than a shared commitment to use the system, RESC Alliance indicated each could run the system in different ways. "In a perfect world, we (schools) would do all the Discovery (service)...but we will train the providers in all the modules." When asked, it appears that there is no commitment of the many separate school programs to access the system. Indeed, RESC Alliance and SDE are working on condensing the training to better meet time limitations in schools.

Collaboration for Transition: BRS, DDS, and Schools. There was consensus across representatives from BRS, schools and service providers that DDS needs to be more involved earlier in school. This was viewed to be helpful since many school personnel don't clearly understand what happens after high school. Interviewees felt earlier involvement also might help alleviate fears that drive parent desires for a "Monday to Friday program". At least one provider wanted the opportunity to provide employment services while youth were still in school. This view is supported by data from Washington State, where:

- Only 50% of Developmental Disabilities Administration (DDA) eligible students connect to employment services after exiting high school;
- Approximately 67% of DDA-eligible students who receive employment supports are employed one year after exit; and
- When a County has a School to Work program<sup>35</sup>, there is a 23% higher employment rate than communities without (71% vs 48%).<sup>36</sup>

This "results-based" approach to transition includes four key elements: community information, education and outreach; direct student service delivery; administration and coordination, and technical assistance and relies on combined funding from schools, the developmental disabilities agency, vocational rehabilitation and the county.

BRS staff members noted that the transition always went smoother when the DDS Case Manager was involved with the application and subsequent BRS processes. One recommended, "Make sure the student has a connection with DDS prior to being connected with (BRS.)" The Case Manager often had historical information useful to the BRS Counselor during application, eligibility determination and planning; and was able to help with appointments and with communicating with the youth and family.

<sup>&</sup>lt;sup>35</sup> The State of Washington's School to Work Program (S2W) addresses a gap between the school and adult service system through a model of inter-systems collaboration. The program is designed to help students with developmental disabilities leave school programs with a job and the long-term supports they need to keep the job. Through S2W, students in their last year of school, approaching the age of 21, are able to work with an employment consultant from an adult services agency with the goal of finding paid employment prior to leaving school.

<sup>&</sup>lt;sup>36</sup> Source: DDA SQL 35155 CR 9/13/21, Washington State

The BRS Counselor found it more difficult during transition if the individual seeking services was only connected to the Help Line and had no assigned Case Manager.

One parent described one meeting—their only meeting—with BRS to gather information about her daughter. She felt that the counselor appropriately relied on the school for information needed to make their determination, but there really hadn't been a system to gather that information. The school had not provided their child with a range of employment-related experiences to allow them to gather data about their child's interests, aptitudes and support needs. She thought there needed to be a system in which rehabilitation agencies would develop work and internship opportunities for schools, to take that responsibility off teachers. She felt that would allow the schools to give better information to the counselor, based on real experiences.

One DDS staff person felt that the agreement by schools to use the same individual service planning system, *Charting the LifeCourse* (<a href="https://portal.ct.gov/DDS/LifeCourse/Charting-the-LifeCourse">https://portal.ct.gov/DDS/LifeCourse/Charting-the-LifeCourse</a> ), has improved their ability to communicate since both agencies use the same planning system and language. BRS indicated that Level Up BRS Counselors also have received training in and sometimes participate in *Charting the LifeCourse* planning.

DDS interviewees would like there to be a greater emphasis on employment prior to students leaving school, including getting BRS involved sooner. DDS staff indicated that it takes time to get through the BRS process, but that it is possible to complete the process to obtain DDS services and then "freeze" them until BRS is able to complete their work. Some BRS

Counselors and service providers noted that there was a time delay in getting DDS services started when the individual was ready to move to the other funding system. One school representative stated, when asked about how the process worked with DDS and BRS, "It is like trying to nail Jello to a tree. Confusing to understand. Sometimes DDS says it has to be BRS first. Sometimes BRS says 'No,' this is a DDS case."

"It is like trying to nail Jello to a tree..."

--School staff person

Policies Related to Shifting Funding from Segregated Services to Support for Individual Jobs. As an agency, DDS expects everyone can work, if they want. DDS has worked with Project SEARCH and is developing Customized Employment services as alternative ways to help individuals with intellectual and developmental disabilities gain employment. DDS staff recognized that the framework and structure of the Waiver could be used to further support the shift to funding supports for integrated individual employment. Despite this shift in policy, DDS' data reflect a consistently decreasing percentage of those served in Employment and Day Services receiving employment services (see Figure 1.)

DDS Stopped Funding Sheltered Workshops as a Service Type. When asked, most interviewees stated, "We don't have sheltered workshops in Connecticut." According to DDS, when the definition and the funding for sheltered workshops ended, many individuals moved to funding under Day Support options, Group Supported Employment, or readiness services, such as Transitional Employment Services. Providers confirmed this shift to group and non-employment options for many people. However, no longer funding sheltered workshops—based on DDS data definitions—does not mean that they don't

exist or that those individuals previously receiving that service transitioned out of a segregated site and into an integrated setting in their new designated service category. For example, one of the two consultants conducting on-site interviews noted, "The large main room included about 35 people doing some work (e.g., stuffing water bills into envelopes, shredding, wiping down tables). A few people were also cleaning safety glasses in a tiny room at the back of the facility." The other reported, "The people I met clearly stated that they had been in these workshops — and in some cases, other workshops before being transferred to these provider agencies, for 'a very long time.'"

Service Settings. Based on DOL data, most of the organizations holding subminimum wage certificates are DDS-qualified providers. DDS does not collect and compile data on the nature and integration level of settings in which people are served, including the level of access to people without disabilities. Without these data, this project could not evaluate where these certificates are used or how DDS can assure that sheltered workshops no longer exist. In addition, given the lack of appropriate data, this project could not determine the number of people, if any, are in competitive integrated jobs that meet the WIOA definition in any of the existing service categories.

Sheltered work can be described as taking place in a setting where individuals with disabilities are congregated together, have no or little contact with non-disabled persons other than paid staff, and typically engage in work dictated by the provider's contracts and for which they receive subminimum wage. In an independent on-site study already mentioned in the preceding chapter, experienced

interviewers visited what they described as "large sheltered workshop locations." That study describes each of the sites visited as segregated and sheltered—one with multiple locations including a restaurant, bakeries, garden/greenhouse, and landscape mobile work crew. The interviewers found few individuals in any of these businesses had a regular opportunity to have contact with nondisabled co-workers. As a result, that study refers to each of these settings as segregated. One of the

"One of the largest sheltered workshops that I have ever seen in my 20-year career."

--From report of on-site interviews with individuals at service provider locations, conducted by experts in Employment Services

interviewers refers to the final site visited as "one of the largest sheltered workshops that I have ever seen in my 20-year career." The report found some individuals sitting in a large open area, while others were in one of several of the facility's back rooms. The discrepancy between the professional, on-site observations and the statements made to the reviewers conducting the current study is notable. This inconsistency points out that:

- Data compiled by DDS only report the type of service that is funded, not the actual experience
  of individuals, nor the nature of the work environment.
- Neither the DDS nor BRS evaluation system collects information on the number of people with disabilities in a single location, nor their opportunity to engage with individuals without disabilities.

It appears that service providers have used multiple methods to meet the state's policy shift from sheltered workshops to more integrated settings, including establishing several small businesses

operated entirely by the employment provider rather than a competitive business, and placing people into separate rooms in one large facility. However, based on the observations of the separate on-site interview study, even in those locations where people worked in small, provider-owned and operated businesses, they seldom had an opportunity for regular interaction with people without disabilities.

Level of Need and Referrals Received by Service Providers for ISE. Service providers report that the flow of referrals for Individual Supported Employment has increased with the relaxation of Covid-19 constraints, however they receive few referrals for anyone with a Level of Need greater than three. One provider recognized that their own process to bring in new individuals for services is slow, both because they are dealing with solving staffing problems and because, with the Pandemic, BRS Counselors and Case Managers do not know individuals as well. In some cases, the issue is turnover in the state agency—one parent stated their adult child had had five different BRS counselors. Providers agreed however that their relationship with the two agencies is good, and that it has been challenging for all who work at home.

ISE Funding System Impedes Growth of Individual Employment. Providers indicated that not all Case Managers understand the ISE funding system and how those funds can be used, which creates more barriers to its use. Some of the DDS staff interviewed recognized that the ISE funding system is too hard, with the result that not all providers have figured out how to use it. At least one Case Manager felt that the system itself isn't set up to help providers who want to fade from the job site.

Providers themselves had mixed responses about the funding system for ISE. Some understood it and felt it offered them funding levels that, with success, would support a substantial portion of their staffing budget. Others shared that it is difficult to understand and requires a great deal of paperwork.

For example, one provider discussed how much work is required to obtain authorizations from DDS for additional support hours and to complete reports for individuals in ISE, comparing it to the minimal reporting required for persons in Day Activity services. Providers that hadn't figured out a system for doing it complained about the effort required to submit wage and hour information on individuals working. Hopefully, the DDS MOA with the Connecticut Department of Labor will result in reducing this requirement on providers.

"The (funding system for ISE) is a deterrent to get people into it...It is so complicated we have to look it up in our notebook. But for Day Activity services we only make a checkmark for attendance and the money comes...It should be harder to keep someone in Day Activity."

--Service Provider

Some service providers shared their frustration with what they viewed as a lack of understanding by DDS Case Management of the type and duration of supports required by some individuals with intellectual and developmental disabilities to become competitively employed in an individual job. "The state has moved away from group support to individual jobs. But they haven't factored in how long it may take to support someone to become more independent. The individual may need to get greater intensity of support to get to independence, to natural support, or to drop-in support."

The hours of support funded within ISE is based on Level of Need. For example, providers indicated Level 1 could get a maximum of three hours per week of job coaching funded—no matter the number of hours worked in a week. Level 2 could get a maximum of five hours of job coaching per week. Obtaining additional funded support hours requires a written request. Service providers viewed both the severe limitations on support hours and complicated paperwork requirements as disincentives for pursuing ISE.

"The state has moved away from group support to individual jobs. But they haven't factored in how long it may take to support someone to become more independent. The individual may need to get greater intensity of support to get to independence, to natural support, or to drop-in support."

--Service Provider

The limited number of support hours funded for each the Level of Need also presents a barrier to Individual Supported Employment for individuals facing greater challenges. Providers hoped that the new service "Customized Employment" will better meet the support needs of this group of individuals.

Services that Don't Meet Family Perceptions of Needs. Several interviewees discussed the notion that some of the existing services available through DDS do not meet family perceptions of their needs for services.

Need for Flexibility in Funding to Meet Expressed Family and Individual Needs. DDS staff discussed family concerns about health and safety, and family issues related to the need for having a safe place for their adult child to go. This is especially true given significantly fewer support hours provided in Connecticut in an Individual Supported Employment service than the 30 hours if the individual received a day support service. Fewer hours of support is a critical issue for families if the individual is not safe to be at home alone, or if families have the perception that they aren't able to be alone at home. One DDS staff person indicated one way to address families' need for more hours of support outside of the home than are available with ISE funding could be to blend services. Another strategy suggested by a Case Manager for expanding individual employment, is making greater use of Self-Determination, in which the service budget only pays for the services the individual needs. Other state staff indicated more flexibility in funding, supports, and the definitions of service models would be helpful. More than one individual receiving DDS services spoke to being able to hire their own support person.

Inadequate Transportation Services. Everyone who mentioned transportation referred to it as an issue. They commented on the lack of transportation in more rural areas of the state where jobs are more dispersed or when employment sites or job hours fell outside of the established transportation system, including evenings. One parent talked about needing to drive their loved one 45 minutes to a central service provider location, who then transported the individual a similar distance to the job. A few interviewees referred to being able to use services such as Uber. Some, but not all providers provide transportation. Lack of that transportation service limited the providers available to some parents seeking a program during the transition years. One provider felt they need to have better conversations with families about transportation alternatives, so that families are not looking to providers for that service. Regardless of transportation issues, however, several parents talked about wanting their child

to be served and work in their own community, in a place where they are known by other community members.

Systems to Support a Seamless Transition from School to Work and Adult Services. Parents reported varied experiences as their child transitioned from school services. Some families were able to complete their applications for DDS services and went directly to a service provider funded by DDS. Two families praised their Case Managers, "I go to the DDS Case Manager when I have trouble with DSS" and "She keeps plan goals progressing." Most reported that while still connected to the schools they were confused about aspects of adult services, such as the impact of employment on benefits, the steps they needed to take to access services, and what they could expect from services from BRS or DDS. One parent indicated they had never applied for BRS services, "We've not been clear what BRS does." Parents agreed that parents in general need more information about the transition from school to adult services, and viewed transition as a difficult time.

Service provider, school, DDS, and BRS staff members interviewed, like parents, talked about the lack of information and confusion that families often have related to their services. They reported that some parents don't understand that their services end with the end of school unless they apply for and obtain adult services, or don't believe they need to apply for DDS and Medicaid Waiver services if they have health care coverage. Others don't want to apply because they don't want their child labeled. Consistently, school, provider, and state agency staff felt that parents need more support and information, and that this should start sooner.

Schools interviewed discussed assistance they provide to parents to navigate transition to adult services—some beginning as early as in middle school. Schools also described resource fairs and parent workshops, along with helping with paperwork related to applications and appeals, including documentation needed for eligibility determination. Schools encouraged families to begin the application processes for the various adult services and benefit programs at least a few years prior to the end of school services.

BRS indicated they are available to help with educating families, and that families probably need to hear the same information several times. "Talk early and talk often." These state agency staff recognized that some answers aren't absolute so it is easy for families to get confused. Counselors

"Talk early and talk often."
--BRS Counselor

and service providers alike noted that there is a difference between rural and suburban/urban schools in terms of their resources and knowledge related to what can be done to ensure families are able to obtain adult services. There was a common feeling that the transition process worked better when the parents were proactive, insisting on participation by state agency personnel in team planning meetings.

**Community Support and Participation.** An important component of developing a vibrant statewide community employment system is ensuring that the community organizes around the partners' common vision and statewide goals for Employment First and participates in the program. Achieving this will require coordinated communication and community advocacy.

*Inconsistent Messages on the Value of Employment.* Some interviewees felt that there needs to be a more consistent message from DDS around the value of employment "in all its dimensions". One

provider talked about overall inconsistencies across regions, beyond ISE, at least in part due to inconsistent messaging from DDS. One parent said, "Right now in Connecticut, goals can be anything you want them to be. Employment should be mandated as a goal." Some DDS staff felt that, in some ways, the freedom of choice given to people with intellectual disabilities with personcentered planning has backfired—people want to go back to the facility.

"Right now in Connecticut, goals can be anything you want them to be.
Employment should be mandated as a goal."

--Parent

Parents and providers felt Case Managers needed more practice on how to talk with individuals and their families about employment and its benefits, particularly families who say they don't want work. One provider said, "Everyone can work, but not everyone wants to work." The Case Manager message is critical with these families. Even a DDS staff person wished Case Managers were better able to promote employment services to get more people to choose that.

A Misperception that Families Don't Want Work. Interviewees often referred to people with intellectual and developmental disabilities and their families not wanting work as an outcome. Many interviewees indicated that parents and family members—particularly older parents—present a barrier to moving individuals into individual jobs. "They need time and patience (to get over thinking) he has to go to a group, an agency."

One BRS Counselor said, "Most parents didn't want wages or didn't feel their child is able to work. They want an exemption so they don't have to do a trial work experience. We go through a process if they say that. The parent doesn't want work, they just want an eligibility determination." Comments such as these align with the BRS data in the previous section indicating that approximately 38% of applicants with intellectual disabilities are exited due to a determination that the person is too disabled to benefit from BRS services. There also is a perception that families and individuals don't want to lose the social component when they leave the facility to go to an independent job. However, these staff also felt that with conversations that are starting at school, individuals and families are now more often expecting to have the same life and opportunities as their peers from school.

There also were comments that individuals and families may not have received enough information or the opportunity to better comprehend how work would impact their lives. For example, one parent who did not want employment for their child said, "I never felt he was going to (be able to) work at a Stop and Shop and bag groceries," revealing a limited understanding of the types of jobs that could be developed that might be a better fit and the support strategies that could lead to success.

Various stakeholders spoke about hesitancy of many individuals and families concerning working in community employment because of fear of losing benefits, and the need for more information about the impact of employment on benefits. BRS Counselors felt that parents need help with understanding

and accessing programs such as Ticket to Work and Social Security work incentives, including PASS and IRWE<sup>37</sup>. Yet, one parent requested benefits information from BRS and received conflicting answers.

Parent Perceptions of Ability to Work. Nearly all parents were very clear in their perception that their son or daughter was more competent than BRS personnel or service providers believed, and could work. In general, it seemed that providers and state agency personnel mostly had experience working with people obtaining employment when they had lower assessed Levels of Need. There appeared to be consensus that most BRS staff—though not all—do not believe in the ability of individuals with a more significant intellectual disability to work.

Although many of the adult children of the parents we interviewed were working—or had worked—in individual jobs, a few felt that some of the group supported options should be continued, depending on the level of independence of the individuals. "They will always have the group who needs a group type of thing. Others can do individual."

Community Perceptions of Ability to Work. One parent lamented the community reaction to persons with disabilities having a job, "it is like a bear riding a bicycle. But it shouldn't be (seen as) so extraordinary."

"(They see my son working as) like a bear riding a bicycle. But it shouldn't be (seen as) so extraordinary."

--Parent

School Personnel Perceptions of Ability to Work. Several of the school personnel interviewed spoke to their belief

that not all students would be able to work in a community setting, and that their students with greater support needs participated in community outings, or simulated work, but not real work.

Limited Service Provider Vision. Overall, parents felt that employers and service providers do not see their child's capabilities. The view of service providers related to having a vision that everyone can work varied dramatically. Some clearly expressed that everyone should have an opportunity to work. In some of the service provider interviews, the respondents expressed a limited vision of the ability of persons with intellectual disabilities to work in a competitive job, believing that some people are unable to work at all or require a group supported employment option. Some indicated that their ability to work depended largely on the support their family was able to give, for example, on job applications and transportation. These providers generally focus on serving individuals referred by BRS who are deemed by that agency to be "employable." In some cases, the provider said the individual "occasionally" was involved with both DDS and BRS, but most providers interviewed had a primary relationship with just one of the agencies. A few providers held a vision of the capacity of people to work but identified the state system issues—such as the funding system—as a barrier to achieving that dream.

Service Provider Support for Group and Non-Employment Options. One provider talked about "the Level of Need (for those in Group options) is too high, they need the level of redirection and hand-over-hand teaching in GSE. They are in GSE for a reason." Another provider spoke of a parent who preferred placement in a business operated by a service provider, "She wanted a place she knew he would stay in, despite his behaviors, and still be part of the community." That provider felt there needed to be a

<sup>&</sup>lt;sup>37</sup> Program to Achieve Self Support (PASS) and Impairment Related Work Incentives (IRWE)

variety of options for people, including "that for an individual to get a service, there needs to be a place." Providers described using a center-based facility for individuals to go to during lunch or during times of the day or week when not working in a community job. "People choose to be with the people they came to be with. Andy wants to be with his buddy Mike...there needs to be flexibility." Another described a robust program of participation in community, for example at classes such as exercise classes at the YMCA or cooking class at a restaurant. Providers also noted that although they could be paid for more hours for group and non-employment options, than for ISE, the hourly rate is much lower.

**System Capacity and Skills.** To achieve success, state personnel, schools, provider organizations and employers must have the capacity to provide and maintain high quality individual employment for all who want to work.

*Results Related to Service Providers*. Interviewees had many comments related to the capacity and skills of service providers and their ability to shift to individual community employment services.

Insufficient Service Provider Capacity. Both DDS and BRS recognize that there is insufficient capacity in service providers to provide needed employment services and that their capacity has been impacted by many factors, including closure of programs, lack of ability to fade from job sites, and employee turnover. State agency staff understood that employee turnover results in losing the knowledge of staff who had been working with employers and job seekers, and reducing their agency's ability to accept the number of referrals the state agencies need to make. Agency personnel believed a significant reason for this turnover was low wages. Both BRS and DDS reported they have sought ways to increase funding for wages. One DDS staff person also spoke to the ability of larger agencies to carve out roles for their staff, so they can focus their work in one area, or to be more creative, such as purchasing franchises. Smaller agencies, they said, have to require staff to juggle multiple roles.

Parent Experience with Inadequate Service Provider Capacity. Interviewees raised issues about access to services from service providers, including parents who discussed the problems they had had in obtaining adult services for their child. BRS indicated that CRPs were not able to take on all of the referrals that Counselors wanted to make. At least one parent reported that when seeking a provider while in the transition years, some providers said they were not able to fulfill the youth's needs, others weren't accepting new referrals or had a waiting list.

One parent described spending about two years during transition looking at potential programs for her child before finding one. When they needed to move from that provider, the Pandemic created more issues—programs closing, limiting new intakes, using waiting lists, or not having sufficient skilled staff to take on their child. Staff skills and training also affected access to services.

Concerns About Provider Structure and Ability to Support Individuals Transitioning Out of Group or Day Support Services. Many interviewees indicated that individuals going to service provider agencies are often grouped or placed into jobs that the agency already has available. A Case Manager indicated "The individual budget is key (to changing this)

"Do providers have the capacity to take on all these people (for individual jobs)?"

--DDS Staff Person

when there is staff to help." But even with that, a person with a higher Level of Need number is more likely to go with an agency and will have more difficulty finding a job. DDS staff members shared their concern that providers don't have the structure to support individuals transitioning out of group or day support services: "Do providers have the capacity to take on all these people (for individual jobs)?"

Access to Services and Support Hours. Individuals interviewed related a range of issues regarding accessing services and support hours, including effects of high levels of turnover, limited provider capacity, limited access to the Level Up program, and unacceptably long waiting list for Autism services.

Limited Access to Individual Supported Employment Services for Individuals with Higher Assessed Levels of Need. Service providers report that although the flow of referrals has increased with the relaxation of Covid-19 constraints, they receive few referrals for Individual Supported Employment (ISE) for anyone with a Level of Need greater than three. However, DDS indicated that the planning team for anyone with an assessed Level of Need of five or lower is required to submit documentation of the reason for not including an employment goal in the service plan, and seek approval from the Planning and Resource Allocation Team (PRAT). Those with a higher level of need may be referred directly to a day support agency.

High Levels of Turnover. One provider recognized that their process to bring in new individuals for services is slow, both because they are dealing with solving staffing problems and because, with the Pandemic, BRS Counselors and Case Managers do not know individuals as well. In some cases, the issue is turnover in the state agency. One parent stated their adult child had had five different BRS counselors. Providers agreed however that their relationship with the two agencies is good, and that it has been challenging for all who work at home.

Substantial Requirements on Parents to Navigate the Transition. At least one school interview expressed concern for the youth who fall through the cracks, particularly if they and their family don't do all of the follow-up that is required. This is especially for youth not eligible for DDS services, having an IQ of 70 or higher but with substantial disabilities—these families have to follow-up to get their own services. This matched information received from BRS who indicated that students in transition receive a letter about what they need to do to get connected with that agency: Call an identified BRS representative. The responsibility for making that connection is left to the youth and family. Only one parent brought up that letter, described her conversation with the BRS Counselor, and then said she chose not to pursue eligibility determination.

Lack of Services for Transitioning Youth with Autism. The loudest voices among interviewees related to the lack of available ongoing support funding for persons with autism, due to the very limited Autism Waiver managed by DSS. While it was beyond the scope of this paper to do a more complete review of Autism services, representatives interviewed within each stakeholder group spoke

"For those not qualified for DDS, they drop off a cliff." --Service Provider

to the issue. Parents were concerned that although their children had more than one functional limitation, they tested as higher than the DDS requirement of an IQ of 69 or below, keeping them from receiving DDS services. Several interviewees spoke of the unacceptably long waiting list for these

persons on the Autism Spectrum. "To tell someone on the Autism Spectrum they have to wait 10 years is unacceptable," stated one BRS staff. Schools and others, aware of this waiting list, started prompting these parents to apply for support services several years before exiting school. Parents interviewed felt very alone in struggling with supporting their children to have full lives, including helping them to work in jobs that matched their child's interests. One service provider characterized this experience of families of children with autism, "For those not qualified for DDS, they drop off a cliff."

Access to the Level Up Program. ADS (DORS) and SDE have the WIOA-required formal agreement documenting their shared commitment to collaboration and cooperation across IDEA and WIOA transition services. The major component of this collaboration is the "Level Up" program, Connecticut's required Pre-Employment Training Services (Pre-ETS) program. Level Up includes the five services required by WIOA: job exploration counseling; counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education; workplace readiness training to develop social skills and independent living; instruction in self-advocacy; and work-based learning experiences, which may include in-school or after school opportunities, or experiences outside the traditional school setting<sup>38</sup>. The first four of these services are largely provided through one-to-one or small group instruction through subcontracts with community rehabilitation programs. BRS also contracts for work experiences with CRPs and Workforce Boards (in which students receive no CRP support).

WIOA requires that each state's vocational rehabilitation program provide or arrange for Pre-ETS services for all students with disabilities, without regard to the type of disability and make those services available Statewide to all students with disabilities, regardless of whether the student has applied or been determined eligible for vocational rehabilitation services.<sup>39</sup> All of the schools interviewed indicated involvement with Level Up, giving evidence that BRS does make the program available statewide, despite staffing issues experienced by Level Up.

However, despite the WIOA regulation requiring Pre-ETS be available for all students with disabilities, school personnel generally reported that only a small percentage of their transition program students are served by Level Up—e.g., one out of five students in one program, one out of 16 in another. This perception of Level Up was supported by comments from other stakeholder groups

<sup>&</sup>lt;sup>38</sup> PART 361—STATE VOCATIONAL REHABILITATION SERVICES PROGRAM, Regulations, § 361.48 Scope of vocational rehabilitation services for individuals with disabilities, (a) (2) Required Activities.

<sup>&</sup>lt;sup>39</sup> Ibid. "(a) Pre-employment transition services. Each State must ensure that the designated State unit, in collaboration with the local educational agencies involved, provide, or arrange for the provision of, pre-employment transition services for all students with disabilities, as defined in § 361.5(c)(51), in need of such services, without regard to the type of disability, from Federal funds reserved in accordance with § 361.65, and any funds made available from State, local, or private funding sources. Funds reserved and made available may be used for the required, authorized, and pre-employment transition coordination activities under paragraphs (2), (3) and (4) of this section."

<sup>&</sup>quot;(1) Availability of services. Pre-employment transition services must be made available Statewide to all students with disabilities, regardless of whether the student has applied or been determined eligible for vocational rehabilitation services."

interviewed. Parents often had not heard of Level Up, and thought it might be for a higher functioning student. One BRS Counselor noted that Level Up serves a broader population than students with intellectual and developmental disabilities and did not always accept students with intellectual and developmental disabilities. More than one interviewee—from a provider and from BRS—indicated that students who will need Customized Employment aren't included in Level Up. "If they need job coaching, then this is not the program for them....High needs students (Level Up doesn't) say no. (The program) may not put them in community right now, but they can engage in workforce readiness or other service training they can benefit from." None of the school personnel interviewed mentioned Pre-ETS work readiness training small group classes required by WIOA—neither their availability to their students nor effectiveness. To be fair, however, the interview protocol did not specifically ask about these classes.

Reduction in BRS-Contracted Providers. DDS staff recognized that one issue faced by BRS is the lack of service providers available to provide the services needed. DDS staff and service providers both commented on BRS' action in the recent past to reduce the number of providers with which they will contract. Their feeling was that this move reduced the number of providers available to do community employment. However, their biggest concern was that the BRS recommendation was usually for non-competitive employment.

Difficulty Accessing BRS Services for Persons with Intellectual and Developmental Disabilities. Any student with disabilities may access Level Up services without applying for or being determined eligible for general BRS services. However, accessing other BRS services requires that the applicant be found to be eligible and can be expected to benefit from those services. At least one person from DDS recognized a reluctance of BRS staff to take people with intellectual disabilities. One consumer said, "(BRS was) not good at providing services outside what they usually provide."

Families described their experience when they attempted to apply for BRS services. Several reported that BRS would not accept the application. One reported it was denied twice because, at the time, the youth could stay in school until he was 21. "They said, 'We don't think you should do an application at this time.'" It is official BRS policy that all applications for services are accepted by BRS, so there are no data available that indicate applications not accepted or applicants who are advised to delay applying for services.

Other parents talked about being told after the application and assessment that their child was not competitively employable:

- "We went for a BRS interview, but because of the intellectual disability label, they won't serve you so you go directly to a non-profit."
- "The BRS assessment never finds they are employable. Nothing from BRS fosters a strong belief that people with developmental disabilities can work."
- "Do people understand they are talking to a person? A checklist of all the deficits raised, no strengths, nothing highlighted as doing a good job."

"The BRS experience was extremely frustrating."

--Parent

One parent summed up the experience of many by saying, "The BRS experience was extremely frustrating."

Data presented previously suggest that over one-third of persons with intellectual disabilities are found to be ineligible due to having a disability too significant to benefit from VR service in the opinion of the counselor reviewing assessment information. This was the exit reason for nearly all individuals with intellectual disability found to be ineligible for services. Based on BRS interview data, however, many families who are referred to BRS for services—often during the transition years—request that the counselor find their son or daughter ineligible for services, whether to pursue non-employment Day Support options or preferring group employment that might pay at subminimum wages. Thus, it is difficult to determine if counselors made this decision influenced by the parental request. Improving the rate at which persons with intellectual disabilities are found to be eligible for BRS services will therefore likely require intervention with parents who are asking for a determination of ineligibility, as well as with the counselors.

BRS Counselors work within the system that is provided to them, and some have more experience and motivation than others to work that system to the benefit of individuals with intellectual and developmental disabilities. One Counselor, an advocate for employment for individuals with intellectual

and developmental disabilities stated, "BRS wants everyone with significant challenges to be employed in a community setting, but sometimes it takes a few more steps to enable them to be in that position. What supports are there from families or other resources in the community? As a team, we like to empower the individual." Some of the BRS Counselors the project interviewed, once receiving a

"BRS wants everyone with significant challenges to be employed in a community setting, but sometimes it takes a few more steps to enable them to be in that position."

--BRS Counselor

person on their caseload, shared how they would work with providers to assist the individual to gain employment, and when needed, work with Case Managers to transfer the individual to DDS for long-term support.

Limited Provider Skills Related to Job Placements. Parents and individuals with disabilities in particular complained about the job placements made by service providers—including needing to find their own placements, providers placing individuals into inappropriate jobs, and limited efforts to expand or change job responsibilities over time.

Parents and Friends Find Jobs. Several interviewees indicated that the parent or their friend had developed their adult child's current job. "His agency isn't very successful in finding jobs unless someone is very independent." Even at a school district which the parent otherwise praised, the parent said they had to find internships and employment opportunities themselves.

Poor Match between Individuals and Jobs. Individuals with disabilities and parents lamented that when a person was placed in a job or in a work experience it usually did not match the individual's interests and

skills. One parent indicated they had been with three different non-profits. "I don't know that any is better than any other. They get employers they can get and fit you into those jobs...Why aren't they asking people what they want to do?" Parents complained that agencies don't listen to them and don't use the information that parents provide that would help to set up the individual for success. For example, one said: "He is limited where he can work. He can't have high noise, too much stimulus for him but the provider still tries to put him there."

"He is limited where he can work. He can't have high noise, too much stimulus for him, but the provider still tries to put him there."

--Parent

One parent complained about their child's service provider, "It is like a jail...All he does is clean bathrooms now. I've told them for the last two years that I want (my child) to go out. He is capable of so much more. (Now) he doesn't want to go to work. He wants to sit back and cry. I just want something to be done." DDS staff also complained about the lack of creativity in job development, "Everyone is working at a grocery store doing bagging." Even service providers recognized that their staff tend to have a psychology background, not marketing, noting they need better qualified staff.

Lack of Attention to Expanding or Changing Job Responsibilities Across Time. One parent said the provider did only generic job and daily living skills--nothing that was job-specific. Parents also indicated that providers did not work with employers to expand work hours or job responsibilities or to develop natural supports. "Someone goes and sits in the corner. Instead of having someone at the job giving him support, they have someone going with him...There is no effort to take him to the next step...I wish I was his job coach." Another parent said, "After 9 ½ years doing the same thing, she wanted to work in other parts of the store, but they wouldn't help her learn."

The capability of people with intellectual and developmental disabilities to work also was displayed during interviews with individuals. One individual, currently in a job he likes talked of a previous job in which his tasks were too easy for him; he had wanted to take on computer work. When asked for advice he would give to someone looking for a job, he said "Be patient. Be assertive and persistent. Try try again. If you don't like the job look for one you do. Explore." His advice for job

Advice to job seekers: "Be patient. Be assertive and persistent. Try try again. If you don't like the job look for one you do. Explore."

Advice for job coaches: "Be supportive. Get to know us, our likes and dislikes. Train us in the job we want, how to do it."

--Supported Worker

coaches, "Be supportive. Get to know us, our likes and dislikes. Train us in the job we want, how to do it." Another individual, after listing several of her job duties said, "As challenging as it may be, I'm up to the challenge."

Staff Skills and Training. Many stakeholders interviewed reflected on insufficient knowledge and skills across both provider and state agency personnel, and limited access to appropriate training.

*Insufficient Provider Staff Skills*. The state agencies felt providers had insufficient skills for doing the work. In addition,

"As challenging as it may be, I'm up to the challenge."

--Supported Worker, after listing several job duties

more than one set of parents whose adult child received services indicated that the support staff had not received enough training. They reported that often staff were just observing, rather than teaching the individual how to do tasks. Their view was that staff provided limited training for the person served, expecting the individual to already know how to do the tasks. Providers limited who they would accept and place based on their perception of the individual's ability to do the work, rather than using skilled staff who apply Systematic Instruction methods to help a person succeed in their job. Parents also pointed out staff members who did not reflect a business approach to working with employers.

Limited BRS and DDS Knowledge and Experience related to Community Employment for Individuals with Intellectual and Developmental Disabilities. Staff skills and training also appeared to be an issue with BRS Counselors and DDS Case Managers. One BRS Counselor indicated they did not get a lot of people with significant intellectual disabilities on their caseload. Case Managers usually had limited experience with Individual Supported Employment, with no more than a few individuals on their caseload receiving that service. A few Counselors and Case Managers had come to the state agency from a service provider, or had received training in community employment for persons with intellectual and developmental disabilities, and thus had some experience or training to support their work. More than one interviewee felt that Case Managers needed more training about employment, including the ISE funding system and how to talk with individuals and their families about employment and its benefits.

Inadequate Training Available. Providers referred to the limited training available, primarily provided on-line, and the particular lack of training related to developing community employment skills. Providers who had had staff trained in customized employment by Marc Gold and Associates several years ago valued that training, but indicated that few of those staff remained, either having left the organization or been promoted to supervisory or managerial jobs. Providers have had difficulty getting DDS to approve reimbursement for bringing in out-of-state expert trainers in employment. One provider stated they were seeking "a live body" to provide training.

In response to many of these issues, personnel from each of the state agencies indicated DDS and BRS have worked together with SDE and the RESC Alliance to develop a joint on-line training system accessible to schools (particularly for the module on Discovery), as well as to adult service providers and the state agencies. State agencies indicated that the RESC Alliance, in cooperation with BRS, DDS and SDE led the development of an online curriculum with ACRE certification<sup>40</sup>. These curriculum developers had varied backgrounds, including a special education teacher, occupational therapist, speech therapist, a person with experience with a college program for adults with disabilities, and a clinical psychologist. All had experience with adult learning and providing training and had participated in various transition planning initiatives. None of the curriculum developers or others supporting the project seem to have had direct experience with community employment with long-term support for individuals with intellectual and developmental disabilities. Initial training sessions are being led by staff of the RESC Alliance, who also are training staff from BRS to be able to take over teaching the on-line course in a train-the-trainer process extending over at least several months. BRS is responsible to manage the certification system for providers, certifying individual staff and tracking when certifications need to be renewed. State agencies indicated they have invested in this system as a way to make low-cost staff training widely available, including training that will require fewer provider hours for achieving certification than other available in-person systems.

During our interviews, providers who had heard about the on-line training system being developed were concerned about the content as well as the knowledge and experience of staff involved with developing the system: "The state doesn't get it." One provider indicated they planned to have the Executive Director and Program Manager participate first in the on-line training since they had no idea what the training would be. Providers also indicated, "Practice is important." No interviews were conducted with providers after the initiation of the on-line training system.

**Employment Opportunities.** This component of a state system for Employment First ensures that there are sufficient public and private sector work opportunities at or above minimum wage available throughout the state.

School Work Opportunities. School-based jobs included the library, mail room, stores, and copy services. Most school programs reported that jobs were usually unpaid, volunteer positions, whether on school grounds or in the community, and that most students had the opportunity to work in both on- and off-campus work experiences. One school reported subcontracting to one of two service providers for paid supported employment jobs for some students. Their preferred provider obtained jobs paying

<sup>&</sup>lt;sup>40</sup> The Association of Community Rehabilitation Educators (ACRE). Among other activities, ACRE evaluates curricula related to community rehabilitation submitted for review against competencies to ensure high quality training. Any organization wishing to offer training for any type of ACRE national certificate must go through an approval process. ACRE compares a curriculum submitted against the competencies which include multiple approaches to employment for people with disabilities, including competitive employment, Customized Employment, supported employment, transitional employment. Content must be covered in enough detail to build the knowledge and skills of the professional being trained. (Drawn 8/11/21 from: <a href="http://acreducators.org/competencies">http://acreducators.org/competencies</a>)

at or above minimum wage. Most described paid work experiences being available through Level Up, described above.

Types of School Work Opportunities. Clearly, some schools had a greater emphasis on developing a wide range of potential job opportunities, as well as doing targeted job development in the community to better match student interests. These districts talked about work in several different types of locations, including offices, restaurants, manufacturing, fitness centers, churches, a greenhouse, hospital, pet store, and nature center. They also discussed various types of work including office work, landscaping, cleaning, assembly, food service, sorting books, plant care, and delivery. All schools lamented the loss of work experience opportunities in community businesses due to the Pandemic, and several discussed current efforts to expand in that area again. One interviewee was particularly proud that their program offered "meaningful work," as compared to programs offered by local service providers.

A few schools operated "businesses" either on or off campus. Unfortunately, students with more significant disabilities seemed to be placed more frequently in group work sites or on-campus work. One described a "practice work" setting, where students sorted, assembled and then disassembled parts, "like a workshop model but with no work."

Parent View of School Work Experiences. Parents interviewed also talked about the variety of work experiences their child had completed while still in school. Some of these were in a community business, while others were either in the school or within a private sector service provider organization. Most parents felt these work experiences while in school had been helpful. "There was a lot we knew about him going into (the adult service provider.)" Some parents praised the school district, while others had been disappointed in what the school could do. Although one parent described a variety of school work experiences, she complained about "a lack of meaningful work. They put him anywhere they could throw him in." She felt that with a little training, he would have been able to do much more. One BRS counselor felt the schools that counselor had worked with, in the most part, "are pretty great...our schools had it together" with larger schools having a better system; smaller schools needing more handholding.

Work Opportunities through the Level Up Program. In addition to their own work placements, most districts indicated that some of their students had access to paid work through Level Up, although usually not until their last summer before leaving school. One complained that this "summer" employment actually didn't begin until late August. In general, though, school personnel praised the Level Up counselors as being involved, attending meetings related to students' Individualized Education Programs and providing good follow-up with families.

Students in Level Up may access Level Up work experiences through BRS contracts with Workforce Boards (in which students receive no CRP support) or with CRPs to provide and support students in work experiences in competitive employment settings. Students receive wages from the Workforce Boards or CRPs, i.e., as the employers of record, which are then reimbursed by BRS. In the previous summer, the Level Up supervisor reported that approximately 900 students had indicated an interest in participating in a summer work experience, and about 600 were placed into positions. The Level Up priority is to give each student one work experience; when possible, a student may participate in a second experience.

Payment of Subminimum Wages. A few interviewees raised the use of subminimum wage payments. One individual with disabilities, referring to a previous service provider, said, "Most people there are just doing sheltered workshop. I get frustrated because half of the people I know are still doing that. I understand half can't go out in the community, but those who can, why not? I believe everyone can work." "I have a friend who works for piece work and is so proud of that," another individual said, "but she is so much more capable than that. She only gets paid for what she does...I don't think they should have that. People can do any kind of work, with accommodations, proper support. That is definitely what I believe." A Case Manager indicated, "I believe many companies have taken advantage of people with disabilities paying subminimum wages." One parent, referring to her son's biweekly pay check that was based on an estimated 65% of the prevailing wage for the work performed, felt the pay would be good if her child were paid that amount every week. One provider referred to using subminimum wage certificates, but that they hadn't added anyone to those certificates in many years.

One provider with quite a few 14C certificates stated it has been a struggle to evolve from GSE to competitive wage employment. They were concerned that a lot of people now employed won't be. "We have trouble getting job sites for GSE and subminimum wages, let alone individual jobs."

Compliance with WIOA Section 511 Requirements. Based on interviews, BRS uses two processes—for school exiters and for those working under subminimum wages—to accomplish the WIOA Section 511 requirement that individuals receiving subminimum wages be offered career counseling with the opportunity to apply for vocational rehabilitation services, as described in the Introduction. That represents a substantial number of people in Connecticut who need to receive this career counseling annually: approximately 1100 people are on subminimum wage certificates as of October 2021, plus another approximately 370 youth identified by DDS exiting school each year, some of whom may be seeking subminimum wage employment. Thus, BRS needs processes to meet Section 511 requirements that are efficient while also being effective in communicating with the workers receiving subminimum wages to make sure they understand their options and feel they have the opportunity to request services.

For students exiting school, BRS sends a letter explaining services and providing a contact person they can call for additional information. Those who do follow-up with a call receive information over the phone. When interviewed, the BRS Coordinator indicated that about 80% of the exiting students, or more typically their guardians, follow-up with a call. For those already in services and receiving subminimum wages, service providers are required to show a video explaining the services and explain they can ask for help to change their work. Service providers must document that each person has viewed the video within the required timelines. The BRS Coordinator indicated that compliance with this provision is monitored by DOL during audits. This BRS Coordinator also indicated that BRS receives few requests for services as a result of these 511 meetings.

Onsite In-Person Interviews to Assess Worker Preferences. In a separate set of on-site interviews with 61 people with disabilities conducted by two consultants at provider locations, all but two people were interested in learning more about the opportunity to engage in competitive integrated employment. Across both interviewers and all provider settings, individuals described a lack of awareness or exposure

to opportunities for employment in the community, and several spoke of not receiving the help they requested when indicating an interest in getting another type of job.

Working with Community Employers. A few interviewees discussed community employers and their need to learn more about the capabilities of people with intellectual and developmental disabilities.

Employers without Experience with Workers with Intellectual and Developmental Disabilities. BRS staff felt that employers need more education, more statistics about people with disabilities who work, and information on possibilities through, for example, local Chambers of Commerce. One parent said, "(Employers) without experience with those with disabilities have no clue. They just don't know how capable they are." BRS staff felt that employers could help mentor other employers, with BRS providing a service to employers. Parents also wanted to help educate business owners. "There are neuro-diverse people out there and we need to learn how to be with them."

Tax incentives for Employers. Several interviewees, representing most of the stakeholder groups, referred to tax incentives for businesses as a strategy that the state could use or use more. These interviewees believed it would be an innovative and effective approach for getting more employers involved in providing jobs to individuals with intellectual and developmental disabilities. One service provider, however, discussed DDS' "Working Interview" concept, in which DDS will pay for up to 40 hours of wages—saying, "It can be the kiss of death. The company often doesn't hire then. I'd rather go and get them to hire (from the beginning) instead of this."

## **Achieving Employment First:**

## A Roadmap to Expanding and Improving Community Employment in Connecticut

#### RECOMMENDATIONS AND DISCUSSION

Used throughout this project, the *Framework for Change* is a model that defines state-level actions needed to achieve employment for all adults with intellectual and developmental disabilities who want to work. Thus, it is really a roadmap that could be followed by any state. The *Framework* suggests potential recommendations for improving performance in each of its four components: State Leadership and Infrastructure, Community Support and Participation, System Capacity and Skills, and Employment Opportunities. In developing this *Roadmap to Expanding and Improving Community Employment in Connecticut*, Wise used the *Framework* as a lens for viewing the results of the analysis of documents, data, and interviews, and informed that view with the project staff's experience with systems change in other states.

Recommendations listed in this chapter are specific to Connecticut and support DDS and BRS agency plans: the portion of the DDS 2022-2027 Five-Year Plan (draft) related to Employment and Day Services and BRS' PY2020-2023 WIOA State Plan, particularly related to this project. In addition, recommendations are in alignment with the report provided to DDS by the Supported Employment Leadership Network (SELN), a national group that provides technical assistance to state developmental disability agencies.

Daily Life and Employment Priorities:
Continue to work toward integrated
day/employment opportunities; enhance
with assistive technology; promote
flexibility; educate community.
--DDS Five-Year Plan p. 22

Implementing *The Roadmap's* recommendations will require the cooperation and commitment of state agencies, community providers, families, individuals with disabilities, employers, and other community members. Because Disability Rights Connecticut contracted with Wise for conducting this project, these recommendations are directed to DRCT as actions they and other advocacy groups can take to promote with key leaders expanding supported employment and increasing the employment outcomes achieved in Connecticut. Nearly all recommendations, however, apply to the state agencies BRS and DDS

This chapter of the report organizes the recommendations under the four major components of the *Framework for Change* as a logical structure for addressing the factors that underly the fundamental issues identified in Connecticut. The *Roadmap to Achieving Employment First in Connecticut* (Table 1 in

the Executive Summary) summarizes these recommendations and acts as a key to locating recommendations related to a specific topic.

#### A. State Leadership

# A. Leadership & Infrastructure:

Strong state leadership and systems support development and ongoing program success for youth in transition and adults.

State leadership's relationship to the development of community employment as the service of first choice is critical. In some states, this commitment has come from within that state's Developmental Disabilities (DD), Mental Health (MH) and/or Vocational Rehabilitation (VR) agencies—leadership in these agencies from the start understood the importance of community employment for individuals with disabilities as well as to the community and state. As a result, they then took well-coordinated action to set and achieve community employment goals. In other places, this commitment has grown through interactions with and observations of the experience of other states across the country that have successfully developed community employment. A few states have required action and impetus from

outside the state agency systems to establish strong state leadership for and investment in community employment. This has taken the form of state legislative action, Governor-issued executive orders, and/or lawsuits. All states have felt the pressure to expand community employment, reducing reliance on group and facility-based services, from the federal Centers for Medicare and Medicaid Services (CMS) and Rehabilitation Services Administration.

Whatever the method needed to generate strong leadership for shifting state priorities, resources, and systems to make community employment flourish, that leadership is a necessity. Leadership that is focused on growing and sustaining CIE will be able to share results that are directly related to their shared goals. Leadership must take action to ensure an infrastructure that facilitates rather than impedes the desired outcome of employment in integrated individual jobs in community settings. In our interviews in Connecticut, DDS, ADS and SDE affirmed a commitment to Employment. They also indicated their desire for improvement and welcomed suggestions from this report. Advocacy groups such as DRCT have a critical role in promoting state leadership that takes action at multiple levels to expand and achieve desired Employment outcomes.

## A-1. Leadership & Infrastructure: Agency Coordination.

A-1. Agency
Coordination: Relevant
state departments
partner to champion
the program & provide
strong leadership to
achieve a compelling
common vision

**A-1.1 Responsibility & Authority—Partnerships:** State agencies with responsibility and authority partner to ensure mutual commitment, collaboration and supportive leadership for Employment First

**A-1.2 Responsibility & Authority—Policy:** Employment First policies are embedded all levels of government, especially in departments with program responsibility and authority for transition and/or employment support for individuals with intellectual and developmental disabilities

## A-1.1 Responsibility and Authority—Partnerships

- 1. Maintain Active Strong State Partnerships: Recognize and support a strong state partnership of core agencies to lead Employment First efforts, headed by one chief agency. In Connecticut, these core agencies are DDS, ADS (BRS), and SDE, with DDS to take the lead. To define that partnership, core agencies develop, sign and implement a Memorandum of Understanding (MOU) or Memorandum of Agreement (MOA) that at a minimum includes agreements for joint responsibility for planning, funding, implementation, monitoring and improving services and outcomes. Memoranda are in place related to the joint customized employment on-line training system (ADS and DDS), Level Up and transition services (ADS and SDE), and coordinated employment services (ADS and DDS). However, ADS and DDS need to improve their implementation of the agreement to coordinate employment services to improve joint processes, facilitate better communication across agencies, and achieve seamless service transition for individuals receiving services.
- 2. Promote a Common Compelling Vision and Expectations: Imbed a compelling vision and expectation of employment as the first and preferred option for working age adults by ensuring that all relevant communications both within and outside of each agency clearly promote that vision and expectations. At this time, based on stakeholder feedback, it is not clear that the core agencies at all levels share a common vision and expectations regarding employment for individuals with intellectual and developmental disabilities in Connecticut.
- 3. Establish Champions: Encourage partner agencies to identify an internal "champion"—one person with a strong belief that all people can work, who has extensive knowledge and skills related to employment support services, and who is given the responsibility and authority to lead the Employment Initiative within that agency, including implementing a joint 5-year plan. These individuals must have both the freedom to focus their time on employment for individuals with intellectual and developmental disabilities and the power to make decisions and facilitate change.

## A-1.2. Responsibility and Authority--Policy

1. Form a Cross-Agency Policy Workgroup: Establish a cross-agency policy workgroup to review and triage all relevant policy and guidance statements from each agency for efficiency and effectiveness for implementing Employment First. Rewrite policies found to be deficient so that they consistently promote the expectation of employment and facilitate its implementation as well as cross-agency collaboration.

## A-2. State Leadership: Aligned Infrastructure and Resources.

A-2.1 Data, Quality Assurance, Outcomes and Performance Improvement: Partner agencies/departments establish a joint 5-year plan and maintain State level goals, planning, implementation, quality assurance, and statewide information systems compiling performance data to support continuous improvement of the program **A-2.2 Funding--Revenues:** Partners identify target populations & maximize relevant program revenue sources, including using waiver applications and renewals, as well as alternative funding strategies A-2. Infrastructure: Partner agencies' A-2.3 Service Standards & Required Qualifications: Partners develop/use infrastructure and service definitions, contracts funding formulas, service rates and payment resources align with, systems that facilitate and reward performance on the goals prioritize, and promote the Employment First A-2.4 Agency Coordination—Case Management & Service Monitoring: outcomes Partners use aligned core competencies for Case Managers and BRS Counselors, as well as coordinated transition, referral, planning, case management, service standards, benefits counseling, and service monitoring systems that promote Employment First and interagency cooperation related to youth and adults served A-2.5 Funding—Budgeting Priority: Partners' budgeting, policies, and systems prioritize and promote Employment First

## A-2.1 Data, Quality Assurance, Outcomes and Performance Improvement

- 1. Launch a Five-Year Joint State Plan: Sponsor a facilitated process, including the voices of a broad stakeholder group, to assist partner agencies to agree on joint five-year statewide employment goals for youth and adults who are eligible for DDS services. Include prioritized recommendations from this *Roadmap* and from the SELN report. Turn the plan into action and increase urgency by setting short-term action goals at the system and service levels. Closely track both the implementation and outcomes of these action goals.
- 2. Design and Use a Robust Evaluation System: Advocate for and develop a robust evaluation system that receives sufficient individual-level performance data and then compiles and reports the summarized results at a frequency to support local, regional and state management decisions related to performance improvement. Prioritize development of this system, including developing mechanisms to share data across core state agencies, within the first few years of the joint five-year plan.
  - **Data Expectations:** Regularly request data from state, regional and counseling/case management staffs on employment performance by Level of Need with an expectation that they will develop a way to provide that data.

- **DDS Data System:** Establish an employment data system that includes *inputs* (e.g., number of funded services, Level of Need of those referred for service, resources provided), processes (e.g., days to job placement; hours of Discovery, marketing/job development, job coaching, or retention/follow-along); outputs (e.g., the number of individuals receiving service, number transferred to ongoing support); and outcomes (e.g., the number of individuals placed in jobs, number of new employers developed, hourly wages, hours of work per week, number of jobs with benefits, number of individuals receiving a promotion or desired change in job duties, satisfaction of individuals and family members with the job and support). Include collecting data on the nature of the settings to measure level of integration, including access to people without disabilities. To facilitate collaboration across agencies, include fields to track when a youth is planned to exit school services, when someone is receiving BRS services, and when they are expected to need service funding to shift to DDS funding. Include a Level of Need field to allow filtering and reporting data based on individual Level of Need scores. The Roadmap Project recommends that DDS ask SELN to assist in identifying effective systems in use in other states to build the structure of a comprehensive system. For example, the Washington State data system was developed by SELN and can be found here. In the meantime, there are more simple approaches to collect and compile a few basic measures that Case and Resource Managers may already have in their files, or could collect in their meetings with individuals and providers.
- BRS Data: Advocate with BRS to establish a data source related to services for those who
  are eligible for DDS-funded services, tracking individuals who move between Schools, BRS
  and DDS. Include information on applications received but not accepted, as well as
  information about both the results of the letters to transition students inviting follow-up to
  learn about BRS services and the results of Section 511 meetings.
- SDE Data: Develop the template for a simple data system for use by local school districts to
  measure and report basic activities during transition, such as work experiences, information
  on any jobs with which youth leave school, participation in Level Up, and, at the end of
  school services, the funding source and placement in adult services. Track connections to
  BRS and DDS application and acceptance systems.
- Publicly Reported Data: Report employment system data at least semi-annually, with a goal
  of quarterly reporting as in the existing DDS Management Information Reports. These
  reports should inform the public and stakeholders about the implementation of the fiveyear plan, including actions completed on plan's goals and data reporting (at a minimum)
  the number of students entering DDS and BRS, and employment outcomes filtered by Level
  of Need and by provider.
- **Data Use**: Take action on the data to identify needs and use it to evaluate how effective those actions were.

## A-2.2 Funding--Revenues

- Maximize Agency Resources for Employment: Maximize resources available through RSA,
   Medicaid Waivers, Covid relief and other federal, state, and local sources to support the change
   in Connecticut's capacity for employment, in particular prioritizing resources for professional
   development and system improvements.
  - Individual Technical Assistance: Amend Medicaid Waivers to include individual technical assistance to allow using expert consultants to assist professionals to solve employment challenges and remove any identified barrier(s) to employment for those that have been historically unemployed or underemployed.
  - Flexibility in Use of Waiver Funds: Establish rules for individual budgets that permit greater flexibility in moving funds between services, to focus on the service of greatest need. For example, give Case Managers and Brokers the flexibility to free up funds not needed in residential support to use for employment service.
  - WIOA Requirements: Support BRS to meet WIOA Requirements related to spending on preemployment transition services, services to youth with the most significant disabilities, and other spending requirements.

## A-2.3 Service Standards and Required Qualifications

- Maintain Common Standards: Maintain common standards across BRS and DDS for community employment providers to facilitate providers' ability to contract with both agencies. Having qualified "dual" providers will facilitate seamless and consistent services as funding for individual services moves from one agency to another as individuals move through the processes of obtaining and maintaining community employment. Include in the joint five-year plan a goal to ensure that all community providers are qualified to contract with both departments within three years.
- 2. Develop a Prioritized, Equitable, and Simplified Rate System: Advocate for equitable rates across DDS and BRS that reward providers for providing services that support individual jobs in community settings, rather than group employment or facility-based non-employment services. The highest rates for services should be assigned to work on individual jobs. Reduce the number of separately defined services funded through the waivers, which cause confusion.
- **3. Agree on Core Competencies**: Identify Case Manager, BRS Counselor, and school transition personnel core competencies related to community employment services for persons with intellectual and developmental disabilities. Provide joint training, support and feedback to ensure these staffs meet the requirements of the core competencies.

#### A-2.4 Agency Coordination—Case Management & Service Monitoring

- 1. Coordinate Individual Service Systems: Continue to use Charting the LifeCourse to adjust individual service systems and methods to support school transition personnel, BRS Counselors, and DDS Case Managers to promote individual community employment through all life stages and domains. Charting the LifeCourse assists each system to master a common language and ways to think about transition and employment.
  - Skilled, Creative Facilitators: Connecticut has implemented the Charting the LifeCourse planning system, which includes the domain "Daily Life and Employment" with excellent tools for guiding conversations at all life stages about wishes and needs around working. Probably the most difficult aspect of this system is ensuring that facilitators encourage broad-ranging, creative approaches to supporting each aspect of the employment goal. Thus, the project suggests developing a cadre of facilitators located throughout the state with training and experience with innovative approaches to achieving competitive integrated employment for persons with high levels of need, as well as with leading person-centered planning and the LifeCourse system. Developing this capacity statewide will require an ongoing effort but will provide a strong foundation on which to continue to grow integrated employment that best matches individual interests and abilities across time.
  - A "Living" Employment Plan to Guide Transition: The Employment plans developed during the Transition years must serve as a living guide for youth, family, school staff, BRS counselors and Case Managers to go through the transition years with a better idea of what they should do to be most effective. The plan should: (1) guide IEP development, (2) shape exploring possibilities and opportunities, including things not previously experienced by the youth to support informed choice, and (3) serve as a place to gather new learnings, adjusting the plan as needed. The plan should support person-centered Discovery activities, both during and after the school years. The results of the plan and Discovery processes create a system to inform conversations between schools and BRS counselors, by describing a potential path to employment.
- 2. Establish Local Employment First System Demonstrations—Pockets of Excellence—to Support Systemic Change: The measure of strong state partnerships is how those partnerships are actually implemented at the local level. As a strategy to address perceived disconnects among schools, BRS and DDS staffs and to guide statewide systems development, *The Roadmap Project* recommends that Connecticut develop a minimum of six demonstration sites, or "pockets of excellence," where a local school staff person, a BRS Counselor, a DDS Case Manager and local service providers are truly working together to figure out how to effectively accomplish integrated employment for specific youth or adults with significant challenges to employment. The approach we are suggesting is much like decades ago, when Apple set up some of its best

and brightest to work in a separate building, giving them support to design and build what became the MacIntosh computer. The employees flew a pirate flag over the building as a visual demonstration that those inside weren't constrained by "how things are done." The company provided both resources and freedom.

The pockets we are suggesting will start with identifying at least six sites where the players have a strong commitment both to employment and to figuring it out for individuals who present the greatest challenges or players who are recognized as successful in helping individuals with significant challenges achieve jobs. Supporting these pockets to achieve excellence that is replicable is likely to require multiple components:

- Experienced, knowledgeable staff to participate in these demonstrations. Select individuals who have documented success and/or strong commitment to people with the greatest challenges.
- Selected youth and/or adults who previously have not been given the opportunity to get
  the support needed to work in a competitive integrated employment due to the number
  or severity of their disability.
- An approach that focuses on figuring out what it takes to get one person at a time through the processes of the various agencies so they are successfully employed in a competitive integrated employment job. Use these experiences to identify needed systemic fixes and inform departmental leaders of those needed changes.
- Documentation of the steps followed for each individual, identifying both what works and what doesn't work, as well as the time required to get to the next step. This documentation will support a reiterative process to study and improve the process, resulting in a local system that can be replicated in other locations. Attack making systems issues evident by working directly on a case-by-case basis.
- Management support from BRS, DDS, the school district, and service provider at a level high enough to overcome identified agency barriers at both the local and state level to cooperative local efforts.
- Ongoing access to on-site expert training, technical assistance and mentoring to ensure
  that the partners have the knowledge and skills needed to achieve success. This
  assistance could be funded at least in part by a new "Individual Technical Assistance"
  Waiver service.
- A detailed, cooperative data system that measures demonstration project inputs, processes, outputs and outcomes. The demonstrations may provide an excellent

opportunity to help design and field test the new state evaluation system described previously.

Each Pocket of Excellence Demonstration should focus on one aspect of the system to achieve integrated competitive employment for all. For example, a few sites might focus on establishing an effective School to Work Transition Program, others on addressing disconnects related to Section 511 meetings held for workers receiving subminimum wages, and others on supporting anyone who has an interest in moving from their current job or placement to one that meets the definition of competitive integrated employment. Sharing experiences across these demonstrations would enhance statewide learning and systemic change.

Prioritize beginning these pocket of excellence studies as soon as possible, as a major goal of the joint five-year plan. Use these demonstrations as opportunities to learn how to design or redesign state systems. Immediate implementation of local level demonstration paired with state level action on statewide processes will lead to more effective and efficient transformation of systems.

- 3. Require a Service Plan Employment Goal for All: Advocate for requiring a DDS service plan goal related to employment, as well as monitoring and taking action semi-annually to improve performance on that goal for *all* individuals receiving Work and Day Services, not only those with Level of Need between one and five. Assure that Case Managers know how to use Charting the LifeCourse to talk about employment, how to provide opportunities to learn about employment, and how to get access to employment. Make sure that individuals and families receive the information they need to support making informed choices about employment, including level of integration and desired earnings.
- **4. Protect Individual Budgets for Employment**: Reserve a part of individual budgets to support an employment goal. Allow individuals to use these funds to identify and use unique job supports and accommodations to increase their independence at worksites. Ensure that policy protects funding for employment services, so that an employment goal doesn't have to compete with other priorities.
- 5. Overhaul Section 511 Meetings and Process to Support Statewide Systemic Change: On-site interviews conducted by two consultants, reported above, indicated a high level of interest among interviewees in competitive integrated employment, including wanting a different type of job. These results suggest that the current meeting process used to meet Section 511 requirements is not resulting in either getting individuals to indicate their interest during the video meetings, or in stimulating a response to those requests during or after the meetings. There are several possible causes: (1) The methods used by BRS and service providers to meet Section 511 requirements are not effective in helping people to understand the options they have for getting vocational rehabilitation services to help them get a different job that pays at or above minimum wage; (2) The information about what a worker wants as expressed to the service provider either during or at times other than the video meeting is not forwarded to BRS nor used within the provider's own services to "close the loop"; and/or (3) The providers are not

doing meaningful Discovery and person-centered planning, nor providing the follow-up job development and placement suggested by those processes.

The Roadmap Project recommends that BRS establish a more effective system by: (1) when possible, ensuring that a BRS representative attends the video meetings, if they don't do that now, to record for follow-up any attendee expressions of interest; (2) requiring that service providers close the loop by informing BRS of any interest in full wage jobs and competitive integrated employment expressed at any time in the year, whether or not at a video meeting; and (3) work with DDS and an improved capacity and skill-building system to improve provider skills in putting into practice the information gained during Discovery and person-centered planning, including LifeCourse planning. Data indicated that, at least during the Pandemic, only a subset of DDS-qualified providers actually hold subminimum wage certificates. Therefore, the most effective way to apply this strategy will be to first target those providers holding certificates for skill-building related to helping individuals attain competitive integrated employment. Implementing these three strategies will reduce the disconnect that currently exists between Section 511 meetings and the wishes of individuals in facility-based or group services.

- 6. Resolve BRS Eligibility Issues: Establish a joint workgroup of DDS, BRS and SDE that could identify system improvements that would lead to increasing the number of people with intellectual and developmental disabilities applying for and being determined eligible for BRS services. Review data to determine the most frequent reasons why applicants are determined to be ineligible and work on ways to overcome those barriers. Depending on the most frequently identified barrier, or the "low-hanging fruit," strategies might include:
  - Reviewing BRS policies, procedures, interpretations, and supervisory feedback to help BRS Counselors to be able to declare more individuals with intellectual and developmental disabilities to be eligible for BRS services.
  - Developing tools and training for BRS Counselors that promote declaring persons with intellectual and developmental disabilities eligible for BRS services, and that help Counselors to identify services that are effective in achieving successful closures into community employment for individuals who are eligible for DDS services.
  - Providing training for school transition personnel, DDS Case Managers and service providers on information needed by a BRS Counselor to increase the probability that a person would be declared to be eligible.
  - Working with parents about their perception of the benefits and possibilities of work.
  - Addressing system incentives that encourage parents to seek a determination that their child is not eligible for BRS services.
  - Changing the expectations of service providers who work with this population.

- 7. Extend Benefits Counseling: Make benefits counseling readily available to all transition-age youth and adults interested in achieving community employment, including improving the consistency of the knowledge of Case Managers and BRS Rehabilitation Counselors. Set a long-term goal that benefits counseling will be available at any point in time that the job candidate or employee needs it. Data from BRS indicated only 44 individuals with intellectual disabilities receiving employment services received benefits counseling in 2019, if that number is accurate. Ideally this service at a minimum would be provided before job placement, ensuring the individual has the information they need to determine work parameters and goals.
- 8. Expand Individual and Family Information: Prepare information to be shared with individuals and family members at annual planning meetings, so they learn about the benefits of employment, examples of success, and what is possible. Develop consistent information to be used across the state by schools, BRS Counselors and DDS Case Managers aimed at supporting both adults and youth in transition to recognize the benefits and possibilities of employment. Use the strategies developed by the local demonstration projects to design materials to be used statewide. All families, despite the individual's assessed Level of Need score, should have the opportunity to see how similar people with intellectual disabilities successfully work in integrated community jobs. Brief videos on an easily accessible website are a great way to bring information to families, beyond written materials. Ask family members to assist with development and review materials to make sure the content and format is accessible to families.
- 9. Provide a Joint Letter to Clarify Access to Long-term Funding: Issue a joint letter from agency leaders to BRS and DDS staff that provides assurance to BRS describing the availability of long-term support funding from DDS. Include the processes to be followed for relevant situations, as well as anticipated timelines, and timelines related to long-term support funding that will be available for any DDS-eligible client individual seeking BRS services. Track the results of the clarified procedure through actual people accessing both services. A joint letter that assured ongoing funding for waivered clients issued by the directors of the developmental disabilities and vocational rehabilitation agencies in the State of Washington was very helpful to service providers when they ran into funding barriers or gaps between those agencies in individual services. That letter is provided here.

## A-2.5 Funding—Budgeting Priority

- 1. Prioritize State Agency Budgeting for Community Employment: In all agency budgeting, prioritize resources to support improvement and expansion of state and local activities related to Employment First. Work collaboratively with each of the other agencies and school districts, to prioritize funding to achieve joint strategic goals.
- **2. Plan Annual State Agency Funding Goals:** Set annual goals for agency funding levels that will support expanding and advancing community employment, including: (1) establishing local

demonstration projects that develop unified practices at the local level, (2) building agency and system capacity and skills to increase the number of individuals served in community employment, (3) providing technical assistance to ensure providers are able to serve those with the highest priority of need, (4) developing a robust evaluation system that facilitates sharing and analyzing information across agencies, and (5) ensuring dedicated service funding for competitive integrated employment for students leaving school.

## **B. Community Support and Participation**

B. Community
Support &
Participation: The
Community
organizes around
the common
vision and
statewide goals
for Employment
First

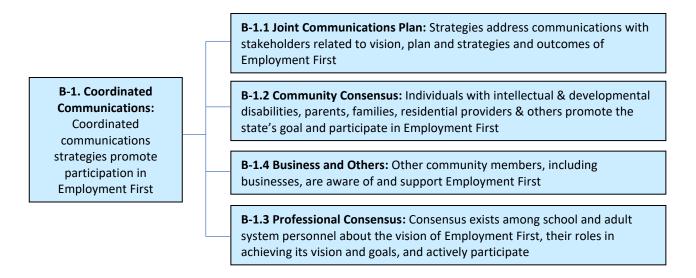
Connecticut, like many other states, faces mixed levels of support for the concept of moving individuals from services primarily provided in groups or congregate settings to individual supported jobs in the community. The attitudes of families, the individuals themselves, day and employment service providers, residential providers, school personnel, Case Managers and BRS Counselors are critical to the state's ability to offer community employment to all working age adults with developmental disabilities. Despite the strong leadership and commitment of state agencies, for community employment to thrive, a state needs a foundation of support in the primary community stakeholder groups. Thus, the state needs to develop an integrated communications program that

will both address the fears related to community employment and increase awareness of its benefits across stakeholders. Developing community consensus around the vision and possibility of community employment should start with bringing together stakeholders who already believe in the effort.

Wise makes this recommendation based on experience with training and technical assistance projects in other states to increase the capacity to offer community employment in which we learned that the most effective use of our resources was to work with "believers" rather than "non-believers." We found that direct approaches to non-believers drained our resources with little effect. Instead, by focusing on working with a core of believers, Wise has been able to most effectively grow momentum for the systems change effort. Basically, the strategy is to give attention and resources to the believers and minimize the attention that non-believers are able to get. Our experience is that the non-believers eventually realized that change was possible and inevitable.

The believers and champions from the various stakeholder groups can have a strong advocacy presence that will provide a foundation for success. People tend to listen to people who have similar experience and roles as theirs. Thus, it is effective to identify peers within stakeholder groups to assist in the effort to communicate about the benefits and possibilities of community employment. During our interviews, Wise found parents with the energy and commitment to build a coalition. State agencies, advocacy groups and others can play an important role in developing and supporting peer advocacy and education groups.

## **B-1.** Community Support and Participation: Coordinated Communications.



#### **B-1.1 Joint Communications Plan**

- 1. **Create a Joint Communications Plan**: Develop a joint communications plan across partners that addresses the vision, priority, and possibility of Employment First with strategies that target families, individuals, businesses, service professionals, and other community members.
  - Why: For each of the important stakeholder groups, understand why: 1) Why do believers in Connecticut "believe," as this will begin to generate the foundational language and areas of emphasis to start building the communication plan. 2) Why don't some stakeholders believe in community employment for all who want it? Use both sets of information to learn what will it take to get leaders representing these groups on board.
  - Pictures of Success: Develop pictures of success so stakeholders have the opportunity to see many examples of success, representing a variety of people, levels of need, places, and jobs. Demonstrate the positive impact community employment can have on a person's life. At first, this may require accessing success stories and videos from other states, but as there is more employment success in Connecticut, these examples must be added. Make the stories and videos easily available on a website for all to access.
  - Branding and a Tag Line: Convene a forum of key stakeholders to name the state's
     Employment First effort. Develop something that can be branded and will advance the
     culture in a positive way. Early in the Employment First effort in Oregon, advocates and staff
     developed the tagline, "A Job is the Key" which appeared on all communications related to
     the Employment First Effort.

• Stakeholder Concerns: Gather information to address stakeholder concerns and lack of belief. For example, does the Incident Reporting System indicate that the rate of incidents is lower in community employment than in congregate settings? Use this information to inform communications about safety in community employment. Support people with disabilities and their family members who have positive experiences in community employment to share their stories and perspectives with others.

## B-1.2, B-1.3, & B-1.4 Community, Business, and Professional Consensus

- 1. Convene Stakeholder Forums: Hold Regional and Statewide Forums that include at least BRS Counselors, DDS Case Managers and school transition staff to promote relationships and mutual understanding of roles, which will facilitate smooth transitions for common clients across agencies. The staff from each organization needs to understand the other agency's processes and constraints to learn how to most effectively work together. Design at least some of these forums to include school personnel, parents, consumers, service providers, and/or employers, based on the purpose of each forum. Include individuals with disabilities and family members as forum leaders. Ensure that forums include information about individuals with various levels of need achieving success in employment. Plan "on-ramp" opportunities addressed at parents of younger children who need to start thinking about future transition to adulthood.
- 2. Find Frequent Opportunities to Dialogue on Employment: Take advantage of every opportunity to engage families and individuals, school personnel, employers, services providers, Case Managers and BRS counselors in presentations and dialogue on community employment. Hold sessions at existing conferences for each group, attend meetings and get on the agendas of existing professional and family groups. Include conversations on the positive impact community employment can have on a person's life, and how families have dealt with perceived issues and barriers. Support participants to raise concerns and gain information on possible solutions and resources. Include champions from the relevant stakeholder groups to discuss their experiences with community employment.
- 3. Launch a Dedicated Website Rich in Information and Resources: Collaborate across agencies to establish an easy-to-access website dedicated to providing information about preparing for transition, adult services, benefits, and community employment, for example. Use the branding developed by the advocates, as described above. Target the website to meet information needs of a wide variety of stakeholders, e.g., including families and professionals. Include, for example, informational videos, downloadable brochures, brief training courses. The Families portion of the DDS Website (<a href="https://portal.ct.gov/DDS/Family/Family/Im-looking-for-information-about-">https://portal.ct.gov/DDS/Family/Family/Im-looking-for-information-about-</a>) is a good start as an example, with information organized by age group. However, it can be difficult to find some information on the site if the user has to rely on a search.

#### B-2. Community Support and Participation: Community Advocacy.

B-2. Coordinated
Advocacy: Employment
First stakeholders
advocate for expansion
and improvement

**B-2.1 Budgets and Communications:** Partner agencies/departments promote the Employment First vision and goals in budgets and in their communications with the Governor and legislature

**B-2.2 Stakeholder Leadership:** Partners support stakeholder-led leadership groups organized around the vision for Employment First, such as self-advocate coalition, parent coalition or employer panel to provide information, recruitment, training and support to peers on Employment First

## **B-2. 1. Budgets and Communications**

1. Promote Employment First in State Level Communications: Partner agencies/departments promote the Employment First vision and goals in budgets, and in their communications with the Governor, Legislature, and the general public.

## **B-2.2.** Stakeholder Leadership

- 1. Invest in Believers and Champions: Identify and support existing "believers" in community employment representing the various stakeholder groups, including service provider agencies, family members, individuals with developmental disabilities, employers and others who are or could be local champions for community employment.
  - Work with these believers to develop initial footholds in the community. Avoid spending valuable time trying to convince the non-believers, instead work with those who already buy into the goal of employment.
  - Provide training, resources and technical assistance to the believers, helping them to
    establish strong examples of success, and encouraging them to talk with other stakeholders.
    In time, they may become members of a leadership group to advise plans for implementing
    strategies.
  - DRCT and other advocacy organizations promote and provide administrative support to existing or newly forming stakeholder-led groups.
- 2. Reinvent Self-Advocate and Parent Coalitions: Support existing coalitions or help self-advocates and parents to organize existing coalitions so both can become vocal advocates for community employment and work with other self-advocates and parents to increase transition and employment awareness. Established regionally, such groups may have several functions, including talking with peers to help those questioning work to understand the value of employment; providing training for peers; recruiting local businesses and jobs through their individual networks; developing information and education resources for families, students, adults with disabilities, and self-advocates; and advocating for resources from state and local

government to support local infrastructure, such as transportation systems, that support employment. Several advocacy and educational groups already exist in Connecticut. It may be possible to work with one or more of these groups to take on these functions.

Particularly important, these coalitions can work in concert with local schools to ensure families have good information during the critical transition period. Schools and state agencies should assist parents and self-advocates with, for example, holding regional virtual calls for monthly question and answer sessions, establishing coaching relationships among parents, and supporting costs such as transportation, presenters, childcare, refreshments and materials to support their work. Coalitions will need strong relationships with BRS, DDS and schools to support a trusted family network and ensure they are sharing accurate information about these systems.

#### C. System Capacity and Skills

C. System
Capacity and
Skills: State
personnel,
schools, provider
organizations and
employers have
the capacity to
provide and
maintain high
quality individual
employment for
all who want to
work

There are critical deficits in Connecticut in the capacity to serve individuals with intellectual and developmental disabilities who require skilled support to achieve employment. Due to the Pandemic, low wages, and other issues, service providers experience high turnover rates, leaving them with an insufficient number of skilled staff to take on all of the referrals that BRS and DDS would like to make. Strategies to address the capacity issue might include assisting service providers to raise wages or to hire additional staff to expand their ability to accept referrals, or contracting with out-of-state service providers, a strategy which has been used by Connecticut.

However, even without issues with turnover, most provider and state personnel do not have the skill they need to help individuals with intellectual and developmental disabilities achieve community employment. The most critical

need is to make regular, ongoing, expert training and technical assistance, as well as peer-supported learning, available to service providers, as well as to BRS, DDS and school staffs. As staff gain expertise, peer-supported learning-based cohorts of peers may further support staff development. To successfully achieve community employment for individuals with intellectual and developmental disabilities who present more than the usual difficulties to staff trying to support them to get and keep jobs, employment specialists must possess a high level of skills in each of the areas required for community employment:

• **Discovery**: Using a variety of person-centered methods, across time, to learn about each individual's skills, talents, and interests, and doing so using whatever communication methods work for the individual.

- Job Finding: Looking for opportunities within public or private sector employers that match the individual's talents, skills, and interests. Job Finding seldom means applying for an advertised job, but rather finding tasks in an appropriate employer setting that could be woven into a job that would meet the employer's need and match the skills of the job candidate. Thus, the employment specialist must communicate well with employers and use workplace analysis strategies to understand the nature of the workplace to determine the interest and willingness of the employer and coworkers to include a person with disabilities at their site. They also must be able to present the individuals they are supporting in a respectful way, emphasizing their competence. Therefore, regular and easily available training on meeting the needs of businesses, speaking the language of business, and selling/promoting supported employment to business should be available for staff who develop jobs or work with employers.
- Job Placement: Getting the individual into the job, completing the myriad of arrangements to
  make that placement a success, and working with employers and coworkers about needed
  accommodations and supports. This includes supporting the primary role of the employer and
  coworkers, looking for possible natural supports in the work environment, and making sure that
  the individual fits well with the workplace culture.
- Training: Teaching the individual to complete all job tasks with high quality and productivity levels acceptable to the employer. Some individuals are able to master a task simply by watching someone else do it, with feedback to correct any errors. Many of the individuals we are trying to get into employment need much better training than that. People with intellectual and developmental disabilities who face multiple challenges to working may need training that relies on techniques such as Systematic Instruction which include evidence-informed strategies for setting up tasks for success, individualizing task analyses, providing and fading both instruction and reinforcement, and effectively providing error correction methods, while using data to constantly improve teaching strategies. Employment Specialists who are trained and experienced in these training strategies achieve more success in job placement and fading support. To shift from tethered supports to place-train-and-fade services, Connecticut needs to provide quarterly in-person training on Systematic Instruction to meet ongoing training needs in the service system.
- Ongoing Support: Providing just the right amount of supports needed to maintain a successful
  placement, to expand the work responsibilities or hours, and to assist employers in providing
  natural supports. As in other phases of community employment, this phase of service delivery
  requires the Employment Specialist communicate regularly and well with employers and
  coworkers and be very perceptive about the environment.

Achieving this level of expertise requires much more than online training, even if it is ACRE-certified. We can expect that online training or presentations will give staff an awareness and knowledge about the topic area, but we cannot expect that they will gain true skills. Skill development—like riding a bicycle—requires real practice with feedback from a person who is experienced in the methods. For

skills that transfer across situations, it is best to provide that in-person training in multiple environments, working with multiple individuals with disabilities and employers. The benefit of using this capacity-building approach to skill development will be that staff will achieve employment outcomes that Connecticut is seeking and do so with higher quality. Staff will require less time to train an individual to criterion and less time to fade successfully. Individuals will maintain their jobs longer. Thus, we recommend using a hybrid multi-level model for staff development, including on-line training for introducing basic concepts and methods, in-person training that includes working with individuals receiving services to support skill development, peer-supported learning that includes experienced employment specialists, and advanced training addressing specific topics of interest to experienced workers.

It appears that there is no regular in-person training offered in Connecticut addressing employment support skills. This perhaps could be remedied by working with the Center for Excellence at the University of Connecticut, or by contracting with experienced training and technical assistance providers from other states. Certainly, the training that Connecticut providers need is available. The state must make an investment in providing this type of training on a regular basis. One seminar on Systematic Instruction or Job Development is not enough. Those seminars must be repeated on an ongoing basis to meet the training need in Connecticut. This sort of a training series would best be supported in person by professionals living in Connecticut. Developing a core group of in-state technical assistance and training expertise will ensure sustainability of the services and address the unique needs of the businesses in local communities.

#### C-1. Training and Technical Assistance Infrastructure and Delivery.

C-1. Training and TA
Infrastructure &
Delivery: Partners
establish and maintain
an infrastructure that
provides coordinated
training and technical
assistance

**C-1.1 Training & Technical Assistance Infrastructure:** A central training and technical assistance organization coordinates training provided within the state designed to most effectively achieve the state's vision and goals for Employment First

**C-1.2 Training & Technical Assistance Delivery:** Ongoing expert, coordinated and effective training and technical assistance are regularly available to support organizational development and change, to provide technical knowledge and skills needed to develop and support high quality individual jobs, & to assure that providers, Case Managers, BRS Counselors, employers and school personnel have needed competencies

## C-1.1. Training and Technical Assistance Infrastructure

1. Establish a Centralized Training and Technical Assistance Infrastructure: Establish a central training and technical assistance (TTA) organization—experienced in state change to community employment—to provide and coordinate activities across time, ensuring consistency in training and technical assistance delivered within the state. Use this organization to identify and contract with other TTA organizations and individuals when additional knowledge, skills or resources are

needed to address training and technical assistance needs and to follow-up on events provided by others.

## C-1.2 Training and Technical Assistance Delivery

- training on Discovery, job development, training: Maintain introductory robust, repeated training on Discovery, job development, training, and supporting individuals with intellectual and developmental disabilities in community jobs. Available training should include easily available web-based on-line or on-demand training to develop awareness and knowledge of Employment First history and philosophy, outcomes, goals and methods and to address initial training needs of new staff. Due to staff turnover, this training needs to be regularly available—at least quarterly—to organizations throughout the state. Provide access to this training to school, BRS and DDS personnel as well as to service providers. Use this introductory training to achieve a pipeline of community-based employment staff. Establish an annual goal in the Joint Five-Year Plan for the number of DDS and/or BRS service provider staff who complete introductory training and achieve ACRE certification. For example, the state of Washington has a goal of 100 staff obtaining ACRE certification each year.
- 2. Maximize In-Person Training: Offer opportunities for in-person training that includes practice with feedback on skills for developing jobs, negotiating with employers, using Systematic Instruction methods, and delivering and fading ongoing employment supports. Include individuals with disabilities in training sessions so that participants can practice providing the service with real people, while being observed by an expert trainer. Ensure these opportunities are offered with a frequency sufficient to meet provider needs for staff development—again, quarterly likely would be best, at least initially. Schools also need this training to grow their own skills to expand opportunities for youth who need significant supports to work or to engage in readiness activities.
- 3. Advance Peer-Supported Learning. Wise has found that peer-learning and resource-sharing have been valuable approaches to help staff to design creative accommodations and supports for people with complex needs. In the greater Seattle area, for example, a special project supported three different service provider organizations to work together to achieve employment outcomes for individuals who presented significant challenges that the agencies alone had been unable to place. The project supported the agencies to overcome the usual boundaries between them, sharing leads and jointly problem-solving accommodations to lead to successful job placements.
- **4. Promote Advanced Training and Development**: Offer advanced opportunities for staffs who have received introductory and initial in-person training to continue to build and share their skills through specialized training events, forums, and peer-to-peer support. Topics may include, for example, positive behavior supports, assistive technology, self-employment, corporate job development, and asset and benefits counseling.

- Fresent Market Training: Provide specific training and technical assistance to providers regarding expanding the markets in which they develop jobs, improving market penetration within public and private sector employers, and expanding outreach to include small businesses and Black Indigenous, and People of Color (BIPOC) owned/operated businesses across Connecticut. Through this enhanced market training, providers will be able to increase both the number and the variety of jobs they seek. For example, teach providers how to network with mainstream business groups such as Rotary and Chambers of Commerce to help them develop awareness and understanding of this untapped workforce. Include opportunities for training and technical assistance on self-employment, including business development, marketing, and operations for individuals and the people providing them with supports
- **6. Deliver Technical Assistance**: Make expert technical assistance available to service providers to assist them in developing and improving their services. Support should include assistance with changeover of facility-based or group services to Individual Supported Employment and assistance to address individual challenges to achieving employment.
- 7. Maintain Core Education for Counselors, Case Managers, School Personnel and Others:

  Provide regular access to role-relevant education and training on community employment for persons with intellectual and developmental disabilities for BRS Counselors, DDS Case Managers, school personnel, parents and other community members. Core Training for DDS Case Managers should include how to promote accessing competitive integrated employment; creative use of funding resources related to Individual Supported Employment, Customized Employment, and Competitive Integrated Employment; and quality assurance for community employment versus on-site or group programs. School personnel need to understand the adult service system in addition to skills that support students and families in transition. BRS needs to work with counselors to shift from a culture that questions employment possibilities for persons with intellectual and developmental disabilities with more significant challenges to a culture that believes that their employment is possible over time with accommodation, innovation, and high expectations. Some counselors already have this belief; BRS should use them to leverage change by leading the effort to expand access and develop a more positive culture.

# C-2 Resources to Expand System Capacity.

C-2.1 Expand Provider Capacity: Providers seek and prioritize resources to increase the capacity of service providers to serve individuals in C-2. Resources to Employment First, including funding for innovative start-ups **Expand System Capacity:** Partners C-2.2 Resources to Support Organizational Development: Partners provide identify and provide grants to local service providers to support changing from facility-based, resources to support non-employment or group employment services expanding capacity of **Employment First** programs C-2.3 Resources to Address Barriers: Partners seek resources and coordinate with other government agencies to address barriers to expanding Employment First (e.g., transportation)

#### **C-2.1 Expand Provider Capacity**

- 1. Invest in Expanding Provider Capacity: Invest heavily, immediately, and on an on-going basis to expand provider capacity.
  - To reduce turnover in community-based positions, find funding to increase wages for staff members who develop jobs, train and provide ongoing support in community jobs.
  - Implement strategies to decrease the investment in non-employment services. Since at least 2014, the percentage of persons in employment services has been decreasing while the number of people in non-employment services has been steadily increasing. Study at an individual level why this trend is happening and take action to reverse the trend. For example, if a major cause is families not wanting to give up full-time day support programs, work with funding flexibility, Case Managers, and parents to identify strategies to overcome this barrier. If a major cause is fear over losing benefits, offer a heightened program of education and individual counseling on benefits. If a major cause is that Case Managers are not fully in support of community employment, focus on expanded education and peer support. As a start, DDS could add a brief survey to each semi-annual individual planning session to collect data on why people are not choosing employment, addressing the most common issue first. Change procedures to make it harder for a provider to keep a person in non-employment services while decreasing the administrative burdens associated with ISE services. Ensure that reviews expect providers to complete specific actions to achieve individual plan goals that are related to achieving employment, so that day activity services complement and lead to ISE.
  - Expand the number of DDS-qualified providers who are also qualified to provide BRS services to improve BRS services for individuals with the most significant challenges. This will provide greater access for BRS Counselors to providers skilled in serving this population. In addition, "dual" providers will facilitate consistent and seamless services during movement between DDS- and BRS-funded services.
  - Expand the number of providers that only provide Individual Supported Employment
    Services and are, therefore, qualified to find and maintain individual jobs in the community,
    rather than to provide facility-based or group services. This may include funding start-up of
    a few new ISE-only organizations, or providing funding, training and technical assistance to
    existing multi-service providers to expand ISE.

## C-2.2 Resources to Support Organizational Development

1. Support Organizational Change: Provide financial resources for a minimum of 24 months to service providers that want to change to assist with the excess costs associated with ISE capacity-building and changing from facility-based and group services during their transition to

community employment. The change from group and facility-based services requires investment across time, because organizations need to, for example, build consensus among their stakeholders for the change, revise and review many human resources and operational policies and procedures, and retool—or replace—staff for new roles in community employment.

2. Improve Individual Transition and Transition Systems: Provide financial resources, technical assistance, and training to service providers and schools on how to work with individuals and their families during service planning and in group forums related to choosing and planning for competitive integrated employment.

#### C-2.3 Resources to Address Barriers

**1. Address Transportation**: Coordinate with state and local transportation providers to develop solutions to transportation barriers impeding connecting individuals with jobs.

#### D. Employment Opportunities

D. Employment
Opportunities:
Public & private
sector
employment
opportunities at
or above
minimum wage
are available
throughout the
state

Certainly, having appropriate jobs available throughout the state will support the expansion of community employment in Connecticut. The state agencies can play important roles in supporting service providers in this goal. Although there are many possible strategies the state may undertake in order to expand the availability of jobs, Wise does not recommend these actions as a current priority. We recommend that Connecticut invest in building system capacity and skills for delivering community employment before building market demand and expectations. Until Connecticut knows it can deliver a quality service, unsuccessful placements will drive employers away from the program. However, for future work around expanding private and public sector employment opportunities, these strategies used in other states may be helpful.

#### **D-1** Private Sector Jobs.

**D-1. Private Sector Jobs:** Statewide efforts, including collaboration with the Department of Economic and Community Development, support expanding job opportunities with typical wages in private sector businesses

States have used several strategies to expand private sector employment opportunities in areas across their state.

1. Build Relationships with Large Employers: States, including Connecticut, have developed relationships with large employers with locations in various parts of the state. This employer development often falls beyond the ability and resources of individual providers to achieve. Yet, the commitment from an employer with multiple sites can provide job opportunities through

several providers. Building an advisory workgroup of subject matter experts in employer development to provide technical assistance to the state agencies would be a starting point for this effort.

- **2. Establish Regional Blue-Ribbon Committees**: States also have formed "Blue Ribbon Committees" of respected employers to both advise the state and regions, as well as to directly market the program to other employers or develop marketing campaigns targeted to employers.
- 3. Partner with National and Statewide Service Clubs: Service clubs spread throughout the state may be interested in taking on projects related to employment for persons with disabilities. For example, in the Seattle area, "Partners for Work" (PFW, <a href="https://www.gowise.org/what-we-do/partners-for-work/">https://www.gowise.org/what-we-do/partners-for-work/</a>) has been a Rotary District 5030 project since 2008. In that time, Rotarians from District 5030 have made connections with businesses that have led to over 140 jobs for persons with intellectual and developmental disabilities. In addition, clubs have hired "Greeters" to support meeting tasks. Mock interviews lead to feedback from Rotarians to assist students and teachers to improve their skills and career portfolios in preparation of exiting school.
- 4. Reduce Use of Tax Incentives: A strategy that has <u>not</u> proven to be effective has been to offer tax incentives or wage subsidies to employers—the result has often been that the individual's job ends at the end of the subsidy. Employers who are committed to including individuals with disabilities in their workforce will not need to depend on subsidies because their new employee will contribute in a valued way. They will, however, expect that there will be expert support to help yield a successful experience.
- 5. Engage the Perspectives of Employer Leaders: Seek the perspectives of a few employers related to employment for people with developmental disabilities to begin forming relationships and to identify employers who may be helpful in achieving the state's employment goal. Select employers who have experience with employing adults with developmental disabilities and who recognize their benefit to the workplace. Support these employers to have conversations with others, or to give presentations at business events related to their experience and benefits gained.
- 6. Form a Partnership with Economic Development: Develop partnerships with agencies such as the Department of Economic and Community Development, for strategies for extending job opportunities.

## D-2 Public Sector Jobs.

**D-2. Public Sector Jobs:** State initiatives support public sector job opportunities with typical wages at all levels of government through strategies such as executive orders, reducing barriers to hiring, establishing goals, and providing technical support

Some states and local governmental units have developed policies and strategies that facilitate employment in public sector jobs. A policy issued by the King County Administrator in Seattle,

Washington went beyond establishing employment goals and opened the door to what is now an organized Office of Supported Employment, with a lead staff who works with County offices and providers to assist them to place individuals into jobs in that county. Other public agencies have developed new employee classifications or application procedures to accommodate various disabilities.

- 1. Establish a Public Sector Employment Initiative: Work within state and local government to establish an employment initiative within agencies, establishing goals and strategies for employing persons with developmental disabilities.
- 2. Become a model employer: Demonstrate the possibilities and benefits to public sector offices by directly employing individuals with significant intellectual and developmental disabilities within each of the core agencies. Be a leader, an exemplar of how Employment First can work well. Share agency experience with employing people with intellectual and developmental disabilities with other departments, including strategies for working within the state's personnel system to develop appropriate employment opportunities and provide support.

#### A Place to Start

Certainly, Connecticut like other states has navigated a tremendously difficult time during the Pandemic. Reemerging from that period offers challenges to regain previous levels as well as opportunities to address barriers in a new way. All states face this. Recovering from the Pandemic may allow states to build a new, more integrated service system given the closures of facility-based programs, i.e., build something new without having to invest in tearing down the old. Connecticut has pursued additional funding through the American Recovery Act and American Rescue Plan Act to strengthen its service system at this time. This report supports that rebuilding effort.

It is clear from the project's analysis of stakeholder input, data, and documents in comparison with the components of the state change model, that there are critical deficits in Connecticut's capacity to serve individuals with intellectual and developmental disabilities who require skilled support to achieve employment. Connecticut needs to make cultural and systemic changes in many areas to: (1) expand access to skilled person-centered services, (2) increase the number of individuals working in competitive integrated employment jobs, (3) make subminimum wages unnecessary, (4) decrease investment in non-employment services, and (5) ensure compliance with federal and state requirements.

As a result, this report includes a comprehensive set of recommendations to increase competitive integrated employment and establish an evaluation system to effectively improve performance. From this lengthy list of recommendations, *The Roadmap* identifies the following systemic transformation priorities to be addressed first:

1) Invest in expanding system capacity and skills, including prioritizing funding for expanding individual employment over non-employment services, and developing a training and technical assistance infrastructure that delivers a tiered training system to significantly improve system skills. Supporting the development of a skilled workforce and expanding the number of available services,

including dedicated funding for competitive integrated employment for students leaving school, needs to be the highest priority. Training must be consistently and readily available to service providers, as well as to BRS, DDS and school staffs, and should include competencies in person-centered planning for employment, supporting informed choice, job discovery, job development and placement as well as evidence-informed strategies for teaching and supporting individuals in community employment.

Leadership from both ADS and DDS lamented that there are not sufficient providers with staff capacity to meet their agencies' needs for providing training and support to persons with disabilities for individual supported and customized employment. Parents seeking a program while in the transition years had difficulty finding one—some programs saying they weren't able to fulfill the youth's needs, others weren't accepting any new referrals or had a waiting list. Schools reflected dissatisfaction with the types of jobs service providers were able to develop for their exiting students.

Even before the Pandemic, providers had difficulty maintaining staff. One interviewee reported the average retention was less than two years for employment provider staff. Although this project did not pursue a study on the reasons for staff turnover, several factors likely contribute to this issue, including wages and benefits, working conditions, company policies, the features of supervision, relationships with supervisors and peers, the nature of the job itself, job status and job security. Many interviewees pointed to low wages as the critical factor, an issue across many states. "When we are able to give a full position with benefits, they stay," according to one provider. Advocates and state agency personnel in Connecticut are looking for a long-term solution to increasing wages for these staff.

Low wages, however, are exacerbated by the working conditions for staff in community employment programs. Particularly in individual supported jobs programs these employees are required to interact directly with employers, their employees, and other community members, and for the most part, work alone without their own co-workers or supervisors present. In their role they are called on to solve what are often complex problems, with little time or support to do so. In addition, their behavior and performance in community settings reflect on the reputation of their service provider employer and on the system of services as a whole. Staff who are insufficiently trained for such a role, who feel as if they are adrift with little supervisory support, are much more likely to seek other employment than staff members who feel supported, competent and confident in their roles. One provider echoed this when they said, "...(W)hen staff people are alone in the community, they are disenfranchised and not supported. Staff are not getting the feedback and training they need...Staff turnover is huge when people are in the community."

Beyond its effect on staff turnover, insufficiently trained staff limit the employment outcomes that can be achieved, especially related to individuals with intellectual and developmental disabilities who experience greater challenges to employment. Highly skilled staff members can develop jobs that better match an individual's interests and skills and can provide more effective training and support that leads to reducing the time staff need to spend on-site. Achieving these broad-based skill levels across providers throughout the state requires significant investment. DDS, in cooperation with SDE and BRS, has chosen to invest in an on-line training system, due to its lower cost and time requirements on providers. The RESC Alliance and SDE are working together to further reduce the time requirements for those modules that will be taken by school personnel. Such on-line training can bring great benefits—

e.g., it can be available 24/7; it eliminates travel costs; it can be made available throughout the state; there is a lower cost to delivering and receiving the training; it is possible to show both good and bad examples of services; and participants can demonstrate skills acquired through applied assignments and reporting back to instructors.

The short-term cost savings of on-line training, however, must be compared with the outcomes the staff receiving that training are able to achieve. If jobs developed don't match as well, if employers aren't developed as well, if job and task analyses are not completed as well, if initial training is not as effective, if support staff are unable to fade their supports from a job site as well—all of these result in higher costs in the long term, well beyond the cost of initial staff training. Costs also may include dissatisfaction of individuals, families, and employers with even the notion of community of employment when things don't go well.

Supporting individuals experiencing greater challenges requires that employment specialists be expert at developing appropriate job opportunities and at designing, analyzing, and teaching tasks, as well as fading their support while maintaining performance. Achieving high levels of competence in these skills requires in-person practice, in multiple settings, with feedback from skilled and experienced trainers or coworkers/managers. It also requires training sessions that include people with disabilities so participants can practice learning newly developing teaching skills with the observation and feedback of

an expert trainer. This linkage to onsite support for the learners is not built into the current capacity building plan of the statewide training program. Indeed, it is unclear even if providers could obtain training from out-of-state training organizations, if DDS, at a minimum, would reimburse any of the costs or accept certifications those staff might receive.

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Issues with system capacity, however, go well beyond issues related to service provider skills and capacity. Few BRS Counselors or DDS Case Managers really have had training or experience related to what great, effective competitive integrated employment services for persons with intellectual disabilities require. Those that did stood out in interviews. One reason may be because, at DDS, so few individuals receive quality Individual Supported Employment services—although it really is not known how many individuals actually are in jobs. Thus, Case Managers don't have the opportunity to work with very many individuals and their service providers to achieve a community employment goal, don't all know the quality features to look for in what providers do, and don't all fully understand how to best use the funding system. To improve their ability to promote community employment with individuals they need to receive training specific to their role.

2) Overcome disconnects across agencies responsible for transition from school to work and adult service delivery. State agencies must prioritize and take action to lead the way in learning how best to redesign their systems to support competitive integrated employment. For example, state partners

immediately can work cooperatively to determine how to restructure implementation of Section 511, and to integrate the results with DDS systems, including improving person-centered employment planning, informed choice, and job discovery. In doing so, the State must develop strategies to overcome individual challenges to employment and to help individuals and their families better understand their employment options and opportunities. Simultaneously, and equally as important, the State must also focus on transition from school to adulthood to design for an effective interagency transition system that achieves the aim of exiting school with a job at minimum wage or higher with skilled support, rather than transitioning into subminimum wage jobs, group employment services, or non-employment day support options.

From the project interviews across stakeholder groups, project staff regularly saw evidence that state agency, service provider, and school personnel viewed the others as part of separate systems that co-exist temporally, rather than as partners working together on a single system that results in seamless transitions from school to adult services or from group or non-employment settings to community jobs meeting the definition of competitive integrated employment.

To improve the overall system, much attention is given to "interagency coordination" and partnerships across the core state agencies involved in supporting community employment. Indeed, achieving state level agreements and systems form an important foundation for work to improve employment outcomes, but also could consume all of the attention available from state leaders. Yet, competitive integrated employment really happens at the local level—through interconnected efforts of school transition staffs preparing and connecting youth with the adult service system, of individual BRS Counselors who creatively apply the resources and services available within the vocational rehabilitation system to assist individuals with the most significant disabilities, of DDS Case Managers who facilitate ways of using resources to ensure individuals get to their best outcomes across their lives, of community service providers who have the skills and capacity to support even those individuals facing the greatest challenges to employment, of families and individuals who believe in and support the possibilities, and of a community and its businesses that adopt the vision of competitive integrated employment for all who want to work.

The BRS system offers great possibilities. With their relationship with the federal Rehabilitation Services Administration, state Vocational Rehabilitation offices are standardized in many ways. They have the same requirements for processes such as applications, eligibility determination, and individual employment planning, for example, and have a data-rich environment. The system also gives Counselors a great deal of flexibility in how they approach helping individuals to achieve a successful closure. However, BRS and many other state Vocational Rehabilitation agencies have limited experience with the kinds of tailored services and skilled systematic instruction required to help a person with intellectual and developmental disabilities get and keep a job. Based on interviews, we believe that many Counselors and their providers expect that the individuals they serve can benefit from classroom-style training on general employment skills. Somehow, they believe that a person with a significant intellectual and developmental disability won't be able to succeed in a job until they learn how to write a resume, or make eye contact with their employer, and that they will be able to do a job itself by just watching someone do it once. Individuals with intellectual and developmental disabilities who don't

meet those expectations find little help from BRS or their providers. Many individuals who do access BRS services and their vendors do not receive the kind of skilled, individual support that individuals with intellectual and developmental disabilities often need to succeed.

3) Establish a robust employment data collection and evaluation system to effectively analyze and share information publicly as well as across agencies to monitor and improve employment outcomes over time. Little data exist in DDS or BRS to paint a comprehensive picture of Employment First in Connecticut. State agencies don't have an effective system for sharing data on common customers, nor for tracking the experience of students transitioning from school to adult services. No DDS data on outcomes are regularly publicly available to allow stakeholders to evaluate system performance. This lack of data limits consumer ability to have informed choice regarding services, and limits community employment agencies and State agency leadership's ability to identify deficiencies and make critical decisions for system improvements.

Connecticut's DDS issues quarterly waiver performance indicator and service planning and utilization reports--Management Information Reports. This existing DDS data system is primarily designed around tracking data on the funded services provided, rather than the outcomes of those services. Using an in-person survey of a random sample of service recipients, the reports from National Core Indicators are the only data the project was able to find that reflected employment outcomes. These and the DDS reports are not sufficient to evaluate performance related to the agency's employment support system.

One of the more revealing aspects of the limited data system at DDS is that while it was clear in interviews that all staff care about the experience and results achieved for individuals they serve, regional staff particularly in DDS when asked were unable to give any estimates of employment outcomes in their areas. There is no system to provide that information to them, and

A robust evaluation system would provide data on inputs (e.g., the number of people funded for service), processes (activities or outputs) as well as outcomes, and provide it with sufficient frequency to support using that data for informing decisions to improve performance.

no expectations that they would know those numbers. The existing system is not able to, for example, track DDS-eligible people receiving BRS services, collect information on wages paid and hourly earnings (including subminimum wages), employer of record, the number of people with disabilities served in a single setting as a measure of integration, or, really, the location where a person is being served. These data are likely known by Case Managers, and may be recorded in individual case files, but there is no system for compiling the information within regions or across the state. The existing system assumes that anyone served in ISE or GSE is in a community setting, and those in a Pre-vocational or Day Activity service may not be. The system measures the services that are contracted to be provided, rather than the results or impact of those services.

Another whole level of improvement would support DDS, BRS and school personnel to share data to track services and outcomes for joint customers.

Having compiled data available is only the first step to an effective evaluation system, however. That data must be organized to support review and provided with a frequency sufficient to allow using that data for informing decisions to improve performance. One DDS staff person said, "We were asking a lot of questions and getting a lot of information back, but not using it for improvements."

## **Culture of Urgency**

To accomplish this work, it is critically important that state agencies, providers, and other system stakeholders develop a Culture of Urgency informed by Employment First principles and an understanding of the importance of meaningful, integrated work. Achieving competitive integrated employment outcomes for all individuals with intellectual and developmental disabilities in Connecticut can be a reality, but not in the absence of this cultural change. Ultimately it will require taking bold action now, as well as long-term and ongoing investment that is guided by a joint strategic plan and fueled by the energy, focus, and belief of leadership to maintain the system-wide commitment.

We found many people in our interviews who spoke to their relationship with employment and employment services. However, despite our efforts to discover it, we were unable to find a culture of urgency about employment as the first and most valued outcome of services to adults with intellectual and developmental disabilities. This lack of urgency also extends to other stakeholders. Two DDS staff members referred to a perceived complacency in individuals and their teams who had become comfortable with a group day service where the individual can go to a location with familiar peers, do outings, and work on daily living skills. "Teams and individuals are fine with people staying in group support options."

Many factors contribute to this overall issue related to culture, including the lack of a widespread belief across stakeholders that all people can work; lack of an actively and regularly communicated vision with goals and regular reports of progress; and limited communication on the importance and status of employment outcomes. Because there aren't a few simple, measurable public goals, there also is a lack of accountability for achieving those goals and low expectations for the system as a whole.

Does anyone at DDS ask, "How many people are employed this month? How many more people got jobs?" In interviews, Case Managers knew the answer about their caseloads. Asking even these questions regularly of Case Managers, of Regional DDS Directors related to their area of responsibility, of service providers with ISE contracts, and so on, would yield data and create a stronger focus on the outcome of employment for people with intellectual and developmental disabilities and demonstrate a sense of urgency.

In a family interview, parents recognized the issue of urgency: "Whoever is in charge has to have a sense of mission...The phrase that most describes my impatience with the system is lack of urgency. If not, now the building is on fire.... The adult system is lacking the political will to make this a priority."

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--Parent

## **Final Thoughts**

Expectations have a dramatic effect on the outcomes a system will achieve. Unfortunately, the project did not find in the interviews a consistent, high level of expectation of employment possibilities for people with significant intellectual and developmental disabilities.

From some BRS and DDS staff who had low expectations on employability, to service provider staff who limited their services to those who already knew how to do a job, these attitudes present an underlying barrier to improvement. The basis of this and similar views is a belief that the ability to work

lies totally within the individual job seeker and family. A service provider with a vision of employment for all understands the role their agency plays, including finding the right job that matches the individual's interests and aptitudes, doing accurate job and task analyses, providing efficient and effective systematic training, fading that support, organizing long-term support to maximize job retention, and throughout, promoting the employer role over their own. An organization that only "does what it does" and

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doesn't stretch to truly individualize services and ensure they are effective for each person served regardless of their level of disability, who doesn't review their own methods and adjust them to improve how they help individuals achieve success in employment, will only be able to be successful with persons with few challenges to employment.

Without a comprehensive vision and statewide plan across partner agencies, and active communication about that vision, the plan, its goals, and progress, there is no clear path to align stakeholders in their work. SDE, DDS, and BRS need to develop an across-agency statewide plan, including the participation of stakeholders. Active communication on that plan, on the value of employment, and on employment accomplishments, would be one strategy to improve the culture around Employment First.

Achieving Employment First: A Roadmap

Certainly, there are many factors that contribute to improving system capacity and skills, overcoming disconnects across agencies responsible for transition to school to work and within adult services, and establishing a robust evaluation system. Changing the current culture and expectations will require a variety of strategies across stakeholders to create an urgency and a state level path for employment as the first and most valued outcome of services to adults.