



# Survival Coalition

of Wisconsin Disability Organizations

---

*P.O. Box 7222, Madison, Wisconsin 53707*

May 18, 2021

Co-Chairs:

Beth Swedeen, (608) 220-2924; [beth.swedeen@wisconsin.gov](mailto:beth.swedeen@wisconsin.gov)

Lisa Pugh, (608) 469-9385; [pugh@thearc.org](mailto:pugh@thearc.org)

Kristin Kerschensteiner, (608) 267-0214; [kitk@drwi.org](mailto:kitk@drwi.org)

## **Survival Coalition Comments on Act 178 – Competitive Integrated Employment (CIE) Joint Plan 2022-2023**

Survival Coalition supports the three outcome areas identified and the list of activities identified under each of the outcome areas. However, Survival urges more specificity to measure progress and advance CIE goals as outlined below. Additionally, the current plan makes no reference to the COVID-19 pandemic's impact on the employment of people with disabilities, as well as the state provider network's ability to recover and expand to meet the increased demand to attain CIE goals. We would like to see a specific set of activities targeted to pandemic recovery, including increased investments to support the increased need specifically for expanded job development and coaching.

Our additional comments on the draft plan are:

- There have been ongoing and unresolved data sharing issues between the three state departments. In order to move CIE forward, this plan needs to result in a resolved data sharing agreement to develop a baseline and identify strengths and needs across agencies and across the state. This is an essential step toward building a comprehensive data set which then results in longitudinal data regarding achievement of CIE goals, allowing

measurement of progress. Although data is being collected from MCOs, ICAs and providers, nothing has been released by DHS regarding CIE data for at least three years. It is also essential that there are consistent data gathering methodologies, accountability, and transparency statewide.

- Every activity listed in this plan should have a measurable metric to determine the impact of the activity, and to assess whether and how much it moved from baseline.
- Wisconsin's state agencies should immediately adopt the federal definition of CIE and eliminate the confusion created by DHS using a different version. The state agencies should also create shared guiding principles. There are currently four different guiding principles which are confusing when everyone is working to a shared goal and definition.
- Survival recommends that the 3 departments develop a set of collaboration standards within the TAGs that must be followed by schools, DVR and long-term care programs including: when and how referrals are made for DVR services, expectations for co-developing and coordinating IPEs, IEPs and long term care service plans specific to each shared participant, and establish expectations and standards for quarterly transition meetings (at minimum) that occur for each shared participant. These standards should be widely shared with participants/consumers of programs in all 3 departments, as well as the staff who work directly with clients/consumers/participants/students.
- In order to significantly increase the use of DVR provided Customized Employment (CE) services, training efforts should include targeted education to DVR counselors about the purpose and outcomes of CE, requiring service providers to follow the newly developed CE fidelity scale, and a set of financial incentives for service providers that consistently implement high fidelity CE services.

- Survival recommends specific P4P requirements for all MCOs to make investments in community-based prevocational services, ensuring any member who receives prevocational services to have at least 25% of their authorized prevocational service time provided in the community.
- Regarding outreach, a comprehensive effort is needed with specific strategies for different audiences communicating the benefits of CIE. This would include connecting with people in facility-based employment being interviewed by UW-Whitewater, families, educators, and other community partners. Specifically, a collaborative CIE plan should ensure, with permission, that an individual's care manager is notified of someone's interest in CIE. Rapid engagement best practices outline a more intentional response. A poster or video campaign, as currently proposed in this plan will not affect change.
- Survival also recommends that MCO contracts with service providers require that providers offer Discovery/exploratory activities for people with complex barriers to employment as well as people who have been in facility-based prevocational services and have reported interest in CIE during WIOA and/or P4P employment discussions. Create service delivery standards and funding models for these Discovery/exploratory activities.
- Regarding training activities, the Business Service Consultants, DVR counselors, transition teachers, CLTS and adult care managers need significant training on supported employment strategies such as customized employment and the Discovery process to be effective in promoting CIE.
- Regarding Goal 1 – Outreach and Targeted Marketing, DWD/DVR item # 4. The current role and approach of Business Service Consultants hasn't been effective in promoting employment for people with the most complex needs and barriers to employment. This is an essential task and all three state departments need to partner together to develop a consistent set of strategies for approaching potential employers, to build lasting relationships, and establish ways for making this a reimbursable activity for

provider agencies. The needed scope must go beyond written marketing materials.

- Exploration of developing a Supported Employment curriculum (Goal 2- DWD/DVR item #3) seems to refer to an effort to develop statewide certification of ACRE-approved Supported Employment job developers. We support the certification effort and recommend using that language rather than reference to developing curriculum (when so much quality curriculum already exists).
- Recognize that adequate transportation is essential for individuals to become employed and maintain employment. Develop cross-agency transportation guidance within the TAGs and measure impact on the individual level, including more consistent policies across the three departments. For example, allow job developers and job coaches to provide transportation.
- Goal 2 – DPI activity #1 – there is a reference to identifying students who would potentially benefit from CIE. All students with an IEP or other disability related accommodations should be consider to potentially benefit from CIE and should be referred to DWD/DVR, as well as DHS LTC programs. Make it clear how the students will be identified and assure that DWD and DHS will have access to this information to assure meaningful connection between systems.
- Goal 2- DPI activity #2- DPI must do more than promote use of the PTP. DPI must require schools to develop the PTP with fidelity by requiring schools to develop them at IEP meetings with the participation of students and families.
- Goal 3 DPI is all noted as continuation of existing activities such as Project Search. Again, this area should have specific metrics – increase the number of Project Search sites, increase the number of youth enrolled, increase successful outcome percentage. Additionally, there should be specific and measurable goals related to a robust Pre-ETS collaborative effort between the three state departments.

- Outreach and marketing activities do not specifically outline how the Departments will intentionally analyze and address disparities in employment outcomes and support provision to underserved communities. The outreach plan referenced in objective 1.A.i should be based upon audit of existing data and other consumer survey with specific joint outreach plans and measurement of results.
- All outreach and marketing activities related to HCBS Nonresidential Setting Rule compliance should focus on activities that can incentivize and support providers to increase capacity for community-based services provision that leads to CIE skill building and jobs. Provider capacity for CIE should be measured and reported on annually as a part of this plan.

Survival appreciates the opportunity to review the draft plan well in advance of the hearing date, as well as the variety of opportunities to participate in commenting, including in-person, via remote technology, and in writing.