

May 19, 2021

To: Via email [DWDCIEPublicComment@dwd.wisconsin.gov](mailto:DWDCIEPublicComment@dwd.wisconsin.gov)

From: Lisa Pugh, The Arc Wisconsin

RE: Comments on CIE Joint Plan SFY 2022-2023

Thank you for the opportunity to provide comment on the state's Competitive Integrated Employment Plan.

The list of performance improvement targets appears robust and it is clear that state agencies are making an effort to increase collaboration to improve CIE. The COVID-19 pandemic has had a serious impact on the employment rates of people with disabilities nationally and in Wisconsin. The plan should reflect this reality, outline specific employment data sets that compare this impact to prior year rates, specifying that the overall intent and focus of this year's plan is to both ensure people with disabilities are a part of the state's overall economic recovery and to return to and surpass pre-pandemic employment levels. In addition, a commitment to addressing disparities should show up more clearly in agency activities with metrics of commitment to improvement. 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.

The list of activities aligned within the target areas lacks specificity and ways to measure and compare successful strategies. An overarching comment is to add a metric or measure of some kind to each activity (perhaps even narrowing and prioritizing the activity lists) to ensure each activity is contributing to continuous improvement annually. Such measures and accountability can lead to future investment decisions in the most successful strategies.

Objective 2D is essential to measure progress of cross-agency CIE collaboration: "Develop and implement a consistent CIE definition across the Departments for Act 178 data reporting purposes." The current 2-page CIE definition adopted by DHS far exceeds (and complicates) the federal definition. We request that all agencies adopt the federal CIE definition and that key CIE stakeholders be engaged in further discussion around definition alignment.

Additional comments:

## **#1: Targeted Outreach & Marketing**

DWD:

3. DWD must more actively connect people responding to the UW-Whitewater WIOA survey indicating interest in CIE to a next step. Include metrics to track increased improvement of individuals who shared an interest in CIE getting connected to employment supports. More specifically, departments should work out a data sharing agreement that at a minimum allows a Family Care care manager or IRIS consultant to be made aware of a person's CIE interest. Without tangible connection to employment supports, the WIOA interviews have limited impact and are a questionable use of resources; this interaction should be maximized.

4. Business Services Consultants can be a key conduit between area businesses interested in filling vacancies and meeting diversity and inclusion objectives, but BSCs must better understand the supports necessary for a person with the most significant disabilities seeking CIE. Specifically, BSCs just receive training in and have materials available to discuss service provision that might include job customization or a Partners with Business model. Such service delivery might both meet a key business need and be an effective job match for an individual. Providers report that BSC referrals are often inappropriate.

Both DHS and DWD should reference incorporating and promoting rapid engagement strategies as part of their training and implementation.

Training efforts must include support for customized employment. Increase the use of DVR provided Customized Employment (CE) services by educating DVR counselors about the purpose and outcomes of CE, requiring service providers to follow the newly developed CE fidelity scale, and build in financial incentives for service providers that consistently implement high fidelity CE services.

DHS:

1, 4: How are web-based trainings promoted and to whom? Any activity related to updating trainings should include a metric to increase engagement and measure outcomes of the training. In addition, ensure that training and outreach is focused on care managers and IRIS consultants who play an influential role in employment services planning.

6. HCBS Nonresidential Setting Rule compliance must focus on supporting providers to come into compliance and have the information, tools, and resources to increase their capacity for CIE and related service delivery. The Department must play an active role in increasing provider capacity.

One way to increase capacity would be to require all MCOs to make investments in community-based prevocational services. Do this by ensuring any member who receives prevocational services must have at least 25% of their authorized prevocational service time provided in the community.

CLTS should include an activity to promote supported decision-making and education about use of a supporter role to engage with employment activities and planning. CLTS should also promote and track the use of available waiver services that can lead to work-related skill building and CIE for youth. Questions about CIE should be more prominent in CLTS planning. CLTS can also play a role in educating parents about the research related to successful outcomes for youth, including a minimum of one paid work experience while in high school.

DPI:

Overall, DPI activities need more detail and measurement, beyond reporting of existing activities.

1. Track the connection between TRG funds use and CIE outcomes of awardees.

4. “Highlight how school districts have supported CIE for students with IEPs” - Who will the highlights be used for and what is the measure of success? Why is this a key activity?

Similar to the recommendation for CLTS, DPI should include an activity to promote supported-decision-making and education about use of a supporter role to engage with employment activities and planning. DPI can also play a role in educating parents about the research related to successful outcomes for youth, including a minimum of one paid work experience while in high school.

## **Objective #2: Align service delivery systems and strengthen coordination to increase CIE opportunities for people with disabilities**

Greater transparency and consistency across data reporting is essential. Families and individuals should be able to make services, school and provider decisions based upon clear CIE outcome data for people and youth with disabilities. When data is published it should be easily accessible and widely promoted by the Departments, including via social media outlets.

Alignment of service delivery systems across agencies must include targeted activities, both individual by agency and collaborative, to improve access to and funding of transportation supports.

DHS:

5. Pay for Performance efforts should include more data and metrics to outline intended impact. This is a key activity.

## **Objective # 3: Prepare students for CIE through their educational experience, connecting individuals to vital services both during and after high school**

This is an essential objective and can be a key component to increasing CIE in Wisconsin, but the activities listed (e.g. continuation of Project Search, delivery of Pre-ETS, promotion of Academic Career Plans, resource sharing through TIG) are mostly existing activities with no metrics to determine which are most effective and whether they are contributing to

continuous improvement beyond baseline. A more powerful objective and activity set would be to hold local cross-agency transition planning teams accountable to an employment first philosophy in supporting transition age youth, ensuring that when youth with disabilities enter the adult long-term care system and are ready to exit public school, they have at least one paid work experience.

DWD:

2. A joint Pre-ETS activity between DPI and DVR to promote collaborative Pre-ETS planning for youth could have a significant impact and reduce duplication of both planning and service provision.

DHS:

We support the sharing of evidence-based information related to CIE predictors and believe a targeted outreach effort to families is essential.

DPI and DHS should collaborate on the concept of hiring Family Navigators who can serve as peer mentors for families, guiding them through the maze of cross-agency employment supports, as well as fill a significant gap in reaching underserved populations.

In closing, The Arc Wisconsin also supports the comments submitted by the Survival Coalition of Wisconsin Disability Organizations.

Although outside the scope of this plan, The Arc Wisconsin supports use of one-time American Rescue Plan funds and increased Medicaid FMAP dollars to invest in innovative CIE strategies that can improve data collection, collaboration and outcomes, while investing in a key social determinant of health for Wisconsin residents with disabilities: employment.

Thank you again for the opportunity to comment and for your commitment to increasing CIE in Wisconsin.