



December 30, 2016

To the CIE Interagency Workgroup:

CECY, the California Employment Consortium for Youth with Intellectual and Developmental Disabilities (IDD) is a 49-member state leadership workgroup that represents 25 agencies, committees, councils, families and self advocates. The mission of CECY is to stimulate policy change and build capacity in California's state systems and local communities to increase the number of youth and young adults with IDD in competitive integrated employment. CECY is California's federally funded Project of National Significance Partnerships in Employment Systems Change Project.

Thank you for this opportunity to provide feedback on the September 23, 2016 draft of the California Competitive Integrated Employment Blueprint for Change. We congratulate the workgroup on this draft of the Blueprint and look forward to the detailed implementation plan that will follow. We commend the leadership commitment, interagency teamwork, common purpose and framework that are reflected in the Blueprint. The content of the Blueprint shows a deepened understanding of each agency's priorities, resources and competencies and underscores the importance of collaboration as a key element of successful implementation.

Members were pleased to see:

- The commitment by the departments to stop placing individuals with disabilities in segregated settings and in subminimum paying jobs.
- The deliberate connections made between the Blueprint and policy implementation of the Workforce Innovation and Opportunity Act (WIOA) and the Home and Community-Based Services (HCBS) settings rule.
- The recognized need and commitment to provide technical assistance, training and information to schools, DOR, providers, families and individuals with IDD.

- The Blueprint defined as a 'living document' with the expectation that there will be changes made during the course of implementation.

The information below summarizes the feedback from CECY members and is organized by topic.

#### Monitoring of Implementation:

There is an administrative structure described within the Blueprint that includes the primary responsibilities of the Implementation Workgroup (to provide recommendations for implementation), Interagency Leadership Workgroup (to oversee implementation), and Steering Committee (to guide the development of the Blueprint and provide feedback on implementation).

It is not clear from the descriptions the level of authority/autonomy of each of these groups and to whom they are accountable. For example, it is not clear from the committee descriptions whether the Steering Committee has the highest-level oversight and responsibility for the Blueprint. It is recommended that there be a designated entity (i.e. agency, committee, group or individual) that is ultimately responsible for the oversight and monitoring of the implementation and progress.

#### Person Centered Planning Process:

We recommend that a Person Centered Plan (PCP) for CIE that is portable across agencies be established. The PCP would incorporate the services and supports to be provided (as appropriate) by each agency in support of individual goals for CIE. Details such as who will conduct the Person Centered Plan, how and when will it be reviewed and revised needs to be addressed, along with its portability and use across agencies for planning purposes.

Streamlining Access, Coordination and Sequencing of Services. The proposed Blueprint does not go far enough to assure the provision, coordination and sequencing of services for individuals with IDD to achieve CIE. There is no one-door entrance to access the services of the agencies, and consequently individuals may be punted from one agency/system to the next. We recommend that a local 'lead' agency or coordinator be established with the responsibility of assuring and addressing the complex issues of service provision, sequencing, and coordination of services. Also there

should be a process for identifying service gaps or needed changes in practice or policies at the local level and how to communicate such issues to the state.

Training and Technical Assistance:

There are numerous references in the Blueprint to the guidance, instruction, leadership teams, training, Triple E practices, and sharing of key regulatory and other related information and strategies that will be necessary for the current disability service system(s) to develop the competencies to plan for and deliver services for CIE. Goal 3 Strategy 2 identifies the recipients for training, core topics and future development of a training plan.

Critical to the success of the Blueprint is that there is a shared understanding of what the Blueprint aims to achieve, and what is being expected of the implementers. This will require strong organizational leadership, new knowledge and strong collaboration in local communities. To achieve this aim, we recommend that the state establish and adopt core values and standards for professional competence in the administration, planning, and service provision for CIE.

We recommend that resources and information regarding the achievement of economic self-sufficiency by individuals with IDD be added as a core element of training (e.g. benefits planning, ABLE Accounts, financial health).

We suggest that the Local MOUs include a training and technical assistance plan for their community/region.

In addition to the currently identified recipients for training, we recommend that training be extended to professionals within the workforce development system, employers, K-12 educators and medical professionals who play an integral role in laying the foundation and/or provide opportunities for career development and employment.

We thank you for this opportunity to provide our comments to the Blueprint Workgroup. We were pleased to see that the Blueprint incorporated previous strategies, tools (Data Dashboard) and recommendations made by CECY. We are enthusiastic about supporting the successful implementation of this plan.

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If you have any additional questions, please do not hesitate to contact me at [oraynor@mednet.ucla.edu](mailto:oraynor@mednet.ucla.edu); or 310-794-1141.

Sincerely,



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