



CALIFORNIA STATE COUNCIL ON DEVELOPMENTAL DISABILITIES

TRANSITION PLAN TO PHASE OUT SUBMINIMUM WAGES: SB 639 (2021, Durazo)

Issue Date: January 1, 2023

SB 639 (2021, Durazo) Report Guide

Due to the complexity and density of the recommendations for this report, this document contains only the following sections:

- **Table of Contents:** Order and structure with accessible links to sections
- **Executive Summary:** 2-page overview
- **SB 639 Report (2021, Durazo):** Includes benchmarks, timelines, best practices, and recommendations for transitioning persons with disabilities from subminimum wage (below minimum wage) employment to competitive integrated employment.
- **Bibliography:** Sources and citations with accessible links

Additional sources that accompany this report will be made available on the SCDD SB 639 website: <https://scdd.ca.gov/sb639-home/>, these include:

Appendices:

- **A:** AB 2920 (2022, Arambula) Factsheet
- **B:** Letters from Community: feedback from stakeholders for phasing out subminimum wage
- **C:** A National Subject Matter Expert's Discussion on Inclusive Employment
- **D1-D13:** References and sources from national subject matter expert Joe Marrone's Discussion on Inclusive Employment

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EXECUTIVE SUMMARY

In 2021, Senator María Elena Durazo authored SB 639 (Chapter 339, Statutes of 2021) which ends the use of subminimum wages (i.e., paying less than minimum wage) to employees with disabilities in California by 2025.

The bill calls for the transition of employees working under subminimum wage by way of the Section 14(c) waiver into Competitive Integrated Employment (CIE). The bill also requires the State Council on Developmental Disabilities to develop a Transition Plan (Plan) along with four subsequent annual reports through 2027.

The State Council on Developmental Disabilities (SCDD) and Disability Rights California (DRC) co-sponsored SB 639 and continue to prioritize employment equity through the implementation of the bill and beyond. The passage of SB 639 compels California to transition the 6,000 people with disabilities working under the subminimum wage program into Competitive Integrated Employment (CIE) and to increase employment across the disability community.

This report, the first of five, provides the Plan. SCDD has gone to great lengths in gathering feedback from all, including self-advocates, family advocates, experts in the field, professionals, service providers, and other community members. These efforts illustrate that the Plan is truly collaborative, transparent, and well-informed.

- The Plan presents the culmination of robust information gathering which includes
- The legislative process in 2021.
- SCDD's formal stakeholder process in 2022 (i.e., four 3-hour meetings, over 30 members, open to the public).
- Ongoing consultation with national and California state subject matter experts.
- Community conversations conducted across the state;
- The responses from the community via a letter-writing survey, and
- SCDD's SB 639 website which includes an active recommendations portal welcoming public feedback.

The letters we received reflect the vast perspective, lived experience, and expertise shared with us and are included in the report's appendix. Widespread stakeholder participation created the SB 639 report content, but the attached report does not represent an agreement among collaborating agencies.

This Plan articulates, summarizes, and prioritizes key recommendations offered and evaluated during the stakeholder engagement process. Fundamentally, ensuring this

policy's effective implementation requires attention to critical multi-agency collaboration and planning, as well as outreach, education, and support to employees (i.e. 14(c) participants) and employers.

The Plan identifies and elaborates upon several actionable recommendations that the Administration and the Legislature should consider. The recommendations are categorized and include:

- Advance state agency collaboration for planning, accountability, and data gathering.
- Develop rate structures that equitably support the needs of all seeking vocational support services.
- Fund work incentives benefits consultation.
- Finance and build a network of job developers and job coaches.
- Mandate CIE concepts and related curriculum in educational settings.
- Identify solutions for transportation barriers and challenges for employees.
- Fund and establish a CIE Pilot to illustrate best practice job development strategies and job retention supports.
- Develop and disseminate effective and appropriate outreach, guidance, technical assistance, and educational materials that reflect lived experience, and successful case studies that inform and incentivize both employees and employers.

As policymakers consider the Plan, please be assured that informed and committed self-advocates, family advocates, employment advocates, service providers, and members of the SB 639 Stakeholder Workgroup are eager and available to discuss the Plan, its findings, and recommendations.

We are confident that you share our belief that employment equity and the effective transition for employees from subminimum wage to competitive integrated employment is, as Senator Durazo noted, a civil rights issue.

The path forward is complex but achievable and we welcome your engagement.

TRANSITION PLAN TO PHASE OUT SUBMINIMUM WAGES: SB 639 (2021, Durazo)

Background

Senate Bill 639 (2021, Durazo)

SB 639 prohibits a worker with a disability from being paid less than the legal minimum wage (subminimum wage) starting January 1, 2025. Prior to SB 639, federal and state law allowed employers to pay people with disabilities less than the minimum wage and subjected them to segregated work settings via use of subminimum wage certificate programs. To guarantee any employee with a disability the minimum wage by January 1, 2025, this bill requires the development of a plan to phase out the use of the subminimum wage certificate program and increase access to opportunities for 14(c) participants to achieve competitive integrated employment.

SB 639 addresses a civil rights issue – by eliminating an unfair labor practice that began decades ago for people who have disabilities. A vocational rehabilitation service industry, low employability “expectations/potential”, and funding mechanisms evolved over time to institutionalize 14(c) subminimum wage programs and sheltered workshops that are segregated. Federal programs, state agencies, school systems, and community programs collaboratively reinforced the framework of subminimum wage—and will need to collaboratively dismantle it in the State of California.

The federal definition of Competitive Integrated Employment (CIE), which includes self-employment and microenterprise follows:

The Workforce Innovation and Opportunity Act (WIOA) defines competitive integrated employment (CIE) as work that is performed on a full-time or part-time basis for which an individual is:

- Compensated at or above minimum wage and comparable to the customary rate paid by the employer to employees without disabilities performing similar duties and with similar training and experience;
- Receiving the same level of benefits provided to other employees without disabilities in similar positions;
- At a location where the employee interacts with other people without disabilities; and
- Presented opportunities for advancement similar to other employees without disabilities in similar positions

Stakeholders maintain that for CIE to succeed, policy change and centralized statewide leadership is needed. Meaningful change is not the responsibility of one agency alone. Agencies like Department of Developmental Services, Department of Rehabilitation, California Department of Education, Post-Secondary education entities, Medi-Cal

Behavioral Health Division (MCBHD), Department of Industrial Relations/Apprenticeship, American Job Centers, Workforce Development, and others must collaborate to support people with disabilities, share data, and establish sequential funding pathways.

Purpose of Report

This report contains transition plan recommendations to phase out subminimum wages—developed by SCDD in consultation with various stakeholders and state agencies, which include the Department of Rehabilitation (DOR), Department of Developmental Services (DDS) and others. The phase out report must include the following:

- Planned benchmarks to achieve outcomes of the plan
- Resources or recommendations for funding necessary to implement the phase out
- Input from people with developmental disabilities who have experience working for subminimum wage and different stakeholder organizations
- Road map for applying to and using all federal funding programs
- Data collection and reporting requirements for tracking outcomes for the individual employees with disabilities who are transitioned out of subminimum wage employment

California's Employment Landscape for People with Disabilities

California has been an Employment First state since 2009. AB 1041 (Chesbro) was signed by Governor Brown on October 9th, 2013 and created the Employment First Policy and continued the Employment First Committee with updated responsibilities. The policy states,

“It is the policy of the State of California that opportunities for integrated, competitive employment shall be given the highest priority for working age people with developmental disabilities, regardless of the severity of their disabilities.”

The California integrated competitive employment system for people with intellectual/developmental disabilities is complex, underdeveloped, and fragmented across siloed government departments. Some of these Departments have stakeholder committees designed to inform state policy and practice. These committees cover similar content and often include the same departmental or community representatives. The committees do not consistently share stakeholder input or project outcomes with one another or the broader stakeholder community. Committee representatives are not often subject matter experts or government departmental decision makers. This lack of cohesion is not due to design but lack of strategic alignment and diffusion of responsibility among diverse participants associated with different departments.

Often, recommendations from these committees are not used or take years to implement. Best practice and innovation identified during pilots is not consistently shared to support knowledge acquisition and capacity building. Requests for data amongst governmental partners are made frequently but data is not provided in a timely manner and the data set is often flawed due to regional variation in the use of sub codes and different service/outcome definitions by regional centers and other vocational service funding sources like grants.

More regional and statewide exploration of the 14(c) population is needed to formulate effective transition planning. The complex demographic characteristics of California's 14(c) population are not fully understood. This diverse group is made up of people who have different types of disabilities, different support needs, intersectional identities, and unique cultural influences which will factor into the provision of individualized vocational services. However, the majority in CA are people with an intellectual/developmental disability.

California's Intellectual/Developmental Disabilities system is unique. The size of the population, the vast geographical area it covers, and the diversity of the population are unlike any other state and brings its own challenges to delivery of employment services. Additionally, due to the Lanterman Developmental Disabilities Act, California is an entitlement state for Intellectual/Developmental services and often serves higher numbers of people who have disabilities than other states. As of December 2021, the Department of Developmental Disabilities reports serving 371,687 people. Regardless of California's uniqueness, much can be learned from other Employment First states that are changing policy and practice to ensure all people who have disabilities can work in competitive jobs aligned with their interests and abilities.

Nationally, the percentage of people using day services through state Developmental Disability systems that are receiving an employment focused intervention is 22%, with California's figure an even lower 13% (FY 2020 figures through *statedata.info*). According to Department of Developmental Services DDS data, 2,825 consumers participated in Work Activity Program (WAP) in FY21/22. DDS defines WAP as: services through the regional centers that include paid work, work adjustment and supportive habilitation services typically in "sheltered workshop" settings. Data from DOR indicates that 6,087 people who have disabilities are engaged with eighty subminimum wage 14(c) providers across the 8 California regions as of September 2022.

Though many new employment incentives have been created by DDS, disincentives for continuing activities like group work, which is not proven to lead to CIE, have not been introduced. Furthermore, the incentives and data collection are not designed to discover and amplify new and innovative practices leading to CIE. The funding and service utilization tracking system is ineffective because providers use a variety of non-vocational and vocational billing codes to implement supported employment services. DDS vocational sub codes are available but variations in the way Regional Centers use

them exist. This variance and ambiguity in code application makes it impossible to assess cost savings and individualized service combinations leading to successful vocational outcomes for people who have different support needs. As illustrated below, DDS data shows extreme variations in the 21 Regional Center employment outcomes. While some regional centers have over 150 CIE placements, others have as little as 10. While some regional centers have over 300 Paid Internship placements, some have less than 11.

REGIONAL CENTER RANGE OF INCENTIVE PAYMENTS

** IN ACCORDANCE WITH DDS DATA DE-IDENTIFICATION GUIDELINES, COUNTS UNDER 11 HAVE BEEN SUPPRESSED TO PROTECT PRIVACY.*

YEAR	PAID INTERNSHIP PROGRAM (PIP)	COMPETITIVE INTEGRATED EMPLOYMENT (CIE)
2020-2021	PLACEMENTS 0-166	PLACEMENTS 13-157
	PAYMENTS 0-\$475,624	PAYMENTS \$16,750-\$266,000
2021-2022	PLACEMENTS *-315	PLACEMENTS 10-176
	PAYMENTS \$26,054-\$1,286,207	PAYMENTS \$35,500-\$610,330

However, existing data does not illustrate the reasons for variation, which may include ineffective vocational engagement, lack of customized employment providers, inability of providers to find and maintain a skilled workforce and job availability. Further analysis will help determine underlying causes and help create informed solutions. Selective standardization of employment related processes and value-based purchasing for regional centers and their vendors supports uptake of best practice. For example, the creation of a best-practice, standardized employment engagement survey/satisfaction survey by DDS that is required bi-annually for Regional Center clients. This would ensure that all Regional Centers are presenting vocational service options, introducing benefits counseling/work incentives resources, and providing examples of people who have disabilities successfully working in diverse CIE positions.

When pilots to explore effective employment services occur, transparency in outcomes and broad community learning does not follow. Pilot parameters do not consistently require best practice and or evidence-based practices, capacity building and sustainability.

California stakeholders have mobilized to share ideas and concerns regarding employment services for people who have disabilities prior to and during SB 639 planning. The topic of 14(c) phase out is contentious and strong feelings regarding safety, security, social connections, adequate funding, service sector skillset and historical service structure exist. SCDD designed the stakeholder engagement process informing this report (detailed in the next section) in an inclusive manner to illustrate

diverse perspectives. Regardless of personal beliefs on 14(c) subminimum wage phase out, the statistics on employment for people who have disabilities in California indicate that existing policy, CIE engagement efforts, training, and funding strategies are not significantly increasing the percentage of people who have disabilities in competitive integrated employment. Only 13 percent of people participating in day services overall are considered served under an employment service.

Annual Disability Statistics Compendium-California Statistics on Employment

Year	People with Disabilities	People W/O Disabilities	People with Cognitive Disabilities
2015	32.7%	71.1%	22.1%
2016	33.3%	72.2%	21.9%
2017	33.8%	73.1%	23.2%
2018	36.9%	75.0%	26.2%
2019	36.9%	75.6%	26.0%
2020	36.5%	72.3%	27.5%

Current Inter-Agency Framework for Services

Many collaborative advances have been made and new stakeholder resources exist. One such resource is the *California CIE Blueprint* created by The California Department of Rehabilitation, California Department of Education, California Department of Developmental Services, and other stakeholders like Disability Rights California. The purpose of the Blueprint is to help Californians who have disabilities better prepare for and participate in CIE. The Blueprint confirms improved departmental collaboration and significant progress by way of local partnership agreements. Smart goals like reduced referral and participation in unintegrated 14(c) subminimum wage environments, data transparency and written guidance are also part of the Blueprint recommendations.

Other helpful resources include:

- The Roadmap to Competitive Integrated Employment details how people receiving regional center services can access employment opportunities. This roadmap starts at the age of twelve to ensure that collaborative planning for CIE begins early.
- The CIE Toolkit-Provides tools and resources like webinars to help people who have disabilities, and their families make decisions about CIE. Resources for providers of supported employment and customized employment are also provided.

Significant improvements in collaboration in California include interagency agreements which launch new initiatives and create a deeper understanding of interrelated services for transition aged youth. The state’s educational system, through an interagency

agreement between the Departments of Education (CDE), Employment Development (EDD), and Rehabilitation (DOR), as authorized by Education Code (EDC) §56470-74 and administered by the CDE, provides work experience and marketable skill-building opportunities for special education students through the WorkAbility I (WAI) program. In conjunction with community-based employers, WAI allows students to continue academic programming while supplementing classwork with on-the-job training and employment opportunities, based on goals and objectives within each student's IEP/ITP.

Meaningful change is illustrated through a total of 36 Local Partnership Agreements (LPA). WAI programs are currently operational in 55 of California's 58 counties, with 269 project sites located within 1,668 local educational agencies (LEA) statewide (CDE, 2019, WorkAbility I; SCO, 2020, p. 54; CDE, DOR & DDS, 2019, p. 4). DOR's California Committee on Employment for People with Disabilities (CCEPD), explored the LPA's promising practices leading to competitive integrated employment and created a resource to help other LPAs increase outcomes.

California government departments are working together to expand access to CIE. The following agencies and initiatives represent a fraction of CA stakeholders and concurrent Employment First related initiatives. The list demonstrates how many systems and groups are involved. Though there is a need for some redundancy as departments seek to address employment through their specific jurisdiction, consolidation and improved coordination across the systems will substantially improve statewide outcomes. The current level of departmental representation overlap in duplicative entities is costly, inefficient, and unsustainable. The list below is just a sample; one stakeholder group counted 70 current and active efforts.

Current Employment Efforts

State Council on Developmental Disabilities

- Employment First Committee (Statutorily mandated-DOR, DDS, DRC, CDE, UCED, Self-Advocates, Family Members)
 - Data Workgroup
- Employment Disability Expert Advisory Panel

Disability Rights California

- Coalition of Californians with Disabilities (DOR, SCDD, Workforce, Regional Centers, UCED, Provider Agencies, Self-Advocates)
- WIPA
- Client Assistance Program

Department of Rehabilitation

- California Committee on Employment of People with Disabilities (SCDD, DOR, DDS, Workforce, Self-Advocates)
 - Employment and Training Subcommittee

- State Coordination Subcommittee
- Youth Leadership Forum
- State Rehab Council

Department of Developmental Services

- Employment Workgroup (SCDD, CDE, DOR, Provider Agencies, Self-Advocates)
- Quality Incentives Workgroup

California Department of Education

- Local Partnership Agreements

Workforce Development Boards

Association of People Supporting Employment (APSE)

American Job Centers

Department of Industrial Relations

- California Apprenticeship Council,
 - Interagency Advisory Committee on Apprenticeship (DOR, SCDD)

Priority Recommendations - Highlights

This section of the report provides a synopsis of stakeholder engagement methodology, stakeholder recommendations on best practice, challenges in the current competitive integrated employment services system and possible solutions. Widespread stakeholder participation created SB 639 report content, but the report does not represent an agreement among collaborating agencies.

This section is designed to highlight local stakeholder recommendations and further substantiate them by connecting them to related guidance and implementation strategies from National Best Practice identified by:

- Federal Office of Disability Employment Policy (ODEP) Initiatives
 - Employment First State Leadership Mentorship Program (EFSLMP)
 - National Expansion of Employment Opportunities Network (NEON)
- State Exchange on Employment & Disability (SEED)

SB 639 Stakeholder Group Process & Community Engagement

The State Council on Developmental Disabilities designed a multi-pronged approach to stakeholder engagement and subject matter consultation. SCDD curated several

opportunities for community engagement. Inclusion and transparency in process and outcomes were guiding principles in design.

- SCDD created a web page to post stakeholder session notes, success stories, resources and Community Conversation Outcomes. See: [SB 639 Home | SCDD \(ca.gov\)](#)
- To optimize participation SCDD created multiple modalities to share information including: SB 639 Core stakeholder group, regional community conversations and a letter writing survey with recommendations from the community, (see *Letters from Community* attached in Appendix A)

SB 639 cosponsors identified approximately 30 diverse people representing government departments, supported employment providers, self-advocates, family advocates, trade groups, and advocacy agencies to serve on a core stakeholder group. SCDD pursued employer involvement but could not secure employer representation. SCDD staff and self-advocates implemented an application and applicant review process for self-advocates to participate on the core stakeholder group. The only requirements for participation were identification as an individual who has disabilities and lived experience in 14(c) settings. Four SA stakeholders were paid \$20 per hour to share their lived experience with 14(c).

To ensure broad, regionally informed stakeholder participation outside of the core stakeholder group, SCDD regional offices facilitated community conversations in various languages. Stakeholder concerns and ideas for successful transition from 14(c) service provision were synthesized and presented to the core stakeholder group for consideration. The community conversation results are also posted on the SCDD website.

Several California based Subject Matter Experts (SMEs) from government agencies, Supported Employment Provider Agencies, trade groups and CIE advocacy groups participated in the core stakeholder group. California benefits from diverse and rich knowledge capital in competitive integrated employment.

SCDD strove to engage this local expertise as well as enlist National Employment First Subject Matter Experts (SMEs). National SMEs Doug Crandell and Amy Gonzalez were accessed via the Administration for Community Living and Administration on Disabilities' Disability Employment Technical Assistance Center. Additionally, SCDD initiated a contract with SME Joe Marrone to inform and provide resources for the SB 639 Legislative Report. National SME inclusion is beneficial in that it helps state level SMEs consider best practice innovations from other states, avoid transformation and implementation pitfalls, and allows for analysis and constructive criticism from diverse perspectives.

The stakeholder group made many recommendations, some of which are included below. The entire list of recommendations can be found in Appendix C. Recommendations on Interagency Collaboration, Transition, Employment Supports, and Benefits Counseling are the same or similar to recommendations made in the first

Employment First Committee Report submitted in 2011. They represent an urgent call for meaningful action and highlight California's inability to significantly increase the percentage of people who have Intellectual/Developmental disabilities who are working in competitive integrated environments.

SB 639 Stakeholder Workgroup Recommendations by Category

State Agency Structure-Collaboration for Tracking and Data-Gathering

1. Support interagency collaboration by creating a dedicated Employment First executive leader position outside of core implementation agencies. This individual must lead statewide efforts to reduce redundancy, guide strategic planning, and enforce accountability. Similarly, Employment First and 14(c) information must be centrally located and easy to access rather than diffused across several entities. For optimal effectiveness, cross-departmental Employment First (E1) efforts must be staffed with informed decision makers and be integrated with initiatives covering similar content. Ideally, California should condense its E1 related groups to enhance efficiency. Any group designed to support CIE access and E1 implementation must be equipped for statewide oversight and cross departmental collaboration.
2. Strategically design data systems across agencies to support data collection and sharing for seamless transition of 14(c) participants. Track, analyze, and publicize code utilization as well as vocational outcomes across the system. Ensure uniform interpretation and implementation across the 21 regional centers.

Funding

1. Leverage existing policy, funding, technical assistance, and services like HCBS, LTSS, and Self-Determination to support awareness and services for the transitioning 14(c) population. State agencies and employment providers must prioritize application to CIE related grant opportunities like ODEP's NEON grants.
2. DOR and DDS must develop a clear billing code/codes to support the delivery of individualized, promising and evidence-based customized employment services. Vocational code rates must be the same or higher as other individualized service delivery rates and address acuity of disability so no disincentive to serve people who have high support needs is created. Pathways for sequential funding and care coordination for shared 14(c) participants is needed.
3. DDS should fund a time limited (4/1/23- 1/1/26) statewide TA Center. The development of communities of practice where providers can share innovation, challenges, and solutions is needed.

Family Engagement

1. Provide all 14(c) participants and their families with work incentives benefits counseling to encourage transition. Share robust information on financial planning tools and resources like CalABLE.

Program Design

1. Provide Job Developers and Job Coaches for people who have disabilities with training in best practices that optimize job seeker independence and leverage transferable skills to meet employer needs.
2. The California Department of Education must require the introduction of competitive integrated employment concepts and prevocational curriculum across all school districts as early as possible but no later than 14. CDE, DOR, and DDS must collaborate and provide clear guidance on funding and access pathways for employment and education related services for Transition Aged Youth to support seamless transition to competitive integrated employment and or post-secondary education.
3. Develop an acuity-based CIE Pilot-The stakeholder group recommends funding a pilot that requires the use of best practice job development strategies, systematic evaluation, and enhanced job retention supports for people who are in 14(c) settings. The pilot awardee will also be responsible for implementing a tiered payment structure based on acuity to ensure those who have the most significant support needs are served. Outcomes of the pilot will be shared publicly, and the awardee will need to identify a sustainability plan that leverages braided funding. A structured pilot framework exists and has been presented within the SB 639 stakeholder workgroup.
4. Government departments should optimize opportunities like Limited Examination and Appointment Program, State Internship Program (LEAP, SIP). Providers of employment services must recruit and hire people with disabilities in a variety of roles including employment service interventions (employment specialists, job coaches, peer mentors, etc.) Sharing lived experience with disability employment experiences is essential. Peer support and mentorship are effective engagement tools.
5. Government departments, regional centers and providers of employment services must source, develop and broadly disseminate diverse 14(c) to CIE transition case studies for employers, family members, people who have disabilities and educators. These case studies must be culturally diverse, in multiple languages, easily accessible and appeal to multiple learning modalities.
6. Conduct a transportation gap analysis to understand transportation access barriers and possible solutions to those barriers for people in 14(c).
7. Through measures such as grants, technical assistance or tax credits, The State of California, DOR and DDS must incentivize and support employers who are engaging in disability inclusive hiring efforts. Via case studies, quantify benefits to employers across industries and educate employers on business bottom line benefits of inclusive hiring and provide support throughout the employment lifecycle. Develop a marketing campaign to increase awareness of benefits.

BENCHMARKS *

1. Assuming there is baseline data available there should be a goal of 100% direct employment staff being certified under some existing national standard (e.g., ACRE, CESP) by 1/1/25
2. Whatever the current numbers of clients working under 14(c) waiver, that number should be at least halved by 1/1/24 and as the legislation requires totally down to 0 by 1/1/25
3. Communication plans should be formalized no later than 4/15/23
4. DDS, DOR, and each of the RCs should develop an agency transition plan by 4/1/23
5. Develop a “model” employment services contract that DDS and RCs can use as a suggested template even though not mandated by 6/30/23
6. Create a centralized data collection system overseen by whatever entity is selected as designated overseer of phase out by 9/30/23
7. Agency formal internal analysis and report of the potential impact of the current rate structure and incentive payments on achieving SB 639 goals by 4/1/23
8. System-wide CIE goals should include a minimum of 20 hours of work per week. This does not mean that CIE services should not be individualized. Those seeking to work less hours are still served. However, one measure of successful Employment First systems change is community-based work for a significant number of hours. This enhances financial security and ensures that tertiary employment benefits like increased self-esteem, improved confidence and socialization opportunities occur.
9. A community of practice with regularly scheduled meetings supporting CIE transformation and expansion of services should be operationalized by 6/1/23.
10. Early adopter sites piloting various strategies should be in place by 7/1/23. Even if the legislature does not create a separate line item this does not preclude DDS or DOR from creating innovative models using their existing funding structures.

*Detailed analysis of associated partner data is needed to expand recommended benchmarks.

SB 639 Workgroup Recommendations with Implementation Guidance

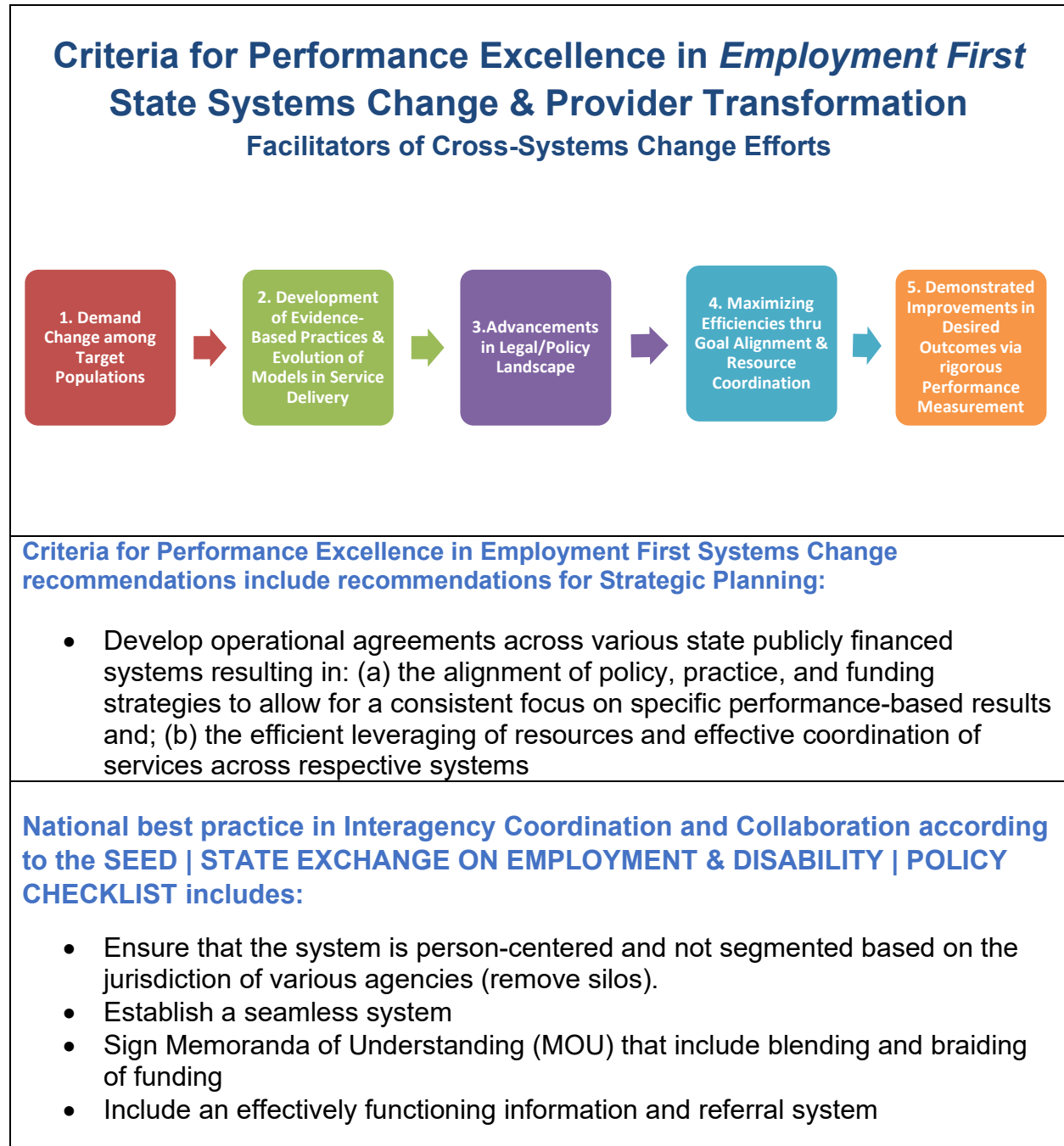
In this section of the report, CA Stakeholder recommendations are compared with National Best Practice Recommendations from several publications which further explore Employment First Policy and Practice implementation guidance.

Interagency Collaboration

The stakeholder group recommends that State Agencies Leverage existing policy, funding, technical assistance, and services like HCBS, LTSS, and Self-

Determination to support awareness and services for the transitioning 14(c) population.

A national subject matter experts consulting with California states that, “The responsibility for implementing SB 639 successfully must transcend any one agency and ultimately is an overall state executive function responsibility. Nonetheless it is incumbent on several key service systems to ensure that their contributions to the process are significant.”



SEED (State Exchange on Employment & Disability) WORK MATTERS- A Framework for States on Workforce Development for People with Disabilities, indicates that:

States can implement policies that optimize resources and services through interagency coordination, collaboration and blending/braiding of funding, and implementation of robust performance measures.

- A. Support policy alignment, collaboration, coordination and braiding/blending of funding and services across all relevant state systems to facilitate competitive integrated employment for people with disabilities, including people with the most significant disabilities, through Employment First initiatives adopted through legislation and/or executive orders
- B. Enhance cooperation and collaboration among state human resources and state agencies that work with people with disabilities by formalizing partnerships
- C. Expand and improve community linkages among organizations engaged in increasing employment opportunities for people with disabilities.
- D. Facilitate collaboration and coordination between federal, state and local educational agencies and state vocational rehabilitation programs, job training, workforce development systems, etc., regarding the design and implementation of career readiness and career development programs, ensuring they are person-centered and disability-inclusive (taking into consideration local control in some states).
- E. Support existing job coach programs and identify funding sources for expanded supports for traditional employee placements and entrepreneurial efforts.
- F. Develop an accessible one-call, one-click system within state governments to offer information and resources to assist and match people with disabilities with appropriate transportation and other services.
- G. Establish or improve reporting mechanisms to measure success of program(s) and drive quality improvement.

Service Coordination

Best Practice in Service Coordination according to the SEED | STATE EXCHANGE ON EMPLOYMENT & DISABILITY | POLICY CHECKLIST includes:

- Provide service coordination to assist people in receiving necessary services when a comprehensive array of services is required, and such services are provided or paid for by multiple agencies

An example of functional Employment First cross-systems collaboration is found in the State of Illinois. Illinois has an Executive Order (14-08) that requires the participation of multiple state agencies to fully implement Employment First across the State. The state agencies include: the Department of Human Services, the Department of Healthcare and Family Services, the Department of Commerce and Economic Opportunity, the Department of Employment Security, the Department of Central Management Services,

the Department of Labor, the Department of Veterans' Affairs, the State Board of Education, the Board of Higher Education, the Community College Board, and the Council on Developmental Disabilities. The Order requires the above agencies to look at everything from policies to funding to partnerships all focused on the goal of integrated employment for people with disabilities.

Lack of collaboration can result in disjointed and disconnected services that result in inefficient delivery of services and frustrate people when they try to access services.

Monitoring & Enforcement

The stakeholder group recommends that a dedicated Employment First staff member outside of the core implementation agencies (DOR & DDS) must be hired by HHS or placed in the Governor's Office to lead statewide disability employment efforts in order to reduce redundancy, guide strategic planning, and enforce accountability.

Additionally, DDS and DOR could appoint a joint statewide Employment First/ SB 639 coordinator to funded TA centers, the UCEDD network, or state specific training/ TA contracts that could monitor implementation of overall employment goals and elimination of any use of 14(c) waivers in the state by the 1/1/25 deadline. This coordinator should be expected to link with a designated person at each of the RCs to monitor compliance with SB 639 progress and identify system wide training or TA needs for staff that could be funded in a variety of ways.

Best Practice in Monitoring & Enforcement according to SEED | STATE EXCHANGE ON EMPLOYMENT & DISABILITY | POLICY CHECKLIST includes:

Include a process for government agencies to review policies, practices, procedures, and implementation, and enable agencies to respond to findings in a timely and effective manner.

This includes:

- Preparing monitoring instruments;
- Conducting monitoring reviews;
- Issuing reports;
- Requiring corrective action;
- Imposing sanctions; and securing remedies for people.

Data

The stakeholder group recommends the strategic design of a comprehensive data sharing system across agencies to support efficient program tracking. Track, analyze, and publicize service code utilization as well as vocational outcomes across the system. Ensure uniform interpretation and implementation across Regional Centers.

Various data sources on employment for people who have disabilities exist. One example is the Base wage file provided to DDS by the California Employment Development Department. Employers report these earnings but existing exclusions in data collection limit the effectiveness of the data file as a comprehensive illustration of employment outcomes for people who have disabilities in California. Though different departments and agencies gather different types of data, most is not readily shared with other agencies and creates challenges when interpreting information to evaluate implementation of services.

Many Regional Centers collect more comprehensive qualitative and quantitative employment data elements in addition to those required by DDS but they are not synthesized and disseminated. Many stakeholders suggest that expanded data points will improve the quality and effectiveness of vocational services while allowing for more complex analysis and oversight.

National best practice in Outcome Performance Measures; Information and Data Collection System according to the SEED | STATE EXCHANGE ON EMPLOYMENT & DISABILITY | POLICY CHECKLIST includes:

- Collect and provide necessary data and information for public agencies to provide for continuous quality improvement and for the legislative branch to carry out its funding and oversight responsibilities (measures should facilitate, not impede achieving policy goals and disaggregate data based on disability).
- Provide outcome performance measures that include: Standards and performance indicators that reflect the expected outcomes for recipients with disabilities; sanctions for failure to meet expected outcomes; and rewards for exceeding expectations.

Regarding data, Criteria for Performance Excellence in Employment First Systems Change recommendations include Measurement, Analysis and Knowledge Management

- Create shared performance-based outcomes and metrics across state government entities that incentivize coordination of public resources, collaborative service delivery and funding strategies, and also capture tiered stages of development and success across systems.

- Link data collection systems across state government entities through the development of a unique identification system (to track impact of public investments at individual level over time).
 - Development of high-impact, relevant data to help inform continued public policy reform, operational practice updates, and funding alignment strategies.
- High-impact knowledge translation through continued commitment to training, technical assistance, professional development and communities of practice.

Results

- Review trends in outcome data with respect to integrated employment outcomes of people with disabilities, including: setting, average hours worked, average wages, public benefits received, advancement, and retention (length of work period).
- Align performance tracking of employment services with other long-term supports (housing, transportation, natural supports) and benefits planning/work incentives.
- Track impact of enhancing reimbursement of effective practices on service delivery and outcomes.
- Demonstrate cost-effectiveness of integrated employment supports through maximization of natural workplace supports, assistive technology and job customization.

Document alignment of policies, funding priorities, and practice recommendations to reflect emphasis on integrated employment service delivery.

Funding

The stakeholder group recommends that DOR and DDS develop a clear billing code/codes to incentivize the delivery of individualized, promising and evidence-based customized employment services. Vocational code rates must be the same or higher as other individualized service delivery rates and address acuity of disability so no disincentive to serve people who have high support needs is created.

Successful CIE implementation requires sequential funding from different Departments who serve the same people throughout the employment lifecycle. This may require MOU creation and demands data sharing and a shared understanding of Departmental roles/authority, CIE terminology and statewide interagency goals.

Stakeholders recommend creating a system that supports job seekers with disabilities from discovery of vocational interests and abilities to job obtainment, job retention and advancement via sequential funding. This is a complex task that must optimize federal and state funding while prioritizing sustainability rather than short term financial incentives. Extensive training within Departments, Regional Centers and external providers will need to be developed and made available.

State agencies and employment providers must prioritize application to CIE related grant opportunities like ODEP's NEON grants.

California, like other states should attempt to use more recent provisions under Medicaid such as the 1915i state plan amendment or an 1115 waiver authority to effect service interventions that are more successful in assisting people with significant disabilities to seek and obtain CIE.

Develop and fund CIE pilots, including an acuity-based pilot: The stakeholder group recommends funding a pilot that requires the use of best practice job development strategies, systematic evaluation, best practice payment structures (such as paying for hours worked versus hours coached), and enhanced job retention supports for people who are in 14(c) settings. The pilot awardee will also be responsible for implementing a tiered payment structure based on acuity to ensure those who have the most significant support needs are served. Outcomes of the pilot will be shared publicly, and the awardee will need to identify a sustainability plan that leverages braided funding. A structured pilot framework exists and has been presented within the SB 639 stakeholder workgroup.

***Note: For Current Work on Incentives: (see different sections)**

- While there needs to be an increased use of the Supported Employment funding mechanism as one indicator of CIE, this is not a totally reliable success measure without an accompanying focus on outcomes
- **SCDD** applied to the NEON grant with signatures of support from DDS and DOR on 12/27/22.
- DOR successfully obtained the federal Department of Education disability innovation fund demonstration and research grant with supporting MOUs from DDS and SCDD . This grant titled, the California Subminimum Wage to Competitive Integrated Employment Project (CSP), began in October of 2022. **See DOR Input Section for additional information.**
- DDS has added CIE incentives. **See DDS Input Section for additional information.**

Criteria for Performance Excellence in Employment First Systems Change recommendations include recommendations for

- Ensure existing and future contractual agreements among state government entities, provider networks and/or service delivery partners reflect the state’s Employment First goals and objectives.
- Align reimbursement and rate structures to augment competitive, integrated employment outcomes.

National best practice in Outcome Performance Measures; Reimbursement Schemes & Financing Systems according to SEED | STATE EXCHANGE ON EMPLOYMENT & DISABILITY | POLICY CHECKLIST includes:

Reimbursement Schemes

- Provide for risk adjustment for serving those with significant disabilities requiring more intensive, on-going services and supports (prevent nonrandom selection of participants).

Financing Systems

- Ensure that the system for financing the services and supports facilitates the precepts, goals, and core policies.
- Use waiting lists as a management tool to achieve objectives, not to unreasonably delay achieving stated objectives.
- Take advantage of existing funding sources, particularly Federal funding sources and waivers.

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- Provide greater flexibility in service definitions and funding. This includes changing and adding service definitions to promote emerging use of virtual supports that result in employment outcomes.
- Make permanent funding for virtual supports and a new mix of virtual vs. in-person supports. During the pandemic, many states made it possible for provider agencies to be reimbursed for services and supports provided by phone or two-way video, in addition to in-person supports. This flexibility, adjustment of service definitions, and funding of a mix of virtual and in-person should continue for the foreseeable future. In addition, emerging funding strategies for virtual supports should be documented and disseminated.
- Create new incentives for fully integrated and personalized or customized supports. With many congregate settings presently closed or reduced, incentivize personalized and integrated supports. This is especially important given HCBS integration expectations, now expected in 2023.
- Increase funding for access to technology (smart phones, tablets, etc.) for people with disabilities and employment support personnel. During the pandemic, it became clear that many people with disabilities do not have

access to effective communications and internet technology. It was also discovered that employment support personnel may not have up-to-date technology devices to provide virtual supports. Funding sources should seek ways to pay for such devices and technology for people with disabilities and employment support personnel. Improvements in the use of technology requires both access to available technology and support to develop fluency in usage. This is true for people with disabilities and employment support personnel.

- Need for systems changes to allocate and increase funding for Direct Support Professional (DSP) wages. Provider organizations have been experiencing unprecedented challenges recruiting and retaining DSPs due to low reimbursement rates. Private sector jobs are raising wages significantly to attract workers during the pandemic workforce shortage and human service organizations have difficulty competing. This is having a significant impact on their ability to provide individualized, flexible services.

Training/Personnel & Human Resource Development

The stakeholder group recommends that the state incentivize and assist with funding training for Job Developers and Job Coaches in best practices that optimize job seeker independence and leverage transferable skills to meet employer needs.

The stakeholder group recommends that government departments and state agencies and providers of employment services must recruit and hire people with disabilities in a variety of roles within employment service interventions (employment specialists, job coaches, peer mentors, etc.)

The stakeholder group recommends cross-training Direct Service Professionals on CIE concepts as they often help employees prepare for work shifts, connect with transportation and build relevant skills.

Job Developers and Job Coaches for people who have disabilities require training in best practices that optimize job seeker independence and leverage transferable skills to meet employer needs. Service providers often experience high turnover and cannot afford to consistently fund this training. Current staff employment issues include recruitment, onboarding, and retention.

Job developers who help people that have significant disabilities find and maintain employment require complex training in Customized Employment and other evidence-based interventions. These interventions require advanced interviewing skills, labor market analysis, developing sector specific vernacular, and the ability to work with employers to identify unmet operational needs.

Job developers also require strengths-based assessment skills, knowledge of job accommodations, assistive technology, and methods to create a culture of inclusion at work sites. Additionally, job developers must be proactive, creative thinkers who seek

out microenterprise/entrepreneurship, career laddering and professional development opportunities for people who have disabilities.

Creating a training methodology informed by existing credentials and certifications like ACRE and the CESP for supported employment professionals will help match job seeker skills and abilities with customized positions. The stakeholder group suggested ways to incentivize training including, creating career pathways, paying for time staff is involved in training, archiving training on a learning management system for flexible access and enhanced reimbursement rates for providers who possess credential and certifications. This training coupled with ongoing skills building via a learning collaborative will enhance sustainability.

*Note: Both government systems and provider agencies currently have a major difficulty in recruiting and retaining qualified workers to serve people with disabilities, including in employment supports. These recommendations need to be optimized by connecting with existing plans or vehicles for recruitment, upward mobility and education for Direct Service Professionals in California.

Best Practice in Capacity Building/Training of Personnel according to the SEED | STATE EXCHANGE ON EMPLOYMENT & DISABILITY | POLICY CHECKLIST includes:

- Ensure that personnel who provide services and supports satisfy qualification standards to perform assigned tasks in an effective and efficient manner.
- Ensure personnel, including managers and supervisors, are knowledgeable about civil rights statutes and best, promising, and emerging practices by offering training and other learning programs.

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1. Continue to support and adequately fund CIE training, including requiring ACRE or CESP Certificates. States should prioritize and fund expanded training of employment support personnel.
2. Conduct an initial assessment to standardize skills, training, education requirements, and core competencies necessary to establish an occupational code to professionalize the support workforce, including Direct Support Professionals (DSPs).

Criteria for Performance Excellence in Employment First Systems Change recommendations include recommendations to upskill the workforce, develop technical assistance, and on-going learning opportunities.

State Systems Change:

Workforce Focus

- Provide resources to support long-term capacity building efforts that lead to a strong state infrastructure of qualified personnel and direct support professionals across all

relevant systems that are competent in the provision of effective practices that promote competitive, integrated employment outcomes for youth and adults with significant disabilities.

- Provide ongoing on-site and virtual access to comprehensive training, technical assistance, and hands-on experiential knowledge translation in the delivery of effective practices that lead to integrated work-based learning experiences and competitive, integrated employment outcomes.
- Consider accreditation/certification and provider contractual requirements that elevate the importance of professional development among system personnel and direct support professionals in the dissemination of effective practices.

Provider Transformation Workforce Focus:

- Realign organizational structure and standard operating procedures to allow the time, flexibility, and incentives required to develop professional staff in key areas critical to successful transformation.
- Ensure ongoing professional development, mentoring, coaching, and staff support promoting continued strengthening of skill sets critical for expanded business models.
- Optimize service time and ratio deployment for provision of long- term supports, crisis interventions, and new job starts within provider network.
- Consider incentives for staff to facilitate clear measurable performance outcomes for competitive, integrated employment and to effectively address individual and cultural resistance to change

Operations Focus

- Ensure existing and future contractual agreements among state government entities, provider networks and/or service delivery partners reflect the state's *Employment First* goals and objectives.
- Align reimbursement and rate structures to augment competitive, integrated employment outcomes.

Training is Not Enough, Ongoing Technical Assistance is Needed

The stakeholder group recommends that DDS and the CAL HHS fund a time limited (4/1/23- 1/1/26) statewide Technical Assistance TA Center with regionalized staff (broader regions than the current 21 regional center service areas (perhaps 6-7 to cover the state) to develop and provide or contract for statewide and regional trainings on the various models and approaches that might successfully assist people with disabilities achieve competitive integrated employment at prevailing wages.

State agencies and employment providers must prioritize application to CIE related grant opportunities like ODEP's NEON grants.

Best Practices: Criteria for Performance Excellence in Employment First Systems Change recommendations include recommendations for on-going learning opportunities.

- Translate high-impact knowledge through continued commitment to training, technical assistance, professional development and communities of practice.
- Ensure ongoing professional development, mentoring, coaching, and staff support promoting continued strengthening of skill sets critical for expanded business models.
- Promote ongoing professional development and mentoring of leaders within provider networks to cultivate a cadre of strong leadership capable and committed to the development of competitive, integrated employment outcomes and socioeconomic advancement for people with disabilities.
- High-impact knowledge translation through continued commitment to training, technical assistance, professional development, and communities of practice

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1. Create and sustain new Learning Communities and Collaboratives. In a time of crisis and rapid change, it is possible for LPOs to become isolated and lack information about effective new strategies and emerging innovations. NPOs I and State and national government should create structures of communication and sharing of emerging new ideas and knowledge. Currently, some states are working to organize virtual and online communities of practice for discussion and sharing of both new problems and new solutions.

Family & Self-Advocate Outreach and Engagement

The stakeholder group recommends several activities to help recruit, inform and engage people who have disabilities and their family members in Competitive integrated employment.

One suggestion is to provide all 14(c) participants and their families with work incentives benefits counseling.

The other is that government departments/agencies, regional centers and providers of employment services must source, develop and broadly disseminate diverse 14(c) to CIE transition case studies for employers, family members, people who have disabilities and educators. These case studies must be easily accessible and appeal to multiple learning modalities.

Research shows that the primary reason people who have disabilities do not pursue competitive, integrated employment is fear of loss of benefits. Accessible benefits information is integral to informed choice. Awareness of benefits consultation resources is low. Addressing fear and misinformation is necessary and can be achieved by expanding existing informational and educational resources offered via Disability

Benefits 101 (DB101), an informational resource website. Additional resources may include marketing tools, video tutorials, and statewide training opportunities. Target audiences are job seekers, employees, families, case managers, job developers and job coaches.

Family members and people who have disabilities report valuing and trusting the experiences of others with similar lived experiences more than other sources of information.

It is important to note that foundationally people with disabilities cannot make informed decisions when they are not fully aware of their options. No mandated information sharing methodology with consistent and clear Employment First messaging exists across the state. When different information pathways with different levels of knowledge and varied intentionality engage PWD in employment exploration, CIE interest will vary significantly. Neutral tone and motivational interviewing skills support self-determination and supportive decision making.

Best Practice in Family Engagement according to SEED | STATE EXCHANGE ON EMPLOYMENT & DISABILITY | POLICY CHECKLIST includes:

States can promote meaningful family engagement throughout the education and career development process for youth and young adults with disabilities.

- Encourage the development and adoption of comprehensive training for parents and families that provides them with the appropriate knowledge to support youth with disabilities in navigating the education and career development process.
- Afford families with children with disabilities, opportunities to serve as advisers in the design of career and workforce development programs and strategies.
- Engage families in education and career development planning to increase their capacity to better assist youth in navigating the career development process and maximize learning opportunities.

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1. Document and disseminate effective communication strategies with families about CIE. The need for new communication strategies with families and home support personnel have become apparent during the pandemic. This includes the need for new discussion about individualized and community focused employment opportunities and community based wraparound services.

2. Communicate about how congregation of people with disabilities is an integration issue (i.e., HCBS 2023), but now also a health and safety issue. Safety has become a more important topic in communication with people with disabilities and families in discussing congregate settings and CIE settings.

Transportation

The stakeholder group recommends that DOR, DDS and regional centers conduct a transportation gap analysis to understand transportation access barriers and possible solutions to those barriers for people in 14(c).

The transportation needs of the current 14(c) population are unknown. People who have disabilities often struggle with accessing reliable, affordable, and safe transportation to and from work.

A transportation gap analysis/ problem solving exercise is needed to understand transportation access barriers and possible solutions to those barriers for people in 14(c). California's regional diversity presents unique challenges for those in urban areas, and distinctly different challenges in rural areas. The stakeholder group recommends conducting a needs assessment to better understand these issues and identify potential solutions appropriate and effective for one's region, level of support needs, and employment goals.

SEED, State Exchange on Employment & Disability, WORK MATTERS, A Framework for States on Workforce Development for People with Disabilities, indicates that:

States are encouraged to ensure that transportation is widely available, reliable, affordable and accessible to people with disabilities in order to support access to the workplace.

A. States are encouraged to adopt policies that prioritize transportation options that are reliable and accessible for people with disabilities, as well as alternative strategies that address and mitigate challenges for people with disabilities.

B. States should encourage businesses to use government incentives and programs to offer shuttles and other transportation options for employees.

Transition

The stakeholder group recommends that the California Department of Education must require the introduction of competitive integrated employment concepts and prevocational curriculum across all school districts as early as possible but no later than the age of 14. CDE, DOR, and DDS must collaborate and provide clear guidance on funding and access pathways for employment and education related services for Transition Aged Youth to support seamless transition to competitive integrated employment and or post-secondary education.

Family members and students who have disabilities often report that they do not know their rights or employment options when developing their IEPs, transition, and employment plans. Many family members report that when they are searching for

employment services, they are bounced from DOR to schools to regional centers without an understanding of the process or how to access services. The Roadmap to Employment is a helpful new resource collaboratively created by CDE, DOR and DDS but many job seekers and family members are not aware of it and cannot locate it. These stakeholders report that schools and or state agencies indicate that age dictates who pays and provides for vocational services at what time. Regardless of this vague guidance, stakeholders indicate that they often reach out to one entity after being referred by another only to hear about complex funding mechanisms and bureaucratic interchange that they do not understand.

National Subject Matter Experts like Robert Leuking indicate that work-based learning (where people learn essential employment skills in real-world worksites while they complete job tasks) is the best predictor of adult CIE success. Unfortunately, most school-based educators and transition specialists state that they do not have knowledge of employer engagement techniques or bandwidth to develop work-based learning experiences for their students who have disabilities. Though national best practice suggests that community rehabilitation providers attend IEP meetings to assist with transition planning and seamless transition, no funding stream exists to support this practice. Furthermore, many students and family members do not know that they can ask and advocate for additional IEP participants.

SEED, State Exchange on Employment & Disability, WORK MATTERS, A Framework for States on Workforce Development for People with Disabilities, indicates that the following activities support students preparing for work:

Preparing for Work: consists of policy issues related to providing education and vocational training opportunities for youth and young adults with disabilities.

Education and Career Readiness. States can promote education and career readiness policies and strategies that expect and prepare youth those with disabilities to enter the workforce.

- A. Promote comprehensive education and career development plans that capitalize on youths' skills, abilities, and career and academic goals.
- B. Include youth with disabilities in a sustained, meaningful manner in the career readiness and development process, beginning at an early age.
- C. Strengthen the capacity of education and career development professionals to design and implement evidence-based, inclusive programs and strategies.

Skill Development and Job Exploration. States can facilitate skill development and job exploration opportunities, such as work-based learning, for youth and young adults, including those with disabilities, that align with education and career development planning and meet businesses' predicted workforce needs.

A. Expand the availability of inclusive work-based learning experiences where eligibility is not contingent on enrollment or participation in an educational program or institution.

B. Facilitate collaboration between state and local educational, workforce development and vocational rehabilitation agencies to provide a wide range of integrated work-based learning experiences for youth with disabilities including paid internships, and leverage funding to pay for training/learning experiences or to reimburse businesses for associated costs.

National Expansion of Employment Opportunities Network (NEON), Plan to Increase Competitive Integrated Employment

Transition from School-to-Work

- Expand access to school age integrated experiences in CIE and Pre-Employment Transition

Services (Pre-ETS), including access to and skills in technology and remote support devices

that carries into adulthood. This also includes the need for employment support providers to provide Pre-ETS.

Employer Engagement

The stakeholder group recommends that through measures such as grants, technical assistance or tax credits, The State of California, DOR and DDS incentivize and support employers who are engaging in disability inclusive hiring efforts. Via case studies, quantify benefits to employers across industries and educate employers on business bottom line benefits of inclusive hiring and provide support throughout the employment lifecycle. Develop a marketing campaign to increase awareness of benefits to employers.

Survey data shows that California employers want to learn about disability inclusion from other employers. Case studies will provide best practices highlighting disability as a necessary diversity and inclusion component.

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Employer Engagement

Document and track emerging practices for employer relationships. LPOs have continued job development and employer engagement even during this pandemic.

Virtual contacts now include communications with employers for both job development and employment supports. These emerging practices should be further developed, documented, and disseminated.

State Agency Input and Data

Department of Rehabilitation (DOR)

Under the direction of the federal Department of Education and administered through the Rehabilitation Services Administration (RSA), Department of Rehabilitation (DOR) is awarded an annual federal grant to provide the full array of vocational rehabilitation (VR) services to people with disabilities pursuing competitive integrated employment (CIE). Priority consideration is given to people with the most significant disabilities, a category which includes those served by the Department of Developmental Services (DDS) through the Regional Center (RC) system.

DOR's belief in the ability of all people to work at or above minimum wage is reflected in its support of Senate Bill (SB) 639 and similar efforts to end the sanction on paying sub-minimum wages (SMW) to people with disabilities. While the passage of SB 639 was rightfully lauded as a necessary step in ending the outdated practice of excluding some people with the most significant disabilities from CIE, it did not mark the beginning of DOR's work to provide services to people with disabilities seeking CIE.

WIOA Section 511 Career Counseling Information and Referral:

In 2016, consistent with the Workforce Innovation & Opportunity Act's (WIOA) Section 511, and in an effort to encourage more people to engage in CIE, DOR began providing Career Counseling Information and Referral (CCI&R) services to inform people in SMW employment about CIE, employment programs, and available supportive resources.

While Section 511 did not require it, DOR expanded and has made CCI&R services available to people making more than the federal minimum wage but less than the California minimum wage.

As more people transition out of SMW employment, DOR has seen a decrease in the need for CCI&R services and an increase in requests for VR services, including supported employment and customized employment services. People who have worked in, or are being diverted from work in non-CIE settings may receive, through an individualized plan for employment, services from DOR in collaboration with the local RCs, including but not limited to the following:

- job discovery to explore interests, uncover transferrable skills, and identify needed supports.
- guided assistance in researching and assessing the current job market.
- training and education, including career technical education.
- attendance of DOR staff at RC planning meetings to advocate for CIE and to assist with identifying preliminary services from the RC to prepare for a smooth transition to VR.

- assistance for the individual and their identified support network (family, representative, service coordinator, or peer mentor) in learning and navigating the VR process, to include applying for VR services.
- support for the individual, their network, and the employer (if agreed to by the individual) to resolve challenges that arise as the individual pursues CIE.
- road map for applying to and using all federal funding programs including, but not limited to, programs available under Medicaid waiver amendments, technical assistance grants under the Office of Disability Employment Programs, and resources under the federal Workforce Innovation and Opportunity Act, to assist people with disabilities to obtain CIE.

Disability Innovation Fund - The DOR in collaboration with the State Council on Developmental Disabilities (SCDD), DDS, and other partners applied for and were awarded a federal Department of Education disability innovation fund demonstration and research grant. This grant titled, the California Subminimum Wage to Competitive Integrated Employment Project (CSP), beginning in October of 2022, is a five-year, \$13.9 million, in total, grant funding an innovative model demonstration project. The CSP is a multi-agency collaborative piloting an innovative design to develop and test effective evidence-based practices that will be used to inform DOR, its partners, and the national VR program. Services to be provided include supports for participants and their family members that will address the historical challenges that are faced by people that are currently working in, or who are considering SMW employment. The CSP will serve participants at two community college locations, one in North Orange County and the other in San Diego County. The CSP will provide participants with career exploration, employment preparation, support training and education, benefits advisement, provide resources to participants' families, and incorporates intensive employment services including customized employment. The project proposes to serve approximately 400 participants. We anticipate that the interventions and lessons learned through the study will inform the coordination and delivery of services leading to CIE across the range of systems.

Demand Side Employment Initiative - In the 2021-2022 state budget, prior to the passage of SB 639, DOR and DDS received a one-time appropriation of \$20 million dollars to implement strategic initiatives to increase the employment of people with disabilities. As proposed by the administration and supported by the legislature, DOR is utilizing its portion of the appropriation on influencing key players in the employment landscape who are not typically included in VR spending, due to limitations on the federal program, specifically small to medium-sized business owners and the Human Resources Professional community. The focus areas were further informed by input from stakeholders through public listening sessions, participation on the DDS Employment Workgroup, and a variety of more intimate engagement opportunities. Given the name, "Demand Side Employment Initiative" (DSEI) for its departure from a traditional focus on the individual to a system influencing view, DSEI funding is being distributed in the following areas through June 2024:

- Business incentives for small and medium sized businesses who commit to employing new staff members with disabilities or offering work-based learning opportunities for people with disabilities.
- Media campaign promoting business argument for employing people with disabilities representative of the communities they work in.
- Meaningful and recognized Human Resource Training for current and in- school future professionals designed to remove stigma and increase competency in disability employment inclusion beyond legal compliance.
- Partnership with three or more businesses to create industry recognized Earn-and-Learn opportunities.

The comprehensive success of Competitive Integrated Employment for all people, to include those with the most significant disabilities, must address three key elements: 1) belief in and expectation that the individual with the most significant disability can and will go to work, 2) developing the individual's work skill and competence, and 3) a business community that includes federal, state, local, private, for-profit, and non-profit businesses willing and able to provide the employment opportunities. The lessons learned through this initiative will be used to inform the larger system on ways to expand CIE opportunities for people with the most significant disabilities across the state.

Data Collection:

3) What data do you currently collect on 14(c) participants and what is the source of the data?

The DOR collects information on 14(c) employers and their staff employed under those certificates through information made available by the federal Department of Labor, including information available through the Department of Labor's website. Additionally, DOR collects information on people in SMW directly from employers, who can request CCI&R services by phone or through DOR's website and from referrals from community service providers, regional centers, and other organizations working with people with disabilities. Since 2016, DOR has been providing CCI&R services to people receiving SMW and has kept a database on those people to track the provision of CCI&R and ensure follow-up CCI&R are provided as required by Section 511.

The CIE Blueprint (DOR, DDS, and California Department of Education (CDE) served as a catalyst for many policies and programs to increase opportunities for people with disabilities to make informed choices regarding preparing for and achieving CIE.

While each of the departments above is committed to sharing data to secure the best interventions for people with disabilities currently not participating in CIE, the challenges of staying within the confines of state and federal law, and regulations related to each department's specific restrictions on the data it collects, has limited the effectiveness of the intent. As currently structured, there may be limitations to data sharing at an individual

level because data is protected by federal and/or state regulations that guard the confidentiality and privacy of those served. Data sharing at the aggregate level limits the ability to identify the specific set of services or interventions that lead to successful CIE employment. A statewide approach is necessary to build a framework and infrastructure that will advance efforts to create and sustain permanent pathways to CIE for all. Additional work in the collection and synthesizing of data from different sources with disparate legal requirements for privacy will be needed to support the efforts to a degree that individual and aggregate data can be used to inform interventions.

1. Data collection and reporting requirements for tracking the following outcomes for the individual employees with disabilities who are transitioned out of SMW employment, including, at time of employment and closure the:

- i) Wages earned: DOR collects data on hourly wages;
- ii) Hours worked each month: DOR collects data on hours worked in a week;
- iii) Type of job: DOR collects the individual's job title;
- iv) Length of employment; DOR collects data on the start date; and
- v) Services utilized to obtain and retain CIE.

As noted, at the time of exit from the VR program, DOR collects data on an individual's employment outcome (iii), start date of employment (iv), hourly wage (i), and hours worked in a week (ii). Data reflects employment information from first day of employment through date of record of services closure (exit from the program) and is not inclusive of all people earning or transitioning out of SMW employment, just those who have received services under the VR program.

DOR services that may lead to CIE for people with the most significant disabilities include supported employment, customized employment, short-term job supports, job search assistance, among a full array of vocational rehabilitation services. (v).

While DOR provides a full array of services, correlation between services and CIE may vary on a case-by-case basis. DOR data is not inclusive of all people earning or transitioning out of SMW employment, as noted above, information is only available to DOR for those people that have applied for and have received DOR VR services.

2. Data collection and reporting requirements that will track the following aggregate outcomes of employees with disabilities who transition out of SMW employment, including:

- i) Total number of people with disabilities who are employed and paid SMW;
- ii) Employment rates;

- iii) The number of people who were participating in a SMW position that are not participating in job search activities;
- iv) The number of people who move from SMW positions to nonpaying activities; and,
- v) The number of people who move from SMW positions to positions that are paid at or above minimum wage.

For people who are currently earning or considering employment at SMW and are determined eligible for DOR services, DOR can track the following data:

- i) Total number of people employed at SMW at time of DOR intake.
- ii) The rate of people in CIE at the time of closure in relation to the total number of people employed at SMW when they were determined eligible for DOR services.
- iii) See next paragraph.
- iv) The number of people who move from SMW positions to nonpaying activities related to DOR's program and services.
- v) The number of people who move from SMW to positions that are paid at or above minimum wage at the time of closure.

DOR cannot track “the number of people who were participating in an SMW position who are not participating in job search activities” because people determined eligible for DOR services participate in job search activities to achieve CIE (number iii above).

DOR data only reflects a snapshot in time for people engaged in DOR services and only represents a subset of all people with the most significant disabilities employed in SMW and/or served by other entities. DOR data is not inclusive of all people earning or transitioning out of SMW employment.

Additional Department of Rehabilitation (DOR) CIE Activities:

State Leadership Collaborative (SLC) – California was selected to participate in the 2021-22 State Leadership Collaborative initiative, IT'S EMPLOYMENT.

IT'S EMPLOYMENT was an RSA funded effort to improve employment outcomes for people with disabilities through training of VR staff and partners. The project was operated by the Institute for Community Inclusion at the University of Massachusetts Boston.

Over the course of the year, staff from DOR, DDS, and the CDE received two full days of online training with a follow-up Community of Practice meeting remotely approximately once per month over six months. Participants included VR professionals, Regional Center Employment Specialists and Service Coordinators, Community

Rehabilitation Program (CRP) service providers, local educational agencies (LEAs), California Workforce Development Board (CWDB), and family/parent advocates.

DOR, as lead entity on the SLC and working in close partnership with CDE and DDS, elected to focus on skill building in the areas of person-centered-planning (PCP) and self-determination (SD) as a natural starting point for working with people with disabilities who have traditionally been employed in SMW and/or non-integrated work settings, with limited opportunities to demonstrate their ability to work in CIE.

Thank you again for your continued partnership and deep commitment to employment and equitable pay for people for people with developmental disabilities.

Department of Developmental Services (DDS)

To meet requirements of SB 639, DDS created a Subminimum Wage Work Group consisting of representatives from PDC, CS, DDS staff, and Department of Rehabilitation staff. The work group drafted a Subminimum Wage Certificate Phaseout Plan for Porterville Developmental Center and Canyon Springs. The multiyear plan contains benchmarks and desired outcomes for people who reside at Porterville and Canyon Springs, describes how the facilities will phase out and end their Subminimum Wage certificates, and includes how the facilities will assist those who reside at the facilities to meet these changes. The plan is undergoing internal review.

The Department of Developmental Services has and is implementing several initiatives to support increased access and participation in competitive, integrated employment. These include:

- [Rate Study](#) and increased funding
- [CIE Milestone Incentives](#) (refer to slide 11-12) and [Quality Incentive Program](#) tied to CIE for providers. These include incentives to certify employees as employment specialists (capacity building& workforce development), number of people achieving CIE placements (access to CIE) and Paid Internship Program participation.
- Working with SCDD to complete an employment satisfaction survey designed to explore job holder perceptions of their position and existing supports.
- CIE Pilot, Work Activity Programs (WAP) New Service Model - \$8.3 million (\$5 million General Fund) to establish a three-year service model pilot program focused on CIE, postsecondary education, and career readiness for people with developmental disabilities exiting WAP or secondary education in order to explore inclusive options, including, but not limited to, paid internships, competitive integrated employment, and college-to-career programs.

- Employment Grant Program, more information [here](#). DDS has identified key grant priorities with input from stakeholders through the Employment Workgroup. The priority areas of focus are:
 - Implementing evidence-based, new, and emerging best practices for job attainment, retention, and career advancement through an individualized, self-directed, and whole-person approach to services.
 - Providing pathways to employment for people with high support needs through an individualized and whole person approach to services.
 - Developing business or industry focused collaborations to increase workforce preparation and employment opportunities.
 - Increasing family, adult and youth knowledge and use of community employment-related resources and services.
 - Changing service delivery models to promote competitive integrated employment for all people served.
- Tailored Day Services or vouchered community-based training services provide opportunities for adults with developmental disabilities to choose and customize day services to meet their individualized needs; have opportunities to further the development and support of employment and volunteer activities; direct their services; pursue postsecondary education; establish and support paid internship program opportunities; and increase their ability to lead integrated and inclusive lives. For more information click [here](#). For recent changes to tailored day services click [here](#).
- Home and Community Based Services Compliance Funding: The 2016 Budget Act (SB 826, Chapter 23, Statutes of 2016) contained \$15 million to help fund changes necessary for regional center service providers to come into compliance with the HCBS Final Rule. This funding has continued each year through Fiscal Year 2022-23.
- Regional Center Performance Measures (RCPM): DDS is working with stakeholders consisting of representatives from all aspects of the developmental disabilities services system to develop performance incentives and measures to promote improvements in consumer outcomes and regional center performance. This voluntary RCPM program has six focus areas identified by the Workgroup, one of which is Employment. Each focus area has one or more performance measures tied to specific desired outcomes, with corresponding performance targets and incentives. More information about RCPM can be found [here](#).

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EDD data provides quarterly wage earnings for all people served by regional center. Data includes total wages earned during that quarter and the universal EDD business industry type.

Regional Center Performance Measures can be found [here](#).

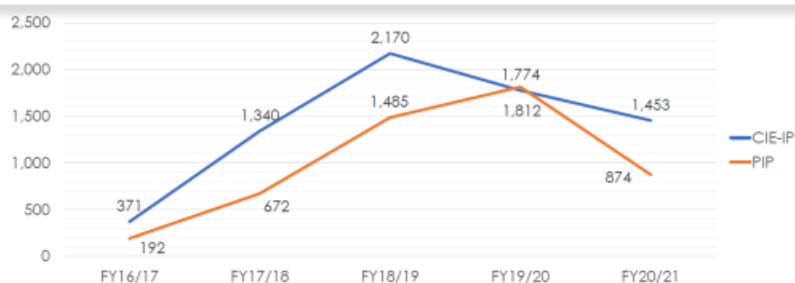
Data Sharing Agreements-the following are noted in the blueprint and presented here for reference:

- The DOR and DDS will complete a data sharing agreement to share data to better determine consumer outcomes.
- The CDE, DOR, and DDS will continue analyzing ways to share data, with the goal of having the departments enter into a comprehensive data sharing agreement, within each department's regulatory and statutory requirements.

A Business Use Case Proposal has been established between DDS and DOR and are currently in the process of exchanging data.

DDS CIE Numbers

Overview: Number of Consumers Participating in Competitive Integrated Employment Incentive Payments (CIE-IP) & Paid Internship Program (PIP)



Source: DDS Research Section's Analysis of CIE-IP and PIP Survey Data Collected by Regional Centers

SCDD Update

In addition to overseeing administration of the Employment First Committee (EFC), SCDD addressed CIE stakeholder needs by preparing a comprehensive Employment First Resource list for stakeholder groups such as job seekers, family members,

employment service providers and employers. This resource included both national and California specific tools and was shared statewide and nationally via Office of Disability Employment Policy and ANCOR webinars. In response to SB 639 stakeholder requests for additional technical assistance and support SCDD applied for the 2023 ODEP National Expansion of Employment Opportunities (NEON) Grant on 12/28/22.

SCDD attempts to bridge the gap across government agencies and amplify stakeholder voice to create resources and supports. One example is through membership in DOR's California Committee on Employment for People with Disabilities (CCEPD). CCEPD learned that many Regional Center staff may not have knowledge of Social Security work incentives which are often key decisional factors in a person's search for CIE. To remedy this issue SCDD contacted DDS which supported the arrangement of a 2-part benefits education series for regional center staff.

Historically, SCDD has recognized employment as social determinant of health and in in-demand service for people who have disabilities. SCDD provides advocacy and awareness building of CIE opportunities in many ways. To help publicize the benefits of CIE SCDD prepared a "Why Work is Better" guide on CIE in English and Spanish and provided a grant to produce "Let's Work!" <https://youtu.be/Jgl-tfUkhsQ> "Let's Work!" is a documentary that explores the positive impact of CIE on the lives of 8 people who have intellectual and developmental disabilities, their family members, employers, and communities.

Through employment activities during the 5-year state plan cycle ending in 2021, the Council engaged in a total of 2,781 activities, reaching 612,964 people. SCDD staff engaged in 176 trainings, increasing the knowledge and skills of 5,861 people.

The Council invested in 6 employment-related grants (2 of which were statewide) and 2 grants that combined transition, employment, and self-advocacy work. Three (3) of the grant projects were sustainable and continued forward, one of which was an in-reach training, internship program and employer partnership within the Vietnamese community. Another sustainable project also provided broad-based employer outreach, job developer training and employment development opportunities for people with intellectual and developmental disabilities. A Bay Area grant project developed/provided training to engage both families and employers, increasing the capacity of employers through customized employment methods, in reaching CIE goals for people with more significant learning disabilities. A train-the-trainer component (and family engagement toolkit/resource guide, which is posted on SCDD's website) was developed to assist advocacy, educational, state and service entities in better engaging families and people with disabilities.

Through a Council grant with Easterseals Southern California, a Discovery Fidelity Scale was created to identify the interests/skills of people with developmental disabilities and implement customized employment opportunities (e.g. job creation, job

carving, job sharing, self-employment, etc.) to also fit within the needs of employers, thereby promoting best practices in CIE.

In 2020 alone, SCDD met or exceeded its projected benchmarks in every area of the employment-related objective's work plan, engaging in 436 activities and reaching a total of 150,191 people (19,663 self-advocates [SA], 69,859 family advocates [FA] and 60,669 others) with information, resources, training, events and technical assistance. Regional staff created and/or updated 5 curricula and provided 35 workshops and/or training events, reaching 502 SA, 312 FA and 343 others, for a total of 1,157 people.

SCDD Employment First Committee Update

The Employment First Committee (EFC) is a SCDD standing committee created by statute in 2009 and is responsible for identifying and promoting strategies that increase the number of people with intellectual and/or developmental disabilities who engage in competitive integrated employment.

Specifically, EFC is tasked with advancing competitive integrated employment (CIE) for people with developmental disabilities by:

- identifying the roles and responsibilities of state and local agencies that enhance employment for people with disabilities
- strategies and best practices for increasing employment including transition practices
- identifying sources of employment data and recommended approaches for measuring progress
- identifying demographic data that can be matched to employment outcomes
- recommending goals for measuring employment participation and outcomes for various people with developmental disabilities across service systems

Additionally, EFC Annually Develops Policy and Administrative Recommendations Supporting CIE

Recommendations are informed by cross departmental information, national best practice and feedback from people who have disabilities and their family members. Past recommendations include:

Data Sharing Across Agencies and Cross Department Partnerships

- Data is not released until years after collection. Data delay impact's the ability to identify trends and create targeted interventions. CDE, DOR, and DDS should work collaboratively to streamline information sharing and service delivery planning to ensure a) delivery of services are unified and b) comprehensive implementation and evaluation of CIE:

- DDS should invest in the collection and reporting of disaggregated, timely data with universal client identifiers across government systems to understand the factors that impact whether a person enters or retains CIE.
- DDS and the State Council should publicly report aggregate data on the Data Dashboard in a consumer friendly and accessible format so that the impact of CIE can be assessed and people with developmental disabilities and their families can make informed data-driven decisions about choosing the best pathway to CIE.
- CDE, DDS, DOR and State Council should create data-sharing agreements across agencies that identify benefits of employment as a social determinant of health.
- Loop in Regional Centers to also collect data. PIP information and data on how many CIE placements evolve out of internships must be shared broadly across workforce development partners, employers, educators, family members and people with disabilities.
- All government-related websites should create cross-links for CIE resources to avoid disconnected services. Currently sites only offer their dept specific services but don't address intersectionality of services.

Funding

Funding is needed in specific areas to assist in the subminimum wage phase out and move towards competitive integrative employment:

- DDS should adopt a tiered incentive structure to implement Welfare and Institutions Code Section 4870 (d-g) that provides for higher incentive payments for people with the most significant disabilities.
- Increase funding for access to technology for people with disabilities who need to use it to enter or retain CIE.
- Direct Service Providers in Vocational Rehabilitation are under-skilled, and retention of job coaches is a challenge. Funding is needed to provide skills training to job developers and supported employment practitioners in customized employment and job coaching supports.
- Funding for transportation solutions and supports.

Marketing Campaign- Encourage Transition Among People with Disabilities

CDE, DOR, DDS and the State Council should work collaboratively to launch a multi-media campaign to create awareness, education, and incentives for people to make transition to CIE:

- The primary reason people do not pursue employment is fear of losing benefits. Transition planning (from subminimum wage work to competitive wage work) should include discussion of the impact of wages on benefits. Information on CalABLE and asset limit changes must be widely available to people with

disabilities and their families so they can make informed decisions regarding employment.

- CIE media campaign geared towards employers and eliminating stigma of hiring people with disabilities. Increase outreach to create partnerships with employers.
- CIE campaign for consumers to showcase disability employment success stories across industries. This needs to be reflective of diverse cultures and communities so that people who have disabilities and family members see themselves in the service. Functional examples include targeted social media campaigns to people with lived experience of disability linked to self-advocacy and self-determination. Ideally this will involve overcoming fears, challenges and building resiliency during work search and job loss.
- DDS and Regional Centers must build awareness and encourage career exploration.

Education Update

At the post-secondary level, California is behind on creating inclusive college opportunities that can increase opportunities for family sustaining wages for people who have disabilities. At the high school level, there is a challenge to transition youth into employment after graduation. California created Alternatives to High School Diplomas (Alt-Pathways), a state initiative that is meant to support transition by providing additional options for high school completion credits. This initiative was meant to provide students with disabilities who do not graduate with a traditional high school diploma to receive “alternative” diplomas so that they could pursue employment that requires a high school diploma or equivalent. The challenge has been that “alternative” diplomas are sometimes not recognized as “diplomas” by employers who require these for employment. However, marketing and outreach equivalency may resolve this.

Senate Bill 74, Budget Act of 2020, authorized two workgroups: (1) the Alternative Pathways (Alt Pathways) to a High School Diploma Workgroup and (2) the Individualized Education Program (IEP) Template Workgroup. The Alt Pathways Workgroup was tasked with developing recommendations to the California Legislature regarding existing and potential pathways to a high school diploma for students with disabilities. The workgroup concluded that instead of creating a set of new alternate pathways the state should increase access to the full range of pathway options already provided to all students. This includes better access and support for students with disabilities to meet existing state and local requirements for earning a regular diploma and warned against creating separate pathways that could perpetuate exclusion of students with disabilities in higher education opportunities. It is not clear how/when policymakers will use the recommendations.

- Alternate Pathways (Alt Pathways) to a High School Diploma Workgroup Report https://www.scoe.net/media/2tla0rk5/ca_alternative_pathways_workgroup_report.pdf

- Statewide Individualized Education Program (IEP) Workgroup Report
https://www.scoe.net/media/ankhexys/ca_iep_workgroup_report.pdf

Lack of Inclusive Higher Education and its Effect on Employment

There is an urgent need for inclusive college opportunities for students with intellectual and developmental disabilities in California. One in eight students in California public schools receive special education services (LAO 2019). There are 66,000 California transition-age students with intellectual disabilities that are currently waiting for inclusive post-secondary opportunities.

We are over a decade behind in building inclusive college programs across our state and an Inclusive Higher Education Coordinating Center for our state. There are currently 18 PSEs in CA, only 5 of which are at 4-year universities. Of those 5, only 2 have sustainable funding.

Meanwhile, recognizing the value of these programs, other states—including Colorado, Tennessee, Georgia, Florida, South Carolina, and Maryland—have invested in inclusive opportunities at 4-year universities.

We know that graduates of Inclusive post-secondary education programs are more likely to enter the workforce, earn higher wages and thus be less reliant on state benefit programs. Studies have found that:

- Higher education offers opportunities for social and intellectual exploration and builds capacity for future employment. With the advent of funding due to legislation and policy changes in the US, students with intellectual and developmental disabilities are beginning to reap these same benefits from higher education. (See Grigal et al, 2021; Think College Annual Report, 2020-21, both included in folder)
- Post-Secondary Education (PSE) for people with Intellectual Disability is both cost-effective (cheaper than other services) and cost-efficient (pays for itself over time). (Cimera, et al., 2018)
- Vocational rehabilitation (VR) clients with Intellectual Disability who experienced PSE were more than twice as likely to be employed and had increased earnings compared to their counterparts who did not participate in post-secondary education while receiving vocational rehabilitation services. (Sannicandro, et al., 2018, included in folder)
- Youth who received PSE services as part of their Individualized Plan for Employment (IPE) were 14% more likely to exit with paid integrated employment and earned 51% higher wages than those who did not access PSE services. (Smith, et al., 2018)

- Graduates of PSE use fewer government support services after exiting college. Graduates of PSE earned higher wages and thus used 31% fewer government services than people with only a high school education. (Cimera, et al., 2018)
- The odds of exiting VR with an employment outcome were 1.59 times higher for those who participated in a PSE. (Rast, et al., 2019, included in folder)

Moreover, the US Department of Education Model Transition and Postsecondary Programs for Students with Intellectual Disabilities (TPSID) programs are a proven predictor of employment success.

- As of September 30, 2020, 59% of students who completed a TPSID program had a paid job after exit in 1 year, 66% had a paid job after exit in 2 years, and 67% had a paid job after exit in 3 years.
- 65% of students who attend a TPSID receive paid employment as graduates compared to less than 20% of adults with Intellectual and Developmental Disabilities who do not attend a TPSID.

Legislation for Inclusive Higher Education

[AB 2920 \(Arambula, 2022\)](#) goal was to increase living wages and employment for people with intellectual and developmental disabilities through establishing and maintaining sustainable, high-quality inclusive post-secondary education programs at University of California (UC) and California State Universities (CSU). This bill failed in the Assembly Appropriations Committee.

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