



February 2, 2018

Re: Request for Information on Strategies To Improve Adult Outcomes for Youth Receiving Supplemental Security Income (SSI)

To Whom it May Concern:

The Wisconsin Board for People with Developmental Disabilities (BPDD) is a proponent for community integrated employment for people with Intellectual/Developmental Disabilities. BPDD has been awarded Partnerships In Employment (PIE) project of national significance funds to improve employment outcomes for transition age youth and is a current partner in Wisconsin's PROMISE grant awarded by the Social Security Administration. BPDD works with the Governor's office, state agencies, and the legislature to improve community employment and other policies that improve self-determination, independence, productivity, and integration and inclusion in all facets of community life for people with developmental disabilities. Our Board is primarily comprised of people with disabilities and family members of people with disabilities; our perspective is informed by people with lived experience across the state.

Our experience finds that having multiple community employment experiences while in high school that allow youth to explore different job skills and identify jobs they like is the greatest predictor of community employment after graduation. The results from BPDD's PIE grant found that community employment tripled in the first year, and that 60% of students were working in their communities after 3 years. Many of the policy and practice changes identified in this project were further tested and supported by the Wisconsin PROMISE grant work, including early engagement with vocational rehabilitation and work incentives benefits counseling.

The Wisconsin PROMISE grant has furthered our understanding on how youth with disabilities engage with the current system and the barriers that often prevent successful employment outcomes or working to full potential. We offer our observations and recommendations in the following areas.

Orient SSA system to maximizing earning potential

While it's implicit in the SSA's questions here, it is necessary that the entire agency shift to an emphatic imperative that policy is grounded in the fundamental belief that youth with disabilities can work and that systems should be aligned to provide the necessary services and supports to make that a reality.

We often hear from families and people with disabilities that the emphasis is on restrictions and what you cannot do at the risk of jeopardizing benefits. Many families here a clear message that the person cannot work without losing SSI, and many are unaware that any work incentive programs exist within the agency. Training and ensuring that all agency personnel are well-versed in work incentive programs and options for the I/DD population is essential to transforming the message into "you can work."

Orient SSA system to focus on strengths and abilities rather than deficits

Agency personnel should focus on the youth and family member's strengths, abilities, and interests (rather than their deficits) and match these with employer needs and provide accommodations and/or supports as needed. This will be a culture shift as eligibility for SSI/SSDI is predicated on functional limitations.

Asset limits are a limiting factor for many families in poverty

Low asset limits are a feature of many public benefit programs. Often these asset limits have remained unchanged for decades, and do not reflect current cost of living. Artificially low asset limits become a limiting factor on not only employment, but also stable housing, transportation, and the ability to save and manage finances. For example, the current \$2000 asset limit is less than the first and last month's rent often needed to secure an apartment; it is also insufficient to have an adequate down-payment on most vehicles (even used). Many banks require a minimum deposit to avoid fees that exceed the total amount of asset allowed by the program. These strict asset limits are a barrier to accessing the improvements (reliable transportation) for example that lead to employment and stability.

We recommend developing a tiered approach for this population that facilitates increased income and lifts the asset limit ceiling higher as income increases. This would incentivize work, encourage increased earnings and savings, and enable purchases that could help lift families further out of poverty.

It should be noted that for many PROMISE families the barriers to finding full or part time permanent employment are so significant, and incomes so low, that they are unable to set aside any funds. This lack of assets is in itself a significant barrier, as families lack the means to obtain transportation and other supports that would facilitate employment. Micro investments in these families can provide the capital needed to enable the person to accept a position and get to work. A hardship exemption could be designed to target small contributions to individual's accounts for the purpose of employment.

Consistency and alignment across programs requirements regarding asset limits

Many people with disabilities are dependent on more than one public benefit program (SSI/SSDI, Public Housing, Medicaid, FoodShare, etc.) for a network of supports that provides stability, and a way to live successfully in the community. Unfortunately, many of these programs have different income and asset requirements, which serve as limiting factors and barriers to reaching full employment potential. Several of our board member's personal stories illustrate the impact of increased income leading to the loss of other needed benefits, creating a disincentive to work to their full potential in order to preserve their eligibility for the services they need.

Because of inconsistency between programs on the amount of income/assets individuals can have before becoming ineligible for the program, many people with disabilities are unable to escape poverty. Coordination and consistency across programs is necessary to provide a path for people with disabilities to increase their incomes and reduce their reliance on public supports without losing the supports they need.

Navigation of system is difficult and a barrier to many

People with disabilities and their families have trouble navigating SSA benefits and work incentives. Personal case management is needed to connect SSI youth and their families to services and supports that can help increase their education, employment, and financial self-sufficiency. As youth begin working and monthly incomes change, case management becomes even more essential.

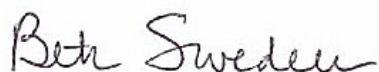
Wisconsin PROMISE has found that motivational interviewing is an effective strategy to teach youth and family members to problem solve and improve their ability to navigate the existing system. Existing SSA resources are not sufficient to help families and youth understand the work incentives available, how to use these work incentives, and ultimately report monthly earnings to avoid overpayments

Youth with intellectual and developmental disabilities, may be non-readers, non-verbal, use adaptive or responsive technology (including touchpads), may communicate better verbally or when images are used, have large print needs, may not have access to the internet, or have other needs that are not met using traditional print mediums.

Written materials should be written at a 4th to 6th grade reading level whenever possible. Information should be shared with less words and more pictures, effectively using white space, larger fonts, and pictures and/or graphics rather than trying to explain everything with long wordy explanations. In Wisconsin Promise we have found it is important to communicate in multiple ways, times, and modes (texts, emails, mail, postcards, phone calls, knocks on the door, etc.).

It is important for communication materials to be reviewed and tested by the very individuals who are targeted to get the information. SSA should set up a feedback loop with beneficiaries and their parents/guardians to get input on how helpful the information is and what SSA could do to better provide information to beneficiaries. This feedback loop (more than anything else) will help make materials more accessible and consumer friendly.

Thank you for your consideration,



Beth Swedeen, Executive Director
Wisconsin Board for People with Developmental Disabilities