



TO: CIE Joint Plan Team
FROM: WI Board for People with Developmental Disabilities
RE: Act 178 Competitive Integrated Employment Plan for 2022-23

Thank you for the opportunity to provide public comment on Act 178's draft Competitive Integrated Employment (CIE) inter-agency plan for 2022-23. The Wisconsin Board for People with Developmental Disabilities (BPDD) appreciated the advance publication of the plan, and the variety of formats and opportunities provided to gather input.

BPDD supports the 3 outcome areas identified in the plan, as well as many of the proposed as well as many of the objectives within each goal. We do have concerns that the three agencies still do not have a common definition of Competitive Integrated Employment, that there are no shared set of guiding principles among the 3 agencies, and that DHS still does not have a statewide consistent process for collecting and publicly sharing current employment data.

BPDD also notes 3 areas that are missing from the plan: 1. We would like to see the plan include a specific shared outcome around getting people with disabilities back to work with appropriate employment supports as the COVID pandemic begins to subside. We know that many people with disabilities left their jobs or were laid off during the pandemic, and that providers are struggling to rehire and train adequate numbers of staff; 2. There is no common, quantifiable pre-ETS outcome or metrics within the youth transition area; and 3. There is no mention of targeted strategies to address racial/ethnic/geographical/disability disparities.

Specifically, BPDD recommends that Wisconsin's 3 agencies adopt the federal definition of CIE. We also are concerned that for full plan implementation to occur, Wisconsin needs baseline data to identify strengths and needs across agencies and across the state. We know from provider feedback that DHS long-term care data is not being gathered with consistent methodologies, and has not been aggregated and published in more than 3 years.

BPDD also recommends that each activity in this plan have a measurable metric to determine the impact of the activity, and to assess whether and how much it moved from baseline. A significant number of the activities are ongoing and have been so for years (development of a TAG, outreach activities, support for Project Search, etc). To be listed in the plan, BPDD recommends identifying a measurable metric for each of these activities that will take our state beyond baseline.

Specific to the TAGs, BPDD recommends that the 3 departments develop a set of collaboration standards within the TAGs that must be followed by schools, DVR and long-term care programs including: when and how referrals are made for DVR services, expectations for co-developing and coordinating IPEs, IEPs and long term care service plans specific to each shared participant, and establish expectations and standards for quarterly transition meetings (at minimum) that occur for each shared participant. These standards should be widely shared with participants/consumers of programs in all 3 departments, as well as the staff who work directly with clients/consumers/participants/students.

Specific to outreach activities, a comprehensive effort is needed with specific strategies for different audiences communicating the benefits of CIE. This would include connecting with people in facility-based employment being interviewed by UW-Whitewater, families, educators, and other community partners. Specifically, we recommend that a collaborative CIE plan should ensure, with permission, that an individual's care manager is notified of someone's interest in CIE. Rapid engagement best practices outline a more intentional response.

Specific to training activities, the Business Service Consultants, DVR counselors, transition teachers, CLTS and adult care managers need significant training on supported employment strategies such as customized employment and the Discovery process in order to be effective in promoting CIE. BPDD would like to see specifics of a comprehensive training plan included in the plan.

Specific to the reference to transportation, BPDD recommends developing cross-agency transportation guidance within the TAGs and measure impact on the individual level, including more consistent policies across the three departments, including the flexibilities to allow school staff, job coaches and job developers to provide transportation.

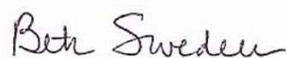
Specific to Goal 3, DPI lists a set of existing activities such as Project Search. Again, this area should have specific metrics – increase the number of Project Search sites, increase the number of youth enrolled, increase successful outcome percentage.

Specific to outreach and marketing, the listed activities do not specifically outline how the departments will intentionally analyze and address disparities in employment outcomes and support provision to underserved communities. The outreach plan referenced in objective 1.A.i should be based upon audit of existing data and other consumer survey with specific joint outreach plans and measurement of results. The plan does not address existing inequities and overall disparities at all and needs this addressed.

All outreach and marketing activities related to HCBS Nonresidential Setting Rule compliance should focus on activities that can incentivize and support providers to increase capacity for community-based services provision that leads to CIE skill building and jobs. Provider capacity for CIE should be measured and reported on annually as a part of this plan.

Thank you for the opportunity to review the draft plan and provide public comments.

Beth Swedeen,



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WI Board for People with Developmental Disabilities