## SSII YOUTH $\begin{aligned} & \text { SOLUTIONs }\end{aligned}$

# Policy Considerations for Implementing Youth and Family Case Management Strategies Across Systems 

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#### Abstract

Identifying the critical elements of supports and services leading to long-term improved employment, educational, and economic outcomes for youth receiving Supplemental Security Income (SSI) and their families is of great importance but has been challenging historically. The historical and present policy framework for supports and services all intend to offer the decisive service components to improve these outcomes, yet these youth still lag significantly behind their peers in key education and employment benchmarks. However, augmenting this framework with case management supports can promote the achievement of these seemingly elusive goals. As conceptualized in this paper, the Youth and Family Systems Navigator (YFSN) is the catalyst missing in this framework. Analogous to the braces securing the scaffolding, the YFSN provides focused attention for youth and families to meet their basic need deficits (such as food, shelter, and clothing) and address daily crises acting as primary barriers to accessing service. Current singular case management systems typically focus on an incomplete array of supports within the single system. In contrast, the YFSN functions as the support to build strong connections and pathways to the appropriate resources across each of the singular focused systems to eliminate duplication of service delivery and increase coordination of supports.


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## I. Introduction

The current domestic disability, employment, and education policy landscape provides a complex structural foundation of supports for youth with disabilities designed to lead to positive employment, educational, and economic outcomes. However, the complexity of navigating the supports and services available through the Individuals with Disabilities Education Act (IDEA) (P.L. 101-476), the Workforce Innovation and Opportunity Act (WIOA) (P.L. 113-128), the Ticket to Work and Work Incentives Improvement Act (P.L. 106-170), and the Social Security Act (P.L. 9821) can pose significant barriers for youth with disabilities and their families.

In this paper, we propose a Youth and Family Systems Navigator (YFSN) to assist youth with disabilities and their families to navigate and access this complex transition system. By design, existing systems (i.e., education, mental health, developmental disabilities, and vocational rehabilitation) provide supports with a singular or, at best, an incomplete multi-pronged focus challenged by the individual's and/or family's basic need deficits, coupled with other familial, cultural, and institutional points of adversity. For example, the vocational rehabilitation system by regulation is prohibited from providing broad based case management services to address needs not directly related to an employment goal. Consequently, the choice facing youth and families is either to focus on meeting an immediate basic need, such as food and housing, or to sacrifice the need in favor of their child's employment, educational, and economic aspirations (Anderson and PartchDavies 2018; Cooper 2017; Ipsen and others 2019). The proposed intervention offers a potential pathway to address the array of needs that arise by allowing greater latitude to operate across systems on the part of the YFSN to pursue issues that typically fall outside the realm of employment supports yet are essential to overcoming obstacles and challenges to long-term success.

The YFSN intervention emerged from case management taxonomy research conducted under the New York State (NYS) Promoting the Readiness of Minors in Supplemental Security Income (PROMISE) initiative (Golden and others 2021) and was further refined through the collective findings of the six national PROMISE demonstration projects. NYS PROMISE sought to implement a fidelity-based approach to case management supports, uniquely responsive to the needs of youth receiving Supplemental Security Income (SSI) and their families, recognizing the importance of a catalyst to support, connect to, and engage with the existing supports and services.

The YFSN intervention involves youth ages 14 to 24 who currently receive SSI, along with their families. Its goal is to engage youth at age 14, two years before the IDEA requirement to begin transition planning at age 16, and to continue to offer supports and services until youth turn age 24 . Maintaining engagement through age 24 offers great value (National Academies of Science, Engineering, and Medicine 2019). Research indicates that prolonging adolescence (Steinberg 2005), coupled with the potent risk of racial and ethnic disproportionality that exists (U.S. Department of Education 2016), can greatly shape the trajectory of adolescence. The selection of this age range was likewise informed by experience and lessons learned from the collective of national PROMISE projects.

The overall goal of the YFSN is to encourage greater financial independence and self-sufficiency for youth receiving SSI through securing and maintaining employment. The YFSN will achieve this by connecting youth receiving SSI and their families to the existing scaffolding of supports and services to help them attain improved employment, educational, and economic outcomes. To improve on these historically elusive goals, a creative approach to the utilization of waiver authorities, such as integrating Medicaid 1115 waivers and adapting the Ticket to Work (TTW) program to include a Youth Partnership Plus (YPP) option, presents a potential framework for policymakers to consider in implementing the YFSN intervention. Although the 1115 waiver is an already existing option for implementation, the YPP might be preferred because it would extend a form of the TTW to youth through the development of a new programmatic initiative.

## II. Background

The transition to adulthood for youth receiving SSI and their families is complex. This complexity is created by numerous hurdles, including poverty and scarce family support (Garcia-Iriarte, Balcazar, and Taylor-Ritzler 2007); racial and ethnic disproportionality in special education (Cruz and Rodl 2018); challenges associated with foster care or homelessness (Kang-Yi and Adams 2017; Zlotnick, Tam, and Zerger 2012); and issues with access to needed community services and supports, coordinating fragmented services, accessing vocational rehabilitation (VR) services, understanding eligibility and benefit rules, and meeting basic needs (Anderson and Golden 2019). Consequently, these hurdles have traditionally resulted in this population achieving significantly lower employment, educational, and economic outcomes when compared to their peers (Newman and others 2011; Sanford and others 2011).

## A. Current domestic transition policy and practice landscape

The current domestic disability, employment, and education policy landscape has evolved considerably over the past forty years and encompasses evidence-based services and supports and twenty-three in-school indicators predictive of post-school success for youth with disabilities (Mazzotti and others 2020). Over this time, the United States witnessed the passage of the Americans with Disabilities Act (ADA) in 1990 and subsequent ADA Amendments Act of 2008 (P.L. 110-325) to broaden the definition of disability, which expanded the impact and power of the law. Furthermore, the reauthorization of IDEA and recent amendments through the Every Student Succeeds Act (P.L. 114-95) in 2015 have set increased standards for special education regarding students with disabilities. In 2014, WIOA created new standards and expectations for the VR and workforce systems to serve students and youth, a significant modification of the Workforce Investment Act of 1998. Finally, the Ticket to Work and Work Incentives Improvement Act and the Social Security Act offer alternative options for employment supports and services. Nevertheless, despite these changes, problems of overlapping and conflicting regulations and services continue to hamper the transition process for youth with disabilities (Fraker and others 2014; U.S. Government Accountability Office 2012, 2016). The above programs and policies provide a constellation of supports difficult for youth receiving SSI and their families to access and navigate (Carter and others 2012; Francis and others 2014), and the overall outcomes of transition-age youth with disabilities continue to fall short of the outcomes achieved by youth without disabilities.

## B. Supplemental Security Income—intersection with systems

Stationed within this scaffolding of policy and programs is the SSI program. The SSI program provides means-tested payments funded by general tax revenues to people with limited income and resources who are "disabled, blind, or age 65 or older" (Social Security Administration [SSA] 2020a). For transition-age youth ages 14 to 24 (as presented in this paper), the age- 18 redetermination process bifurcates eligibility for SSI. Because the criteria for disability differs for children and adults, all youth receiving SSI must have their eligibility redetermined under the adult standard upon reaching age 18.

Approximately 55 percent of all child SSI recipients are initially determined ineligible for SSI during the age-18 redetermination process (SSA 2014). This phenomenon occurs despite the protections through Section 301 that allow youth to continue to receive SSI if they are also receiving special education services under an individualized education program (IEP) or are involved in a qualifying VR program (SSA 2020a). However, understanding the connections between these systems and programs in the midst of the transition process is difficult. Compounding this challenge is the intersection of indigenous services or programs available to youth with disabilities as they navigate their transition to adulthood years, including school-based programs, non-school programs, cash assistance, health insurance, impairment-specific systems, employment support programs, and other programs and services (Wittenburg, Golden, and Fishman 2002). It might be that youth receiving SSI and their families often do not understand the intersection between these services or are not ready to access, engage in, and benefit from these services and supports, perhaps because of basic needs deficits. The YFSN, in response to these challenges, is the natural fit to brace this scaffolding of resources for the youth receiving SSI and his or her family.

## III. The YFSN intervention

In this section, we provide details about the YFSN, including supporting evidence, its primary functions, and the theory of change.

## A. Supporting evidence for the YFSN

Research on the effectiveness of case management strategies with transition-age youth, though limited, underscores its value. For example, the PROMISE research demonstration documented the pivotal role case managers and family coaches played in engaging youth and their families in the intervention (Crane and others 2019; Golden and others 2019). Case management provided within the context of postsecondary education (Balcazar and others 2012), as well as through targeted demonstration programs such as the Youth Transition Demonstration (YTD) (Fraker and others 2014), provides further support for the service's value. However, in the latter example, case managers and family coaches had a narrow purview, focusing only on coordinating services and educating youth and their families. Moreover, the Guideposts for Success: A Framework for a Future supports the need for youth focused programs to offer access to critical connecting activities across health care, mental health, benefits advisement, financial literacy, recreational activities, and life skills education (Center for the Advancement of Policy on Employment for Youth 2020). Additional research indicates case managers can support the successful adult outcomes of youth and their
families by helping them to understand their options; to make choices reflecting the youth's values, needs, and abilities; and to resolve problems and crises as they arise (Crane and others 2019; Ipsen and others 2019). The supports provided by PROMISE case managers were determined to be essential in connecting youth receiving SSI and their families to local services and played an important role in supporting work outcomes (Anderson and Golden 2019).

Other evidence about the impact of case management on employment supports the findings from studies such as PROMISE and YTD. For example, Project NetWork, an SSA demonstration, tested the impact of case management and referrals and found short-run increases in employment, though the demonstration did not focus on youth (Kornfeld and Rupp 2000). A research demonstration project conducted by the College Connection Program for the Rehabilitation Services Administration provided some insight into the effect of case management services specifically for transition-age youth (Balcazar and others 2012). High school graduates with disabilities who received a set of case management services were significantly more likely to be employed, to be enrolled in postsecondary education, and to complete their postsecondary programs by the end of the study. The authors found large impacts of a broadly defined case management intervention with small caseloads, but it is unclear whether the more typical case management functions or other concurrently offered services, such as the focused employment and college supports, contributed to these increased employment outcomes. Although the connections between case management services and employment outcomes are clear, no universal system exists to deliver comparable services and supports.

## B. The primary functions of the YFSN and the theory of change

The crux of the YFSN intervention is the core functions of the case manager-educating youth and families about transition and connecting them to services-will lead youth and families to better outcomes. The YFSN serves as the connecting braces to the scaffolding of a robust system of supports available to many youth and families. Case management for the YFSN includes (1) advocacy and self-sufficiency, (2) assessment activities, (3) brokering of resources, (4) case planning, (5) crisis management, (6) education engagement and preparation, (7) employment preparation, and (8) meeting basic needs.

For many youth and families simply identifying the appropriate entry point to engage in these services can serve as a barrier. The current system (Figure 1) does not have these connecting points, whereas the YFSN (Figure 2) creates the linkages within the current system.

Figure 1. Youth connection to programs under the current system


CMS = Centers for Medicare \& Medicaid Services; IDEA = Individuals with Disabilities Education Act; LEA = local education agency; WIB = Workforce Investment Boards; WIOA=Workforce Innovation and Opportunity Act

Figure 2. Youth connection to programs with YFSN


CE = competitive employment; $\mathrm{CIE}=$ competitive integrated employment; $\mathrm{CMS}=$ Centers for Medicare \& Medicaid Services; EN = Employment Network; IDEA = Individuals with Disabilities Education Act; LEA = local education agency; Pre-ETS = pre-employment transition services; SE = supported employment; WIB = Workforce Investment Boards; WIOA=Workforce Innovation and Opportunity Act

The YFSN becomes the entry point by (1) conducting a robust family systems assessment, (2) building a multi-pronged intervention plan, and (3) setting and implementing a vision with shortterm, intermediate, and long-term goals. Figure 3 provides an overview of the exact services the YFSN would offer.

Figure 3. YFSN services offered

| Family systems <br> needs assessment | Identify youth's strengths and challenges in the context of the family <br> systems exploration process that considers family culture, values, norms, <br> attitudes, and beliefs |
| :---: | :--- |
| Family systems <br> planning | Develop a comprehensive plan to address individual and familial barriers <br> that are identified during the assessment process. |
| Basic needs <br> fuliflilment | Identify needs and make connections within the community to meet basic <br> needs that are serving as barriers to intermediate and long-term goals of <br> employment. |
| Crisis management | Provision of immediate and flexible supports (funded support and <br> assistance) to respond to unanticipated challenges. |
| Advocacy skills and |  |
| resources |  |
| development |  |$\quad$| Provide training to youth on advocacy, self-determination and building |
| :--- |
| social capital. |

The first step, and a foundational component of the YFSN intervention, is a family systems assessment tool. The family systems assessment tool accounts for the youth's and family's needs and also considers how the environment can and will affect the youth's successful transition into adulthood. This in-depth analysis of the environment, including all the factors potentially impeding or accelerating the path to employment, is critical. For example, the YFSN must pay careful attention to elements related to basic needs, race, ethnicity, cultural norms, potential adverse childhood experiences and other points of trauma and adversity, and familial crisis. The YFSN must also consider more typically addressed issues like transportation, desired employment aspirations, and future goals. Too often, singular service systems neglect the complete picture and focus on barriers in a myopic or an insufficiently multi-pronged approach. The YFSN assessment process seeks to mitigate this systemic deficiency by assessing the complete family system of needs before moving forward with the youth.

In the second step of service delivery, the YFSN develops a multi-pronged intervention plan to address the needs and points of adversity (such as health issues, unemployment, eviction, and family crisis) as they emerge. As trust builds in the planning process, the YFSN can delicately navigate the
impact of basic need deficits on the family but most critically on the youth's education and employment aspirations. In fact, the Maryland PROMISE initiative found significantly higher levels of service retention and reengagement when case managers focused on building trusting relationships with youth and families (Crane and others 2019). Another component of the multipronged intervention plan is for the YFSN to make linkages to existing programs like Titles I and IV of WIOA and Medicaid waivers under the Social Security Act. The family may already be linked to some of these programs, but the YFSN will highlight these existing linkages in the planning process while also increasing engagement by providing the focused attention on other systems to meet the goals of youth and families (Crane and others 2019; see Figure 4).

In the third step of the intervention, the YFSN will set and implement a vision with short-term, intermediate, and long-term goals. Initially, the focus of the YFSN must be on addressing the immediate needs acting as barriers to employment. The YFSN will create linkages to local and state resources to increase financial literacy, stabilize basic needs, and increase understanding of available services and resources. For example, this may include connecting with local programs through community banks focused on budgeting. The need for this was illuminated in the Wisconsin PROMISE project, which found youth and families significantly benefited from assistance in navigating and avoiding debt by gaining strong financial skills (e.g., "establishing local banking and securing stable housing"; Schlegelmilch and others 2019). Other connections may assist the youth in increasing self-determination and self-advocacy and in building strong peer relationships. Leveraging the youth and family systems assessment, and in partnership with the educational system (through IEP or 504 planning, when appropriate), the YFSN will also encourage the youth to form transition and post-school goals, as well as increase the youth's ability to navigate existing systems and structures. By ensuring youth set clear post-school goals, are included in general education, access career and technical education, gain paid work experience including work-based learning opportunities, build independent living skills and social skills, engage in self-determination, and access transition services inclusive of linkages to support students, the YFSN facilitates a proven pathway leading to post-school success (Mazzotti and others 2020). Finally, connections to federalor state-funded parent centers can allow families to gain a clearer understanding of the transition and special education process.

After the fulfillment of the youth's and family's basic needs, the YFSN can then work with them on achieving intermediate goals. These intermediate goals drive deeper into fostering true change in the behaviors of youth and family. These changes include increased access to employment and educational services, participation in benefits planning, utilization of existing work incentives, and engagement in services leading to employment and/or postsecondary education. Whether through increased educational attainment or engaging in more comprehensive career planning, even small steps in these areas are predictors of adult employment success (Mazzotti, Test, and Mustian 2012; Luecking and Wittenburg 2009). Further, low to moderate levels of exposure to benefits planning may lead to increased employment outcomes for youth (Schlegelmilch and others 2019).

Ultimately, the long-term goal of the YFSN intervention is attainment of high quality competitive integrated employment; greater economic self-sufficiency; and a reduction in the overall household poverty level, including reliance on SSI and other means-tested public assistance. At this step in the
process, the YFSN becomes a critical touchpoint if any intermediate crises or challenges arise to interrupt or impede the progress the individual made in the short-term and intermediate phases.

Figure 4. YFSN logic model


A simplification of the system by using a YFSN as a catalyst for increasing the understanding of the system by youth and families and by making systemic and resource connections is the most essential premise to accomplishing the outcomes identified in the YFSN logic model (Figure 4). When accessing the constellation of services and supports available, the YFSN intervention should promote and accentuate the policy objectives of existing programs-enabling them to realize their full potential in serving youth receiving SSI and their families. Three declarations form the foundation of the YFSN intervention:

1. The existing policy and practice scaffolding for education, transition, and workforce development presumes universal access to and delivery of evidence-based services (i.e., in-school predictors) and supports for youth with disabilities leading to improved adult living, learning and employment outcomes.
2. Youth receiving SSI and their families face increasingly complex barriers to accessing, engaging, and benefitting from this existing scaffolding of supports and services.
3. Additional bracing, in the form of critical case management (Figure 3), is necessary to facilitate access to the system of supports to aid youth receiving SSI and their families in realizing their full potential under the existing education, transition, and workforce development scaffolding. The complexity, breadth, and depth of their needs will require smaller caseloads for the YFSN.

## IV. Implementation in the existing system

The intersection of the YFSN intervention with the existing system is the foundation of the intervention, as well as its potential scalability and replicability. Youth's receipt of SSI and Medicaid will determine the eligibility for YFSN case management services. A designated YFSN will deliver services to the youth as well as to the parent or guardian responsible for the youth's daily care. The level of overall YFSN services, and funding to address short-term crisis needs, provided to support each family would be determined by the development of a Family Systems Needs Assessment (FSNA) and subsequent validation of those needed supports by a quality assurance team set within a designated state agency (e.g., Department of Health, Social Services, etc.). The FSNA is a critical tool for ensuring equity of services and addressing the presence of potential disproportionalities in the life of a youth and family based upon race, ethnicity, socioeconomic status, or other factors. As the individual needs of the youth are identified, the YFSN can engage in a culturally and family systems responsive education and employment planning process. The YFSN core interventions (see Figure 3) are the primary linkages of the existing system to available services under IDEA and WIOA Titles I and IV.

Each of these respective systems provides a potential piece of scaffolding leading to increased employment and economic success of youth. For example, under IDEA, the provision of workbased learning opportunities and vocational skills training to youth attending school has been shown to lead to increased post-school employment (Mazzotti and others 2016; Test, Smith, and Carter 2014; Test and others 2009). Quite simply, gaining work experience while in school is the primary indicator of post-school employment for youth with disabilities (Hasnain and Balcazar 2009; Taylor and Henninger 2015; Test and others 2009; Tucker, Guillermo, and Corona 2019). Similarly, for out-of-school youth, the Title I workforce system provides an opportunity to engage youth who have graduated or prematurely exited from school. There is evidence a significant percentage of out-ofschool youth do not engage with the mainstream support systems, such as education and social welfare systems, because of previous negative experiences (Hossain 2015). To address these historical concerns of engagement, recent findings suggest a linkage offered by a YFSN can increase engagement of youth and families (Crane and others 2019). Finally, the Title IV VR system offers youth with disabilities a variety of proven pathways to employment, including supported employment, customized employment, and career readiness programs (Wehman and others 2018). However, only 3.2 percent of SSI recipients in 2019 had earned income (SSA 2020b), and the gap between the success of the aforementioned interventions and execution of those services remains vast, thereby suggesting the critical "engagement" (Crane and others 2019) of a YFSN has the potential to act as the connector to the scaffolding of the WIOA system.

Though existing research discussed above offers clear evidence of the value of the YFSN case management services, no definitive policy framework exists on how to successfully structure and maintain these supports or where to situate them within the existing programs. While both regulatory and legislative changes to existing programs could yield the programmatic enhancements needed to provide comprehensive case management support to youth receiving SSI and their families, the time frame associated with these types of changes is prohibitive and-based on the historical political cycle-may not come to fruition. Nevertheless, developing pilots can identify a permanent mechanism along with associated regulatory changes needed. The pilot(s) of the YFSN intervention should build on the existing programs described in Table 1.

Table 1. Existing programs for youth receiving SSI and intersections for the YFSN intervention

| Program/ policy | Description | Eligibility | Potential YFSN intersection |
| :---: | :---: | :---: | :---: |
| Individuals with Disabilities Education Act | Ensures all children with disabilities are entitled to a free and appropriate public education to meet their unique needs and prepare them for adult living, learning, and earning. | IDEA offers provisions to youth in need of special education services through high school graduation or age 21. To qualify, a child must have a disability falling under one of the thirteen categories covered by IDEA. | The service planning document for special education is the IEP, which exclusively focuses on the child's needs. At age 16, the IEP shifts to a future-oriented focus to support the students' long-term adult outcomes. Not all youth receiving SSI are eligible for special education. The YFSN will intersect with this system by supporting the youth in the IEP or 504 process, such as ensuring youth's participation in the IEP/504 meeting and attending the IEP/504 meeting with the youth (if the youth requests it). The goal for the YFSN is to inform the IEP/504 development process to create synergies with the other planned activities specified by the YFSN extending beyond the goals of the educational system and to create a post-school bridge to interventions such as supported employment and customized employment producing increased outcomes. |
| Temporary <br> Assistance for <br> Needy <br> Families <br> (TANF) | Federal/state block grant program providing time-limited cash assistance to families with children when basic family needs exist. | To qualify for this monthly cash benefit, a household must meet specific state income thresholds and have minor children living in the household. | A large number of TANF recipients ( 72 percent) are children who qualify for the benefit because of the family (Falk and Landers 2020). Many state TANF programs work closely with both Title I and IV WIOA programs to make summer youth employment and year-round employment support programs available. In addition, many states implement welfare transition programs providing full case management to support employment and training. There is considerable state-tostate variation in the types of transition support plans developed. Finally, SSI and TANF have differing disability standards, rules, and incentives related to work, further compounding complexity. The YFSN can support the youth and family in navigating these components and making sense of the "potential" opportunities for youth if and when the family has a connection to this system. |


| Program/ policy | Description | Eligibility | Potential YFSN intersection |
| :---: | :---: | :---: | :---: |
| SSI | A federal income supplement program funded by tax revenues designed to help aged, blind, and disabled people with little or no income through cash assistance. The majority of states supplement the monthly federal benefit. | To qualify, adults and children with disabilities must have limited income and resources, Children determined eligible for SSI under the child disability standard must be redetermined at age 18 under the adult disability standard. | The YFSN is a critical voice in creating awareness of key work incentives and program rules to assist the youth in pursuing employment. First, the Student-Earned Income Exclusion allows youth under the age of 26 to exclude earned income up to an annual threshold from the means-tested calculation, thus reinforcing paid work. Second, the Plan for Achieving Self-Support is a written plan of action to support a person receiving SSI in securing a particular kind of job or starting a business-allowing him or her to set aside income and resources to support the plan. Third, the age-18 redetermination of benefit eligibility serves as an important milestone point where youth could lose important supports. Finally, youth and families could benefit from knowledge of Section 301 protections, as well as other critical programs like 1619 and the Medicaid Buy-In program. Although benefits planning and assistance is available nationally, the YSFN would vastly expand access to the knowledge and support needed to understand these various program rules and incentives. |
| Medicaid | Provides state-administered public health care coverage to eligible low-income adults, children, pregnant women, elderly adults, and people with disabilities. | In all states, Medicaid provides health coverage for some lowincome people, families and children, pregnant women, the elderly, and people with disabilities. In some states the program covers all low-income adults below a certain income level. Eligibility by state varies. | Although the Medicaid program does not provide for formal transition planning for youth disabilities, it provides a critical health care support to ensure health and well-being. In addition, in most instances, eligibility for SSI guarantees eligibility for Medicaid-creating an important intersection between these systems. For youth and adults who begin working and earning over allowed state thresholds, many states offer a Medicaid Buy-In program for working people with disabilities to allow them to continue eligibility. In those states, the Medicaid Buy-In program provides an essential continuity in coverage to support improved work outcomes. Linkages to 1115 waiver services and existing Home and Community-Based Services waivers are also a critical component of the YFSN intervention. Though Medicaid includes case management and service coordination within its own systems, such services are not responsible for managing supports across all systems. Thus, the role of the YFSN is critical to aligning these plans with other plans and forming new linkages. |


| Program/ policy | Description | Eligibility | Potential YFSN intersection |
| :---: | :---: | :---: | :---: |
| Ticket to Work and SelfSufficiency Program | The Ticket to Work program offers free and voluntary employment services to SSI recipients and Social Security Disability Insurance (SSDI) beneficiaries through a network of providers known as Employment Networks or state VR programs. | Any SSI recipients and SSDI beneficiaries between the ages of 18 to 64 are eligible to participate in the Ticket program. Youth who have not yet completed their age-18 redetermination are not eligible for the Ticket program. | The Ticket program is plan guided and focuses on ensuring Ticket participants receive the education and training they need to secure and succeed at work, stay employed, and reduce or eliminate dependence on SSI and SSDI. While the program is plan-guided, it is exclusively focused on the participant's needs to achieve their desired employment outcomes. Further, it does not recognize many youth will already have begun their pathway toward employment before age 18. Although the YFSN can make a linkage to employment networks, or VR providers under the partnership plus arrangement, a greater linkage for youth could be made with the proposed YPP. |
| Title I, WIOA <br> State <br> Workforce <br> Development | Every state has a workforce development program providing training and education services and supports to prepare individuals for employment and improve their prospects in the labor market by providing central points of service; there are approximately 3,000 One-Stop Centers nationwide. | All adults ages 18 or older and some youth, including those with disabilities, are automatically eligible for the program. | The 2014 passage of WIOA enacted a comprehensive youth employment program for serving eligible youth who face barriers to education, training, and employment. These services include a broad array of supports: tutoring, study skills, training, and instruction; paid and unpaid work experiences; occupational skills training; leadership development; mentoring; guidance and counseling; financial literacy; entrepreneurial skills training; postsecondary preparation and transition activities; and other supports. The federal/state partnership for workforce development has a strong track record for conducting intervention demonstrations, ranging from the Work Incentive Grants in the 1990s through the Disability Program Navigator, to the current Disability Employment Initiative. The 14 to 24 age eligibility window for youth services, and availability of adult services, coupled with the strong ties of One-Stop Centers to the Ticket to Work program, make the Title I program a strong contender for implementation of the YFSN intervention. The YFSN fills a gap in the existing system because there is no existing intensive case management function to navigate these services. |


| Program/ <br> policy | Description | Eligibility | Potential YFSN intersection |
| :--- | :--- | :--- | :--- |

## V. Testing and evaluating the YFSN intervention

## A. Exploration of structure and funding: Demonstrations

A critical challenge in developing any broad-reaching and cross-system support is to identify the appropriate funding and structure to utilize in its implementation. No current and consistent vehicle to offer comprehensive case management services to the broader SSI population exists in the current disability, education, and employment policy framework. Where elements do exist, they are only available based upon strict eligibility requirements and they do not extend to the individual's family (Golden and others 2021). For instance, in our current social services environment, targeted case management is implemented on a limited basis across various job titles, in distinct systems (see Table 1), to provide services in support of specific adult living, learning, and earning outcomes. These services can include support with daily living issues, transportation, mobility, emotional support, and crisis management. The YFSN can fill a gap as the braces to this existing scaffolding.

To implement the YFSN intervention in a timely fashion, we propose utilizing existing demonstration authorities. The preferred option is to use Sections 1115, 1115(a), and 1915(c) of the Social Security Act, which provide demonstration authority to the Secretary of Health and Human Services (HHS) to conduct Medicaid demonstrations, apply waivers, and test innovative service delivery models. However, a more centralized guidance of these demonstrations at the federal level is suggested to safeguard against inconsistent implementation of the YFSN intervention across states. If too much latitude in the design of the service is allowed, the potential diminishing power of the intervention increases. Additionally, under Section 1115, the commissioner of SSA can authorize support and waivers for state demonstrations involving SSI recipients. Although this approach is an option, SSA has historically relied on external workforce development partners to aid it in its execution of the Ticket to Work and Self-Sufficiency program, which does not contain a case management function. Nevertheless, the Partnership Plus provisions included in the 2008 amendments to the Ticket to Work program offer an interesting cross-systems funding mechanism to support the overall YFSN intervention.

Conversely, the demonstration authority under WIOA presents two options for implementing the YFSN intervention, Title I One-Stop Centers and Title IV VR Agencies. Past navigator type demonstrations specifically engaging individuals with disabilities and those receiving SSI or SSDI were implemented through Title I, which sets a precedence for allowing YFSNs to operate within the local One-Stop Centers. Though some state VR agencies have been involved in past SSAsponsored and U.S. Department of Education-sponsored research demonstrations, leveraging these agencies for YFSNs would require overcoming certain programmatic challenges. Specifically, to promote the viability and consistent adoption of the intervention, policymakers must consider variances in state budgets influencing available human capital for demonstration implementation, such as state match requirements, order of selection restrictions, and a growing demand for VR services in response to new youth priorities.

## B. Exploration of structure and funding: Proposed demonstration methodology

Given the aforementioned options, it is clear a creative approach to funding the YFSN intervention is necessary. Both the HHS and the SSA have broad authority to implement demonstration waivers under the provisions of the Social Security Act. As a result, these two agencies could implement separate but coordinated demonstrations under the provisions of an 1115 waiver initiative that would allow for HHS provision of actual YFSN services to Medicaid-eligible youth receiving SSI and their families. In addition, the SSA could demonstrate and test a YPP under the Ticket to Work and Self-Sufficiency Program to allow for the sharing of incentive payments across providers in the Medicaid, workforce development, and VR system, as demonstrated in some current Employment Network (EN) models. To achieve the flexibility necessary for the YFSN to navigate across systems, the core interventions delivered by HHS would be augmented by the braiding of the incentives to achieve key value-based outcomes through the introduction of a YPP (Figure A.1). The YPP would require the commissioner of SSA to utilize its Section 1115 demonstration authority to create a youth Ticket to Work, otherwise known as the YPP. Although singular approaches delivered under Medicaid or SSA could provide an additional, potentially easier method of implementation, they may further reinforce the theoretically segmented system that currently exists and thereby eliminate at its core the purpose of the YFSN intervention.

The YPP builds upon the current concepts of the partnership plus agreement between state VR entities and SSA while introducing new partners around key measurable skill gains. This mechanism would allow for the sharing of YPP and traditional TTW payments across providers in the education, workforce development, VR, and Medicaid systems, as seen in some current administrative EN models implemented in states such as New York. It accounts for the known fiscal parameter of payer of last resort in the Medicaid system and comparable benefits in the VR system, wherein the utilization of comparable benefits existing outside of the VR system must occur prior to the authorization of VR funds. This mechanism clearly defines these lanes of funding while also braiding them to ignite the power of the robust systems of supports available to each youth and family. Under this framework, VR agencies would still be eligible for cost reimbursement for those engaged in the YPP in accordance with the current rules and regulations of the Ticket to Work and Work Incentives Improvement Act, but new outcomes payments-linking to the measurable skill gains outlined in WIOA-are needed to engage the additional systemic partners in the approach and to bring about a measure of cross-systems accountability.

To alleviate barriers for the youth and family, a universal approach to presumed eligibility criteria for the YFSN intervention and the YPP would ensure ease of access and, most importantly, offer youth an uncomplicated pathway to supports. The presumed eligibility is predicated upon the verification of a youth's eligibility/receipt of SSI and Medicaid. Enrollment in each facet of the YFSN intervention and the YPP would be automatic, to offer one front-door access to the full complement of supports in the 1115 waivers (Medicaid and SSA) as well as existing WIOA services. Although the presumed eligibility is difficult to implement in the current policy landscape, some definitive changes, if demonstrated effective through pilots, would warrant the attention of policymakers. This approach would require the following critical policy amendments:

- Expanded Section 301 Protection: Ensuring the protection of benefits for the youth during the age-18 redetermination process by including active engagement in a YFSN intervention as one way to continue benefits. Currently, the Section 301 protection allows those participating in a VR program or enrolled in special education program to continue receiving SSI benefits even if the person is found ineligible from an age-18 redetermination.
- Alignment of outcome payment with key WIOA performance indicators on measurable skills gains attained by youth in and out of school.
- Leveraging of the WIOA and Medicaid funding rules pursuant with all existing federal and state guidelines while introducing a new hybrid Outcome and Milestone/Outcome method of payments associated with the YPP.
- Paid employment in the YPP defined as competitive integrated employment (per WIOA) with a minimum of five hours of work.


## C. Evaluation and testing

Testing a service model before any attempts to implement a large-scale systems change effort is a core principle of improvement science (Langley and others 2009) and should not be ignored in the implementation of the YSFN approach. Specifically, measuring the approach's short-term, intermediate, and long-term outcomes in a pilot environment, perhaps following a clear model of improvement such as a Plan-Do-Study-Act cycle, is essential toward a goal of scalability. Assessing the essential policy amendments through smaller pilots will allow for the utilization of formative and summative evaluation mechanisms. These mechanisms can identify implementation challenges from the dual lens of both policy and practice, to develop and implement stronger approaches through demonstration waivers.

To qualify for approval of a Section 1115 demonstration waiver, the Centers for Medicare \& Medicaid Services (CMS) has rules regarding what state demonstration evaluations must include. These evaluation rules include quantitative research methods to support an empirical investigation of the impact of programmatic features of the demonstration, approaches to minimize beneficiary impact and protect privacy, and a published evaluation design plan including the hypothesis and evaluation parameters of the demonstration on the state's public website within 30 days of CMS approval (Rosenbaum and Kenney 2017).

Applying lessons learned from YTD, PROMISE, and Section 1115 demonstration evaluations, any demonstration should include the following elements for designing, testing, and evaluating the YFSN demonstration:

- Provide a six- to nine-month start-up (design phase) in which all states engaged in pilots will collectively build uniform practices and measures by investing and engaging stakeholders across the community spectrum in the evaluation design to identify micro, meso, and macro level data collection elements to inform policy impacts.
- Develop a strong, coordinated outreach approach across SSA, the Rehabilitation Services Administration, and CMS to distribute the cost of the outreach and demonstrate a unified voice among federal partners.
- Utilize a "comparable" community, where similar communities serve as the intervention and control sites to promote full adoption of the services within the intervention group.
- Create a uniform consistency in the design with uniform measures. Key elements of the YFSN intervention should be tracked uniformly across all projects, particularly the Family Systems Needs Assessment and linkages to basic need entities, crisis intervention, education, employment, and other supports.
- Create a community of practice to address racial and ethnic disparities within the implementation of the demonstration. The goal of the community of practice would be to increase communication, knowledge, and strategies to build equitable solutions to overcome systemic barriers.
- Create focused working groups to understand how data are shared and engage in problem solving and continuous quality improvement.
- Provide access to and capacity to link to administrative data (at the state and federal levels, such as participation in SSI through SSA) to maximize comprehensiveness of participant outcome data.
- Incorporate funding and resources for an external evaluator to identify a standardized evaluation approach and support data collection and analysis.
- Incorporate measures of fidelity of the YFSN intervention to ensure implementation adheres to the model.


## D. Intervention cost-benefit assessment

The measurement of the costs and benefits of any intervention is a critical step to understanding its sustainability. To measure costs and benefits of the intervention, we could leverage the controlled design by comparing the intervention and control groups. The costs of existing services utilized by youth, such as Title I, Title IV, and other services, would be consistently and uniformly tracked for both the intervention and comparison groups to see any impact of the YFSN intervention on these costs. Similarly, we could compare the groups to measure the net benefit in terms of subsequent outcomes. Because the majority of employment, education, and other supports would be offered through existing systems, the pilot project would cover the costs of the YFSN staff as well as the evaluation. It is estimated the annualized cost for the YFSN service implementation (excluding the research and evaluation cost) would be between $\$ 5,000$ and $\$ 7,000$ per youth. This is based on an average caseload size of twenty to twenty-five youth, factoring in regional differences, and accounting for the need for highly experienced staff. For youth who enter at age 14 and exit the service on average at age 24 , the lifetime cost per youth would range from $\$ 50,000$ to $\$ 70,000$. Although these costs are higher than the $\$ 1,500$ per youth associated with the initial PROMISE design, in reality, the actual cost of PROMISE case management services (comparable to the YFSN) ranged from $\$ 1,175$ (Wisconsin) to $\$ 6,859$ (New York) (Mamun and others 2019). The nature and
scope of these services are designed to be provided with an equal, and perhaps increased, intensity and an increased expectation of training and expertise of the staff implementing the service relative to PROMISE.

Overall, the YFSN intervention should consider multiple stakeholders' perspectives, including the youth receiving SSI and their parents or legal guardians; state and federal government; provider networks, including the YFSN; and society. This will require identifying, categorizing, and archiving all costs and benefits associated with the YFSN demonstration from each of the stakeholder perspectives above. Potential key points of measurement should align with six primary indicators of performance of WIOA, as well as other key measures of programs from Youth Build, Disability Employment Initiative, and apprenticeship programs. Comparison of these key measures will allow the project to be clearly evaluated against the current program and policy framework, which will aid in the sustainability of a standardized approach in the future. This design also ensures the project will address budget neutrality as required under Section 1115 demonstrations.

Section 1115 demonstrations have a long policy history of budget neutrality in accordance with the law. A demonstration project is considered cost neutral when the total cost of the demonstration to the federal government does not exceed the anticipated cost to the government of a state's program in the absence of the demonstration (Rosenbaum and Kenney 2017). Although this premise of budget neutrality has remained unchanged, interpretation across various administrations has tended to take a flexible approach, allowing states to receive federal funding even though the demonstrations vary from their existing state plans. Toward this end, a comprehensive return-oninvestment study grounded in advanced economic theory and methods may not be necessary. A foundational assessment composed of administrative data and relevant calculations across various stakeholder perspectives may be adequate to meet the budget neutrality mandate.

## E. Intervention replicability, scalability, and sustainability

In any economic climate, the need to explore the replicability, scalability, and sustainability of a new intervention model is critically important. The best avenue for replicability and scalability of the YFSN intervention is to have each interested state complete an application to implement a Section 1115 demonstration. Each state proposal would need to follow a set of prescriptive application guidelines to certify the implementation of the YFSN intervention with fidelity. Two coordinated components make up the fiscal framework for the provision of the YFSN: the Section 1115 waiver, through HHS and the Medicaid-designated state units, and the YPP as implemented by the SSA through the Ticket to Work and Self-Sufficiency Program. To sustain the YFSN intervention, dual engagement with HHS and SSA would be ideal. Centrally establishing the 1115 waivers for both coordinated pieces ensures consistent national implementation and federal oversight, even though states would be responsible for implementation of the YFSN intervention. However, for HHS, Section 1115 waivers only allow for research and demonstration projects designed to temporarily pilot or demonstrate programs that are expected to enhance or promote coverage and efficiencies. A more permanent funding vehicle would therefore be needed to sustain the YFSN portion of the intervention. Such a vehicle would likely require amending existing law to expand the TTW program to include the YPP intervention or to move the YFSN portion to another waiver authority. States
initially participating in demonstrating the impact of the intervention would provide further knowledge on the effectiveness of the YFSN intervention and thus how it could potentially be adapted. This information could be critical for policymakers as they consider the value of the more substantial policy amendments needed to sustain the intervention long term.

## VI. Conclusion

Overall, the YFSN creates the unique connecting point to the existing scaffolding to increase the employment, education, and economic outcomes of youth with disabilities. In short, the YFSN addresses issues related to youth and family's lack of knowledge of available systems and supports as well as the lack of connection to those supports. The YFSN creates the additional systemic braces to reinforce the strong scaffolding in place through WIOA, IDEA, and the Social Security Act. Previous demonstration and research projects such as YTD and PROMISE have provided critical guideposts pointing to a systems connector as a missing component in the WIOA framework. These projects also indicated many families struggle to see beyond the immediate crises and basic need deficits. They further face obstacles to navigating the maze of micro-systems within our larger social services construct to put their child on a path to improved economic and educational outcomes. The connector or brace in the scaffolding of the WIOA system of supports is the YFSN. The YFSN intervention includes a robust assessment and planning process, leading to accessing the required services and supports.

Through the creation of two coordinated Section 1115 demonstration waivers within HHS and SSA, the intervention creates a catalyst for change in the lives of youth receiving SSI and their families. The YFSN intervention builds on the research and lessons learned from the last twenty years on the development of high quality employment outcomes for youth with disabilities, as well as the poignant research of PROMISE. Although there is strong evidence for need for these supports, the 1115 waivers will only provide a temporary framework for the intervention. As a result, creating a long-term structure to maintain these supports will require further policy amendments. We have laid out several potential options to create the funding mechanism to support the YFSN. Regardless of the mechanism, the basis of YFSN intervention points to strong evidence supporting youth on SSI to achieve better outcomes.

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## Appendix A

Figure of YPP payment methodology

Figure A.1. YPP payment methodology



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