

TRAINING AND EMPLOYMENT NOTICE	NO. 07-22
	DATE October 18, 2022

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE LIAISONS
STATE WORKFORCE ADMINISTRATORS
STATE AND LOCAL WORKFORCE DEVELOPMENT BOARDS
ALL AMERICAN JOB CENTER PROGRAMS

FROM: BRENT PARTON 
Acting Assistant Secretary

SUBJECT: Joint Communication on Resource Leveraging & Service Coordination to Increase Competitive Integrated Employment for Individuals with Disabilities.

1. **Purpose.** To announce a joint communication from Department of Labor’s (Department) Employment and Training Administration (ETA) and the Office of Disability Employment Policy (ODEP), along with seven other federal agencies, to state and local governments titled “Resource Leveraging & Service Coordination to Increase Competitive Integrated Employment for Individuals with Disabilities.”
2. **Action Requested.** ETA encourages state and local partners to implement blending, braiding, and sequencing strategies across systems to maximize resources and increase Competitive Integrated Employment (CIE) for youth and adults with disabilities.
3. **Summary and Background.**
 - a. Summary – Many different federally-funded programs provide various services to adults and youth with disabilities. If administered without intention, these programs can unintentionally deliver fragmented or disjointed services. Blending, braiding, and/or sequencing enables state and local agencies to effectively leverage available funds across multiple systems to contribute appropriate resources or services so that individual job seekers can enter competitive integrated employment.
 - b. Background – Consistent with the Department’s commitment to a diverse and inclusive workforce, ETA, ODEP, the Social Security Administration and agencies within the U.S. Departments of Education and Health and Human Services have issued a joint communication to promote the leveraging and coordination of resources (e.g., funds, staff, equipment, services) by state and local government systems to increase competitive integrated employment for individuals with disabilities. Agencies and programs often serve jobseekers with disabilities jointly; therefore, the goal for each shared jobseeker with a disability is to receive unduplicated government-funded services in an effective, efficient, and seamless manner.

In competitive integrated employment, individuals with disabilities are paid competitive wages and work in a community setting where most workers do not have disabilities.

The joint communication, included as an attachment to this notice, is also available alongside other resources at ODEP's webpage on competitive integrated employment, at <https://www.dol.gov/agencies/odep/program-areas/integrated-employment>.

4. **Highlights from the Joint Communication.** The joint communication provides an overview of blending, braiding, and sequencing strategies across federal systems and encourages State and local partners to proactively leverage and coordinate their resources. In summary:
- “Blending” occurs when grantees combine dollars from multiple funding streams to create a single source of dollars that is then used to fund specific services that support an individual with a disability in pursuing, obtaining, or maintaining CIE.
 - “Braiding” occurs when grantees use multiple funding streams separately and simultaneously to provide specific services.
 - “Sequencing” involves using multiple funding streams separately and sequentially providing services in support of CIE.

The joint communication highlights examples of leveraging resources to maximize employment, inclusion, and economic advancement outcomes for people with disabilities. It includes a set of frequently asked questions that provides agency-specific examples of blending, braiding, and sequencing among various federal programs and services.

5. **Inquiries.** For further information, please contact your Federal Project Officer (FPO).
6. **Reference.**
- <https://www.dol.gov/agencies/odep/program-areas/integrated-employment>
 - Section 3(11) of the Workforce Innovation and Opportunity Act of 2014 and Section 7(5) of the Rehabilitation Act of 1973, as amended; definition of competitive integrated employment.
7. **Attachments.**
- Frequently Asked Questions: Competitive Integrated Employment and Blending, Braiding, and Sequencing Resources (Services and Funding)
 - Resource Leveraging & Service Coordination to Increase Competitive Integrated Employment for Individuals with Disabilities

Frequently Asked Questions: Competitive Integrated Employment and Blending, Braiding, and Sequencing Resources (Services and Funding)

August 3, 2022

Question 1: What is “blending” resources?

Blending occurs when dollars from multiple funding streams are combined to create a single “pot” of commingled dollars that is then used to fund an initiative or purchase one or more specific services that support an individual with a disability in pursuing, obtaining, or maintaining competitive integrated employment (CIE).ⁱ Typically, combining dollars from multiple funding streams requires explicit statutory or regulatory authorization because the funds lose their individual program identity when blended.ⁱⁱ However, there are some specific instances when such authorization is not required or where blending is permitted in a limited way. States should check with their program officer on allowable activities.

Question 2: What is “braiding” resources?

Braiding occurs when multiple funding streams, separately and *simultaneously*, provide specific services that support an individual with a disability in pursuing, obtaining, or maintaining CIE while retaining the ability to track and account for funds separately. Unlike blending, programs retain their identity when resources are braided. Because braiding involves simultaneous service delivery by two or more systems, it may require interagency coordination and collaboration with this specific goal in mind. Specific statutory or regulatory authority is not required to braid resources.

Question 3: What is “sequencing” resources?

Sequencing occurs when multiple funding streams separately and *sequentially* provide specific services that support an individual with a disability in pursuing, obtaining, or maintaining CIE.

Question 4: Can State governments receive and *simultaneously* use resources from more than one Federal program/source to support the employment goals of an individual with disabilities?

Yes, State governments can receive and *simultaneously* use resources, including funding, from more than one Federal source to support the employment goals of job seekers with disabilities.

The most common strategy for leveraging resources from multiple Federal programs to support the employment goals of a single eligible individual with a disability is through braiding. There are a variety of funding sources that can be leveraged through braiding, if the following criteria are met:

- Individuals have applied, are determined eligible, and have completed the appropriate enrollment processes for all systems providing resources toward a mutual employment goal.
- When braiding funds, the funds can be tracked and documented to meet any accounting and auditing requirements of each individual federally funded system involved.
- The various systems have developed and agreed to a plan in which all resources being leveraged are supplementing and not duplicating efforts. Unless blending is occurring, agencies cannot pay for the same service at the same time. In other words, with braiding, they can pay for services that supplement each other. For example, one system can pay for a job coach while another system pays for transportation to and from work. In some circumstances, programs can pay for the same services under a braiding strategy. If funding is simultaneous, payer of last resort rules require detailed accounting processes documenting that, without the investment of resources from two or more programs, the individual would not be able to access and benefit from the specific service(s). (See additional information in Questions 7 and 8.)

Question 5: What are some examples of programs and funds that may be blended, braided, and/or sequenced to support competitive integrated employment (CIE) outcomes?

The following funds can be blended, braided, and/or sequenced, as applicable, with funds from different funding sources to assist eligible individuals with disabilities to achieve CIE outcomes:

- Individuals with Disabilities Education Act (IDEA) Part B funds reserved for State-level activities may be used to carry out the development and implementation of transition programs, including coordination of services with agencies involved in supporting the transition of students with disabilities to postsecondary activities. 34 CFR 300.704(b)(4)(vi).
- IDEA Part B funds are provided to States, which subgrant the funds to local educational agencies (LEAs), to support the provision of a free appropriate public education to eligible students with disabilities in accordance with their individualized education program (IEP). The IEP, developed under IDEA, for each student with a disability must address transition services requirements beginning not later than the first IEP to be in effect when the student turns 16, or younger if determined appropriate by the IEP Team, and must be updated annually thereafter. The IEP must include:

(1) Appropriate measurable postsecondary goals based upon age-appropriate transition assessments related to training, education, employment, and, when appropriate, independent living skills; and

(2) The transition services (including courses of study) needed to assist the student with a disability in reaching those goals. 34 CFR 300.320(b). While the IDEA statute and regulations refer to courses of study, they are but one example of appropriate transition services.ⁱⁱⁱ Transition services may include job development, job analysis, job placement, and job coaching.

- The Vocational Rehabilitation (VR) program (title IV of WIOA), which provides funding for services designed to meet employment and career goals on an individualized basis, could fund on-the-job training, assistive technology, trial work experiences, skills training, and supported, self, and customized employment services.
- Workforce Innovation and Opportunity Act (WIOA) Youth Services (Title I of WIOA) provides funding for leadership development activities, summer work experiences, skills training, financial literacy, supportive services, and case management.
- The Centers for Medicare & Medicaid Services (CMS) funds employment and related services through the Medicaid State plan and home and community-based services (HCBS) waivers. Medicaid State plans services and HCBS waivers can provide funding for prevocational services, supported and customized employment services, transportation, benefits counseling, financial capability development, workplace personal assistance, peer support, and support coordination.
- Milestone/Outcome payments from the Social Security Administration (SSA) for Ticket to Work can be made at the same time as CMS provides funding for supported employment services. CMS has clarified that Ticket to Work Outcome and Milestone payments funded through the Social Security Administration may occur simultaneously with payment for Supported Employment services funded through the Medicaid HCBS waiver program to create a more robust support system for individuals seeking sustained CIE. Such combined support increases employment opportunities and meaningful community engagement. States have flexibility to craft their own service definitions, even though many States rely on the core service definitions provided by CMS.^{iv} This flexibility helps State agencies come together to support and increase opportunities for CIE for Medicaid HCBS waiver participants. Additional information can be found at: https://www.hhs.gov/guidance/sites/default/files/hhs-guidance-documents/CIB-09-16-2011_2.pdf
- WIOA Adult Services (title I of WIOA) provides funding for skills training, soft skills development, financial literacy, career counseling, and individual training accounts.
- The Substance Abuse and Mental Health Services Administration's (SAMHSA's) Mental Health Block Grants provide funds to behavioral/mental health agencies for eligible individual person-centered plans that cover the costs of peer support, supported employment, rehabilitative services, and service coordination.

- The Consumer and Consumer Supporter National Technical Assistance Centers under the SAMHSA provide training and technical assistance to promote employment for individuals with serious mental illness, including peer support, financial literacy, planning for employment, and entrepreneurship.
- Public housing agencies that receive U.S. Department of Housing and Urban Development (HUD) funding for family self-sufficiency programs cover the expenses of financial literacy, service coordination, and career pathways.
- Centers for Independent Living (CILs), under the Administration for Community Living (ACL) Independent Living program, provide career exploration, job readiness training, resume building, work-based internships and activities, and work incentives benefits counseling.
- University Centers for Excellence in Developmental Disabilities Education, Research, and Service (UCEDD), under the Developmental Disabilities Assistance and Bill of Rights Act (DD Act), provide job skills training through university resources.
- Funds available to local educational agencies and other eligible subrecipients under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V), may be used to pay for the costs of career and technical education (CTE) services required in an IEP developed under IDEA or the costs of CTE services necessary to meet the requirements of Section 504 of the Rehabilitation Act. Funds also may be used to reduce or eliminate out-of-pocket expenses for individuals with disabilities and other special populations participating in CTE, including those participating in dual or concurrent enrollment programs or early college high school programs, and supporting the costs associated with fees, transportation, childcare, or mobility challenges.
- With support from their Governors and/or legislators, a growing number of states have created state-level cross-agency working groups to implement Employment First strategies through cross-system coordination of public resources to advance CIE outcomes.^v

Under [20 U.S.C. 1413\(a\)\(2\)\(D\)](#) and 34 CFR 300.206, LEAs may use IDEA Part B funds to carry out a schoolwide program under Title I of the Elementary and Secondary Education Act (ESEA) provided certain requirements are met, including that the amount of funds used in any such program is, in general, proportional to the number of children with disabilities participating in the schoolwide program.^{vi} Schoolwide programs under Title I of the ESEA allow for greater flexibility in the way public schools may use funds, provided they are based on a comprehensive schoolwide plan built on the results of a comprehensive needs assessment. Additional information on schoolwide programs under Title I of ESEA is available at <https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/title-i-part-a-program/resources/>.

Additional examples of services and resources that can be blending, braided and/or sequenced can be found at the end of this document.

Question 6: How can interagency agreements be used to design collaborative resource leveraging processes to initiate resource blending, braiding, and/or sequencing between two or more public entities?

The Workforce Innovation and Opportunity Act (WIOA) encourages, and in some instances mandates, interagency agreements between two or more public entities at both the State and local level for youth and working age adults with disabilities.^{vii} Public entities benefit from these interagency agreements at State and local levels because they clarify roles and responsibilities. In addition, these interagency agreements offer common definitions for specific supports and services to reduce confusion for provider agencies and individuals with disabilities. They provide guidance on collaboration in the development of individual education, employment, and support plans, specify financial responsibilities, and establish the scope and duration of services and supports. These agreements can also describe the approach to data sharing and measuring performance. They can help avoid confusion among personnel from participating agencies and possible delays in the provision of employment-related services through clearly defined roles and responsibilities. Additionally, interagency agreements can be used to outline how the collaboration between two or more agencies will result in continued compliance with all relevant Federal and State rules and regulations. As a result of such agreements, more support is available to better ensure that individuals with disabilities achieve and retain competitive integrated employment (CIE). (For more information, refer to the Workforce GPS [Sample MOU and Infrastructure Costs Toolkit](#).)

The following are examples of interagency agreements between State and local government entities to leverage resources across systems and ensure that services are appropriately provided to individuals with disabilities:

- American Job Centers (AJCs) and State/Local Workforce Development Boards (WDBs) are State or local government partners that enter into interagency agreements when the “other entities...are components of the statewide workforce development system of the State.”^{viii} Under [34 CFR 361.24\(g\)](#), the vocational rehabilitation (VR) services portion of the WIOA State Plan must describe how the VR agency will collaborate with the State agency responsible for administering the State Medicaid Program, the State agency responsible for providing services for individuals with intellectual and developmental disabilities (I/DD), and the State agency responsible for providing mental health services, to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable.
- State workforce entities, local Centers for Independent Living (CILs), and other for-profit or non-profit local entities providing employment support services to Social Security

Disability beneficiaries may choose to enter into an agreement (Ticket to Work Program Agreement) with the Social Security Administration (SSA) to become a Ticket to Work Employment Network (EN). As a Ticket to Work EN, the organization is eligible for outcome payments based on beneficiary work and earnings outcomes. These funds may be used at the discretion of the organization.^{ix} In addition to workforce entities, Ticket to Work outcome and milestone payments can be received and used concurrently with payments for Medicaid services because these payments are made for an outcome, rather than for a Medicaid service rendered.^x

- Most State agencies have interagency agreements between the workforce system, Medicaid, VR, I/DD, Mental Health, Substance Use, and Education.
- The U.S. Departments of Labor, Education, and Health and Human Services have collaborated for more than a decade on career pathway approaches for individuals with and without disabilities, which also encourages resource braiding through interagency agreements among multiple public entities, as highlighted in the *Career Pathways Toolkit: A Guide for Systems Development*.^{xi}
- The Maryland Department of Labor (MD Labor); State Department of Education, Division of Rehabilitation Services (DORS); Department of Human Services (DHS); Governor's Workforce Development Board (GWDB); and Department of Housing and Community Development (DHCD) created [comprehensive cross-agency policy guidance](#) on creating and implementing Workforce Innovation and Opportunity Act (WIOA) Memoranda of Understanding (MOUs) and Resource Sharing Agreements (RSAs) to promote interagency collaboration and the leveraging of resources between programs.
- Through the Disability Innovation Fund program, authorized by the Further Consolidated Appropriations Act, 2020 ([Pub. L. 116-94](#)), the Rehabilitation Services Administration encourages the development of interagency agreements to support innovative activities aimed at improving the outcomes of individuals with disabilities and the education and post-school outcomes of children receiving Supplemental Security Income (SSI) and their families, which may result in long-term improvement in the SSI child recipient's economic status and self-sufficiency.^{xii}
- Under the Rehabilitation Act of 1973, as amended by WIOA, and its implementing regulations, VR agencies must enter into formal interagency agreements with State educational agencies (SEAs) to collaboratively plan and coordinate transition services for students with disabilities. The formal interagency agreement, which may also include local educational agencies (LEAs), must describe how the parties will conduct joint transition planning and provide pre-employment transition services for in-school youth with disabilities.^{xiii}

- Funding for transition services for youth with disabilities served under the Individuals with Disabilities Education Act (IDEA) may be braided with Medicaid HCBS waiver funds through the development of interagency agreements that specify the responsibility of each partner in accordance with the youth’s individualized education program (IEP), provided the services for those youth are not required under the IDEA. The provider agency must provide documentation showing that the services are required and that they are not already required under the IDEA.^{xiv} The collaboration and braiding of funds allow for additional services to advance employment outcomes and community participation for youth with disabilities who are eligible individuals under both IDEA and State Medicaid HCBS waivers. CMS notes that supported employment cannot be funded through Medicaid if those services include “special education and related services (as such terms are defined in Section 602 of the IDEA) which otherwise are available to the individual through a local education agency.”

Question 7: What does “payer of last resort” mean and does this prevent State or local agencies from braiding resources to support the employment goals of individuals with disabilities?

“Payer of last resort” means the entity that pays after all other programs have been pursued for enrollment and payment. Under the “payer of last resort” (also referred to in Medicaid as “third party liability”) (Section 1902(a)(25)) of the Social Security Act) requirement, State Medicaid programs must take “all reasonable measures to ascertain the legal liability of third parties.”^{xv} Even though many, but not all, publicly funded services are defined as the payer of last resort, there are options that permit braiding resources with other public funders to meet the needs of individuals with disabilities. Further, if the payer of last resort has paid a bill that should have been paid by another entity, then the State or local agency that is the payer of last resort may seek reimbursement.^{xvi}

The payer of last resort requirement does not prevent State and local agencies from braiding resources. Braiding resources to meet the needs and employment goals of individuals with significant disabilities is a strategy that is supported across the Federal government. In 2011, CMS issued an Informational Bulletin clarifying that Medicaid HCBS waiver funds may be used for supported and customized employment, peer support services, and prevocational services.^{xvii} The Medicaid 1915(c) HCBS Waiver program complements as well as supplements services that are already available under the Medicaid State plan and other Federal, State and local public programs, as well as the supports that families and communities provide.^{xviii}

Question 8: How can State and local partners use interagency agreements to promote competitive integrated employment (CIE) that meet payer of last resort (also known as third party liability) requirements?

State agency funders (e.g., vocational rehabilitation, behavioral health, developmental disabilities, education) should develop interagency agreements that outline the specific resources (i.e., funds, staff, and services) for which each funder is taking responsibility to jointly support job seekers with a disability. Interagency agreements detail how the separate agencies will come together to make decisions and engage common customers in making informed choices about services. By clarifying responsibilities between the agencies upfront, the funders will be able to work collaboratively to ensure a smoother payer of last resort process when providing services to a shared job seeker. A procedure for resolving disputes regarding payment or reimbursement for specific services can also be specified in the agreement.

To comply with payer of last resort requirements, an interagency agreement must include descriptions of the specific services to be provided. Public entities should also specify in the interagency agreement who will provide specific services, under what conditions, for how long, how they are going to help the individual, and how they are going to fund the services. If services for an individual are likely to overlap due to the timing and sequencing of the services, the interagency agreement should specify which entity funds what services.

Question 9: Where can States and local partners find more information to support competitive integrated employment (CIE) for job seekers with disabilities?

To learn more about proven and promising practices that result in CIE outcomes for individuals with disabilities, please visit the [Knowledge Translation \(KT\) Consortium](#) page on the [LEAD Center website](#). The KT Consortium brings together over 25 federally funded training and technical assistance centers, each with their own unique mission addressing different aspects of employment, career readiness and development, transition, and accessibility for youth and adults with disabilities. On the LEAD Center website, you also can find [State Specific Policies and Data](#), resources on [Competitive Integrated Employment](#), [WIOA data resources](#), employment strategies (e.g., [inclusive career pathways](#), [inclusive apprenticeship programs](#), [customized employment and discovery](#), [Individual Placement and Support for People with Mental Health Conditions](#)), and more. These training and technical assistance centers are funded by the following Federal agencies: Administration for Community Living (ACL); National Institute for Disability, Independent Living and Rehabilitation Research (NIDILRR); Office of Disability Employment Policy (ODEP); Office of Special Education Programs (OSEP); Rehabilitation Services Administration (RSA); Social Security Administration (SSA); and the Substance Abuse and Mental Health Services Administration (SAMHSA).

Examples of Programs and Services for Blending, Braiding and/or Sequencing Resources to Support Competitive Integrated Employment (CIE)

Agency	Program
<p><u>Health and Human Services: Centers for Medicare & Medicaid Services (CMS)</u></p>	<p><u>Home and Community-Based Services (HCBS) Waivers, Medicaid State Plan Services</u></p> <ul style="list-style-type: none"> • Prevocational Services • Supported Employment (wage or self-employment) • Customized Employment • Personal Assistance/Personal Care Assistance • Transportation • Work Incentives Benefits Counseling • Peer Support <p><u>CMS 1915(c) Technical Guide Instructions, Technical Guide and Review Criteria.</u></p> <p><u>HCBS Authorities Information</u></p> <p><u>Medicaid Employment Initiatives</u></p> <p><u>ACA Premium Assistance Options</u></p> <p><u>Money Follows the Person (MFP)</u></p> <p><u>Community First Choice Option (CFC)</u></p> <p>State and local initiatives through HCBS and other waivers</p> <p>Extended supports for people not enrolled in HCBS waiver</p> <p>American Rescue Plan Act of 2021 Section 9817 web page provides information on State’s approved plans to spend a total of \$25 billion in funding on enhancing, expanding and strengthening HCBS.</p>
<p><u>Health and Human Services: Administration for Community Living (ACL)</u></p>	<p>Centers for Independent Living</p> <ul style="list-style-type: none"> • Career Exploration • Individual Advocacy • Job Readiness Training • Resume Building • Work-based Internship Activities • Work Incentives Benefits Counseling • Peer Support • Assistive Technology

Agency	Program
	<ul style="list-style-type: none"> • Ticket to Work <p>University Centers for Excellence in Developmental Disabilities Education, Research, and Service (UCEDD)</p> <ul style="list-style-type: none"> • Education • Occupational skills training • Supportive services • Technical Assistance • Assistive Technology • Mentoring <p>State Grants for Assistive Technology (AT) Program</p> <ul style="list-style-type: none"> • Public awareness, training and technical assistance • Information, assistance and referral • AT device demonstrations and device loans • Reutilization of AT devices and durable medical equipment • State financing activities
<p><u>Health and Human Services: Substance Abuse and Mental Health Services Administration (SAMHSA)</u></p>	<p>Individual Placement and Support (IPS)/ Evidence-based Supported Employment Grants</p> <p>Community Mental Health and Substance Abuse Treatment and Prevention Block Grants</p> <p>Certified Community Behavioral Health Clinic Grants</p> <p>Healthy Transitions Grants</p> <p>Treatment, Recovery and Workforce Support Grants</p> <p>Person-centered recovery plans used for</p> <ul style="list-style-type: none"> • Rehabilitative services • Supported employment • Service coordination • Self-directed care • Behavioral health care
<p><u>Social Security Administration (SSA)</u></p>	<p>Ticket to Work</p> <ul style="list-style-type: none"> • Free employment support services provided by an Employment Network or Vocational Rehabilitation agency to Social Security beneficiaries aged 18 to 64 with disabilities (Choose Work! - Ticket to Work - Social Security (ssa.gov))

Agency	Program
	<p>Plan to Achieve Self-Support (PASS)</p> <ul style="list-style-type: none"> Excludes income or resources saved for vocationally related objectives that would otherwise be counted in determining SSI eligibility (Social Security Online -Plan to Achieve Self-Support (PASS) (ssa.gov)) <p>SSA Work Incentives (Social Security Online - The Red Book - A Guide to Work Incentives (ssa.gov))</p> <p>Work Incentives Planning Assistance (WIPA) – Free work incentives and benefits counseling services for beneficiaries with disabilities (The Work Site - Work Incentives Planning and Assistance (ssa.gov))</p> <p>Protection and Advocacy for Beneficiaries of Social Security (PABSS) – PABSS advocates provide legal support, advocacy, and information to assist beneficiaries to resolve employment-related concerns</p>
<p>Labor: Employment and Training Administration (ETA)</p>	<p>Workforce Innovation and Opportunity Act (WIOA) Adult and Dislocated Worker Programs</p> <ul style="list-style-type: none"> Career and training services available, along with supportive services to allow participation in those services. The Adult program prioritizes adults receiving public assistance, adults who are low-income and adults who are basic skills deficient. The Dislocated Worker program serves those impacted by layoffs or economic disruptions. Training is often purchased through an Individual Training Account (ITA), a voucher-like mechanism. Local boards may also deliver class-size trainings in certain circumstances outside the ITA process. Registered Apprenticeships <p>WIOA Youth Services</p> <ul style="list-style-type: none"> Tutoring, study skills training, instruction, and dropout prevention services Alternative secondary school services and dropout recovery services Paid and unpaid work experiences Occupational skills training Education offered concurrently with workforce preparation and training Leadership development opportunities Supportive services Adult mentoring Follow up services Comprehensive guidance and counseling

Agency	Program
	<ul style="list-style-type: none"> • Financial literacy education • Entrepreneurial skills training • Job Corps • Services that provide labor market information • Post-secondary preparation and transition activities <p>Competitive Grant Programs, i.e. Pathway Home, Young Adult Reentry Partnerships, Growth Opportunities, YouthBuild, Senior Community Service Employment Program</p> <ul style="list-style-type: none"> • Career services • Training services • Supportive services • Paid and unpaid work experiences
<p style="text-align: center;"><u>Education:</u> <u>Office of Elementary and Secondary Education</u> <u>(OESE)</u></p>	<p>Title I ESEA Improving Basic Programs Operated by Local Educational Agencies</p> <ul style="list-style-type: none"> • Counseling • College and career awareness and preparation • Mentoring • Family Literacy
<p style="text-align: center;"><u>Education:</u> <u>Office of Career, Technical, and Adult Education</u> <u>(OCTAE)</u></p>	<p>State Leadership Activities under Perkins Title I Basic State Grants</p> <ul style="list-style-type: none"> • Recruitment of special populations to enroll in career technical education programs • Career technical education programs for students in State schools for the deaf or blind <p>Local Uses of Funds under Perkins V Title I Basic State Grants</p> <ul style="list-style-type: none"> • Career exploration and career development activities • Career and technical education (CTE) programs • CTE services required in an individualized education program developed under the Individuals with Disabilities Education Act and services necessary to meet the requirements of section 504 of the Rehabilitation Act of 1973 with respect to ensuring equal access to CTE. • Continuum of work-based learning opportunities, including simulated work environments • Industry-recognized certification examinations or other assessments leading toward a recognized postsecondary credential • Support to reduce or eliminate out-of-pocket expenses for individuals with disabilities and other special populations participating in CTE, including costs associated with participating

Agency	Program
	in dual or concurrent enrollment programs or early college high school programs, and costs associated with fees, transportation, child care, or mobility challenges
<p style="text-align: center;"><u>Education: Office of Special Education Programs (OSEP)</u></p>	<p>Special Education and Related Services</p> <ul style="list-style-type: none"> • Individualized Education Program • Transition Services in Most Integrated Setting • Work Experience / On-the-Job Training (OJT) • Assistive Technology • Financial Capability
<p style="text-align: center;"><u>Education: Rehabilitation Services Administration (RSA)</u></p>	<p>Title IV of WIOA/Vocational Rehabilitation Core Services</p> <ul style="list-style-type: none"> • Purchase of services for employment-related objectives • Assistive Technology • On-the-Job Training (OJT) • Work Readiness/Skills Development • Internships/Trial Work Experiences/Work-Based Learning • Education/Training • Work Incentives Benefits Counseling • Supported, Self and Customized Employment services • Job Loss Prevention services • Pre-Employment Transition Services for students
<p style="text-align: center;"><u>Housing and Urban Development (HUD)</u></p>	<p>Family Self-Sufficiency Programs</p> <p>Homeownership</p> <p>Rental Assistance</p> <p><u>Jobs Plus Initiative (JPI) program (HUD)</u></p>

Agency	Program
<ul style="list-style-type: none"> ○ <u>Department of Health and Human Services' Centers for Medicare & Medicaid Services (CMS), Administration for Community Living (ACL), and Substance Abuse and Mental Health Services Administration (SAMHSA);</u> ○ <u>Department of Education's Rehabilitation Services Administration (RSA) and Office of Special Education Programs (OSEP);</u> ○ <u>Social Security Administration (SSA).</u> 	<p><u>Recent Funding Opportunities to Expand Access to CIE for Individuals with Disabilities (dol.gov)</u>: The Further Consolidated Appropriations Act of 2020 (FCAA); Coronavirus Aid, Relief, and Economic Security Act (CARES); the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSA); the American Rescue Plan Act of 2021 (ARPA).</p>

ⁱ The Workforce Innovation & Opportunity Act (WIOA) ([Public Law No. 113-128](#)) defines “competitive integrated employment” as work that:

(i) Is performed on a full-time or part-time basis (including self-employment) and for which an individual is compensated at a rate that-

(A) Is not less than the higher of the rate specified in section 6(a)(1) of the [Fair Labor Standards Act of 1938 \(29 U.S.C. 206\(a\)\(1\)\)](#) or the rate required under the applicable [State](#) or local minimum wage law for the place of employment;

(B) Is not less than the customary rate paid by the employer for the same or similar work performed by other employees who are not individuals with disabilities and who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills; and

(C) In the case of an individual who is self-employed, yields an income that is comparable to the income received by other individuals who are not individuals with disabilities and who are self-employed in similar occupations or on similar tasks and who have similar training, experience, and skills; and

(D) Is eligible for the level of benefits provided to other employees; and

(ii) Is at a location -

(A) Typically found in the community; and

(B) Where the employee with a disability interacts for the purpose of performing the duties of the position with other employees within the particular work unit and the entire work site, and, as appropriate to the work performed, other persons (*e.g.*, customers and vendors), who are not individuals with disabilities (not including supervisory personnel or individuals who are providing services to such employee) to the same extent that employees who are not individuals with disabilities and who are in comparable positions interact with these persons; and

(iii) Presents, as appropriate, opportunities for advancement that are similar to those for other employees who are not individuals with disabilities and who have similar positions. (29 U.S.C. 705(5) and 709(c); 34 CFR 361.5(c)(9)).

-
- ⁱⁱ Butler, S., Higashi, T., and Cabello, M. (2020). [*Budgeting to promote social objectives—A primer on braiding and blending*](#). Brookings Institution and LEAD Center (2013). *Building a Progressive Vision for a Policy and Service Delivery Framework that Promotes the Effective Leveraging of Resources to Improve Employment & Socioeconomic Advancement of Youth and Adults with Disabilities*. Office of Disability Employment Policy, U.S. Department of Labor. <https://leadcenter.org/resources/2013-lead-center-policy-roundtable-report-making-collaboration-real/>
- ⁱⁱⁱ [A Transition Guide to Postsecondary Education and Employment for Students and Youth with Disabilities](#). (Revised August 2020.)
- ^{iv} The CMS 1915(c) Technical Guide is available at: https://wms-mmdl.cms.gov/WMS/help/35/Instructions_TechnicalGuide_V3.6.pdf
- ^v U.S. Department of Labor, Office of Disability Employment Policy, Employment First State Leadership Mentoring Program, found at <http://www.dol.gov/odep/topics/EmploymentFirst.htm>
- ^{vi} See regulations at 34 CFR 300.206: [https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-300#p-300.206\(a\)](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-300#p-300.206(a))
- ^{vii} WIOA section 121(c) and (h) requires that Local Workforce Development Boards sign an MOU with one-stop partners/ programs on service delivery and cost-sharing within AJCs, as described in the WIOA Joint Rule at 20 CFR 678.500 for the core programs administered by the U.S. Department of Labor and in 34 CFR 361.500 and 463.500 for the Vocational Rehabilitation and Adult Education and Family Literacy Act (AEFLA) programs.
- ^{viii} 29 U.S.C. § 721(a)(11)(A) as amended
- ^{ix} [RFA and TPA - yourticketto work.ssa.gov](#)
- ^x Centers for Medicare & Medicaid Services. (September 16, 2011). CMCS Informational Bulletin and Technical Guide. https://www.hhs.gov/guidance/sites/default/files/hhs-guidance-documents/CIB-09-16-2011_2.pdf
https://wms-mmdl.cms.gov/WMS/help/35/Instructions_TechnicalGuide_V3.6.pdf
- ^{xi} Workforce GPS (2019). [Career Pathways Toolkit: A Guide for Systems Development](#).
- ^{xii} Federal Register. [Notice inviting applications for fiscal year \(FY\) 2021 for the Disability Innovation Fund—Career Advancement Initiative Model Demonstration Project, Assistance Listing Number 84.421C.](#)
- ^{xiii} Federal Register (2016) 29 U.S.C. 721(a)(11)(D) and 34 CFR 361.22
- ^{xiv} [34 CFR 300.154\(a\) and \(b\)](#)
- ^{xv} Social Security Act codified at 42 U.S.C. §1396a(a)(25)
- ^{xvi} See 42 U.S.C. §1396a(a)(25)
- ^{xvii} Centers for Medicare & Medicaid Services. (September 16, 2011). CMCS Informational Bulletin and Technical Guide. https://www.hhs.gov/guidance/sites/default/files/hhs-guidance-documents/CIB-09-16-2011_2.pdf
https://wms-mmdl.cms.gov/WMS/help/35/Instructions_TechnicalGuide_V3.6.pdf
- ^{xviii} See Social Security Act §1915(c)



**FEDERAL JOINT COMMUNICATION TO STATE AND LOCAL GOVERNMENTS:
Resource Leveraging & Service Coordination to Increase Competitive
Integrated Employment for Individuals with Disabilities**

August 3, 2022



Dear Colleagues:

As part of our commitment to a diverse and inclusive workforce, the U.S. Departments of Labor, Education, Health and Human Services, and the Social Security Administration, as well as the undersigned subagencies below, are providing this joint communication to promote the leveraging and coordination of resources (e.g., funds, staff, equipment, services) by State and local government systems to increase competitive integrated employment (CIE) outcomes for individuals with disabilities.¹ We recognize across agencies that we often serve job seekers with disabilities jointly. Our goal for each shared job seeker with a disability is for them to receive effective, efficient, and seamless government-funded services.



Our respective Federal departments and agencies are collectively encouraging State and local partners to proactively implement resource blending, braiding, and sequencing strategies, as appropriate, across systems to maximize resources while simultaneously tackling our shared goal of improving CIE outcomes for youth and adults with disabilities. Our purpose, through this joint communication, is to drive innovation and effectively disseminate best practices across systems that share a common goal, which is to increase CIE outcomes for job seekers with disabilities.



Through collaborative efforts, State and local entities providing employment support services can maximize employment, inclusion, and economic advancement outcomes for individuals with disabilities. This communication also highlights examples of resource leveraging through the blending, braiding, and sequencing, as allowable, of resources and service coordination strategies across Federally financed systems to improve employment outcomes.



What is blending, braiding, and sequencing of resources?

Multiple efforts at the local and State levels of government bring an unprecedented focus on the importance of resource leveraging and service coordination across various public systems to increase CIE outcomes for job seekers with disabilities. Numerous innovative strategies are available to maximize the efficient and effective use of Federal funds across systems for supporting individuals with disabilities to secure and maintain CIE. These strategies include, as appropriate, the blending, braiding, and sequencing of funding, resources, organizational functions, and services, often resulting in cross-system processes that are streamlined and more user-friendly for job seekers with disabilities and families.



- **Blending** occurs when dollars from multiple funding streams are combined to create a single “pot” of commingled dollars that is then used to fund an initiative or purchase one or more specific services that support an individual with a disability in pursuing, obtaining, or maintaining CIE. Blending refers to the mixing together of funds from multiple sources to support a common goal, such that each individual funding source loses its program identity. Typically, States or regions need explicit authorization by statute or regulation to allow the blending of funds.ⁱⁱ However, [Ticket to Work Outcome and Milestone payments](#) do not require separate tracking and can be blended with other fund sources that do not require such tracking, based on program authorization. [Performance Partnership Pilots \(P3\)](#) for disconnected youth allow considerable flexibility in using discretionary funds across multiple Federal programs. Ticket to Work payments can be blended in a P3 project under a P3 agreement if the P3 project participates in the Ticket to Work program under a Ticket Program Agreement.
- **Braiding** occurs when multiple funding streams separately and *simultaneously* provide specific services that support an individual with a disability in pursuing, obtaining, or maintaining CIE. Because braiding involves simultaneous service delivery by two or more systems, it may require interagency coordination and collaboration with this specific goal in mind. Unlike blending, braiding resources enables programs to track and maintain separate accountability for each funding stream. In other words, with braiding, resources do not lose their program identity and, thus, agencies do not need specific statutory authority to engage in the braiding of resources. For instance, the Centers for Medicare & Medicaid Service (CMS) has clarified that Ticket to Work Outcome and Milestone payments funded through the Social Security Administration may occur simultaneously with payment for Supported Employment services funded through the Medicaid Waiver program to create a more robust support system for individuals seeking sustained CIE.
- **Sequencing** occurs when multiple funding streams separately and *sequentially* provide specific services that support an individual with a disability in pursuing, obtaining, or maintaining CIE. For instance, an individual may begin the journey toward sustained CIE through funding available under the Individuals with Disabilities Education Act (IDEA). When they age out of educational services, they may continue with funding through Vocational Rehabilitation and progress to Medicaid funding through a Home and Community- Based Services (HCBS) waiver for sustained job coaching over an extended period of time.

NOTE: Sequencing of funds may be an important strategy when one-time additional funding is provided, such as through the American Rescue Plan or funding as a result of disasters.

Federal policy guidance on providing and delivering services to support CIE for individuals with disabilities often involves multiple Federal, state, and local agencies. Further, across different states, local agencies vary in the services they provide using multiple Federal funding streams. For example, a state workforce agency may finance training and job placement services for an eligible participant under one core program while the Vocational Rehabilitation agency may provide transportation support,

assistive technology, and the services of a job coach for that same individual who is also eligible under the Vocational Rehabilitation program. When these services are provided in a coordinated and simultaneous manner, this is an example of the braiding of resources at the state level.

Through blending, braiding, and sequencing resources, all partners can share in the achievement of successful employment outcomes, while ensuring a seamless experience for the job seekers receiving services.

The undersigned agencies promote and support the leveraging of resources, as applicable, across their systems to further encourage strategic collaborations and maximize efficiencies in the pursuit of CIE and economic advancement of individuals with disabilities. Our agencies continue to work together to issue additional informational resources (such as those attached) and technical assistance to support systems in these efforts.

Sincerely,



/s/

Alison Barkoff
Acting Administrator and Assistant Secretary for Aging
Administration for Community Living
U.S. Department of Health and Human Services



/s/

Miriam E. Delphin-Rittmon, Ph.D.
Assistant Secretary for Mental Health and Substance Use
Substance Abuse and Mental Health Services Administration
U.S. Department of Health and Human Services



/s/

Carol L. Dobak
Acting Deputy Commissioner, delegated the authority to perform the functions and duties of the
Commissioner, Rehabilitative Services Administration
Office of Special Education and Rehabilitative Services
U.S. Department of Education

Stephen Evangelista

Digitally signed by Stephen Evangelista
Date: 2022.08.10 13:05:08 -0400

/s/

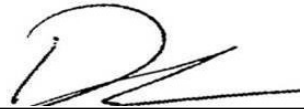
Stephen Evangelista
Acting Deputy Commissioner,
Office of Retirement and Disability Policy (DCRDP)
Social Security Administration

/s/ 

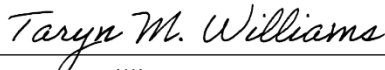
Katherine Neas
Deputy Assistant Secretary, delegated the authority to perform the functions and duties of the
Assistant Secretary for the Office of Special Education & Rehabilitative Services
U.S. Department of Education

/s/ 

Brent Parton
Acting Assistant Secretary, Employment & Training Administration
U.S. Department of Labor

/s/ 

Daniel Tsai
Deputy Administrator and Director Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
U.S. Department of Health and Human Services



Taryn M. Williams
Assistant Secretary, Office of Disability Employment Policy
U.S. Department of Labor



/s/

Valerie C. Williams
Director, Office of Special Education Programs
U.S. Department of Education

Enclosures

ⁱ Pursuant to [34 C.F.R. § 361.5\(c\)\(9\)](#) for purposes of the Vocational Rehabilitation program, competitive integrated employment means work that:

- (i) Is performed on a full-time or part-time basis (including self-employment) and for which an individual is compensated at a rate that-
 - (A) Is not less than the higher of the rate specified in section 6(a)(1) of the [Fair Labor Standards Act of 1938 \(29 U.S.C. 206\(a\)\(1\)\)](#) or the rate required under the applicable [State](#) or local minimum wage law for the place of employment;
 - (B) Is not less than the customary rate paid by the employer for the same or similar work performed by other employees who are not individuals with disabilities and who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills; and
 - (C) In the case of an individual who is self-employed, yields an income that is comparable to the income received by other individuals who are not individuals with disabilities and who are self-employed in similar occupations or on similar tasks and who have similar training, experience, and skills; and
 - (D) Is eligible for the level of benefits provided to other employees; and
- (ii) Is at a location -
 - (A) Typically found in the community; and
 - (B) Where the employee with a disability interacts for the purpose of performing the duties of the position with other

employees within the particular work unit and the entire work site, and, as appropriate to the work performed, other persons (*e.g.*, customers and vendors), who are not individuals with disabilities (not including supervisory personnel or individuals who are providing services to such employee) to the same extent that employees who are not individuals with disabilities and who are in comparable positions interact with these persons; and

(iii) Presents, as appropriate, opportunities for advancement that are similar to those for other employees who are not individuals with disabilities and who have similar positions. (34 CFR 361.5(c)(9))

ⁱⁱ Butler, S., Higashi, T., and Cabello, M. (2020). [*Budgeting to promote social objectives—A primer on braiding and blending*](#). Brookings Institution and LEAD Center (2013). *Building a Progressive Vision for a Policy and Service Delivery Framework that Promotes the Effective Leveraging of Resources to Improve Employment & Socioeconomic Advancement of Youth and Adults with Disabilities*. Office of Disability Employment Policy, U.S. Department of Labor. <https://leadcenter.org/resources/2013-lead-center-policy-roundtable-report-making-collaboration-real/>