

## **National Expansion of Employment Opportunities Network (NEON):**

### **A Framework to Increase Competitive Integrated Employment through State Policy**

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# Executive Summary

When given sufficient opportunities and support, people with disabilities, including those with significant disabilities, have demonstrated that they can work in a wide range of jobs alongside people without disabilities. Efforts to support job seekers to find work in the community that pays a fair wage are called Competitive Integrated Employment (CIE) programs. Several approaches have proven effective for increasing competitive job opportunities and supporting disabled people to find and keep these jobs. Federal and State policy should support the goal of CIE for all people with disabilities who want to be employed by:

- Creating CIE services and making them available to everyone who needs them,
- Ensuring organizations that provide services have the resources they need, such as understanding of best practices in management and structure, and
- Promoting the expectation among service providers, customers, families, caregivers, and policy makers that employment services will result in employment.

The U.S. Department of Labor's (DOL) Office of Disability Employment Policy (ODEP) established the National Expansion of Employment Opportunities Network (NEON) as part of its approach to promoting, supporting, and expanding CIE for disabled people, including those with Intellectual and Developmental Disabilities (IDD). One of NEON's strategies is to develop a National Framework that identifies barriers to increasing CIE and describes how policy and practice can promote it at the State level. Since each State has agencies that fund, regulate, oversee, and/or influence the provision of employment services to individuals with disabilities, NEON enlisted leaders of State Intermediary Organizations (SIOs) to develop a set of recommendations that their members and other State and Federal policy makers can reference as they work to increase and enhance CIE. These participating SIOs included:

- [Council of State Administrators of Vocational Rehabilitation \(CSAVR\)](#),
- [National Association of State Mental Health Program Directors \(NASMHPD\)](#),
- [National Association of State Directors of Developmental Disability Services \(NASDDDS\)](#), and
- [National Association of Medicaid Directors \(NAMD\)](#).

The [Association of People Supporting Employment First \(APSE\)](#) also participated in the development of the Framework.

Leaders from these SIOs met several times during 2023 and 2024 to develop this Framework. Over the course of these meetings, they agreed that, in addition to assumption of universal employability among job seekers, the Framework's fundamental principles should be: 1) All decisions and actions should

respond to the needs, preferences, and experiences of employment service customers<sup>1</sup>, and 2) all decisions and actions should reflect the values of Diversity, Equity, Inclusion, and Accessibility (DEIA).

With these principles as a foundation, the SIOs identified and organized the group's findings and recommendations into six core values: collaboration/coordination, consistency, creativity, conviction, communication, and celebration/curiosity.<sup>2</sup> SIO leaders defined each value, identified barriers to their widespread adoption, identified actions with potential to overcome these barriers, and made suggestions for how policy and practice can incorporate these values. They then framed those considerations as possible questions for planning actions.

The "six Cs" are:

1. **Collaboration/Coordination:** Active efforts by agencies to collaborate with key partners, including employment service customers, and to share data and outcomes. These coordinated efforts should occur throughout the planning, development, implementation, and evaluation of employment service.
2. **Consistency:** Sharing the same expectations of outcomes and interpretations of policies across agencies, including adopting shared definitions and terminology by all to enhance service consistency. Consistency also includes joint staff training, shared places to access training materials, shared application processes, and shared service data.
3. **Creativity:** Willingness to try innovative approaches and flexibility in delivering employment-related services. Customers' needs and preferences, rather than rigidly interpreted regulations, should drive the employment service process.
4. **Conviction:** Demonstrated commitment to clear core values. All organizations should share the conviction that anyone who wants CIE is employable and the expectation that supported employment services will lead to employment. All persons who want to work can find employment when provided with individualized service and accommodation, regardless of disability label or need for support. All services and management processes should reflect the values of DEIA.
5. **Communication:** Seeking and responding to feedback from customers and collaborators in establishing employment service policy and in delivering employment services. Communication also includes clear data reporting and use of plain language in describing services and evaluation results.
6. **Celebration/Curiosity:** Identifying and spotlighting progress in helping customers to achieve employment, especially when it exceeds initial expectations and goals. This also includes a focus on recognizing and encouraging people whose work is to assist individuals with disabilities to achieve

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<sup>1</sup> Different entities that serve individuals with disabilities use different labels, including "clients," "consumers," and "end service users." The SIOs chose to use the term "employment service customers," or simply "customers" in this report based on CSAVR data that indicate customers prefer this term.

<sup>2</sup> Known as the "6 C's," adapted from values identified by the Virginia Department of Behavioral Health and Developmental Services for [its strategic mission and vision](#).

CIE goals. The principle of curiosity reflects the importance of continually working to improve service quality and outcomes.

# Introduction to State Policy Framework

## Background

In 2016, the Advisory Committee on Increasing Competitive Integrated Employment for Individuals with Disabilities (the Advisory Committee) submitted a [final report to Congress](#). The Advisory Committee comprised self-advocates, employment service providers, representatives of national disability advocacy organizations, academic experts, and employer representatives. The Advisory Committee's report discussed issues that impact the pursuit of *Competitive Integrated Employment* (CIE) by people with disabilities, including those with Intellectual and Developmental Disabilities (IDD), and made recommendations for mitigating barriers to CIE. Key recommendations were incentives for employment service providers to increase effectiveness through organizational restructuring and staff professional development, as well as to develop supportive State and national policy agendas. To address these needs, the U.S. Department of Labor's (DOL) Office of Disability Employment Policy (ODEP) established the [National Expansion of Employment Opportunities Network \(NEON\)](#).

NEON is an ongoing initiative with multiple thrusts: Collaborations with *National Provider Organizations* (NPOs) to help expand Local Provider Organizations' (LPOs) CIE delivery through their membership networks and implementation of earlier recommendations, known as the [NEON Plan to Increase CIE](#) (2022); *training and technical assistance (T/TA)* to these LPOs for service restructuring to increase CIE; selected States receiving intensive policy consulting and capacity building support for their efforts to increase CIE; and development of a Framework to advance CIE through State policy. This report presents the Framework.

NEON supported *State Intermediary Organizations* (SIOs) in developing this Framework. SIOs represent directors of State agencies with responsibilities for implementing, overseeing, and/or influencing services that impact the provision of employment and related services to people with disabilities. NEON convened SIO leaders to develop a set of recommendations that their members and other State and Federal policy makers can reference as they work to increase CIE. The participating SIOs included: the Council of State Administrators of Vocational Rehabilitation (CSAVR), the National Association of State Mental Health Program Directors (NASMHPD), the National Association of State Directors of Developmental Disabilities Services (NASDDDS), and the National Association of Medicaid Directors (NAMD). The Association of People Supporting Employment First (APSE), a contributor to the NEON Plan to Increase CIE, also provided input regarding this Framework. [Appendix B](#) presents descriptions of these organizations and their missions.

## Action Planning Process

The process for garnering input from SIOs included four day-long meetings convened between June and November 2023. Leaders and representatives from each of the SIOs participated in these meetings, which NEON conducted through a hybrid of in-person and virtual attendance to accommodate the schedules and locations of participants. EconSys recorded the meetings for internal use and prepared summaries after each meeting for reference during development of the Framework.

The meetings focused on key issues, challenges, and opportunities integral to SIO members as they work to increase CIE. Two subject matter experts (SMEs) facilitated discussions designed to highlight key issues related to implementing CIE services, learn from outside entities with perspectives on CIE service delivery, and come to group consensus on recommendations for optimizing and interpreting State policies that facilitate effective service delivery to increase CIE. The group's findings and recommendations follow.

## Findings

It was the consensus of the SIO representatives that the overarching Framework for addressing CIE policy and practice should reflect a strong customer-centered approach. Under the Framework, customers of CIE-related services should drive all service processes, including identifying goals and defining success. SIO representatives agreed that all services should be culturally responsive so that all demographic categories of service recipients have equitable access to services and tailored services when appropriate.

Cultural considerations include understanding variations in terms used to reference disability by distinct cultures and whether these terms are associated with stigma. Additionally, agencies aiming to serve Tribal populations should understand the importance of Tribal self-governance and demonstrate respect for that self-governance and independence when inviting collaboration.

These core values influenced SIOs to organize the group's findings and recommendations according to six distinct concepts, referred to in this report as the "6 Cs," which are an adaptation of one State's approach to its strategic plan for service delivery.<sup>3</sup>

These organizing concepts are:

1. **Collaboration/Coordination:** Active efforts by agencies to collaborate with key partners, including employment service customers, and to share data and outcomes.
2. **Consistency:** Sharing the same expectations of outcomes and interpretations of policies across agencies, as well as the pursuit of quality and consistent service delivery, no matter where customers live or who provides the service, starting from all customer entry points through all aspects of service.

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<sup>3</sup> Based on values identified by the Virginia Department of Behavioral Health and Developmental Services Behavioral Health and Developmental Services for [its strategic mission and vision](#).

3. **Creativity:** Agency self-reflection, trying innovative approaches, and being flexible in service delivery to maximize responsiveness to customer needs and preferences and to achieve desired CIE outcomes. This also includes ongoing processes to analyze service performance and responding with adjustments to make services more effective.
4. **Conviction:** Demonstrated commitment to clear core values. All organizations should share the conviction that anyone seeking service is employable and the expectation that employment will be the outcome of those services. All persons who want to work can find employment when provided with individualized service and accommodation, regardless of disability label or need for support. Services should reflect the principles of *diversity, equity, inclusion, and accessibility (DEIA)*.
5. **Communication:** Seeking and responding to feedback from customers and collaborators in program and policy development and implementation, clear data reporting, and use of plain language in describing services.
6. **Celebration/Curiosity:** Identifying and spotlighting progress, especially that beyond initial expectations, with a focus on recognizing and encouraging people whose work is to assist individuals with disabilities to achieve CIE goals. Curiosity reflects continuous focus on improving the quality of services and outcomes.

The group identified both barriers to and facilitators of change related to each of these organizing concepts, which served as the foundation for considerations for action.

**NOTE:** Different entities that serve individuals with disabilities use different labels, including “clients,” “consumers,” and “end service users.” The SIOs chose to use the term “employment service customers,” or simply “customers” in this report to denote their conviction that customer service should be the hallmark of disability employment services and is based on CSAVR data that indicate customers prefer this term.



# The 6 Cs: Barriers, Facilitators of Change, Considerations for Action, and Example Questions for Action Planning

Strategic planning for change includes assessing current organizational resources, determining short-term, intermediate, and long-term goals, and then developing plans for achieving those goals. At SIO request, the “considerations” section for each core “C” principle includes example questions organizations may ask to begin the planning process. SIO representatives emphasize that conversations beginning with these types of questions are critical to their communication with State agencies.

## Collaboration/Coordination

### Barriers:

Barriers to collaboration and coordination include:

**Variations in naming conventions for service components:** Different agencies within and across States use different naming conventions for service components, potentially creating confusion and therefore roadblocks for those seeking employment. For example, non-work community-based activities can be referred to as: “Community Engagement,” “Meaningful Day,” or “Community-Based Day.” Agencies also may use ambiguous acronyms, such as “CE,” which can mean “[Community Engagement](#)” or “*Customized Employment*.”

**Organizations and jurisdictions differing on eligibility criteria for services:** This can have an unintended consequence of prioritizing serving individuals who are perceived as easier to assist in their job search. This may leave those who can benefit the most from support with the fewest number of service options.

**Isolated State and Federal agencies operating without routine coordination:** This lack of coordination makes it difficult to better *blend, braid, and sequence* funding to maximize resource options for the customer and can require providers to dedicate significant time to fulfilling disparate obligations and collecting incompatible types of data.

**Lack of financial resources and time necessary for effective coordination:** With plenty of obligations to one’s own mission, agencies often do not prioritize coordination across other groups within State government. Even when [Memoranda of Understanding \(MOUs\)](#) are in place, staff often lack the time or motivation to follow through or build upon existing agreements.

**Focusing on maintaining systemic status quo rather than flexibility in response to customers’ needs:** Each agency, funding source, and program has its own expectations, regulations, and mission. Lack of coordination deprives customers of the benefits of interagency collaboration, innovation, data sharing, and opportunity development.

## Facilitators of Change:

Conversely, the following State agency practices facilitate collaboration and coordination:

**Customer-centered, team-based approach to service delivery:** It is optimal for teams to include multiple State agencies, focus on outcomes that respond to individual customers' needs and preferences, and share data and innovations.

**Commitment towards shared core values across agencies:** Agency policies should ensure that services are results-oriented and customer-focused.

**Allocation of funding and time necessary for activities that support collaborative policies and programs:** Policies should facilitate participation of staff at all levels—executive, mid-level, and frontline—to contribute to interagency collaborations.

**Development of policies and processes that facilitate communication across agencies:** Communication can be optimized through standing meetings, open forums, and interagency agreements.

**Establishment of a common vocabulary related to CIE services:** Developed with input from all State agency partners, key terms should be clearly defined for customers, providers, and families.

**Employment of universal design principles:** *Universal design* facilitates all customers in accessing the services they need.

***Collaboration/Coordination in Practice:*** Iowa Vocational Rehabilitation Services (IVRS) has collaborated with the Iowa Department of Education (IDoE) to [develop a portal](#) that provides IVRS direct access to the Statewide Individualized Education Plan data system. This facilitates collaboration between agencies to align service delivery to students, facilitate earlier connection to IVRS, and increase identification of disabled students in need of *Pre-Employment Transition Services* (Pre-ETS).

## Considerations for Action:

**Create a standing council** comprised of representatives from various State agencies tasked to identify opportunities for collaboration to expand CIE. At minimum, such councils should work to develop shared terminology and definitions of success and progress.

**Develop State-level mechanisms for reimbursing service providers and administrators** for time spent building partnerships and collaborating with partners in program and policy development and implementation.

**Develop and implement cooperative agreements and MOUs between State agencies** that spell out the circumstances and conditions for collaboration on behalf of commonly served individuals who are pursuing or maintaining employment.

## Example Questions for Action Planning

- What types of skills, expertise, resources, and authority from potential partners could increase your organization's ability to link customers to CIE?
- What other organizations offer the skills, expertise, resources, or authority that your organization is seeking? Do you already have ties to these organizations? What can you offer them as a partner?
- What potential barriers to meaningful partnership are affecting your organization? What are potential approaches to addressing those barriers?
- Is your organization contributing to and benefiting from your formal agreements? If not, what are the barriers?

## Consistency

### Barriers:

Barriers to consistency in service delivery for customers include:

**Variations in terminology, agency names, service systems, and acronyms:** In addition to the differences in terminology for the customer previously discussed, agency names and structures can vary significantly by State, or by regions within a State; front-facing staff can be called service coordinators, counselors, representatives, support coordinators, or case managers. Also, agency names themselves may not directly identify the service being offered; VR services may be known as "Rehabilitation Services" without mention of "Vocational." Mental health services may be folded into a larger agency, with a name that does not mention mental health.

**Access to programs and services being sometimes controlled in such a way that families and customers are discouraged from pursuing or participating in CIE programs:** Examples include complex or confusing bureaucratic processes, wait lists, and application processes that filter out customers who need significant support with job seeking. In addition, programs may not be well advertised, leaving State agency staff unfamiliar with their benefits and thus unlikely to refer customers and their families.

**Overseeing authorities' varying requirements for certifying staff competency or required educational attainment:** These variations can affect consistency in service delivery. In addition to varied education and certification requirements across agencies and States, many of the requirements are not well known by aspiring staff, and public misconceptions exist about what the education and attainment requirements are for positions.

**Lack of availability of support services:** Lack of access to critical employment supports such as transportation and housing can be a major roadblock to implementing successful CIE programs and policies.

**High agency staff turnover leading to a lack of institutional memory and inconsistent service delivery:** This affects all levels. Senior level staff are responsible for setting strategic direction, which can halt with staff or administration turnover. Front-line staff are responsible for leading services for the customer, which is best done through investing time to develop trust and mutual goals and understanding.

## Facilitators of Change:

Facilitators of consistency include:

**Coordinating across agencies to identify customers' needs and experiences:** Meetings that involve representatives from all State agencies supporting customers generally as well as individual customers are a key strategy for achieving customer-centered consistency.

**Sharing a commitment to address customers' needs effectively by responding to individual needs and working collaboratively to meet them:** Commitment should be stated explicitly in policy documents, training materials, and communications with customers.

**Interagency agreements for standardizing training and personnel certification, to ensure the customer gets a similar experience.**

**Joint interagency staff training:** This is especially crucial on issues pertaining to DEIA, understanding the customer, and ensuring common convictions of employability of all service customers.

**Common opportunities across agencies for accessing training and training resources:** This is often achieved through Statewide training databases and cross-agency publicity of training opportunities.

**Consistency in Practice:** Montana Vocational Rehabilitation and Blind Services (VRBS) collaborates with each Local Education Agency by assigning a pre-ETS specialist and a VR Counselor [to every high school in the State](#). Staff engage with each school based on student and community needs. Staff typically offer weekly office hours to coordinate services. Every high school is offered a contract to deliver all five pre-ETS services directly to eligible students. Using schools to deliver pre-ETS offers consistency and continuity in service delivery to students served by both VR and schools.

**Consistency in Practice:** Several entities offer innovative training toolkits and guides for staff across networks, agencies, and providers. North Carolina Inclusion Works [offers a training guide](#) and tools for collecting data on best practices, barriers, and participant demographics. The Substance Abuse and Mental Health Services Administration [offers a toolkit](#) for evaluating employment support services. The Boggs Center on Disability and Human Development offers "[A Comprehensive Assessment of Supported Employment Service](#)" tool for tracking trends in programming, staff, and service provision.

## Considerations for Action:

**Host forums to compare allowable activities, identify commonalities, and develop a shared understanding of services that support CIE.** In the interest of consistency, these forums should be offered regularly so that new staff can understand interagency standards and staff across agencies are informed of policy changes.

**Offer incentives to support recruitment and retention of staff at all levels.** While these incentives would vary by position, they can include referral bonuses for employees who successfully recruit someone to join an agency, creating opportunities for training and mentorship as recognition for achieving an annual milestone, and ensuring that employees have input in the strategic planning process.

**Train staff to understand the roles and responsibilities of multiple types of service providers.** This will facilitate mutual support mechanisms when responding to employment service customer questions and needs.

**Develop strategies for ensuring staff across agencies and systems share understandings of service eligibility criteria and application processes.** Application processes and eligibility criteria should be the same across State agencies as well.

**Develop joint interagency training opportunities on CIE strategies and techniques.** These trainings can focus on basic information pertaining to customer experiences, DEIA, and common convictions, and are more effective when they feature people with lived experiences. In addition, ensuring these trainings are centrally located (or evenly distributed geographically in larger States) and not segregated by agency will build better consistency and collaboration across agency staffs.

**Maintain a storehouse of CIE training materials and resources that can be accessed by staff across the State.**

## Example Questions for Action Planning

- Are there inconsistent or contradictory policies and processes that result in barriers to linking customers to CIE?
- What are the reasons for these inconsistencies? Are these inconsistencies internal or external?
- What channels are available for customers to let you know about inconsistent applications of policies or contradictory messaging?
- Which stakeholders are needed to coordinate the development of consistent policies and processes that best serve customers?

## Creativity

### Barriers:

Barriers to creativity include:

**Funding that dictates specific and limited-service offerings:** Workforce development funding sources vary greatly by agency and State. Some States and agencies do not fund Customized Employment services, while others have reimbursement rates that are insufficient to encourage faded job supports in CIE positions. Still other funding systems allow funding to support *center-based work activities*, and other non-integrated placements.

**Funding that emphasizes the importance of replicability, which requires repetition and thus may disincentivize innovation:** Replicability is important for establishing an evidence base for intervention effectiveness. However, policies should balance the need for evidence-based practices with the need to develop innovative practices and respond to individual clients' needs.

**When multiple funding sources are involved, responsibility to those funding sources resulting in siloed implementation, results, and communication about results:** Siloed implementation creates barriers to more efficient communication and interagency coordination which can impact results. Establishing policies such as a Memoranda of Understanding (MOU) that defines roles, results, and measures consistently can address these potential challenges and avoid discrepancies between agencies.

**Lack of plain language:** A lack of *plain language* in explaining requirements and procedures can contribute to rigid interpretation of requirements and exclude some customers from understanding their service options or being able to access new and innovative service processes.

### **Facilitators of Change:**

Facilitators of creativity include:

**Flexibility in policies and regulations** and clear guidance in how to interpret policies and regulations are critical for creativity in program and policy development.

**Agency culture that encourages innovation** by allowing time, opportunities, and supportive leadership can allow creative processes which lead to desired employment outcomes.

**Learning from fields outside of employment services** about how effective organizations operate.

**All-inclusive approaches to service delivery that recognize diverse needs can foster more innovative and all-encompassing CIE outcomes.**

***Creativity in Practice:*** Ohio Department of Developmental Disabilities (DODD) [is investing incentive funds](#) in career planning and individual employment support services providers to improve quality through pilot activities, including selected technology enhancements.

### **Considerations For Action:**

**Review all relevant laws and regulations for creative and flexible policy interpretations that promote CIE.** This should be an interagency process, and should not be a one-off occurrence, but should occur

regularly, to ensure laws and regulations can adapt to changing workforce environments, and they can be particularly flexible to technology changes that affect the job development and retention process.

**Facilitate access to Federal and State opportunities to support CIE by using plain language in funding announcements.** Federal and State agencies can also foster creativity through funding by allowing additional time to apply and provide technical assistance to interested organizations. Having funding announcements in plain language allows customers and their families to understand what funding options there are and take an active role in providing feedback and supporting efforts to secure funding for innovative programming.

### Example Questions for Action Planning:

- How does your culture support trying new approaches to support individuals in CIE?
- How are you assessing success in linking customers to the jobs they want?
- What strategies are you using to increase success in linking customers to the jobs they want?
- What partners could you work with to develop innovative approaches to supported employment services?

## Conviction

### Barriers:

Barriers to conviction include:

**Lack of a unified conviction** that ***all people who want to work are employable, regardless of disability*** and any stigma held in opposition to that conviction is the most significant barrier to better CIE outcomes for service customers. Many service providers, agency leaders, and policy makers do not hold this conviction or do not operate by any stated conviction.

**Significant variation in the degree to which agencies and service delivery systems are built around this conviction**, and how individuals and organizations express it.

### Facilitators of Change:

Facilitators of conviction include:

**Genuine presumption of employability and independence for CIE customers, and for the principles of DEIA in service delivery.** States that follow this presumption demonstrate this by visual displays of these core convictions, efforts specifically targeting the involvement of DEIA in service creation, and development of policies such as an office of Employment First, to follow through on convictions.

**Agencies expressing conviction through actions.** This includes effective approaches to mitigating barriers and ensuring accountability by defining and measuring progress.

**Shared terminology** that helps organizations and individuals mutually understand and share convictions.

**Conviction in Practice:** [On its website](#), Colorado’s Office of Employment First (COEF) states "Employment First is an unwavering belief that all people have valuable contributions to offer the workforce, regardless of the type or significance of disability, and have the right to pursue their employment goals." COEF works collaboratively with a broad range of partners including other State agencies, the University of Colorado’s Center of Excellence in Developmental Disabilities, and advocacy organizations. COEF is supported by the State budget and legislation that supports Employment First policies and agency activities that demonstrate conviction, such as a broad range of training and employment support services. COEF conducts evaluation and monitoring to continuously assess the degree to which it meets its goals and to determine ways in which its work can improve.

### Considerations for Action:

**Establish, through various channels, unequivocal support from all State agencies that employment is an attainable outcome for all who wish to pursue work, regardless of disability.**

**Develop and document clear, shared principles for supporting CIE and DEIA in employment service provision.** These shared principles should span all the communities that will benefit from State agency services and should be created by and with members of each community. In addition, the principles should be shared with each community in a manner that is representative of their needs and experiences. Where applicable, efforts should be made to include Indigenous Tribal Councils, and those principles should reflect the independence and self-governance of those Councils as well.

**Develop and implement approaches for collecting, analyzing, and disseminating data to monitor and evaluate progress toward increasing CIE and DEIA in employment service provision.** These approaches should include sharing data with the public and explaining the implications. Data should indicate how diverse communities use services and what outcomes services achieve.

**Develop strategies for engaging communities of color and other marginalized populations in service planning, delivery, utilization, and evaluation.** Agencies should conduct outreach and needs assessments to learn about the communities they serve and collaborate with community leaders in strategic planning.

**Develop guidance for professional practices that support adequate reimbursement and professional respect for all personnel who support the achievement of CIE.** Agencies should review available evidence on best practices and collect primary data within their organizations to determine which management and budget approaches best support CIE outcomes.

### Example Questions for Action Planning:

- What convictions are essential to your organization’s mission?



- What resources (e.g., fiscal, personnel, time, training) have you allocated toward meeting your organizational goals?
- How do you assess organizational support for the conviction of universal employability?
- How do you assess organizational support for the conviction of DEIA?
- How do you measure progress toward achieving shared conviction of core principles?
- How can partner organizations support your organization in expressing core convictions?

**Conviction in Practice:** The Institute for Community Inclusion’s [“Employment and Employment Supports: A Guide to Ensuring Informed Choice for Individuals with Disabilities”](#) (Hoff & Holtz, 2020) states, “Everyone has a right to work in an integrated setting for fair pay if that is their choice” as a core principle and advises users to, “Presume competence.” The guide discusses issues related to choice and employment and provides detailed guidance, including examples and links to additional resources, for how programs and providers can support informed choice.

## Communication

### Barriers:

Barriers to communication include:

**Not soliciting and including the voices of the customers regarding CIE program and policy implementation.** Commonly communicated as “Nothing about us without us,” well-funded and well-meaning programs and initiatives sometimes do not have significant impact on or buy-in from marginalized job seekers if they are not included in the planning process. This also is a crucial barrier to ensuring program creation and effective delivery reaches all populations covered under DEIA.

**Policy development that is “one-way” in its approach.** This occurs when agencies and policy makers communicate information relating to employment services without being open to feedback. When input is not invited from target populations during the policy development phase, effectively engaging these populations when program decisions are communicated will suffer from a lack of effectiveness or buy-in from those the policies are intended to benefit.

**Inviting input, but then developing programs and policies that ignore this input.** This can make customers feel neglected or ignored, particularly after they dedicate time to discuss their needs, often making themselves vulnerable to do so.

## Facilitators of Change:

Facilitators of communication include:

**Active, honest, multi-directional communication between employment service customers, service providers, employers, administrators, and policy makers.** This begins at the planning stages and continues all the way through program execution. When staged in multiple ways, such as public forums, online dialogue, interviews, and meetings, opportunities for customers to give feedback and receive program details are optimized.

**Dissemination of understandable information through diverse channels and use of plain language rather than bureaucratic or administrative language.** Meet the community where they are on decisions pertaining to programming, both at the planning and implementation stages. In addition to the use of plain language, State agencies also should effectively connect with non-native English speakers, deaf, blind, and deafblind communities who use various approaches to communicate, receive feedback and give suggestions.

**Communications that reflect the core convictions of employability as well as DEIA.** When members of diverse communities are involved in the decision making and messaging process, these communities are best able to respond to and benefit from programs created with their consideration and input. Having inclusive involvement ensures that State agencies understand how cultural norms and biases can affect a job seeker's ability or desire to participate, why some language is considered offensive to one or more groups of people, and when to schedule meetings and other feedback opportunities that do not overlap with cultural or religious days of importance.

**Communication in Practice:** The Colorado Division of Vocational Rehabilitation has developed a [messaging campaign](#) in multiple languages for its benefit planning program. It tailors messaging featuring people from diverse communities sharing unique taglines created specifically for each community.

**Communication in Practice:** The Northeast ADA Center [offers several communications templates](#) for organizations to use in developing clear and consistent communication for multiple key stakeholders in supported employment services.

## Considerations for Action:

**Identify barriers to communication, including complex organizational systems and language, and coordinate to mitigate these barriers.** These efforts to identify barriers should be made collaboratively, across State agencies and service customers, and be as inclusive as necessary for the community of any given State.

**Dedicate resources to developing plain language descriptions of effective employment service practices.** [Federal guidelines and guides exist](#) to create plain language documents and materials, and different approaches to plain language are available depending on the needs and the reading comprehension level of the target customer and their family.

**Obtain input from diverse parties prior to policy implementation and develop policies that reflect this input.** This starts with having inclusive teams that help develop policies, and having multiple touchpoints, in different formats, and within different communities, to provide information and solicit feedback.

**Monitor and evaluate the degree to which program and policy development includes outreach to and input from diverse parties.** This requires ensuring that representatives from all communities who will be using programs are included, both in the planning and messaging processes.

**Develop processes and standards to ensure documents related to CIE services (e.g., technical guidance and manuals) are written in plain language.**

### **Example Questions for Action Planning:**

- How does your organization ask customers for input about how best to serve them? How do you work to continually improve these processes?
- What processes does your organization use to ensure customers and other stakeholders, such as employers, policy makers, other service providers, communicate with each other to develop policies and programs that promote CIE?
- What key groups do you need to disseminate information about your services and customers to? What channels are most likely to reach those groups?
- How does your communication support cultural humility, and how do your practices actively incorporate voices from diverse communities?

**Communication in Practice:** Butler County, Ohio Board of Developmental Disabilities uses multiple strategies to obtain and respond to input from customers, direct service providers, employers, and community-based organizations. The Board regularly convenes provider meetings and [advertises the schedule](#) and contact information on its website. It shares its strategic plan and financial statements. The board conducts surveys to assess customer and employer satisfaction and is developing formal processes for communication with customers as they transition from secondary school. The Board promotes diversity and inclusivity through in-person visits and social media campaigns.

# Celebration and Curiosity

## Barriers:

Barriers to celebration and curiosity include:

**Agencies not defining success in measurable terms and not sharing definitions of success across agencies and service providers.** Without these measures, providers and agency employees are left frustrated not knowing what specific metrics agencies value most in serving the customer.

**Lack of a shared understanding of what organizations should celebrate and when.** This leaves opportunities to share successes missed, either at the individual level, where celebration can come at any stage of the job development, placement, or retention process, or at the macro level, when thresholds of employment and service delivery can be met.

**Not adequately celebrating achievement of measurable employment goals.** This affects agency and provider staff alike, as retention and morale issues are often interrelated; a lack of celebration contributes to staff burnout and staff burnout discourages proper celebration of success.

## Facilitators of Change:

Facilitators of celebration and curiosity include:

**Organizational culture that celebrates success to increase staff engagement, at all levels, and acknowledges both individual and team efforts related to successful CIE outcomes.** This includes regular staff awards for Direct Support Professionals (DSPs) and others, milestone achievement recognition, honoring staff when placements are successful, and providing incentives for successful certification attainment.

**Organizational culture focused on improving the quality of services through ongoing self-examination.** Regular feedback up and down an organization is required to ensure service design is feasible and understood by those conducting service implementation. Front line staff executing service programs communicate successes and frustrations to policy and program designers so that initiatives respond effectively to the ever-changing needs of the customer.

**Avoiding excessive attention to mistakes and flaws that might shame and discourage creativity or attempts to improve.** This system of open feedback should not be based on a demerit system. If staff are assigned to pilot a new program, they should be able to be honest in their assessments without repercussions even if the pilot fails.

**Success definitions that reflect principles of DEIA.** This is accomplished when efforts are made to solicit feedback and collect data on how and whether programs advance DEIA. It also ensures that successful service delivery is not imbalanced (e.g., one group of customers having rates of success which mask low success rates amongst other disadvantaged communities).

**Recognizing that celebrating success should not be interpreted to mean that the work is finished and improvement is no longer necessary.**

**Rewards that include opportunities for continuing education and participation in professional conferences.** Professional conferences and continuing education allow all levels of staff to engage with other professionals, see other best practices at work, and feel more invested and connected to the larger movements that support their work. This leads to added buy-in and mission dedication and helps prevent burnout.

**Continuous reflection by agencies and service providers on how to continue progress and improve CIE outcomes.** This is especially true when considering how new policies, approaches to funding, community needs and technology advancements affect not only the job seeking process, but the nature of work, and the lives of the customer on an ongoing basis.

### **Considerations for Action:**

**Define success and progress in measurable terms.** These success and progress definitions should be defined across agencies. Providers and customers interact with multiple State agencies through the job development, placement, and retention process, and as a result, need to know that a success for one agency isn't viewed with indifference by others.

**Share information on progress and success with the public through multiple platforms.** Data on agency progress should be public facing when possible.

**Recognize progress without expecting consistently perfect performance or outcomes.**

**Create an organizational culture that offers safety for staff to acknowledge and address errors.** This requires time and effort on behalf of leaders to ensure staff feel safe to provide feedback. This also requires meeting front line agency staff where they are, which is often in the community, and not necessarily at agency headquarters.

**Offer scholarships and learning opportunities for service providers to continually grow professionally, including through regional and national conference participation.** This is an incentive for high performers to feel more connected to the larger movement to ensure CIE prevails for all.

***Celebration in Practice:*** ANCOR offers a [Direct Service Provider \(DSP\) Week store, social media kit, and creative ideas](#) for demonstrating appreciation for staff excellence, including requesting a thank you message from the mayor, and sharing videos and stories. Agencies across dozens of States participate in DSP week by sharing stories and appreciation on their websites and other communication channels. Several States also give out awards to DSPs, employers, and providers recognizing their efforts.

### **Example Questions for Action Planning:**

- How does your organization express appreciation for staff success? What strategies do you use to continually improve efforts to increase staff morale and turnover?
- Who provides input on staff engagement strategies? Are staff at all levels able to tell you what engages them?
- What strategies does your organization use to encourage a culture of openness regarding errors and the need to make improvements? What alternatives to punishment does your organization employ?
- What strategies do you employ to evaluate organizational performance improvement? Do current strategies provide you with information that supports program planning?
- When and how does your agency support time for reflection and future planning at all levels of your organization?

# Conclusion

When formulating policy and service considerations for increasing CIE, input from SIOs is essential because of their individual and collective expertise and experience in delivering employment services for disabled individuals. NEON responded to the need for such input by convening SIO representatives to develop a Framework to Increase Competitive Integrated Employment through State Policy for State and national policy makers and employment service providers. SIO representatives emphasized that the primary principle for this Framework is that all relevant policies and programs should focus on the needs, values, and experiences of employment service customers. This includes responding to customers' cultural values. In addition, policies and programs should reflect six core values that support the primary principle and each other to promote quality services and increase CIE. SIO representatives defined Framework values, identified factors that are barriers to or facilitators of actions that promote CIE and reflect each core value. They also made recommendations regarding how to apply the Framework to promote CIE and identified examples of applying each core value in the field.

This Framework recognizes that all efforts to promote effective CIE expansion must include a conviction of presumed employability for all who are interested, as well as the expectation that the outcome of employment services will be CIE, regardless of disability or need for support. All action taken must support DEIA. In addition, the Framework recognizes:

- The essential importance of active engagement from all constituencies affected by policies and programs throughout the process of development, implementation, and evaluation. This includes feedback from customers, employers, service providers, and caregivers.
- The value of shared definitions and terminology.
- The importance of coordinated efforts to achieve shared goals.
- The value of flexibility in processes and policies to support individual needs as well as the value of consistency in services and policies.
- The critical importance of recognizing and supporting the work required to support CIE.

As States work to expand CIE for individuals with disabilities, the Framework offers key considerations in this important effort.

# Appendix A: Glossary of Terms

**Blending, Braiding, and Sequencing (BBS):** BBS strategies are innovative ways to maximize the efficient and effective use of Federal funds and other funding sources across systems to help people with disabilities secure and maintain CIE.

- Blending occurs when dollars from multiple funding streams combine to create a single “pot” of commingled dollars which can fund an initiative or purchase more specific services.
- Braiding occurs when multiple funding streams separately and simultaneously provide specific services.
- Sequencing occurs when multiple funding streams separately and sequentially provide specific services.

**Center-Based Work Activities (Sheltered Workshops):** Center-based work activities or sheltered workshops are settings where people with disabilities work together, doing tasks that are different and apart from workers without disabilities.

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

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

**Customized Employment** is a process for achieving CIE or self-employment through a relationship between employee and employer that is personalized to meet the needs of both. It is a universal strategy that benefits many people, including disabled people who might not have found success through other employment strategies. In 2014, Customized Employment was included in Title IV of WIOA as a strategy under the definition of supported employment.

**Diversity, Equity, Inclusion, and Accessibility (DEIA):** DEIA refers to a set of practices intended to ensure people from a broad set of socio-demographic backgrounds are represented and able to thrive through service programs and in the workforce, that is, services and places where all people feel welcome and respected, regardless of their differences.

**National Provider Organizations (NPOs):** NPOs are entities whose members are providers of service to individuals with disabilities. Through NEON, ODEP contracted with NPOs to help expand CIE service delivery across their membership networks, made up of Local Provider Organizations (LPOs). ODEP



selected five NPOs to participate: Association of People Supporting Employment First (APSE), American Network of Community Options and Resources (ANCOR), The Arc of the United States, ACCSES, and SourceAmerica.

**Plain language:** Clear communication that an audience can understand the first time they read or hear it. Language that is plain to one audience may not be plain to another. Material is in plain language if the audience can:

- Find what they need
- Understand what they find the first time they read or hear it
- Use what they find to meet their needs

**Pre-Employment Transition Services (Pre-ETS):** Pre-ETS are activities that provide an early start at job exploration for students with disabilities ages 14-21 to assist with transitioning from school to postsecondary education or employment. State Vocational Rehabilitation agencies work with schools and other organizations in each State to deliver Pre-ETS services. Pre-ETS services focus on:

- Job exploration counseling
- Work-based learning experiences
- Counseling on post-secondary programs
- Work readiness training
- Instruction in self-advocacy

**State Intermediary Organizations (SIOs):** The membership of SIOs are State government agencies in each State that share similar missions and who can learn from each other, lobby for Federal action and legislation related to their mission and share information of mutual interest. The SIOs act to facilitate these activities with and on behalf of their members. Descriptions of each SIO that participated in the development of the National Framework are listed in Appendix B.

**Training and Technical Assistance (T/TA):** T/TA is a process that provides support to an organization, community, or agency that has a development need or resource gap. It can also be defined as the transfer of skills and knowledge to entities that need but don't have them. T/TA can be delivered in many ways, including:

- Consulting: One-on-one or small group facilitation
- Training: High-quality training or professional development
- Resources: Technical resources, analysis, guidance documents, implementation manuals, or other resources
- Online methods: Web-based clearinghouses, email, or other online methods
- Experts: Sending experts into the field to teach skills and solve problems

**Universal design** is a concept in which products and environments are designed to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design.

# Appendix B: Participating State Intermediary Organizations

## **National Association of Medicaid Directors (NAMD)**

NAMD comprises Medicaid directors who oversee Medicaid programs governed by Federal rules but tailored to the needs of each State. The 56 members of the association represent all 50 States, the District of Columbia, and all U.S. territories. Medicaid programs include the Home and Community Based Waiver program, which funds services to individuals with intellectual and developmental disabilities. As a State-Federal program, Federal decisions and actions shape what each State's Medicaid program looks like and achieves. NAMD's Federal policy work ensures that Medicaid Directors are at the table in critical Federal policy debates ([medicaiddirectors.org](http://medicaiddirectors.org)).

## **Council of State Administrators of Vocational Rehabilitation (CSAVR)**

CSAVR comprises the chief administrators of the public rehabilitation agencies serving individuals with physical and mental disabilities in the States, District of Columbia, and U.S. territories. These agencies constitute the State partners in the State-Federal program of rehabilitation services provided under the Rehabilitation Act of 1973, as amended. The Council's members supervise the rehabilitation of some 1.2 million people with disabilities. ([csavr.org](http://csavr.org))

## **National Association of State Mental Health Program Directors (NASMHPD)**

NASMHPD represents the \$41 billion public mental health service delivery system helping 7.5 million people annually in all 50 States, four territories, and the District of Columbia. NASMHPD is the only national association to represent State mental health commissioners/directors and their agencies. NASMHPD members play a vital role in the delivery, financing, and evaluation of mental health services within a rapidly evolving healthcare environment. The principal programs operated, funded, and/or regulated by NASMHPD members serve people who have serious mental illnesses, developmental disabilities, and/or substance use disorders. This role impacts many other constituencies as well. In recognition of these mutual interests, NASMHPD has effectively responded to and collaborated with other organizations and individuals including those representing consumers, families, and State mental health planning and advisory councils. The association provides members with the opportunity to exchange diverse views and experiences and learn from one another in areas vital to effective public policy development and implementation. ([www.nasmhpd.org](http://www.nasmhpd.org))

## **National Association of State Directors of Developmental Disabilities Services (NASDDDS)**

The NASDDDS mission is to assist member State agencies in building person-centered and culturally and linguistically appropriate systems of services and supports for people with intellectual and developmental disabilities and their families. NASDDDS represents the nation's agencies in 50 States and the District of Columbia providing services to children and adults with intellectual and developmental

disabilities and their families. NASDDDS promotes visionary leadership, systems innovation, and the development of national policies that support home and community-based services for disabled individuals and their families. The association's goal is to promote and assist State agencies in developing effective, efficient service delivery systems that furnish high-quality supports to people with intellectual and developmental disabilities. In pursuit of this goal, NASDDDS strives to provide member State agencies with timely analyses of Federal statutory and regulatory policies that affect people with disabilities; disseminate cutting edge information on state-of-the-art programs and service delivery practices; provide technical assistance and support to member States; and offer a forum for the development of State and national policy initiatives. ([nasddds.org](http://nasddds.org))

### **Association of People Supporting Employment First (ASPE)**

The mission of APSE is to advance employment equity for people with disabilities. APSE is the only national, non-profit membership organization dedicated to Employment First, a vision that all people with disabilities have a right to competitive employment in and inclusive workforce. APSE believes that people with disabilities should not work sequestered in sheltered workshops, earning only pennies an hour, but rather enjoy the company of a wide range of co-workers, an opportunity for greater financial independence, and the ability to contribute to the economy. APSE provides more than 3,000 members and 37 State chapters with the tools, opportunities, and timely information needed to take action and build better workplaces through work with policy makers and employers. ([apse.org](http://apse.org))