

To: James Michaels, Chair, Indiana Commission on Rehabilitation Services
From: Steve Cook, President/CEO, INARF
RE: Indiana Employment First Plan 2019
Date: December 9, 2019

Thank you for the opportunity to comment on the Indiana Employment First Plan 2019 draft. INARF applauds the Indiana Commission on Rehabilitation Services for the importance it places upon obtaining public input from a wide range of stakeholders, and INARF appreciates your involvement of many representatives from our member organizations in the creation of the draft plan and recommendations. Additionally, please know that beyond our written comments, INARF is dedicated to assisting the Commission in any way appropriate to improve systems and services to individuals with disabilities.

INARF is the principal statewide trade association representing agencies that serve Hoosiers with intellectual and developmental disabilities. INARF Members often play a lifelong role in the lives of those they serve by providing a continuum of services that in many instances stretches from birth to death and across all facets of life in their chosen community. Further, INARF and its members are committed to ensuring Indiana's system of services and supports for individuals with intellectual and developmental disabilities offers maximum options, access, and choice.

With any policy or plan, the focus must remain on the individuals served and consider individuals of all abilities. While we thank the Commission for its focus on employment of individuals with disabilities, we urge the Commission to assure that a full range of employment options and pathways for persons with disabilities, including supported employment and customized employment opportunities provided in competitive, integrated settings; self-employment; employment opportunities in disability-focused non-profit businesses operated by accredited community rehabilitation programs (CRPs); and volunteerism, remains available from which individuals with disabilities may make informed choices.

INARF requests that the Commission address the following items prior to finalizing the Employment First Plan:

1. Modify Recommendation IV A 7 to "Identify strategies, **including resources and funding, to assist providers that choose** to transition away from the use of 14 C certificates that pay people less than minimum wage."
 - Requiring transition away from the use of 14c certificates would result in the elimination of an employment option that individuals with disabilities choose. Eliminating employment under a 14c certificate would result in decreased

opportunities for individuals to make informed choices and select preferred services from a full range of options.

- For providers to transition away from the use of 14c certificates, additional funding would need to be available to allow providers to pay individuals at least minimum wage. Without additional funding in place, advocating to transition away from use of 14c certificates and paying individuals subminimum wage would result in the elimination of an employment option for individuals with disabilities.
 - Other states that have eliminated use of 14c certificates have shown that eliminating this option forces many individuals who were previously working and earning a paycheck to shift into non-employment day services or staying at home.
 - Many individuals who currently work under 14c certificates are also employed in competitive integrated employment. However, according to the 2017 Indiana Day & Employment Services Outcomes Systems Report, individuals working jobs in the community average only 21 hours per week. These individuals need activities to fill the remainder of their daytime hours each week, and employment under a 14c certificate should be maintained as one of the range of options from which individuals can choose.
 - Some individuals currently employed under 14c certificates have already pursued competitive integrated employment through Vocational Rehabilitation services but were unsuccessful or prefer to work in a workshop, and they are not interested in repeating the process. Employment under a 14c certificate should be maintained as an employment option for these individuals.
 - Other individuals currently employed under 14c certificates are near or at retirement age and choose to work a limited number of hours in a workshop and spend the remainder of their day in non-employment day services. Employment under a 14c certificate should be maintained as an employment option for these individuals.
 - Providers who choose to transition away from the use of 14c certificates should have resources and funding available to assist with the transition.
2. Regarding Recommendation III C 2, INARF recommends that a workgroup of diverse stakeholders, including numerous providers, be convened to discuss development of information on employment outcomes for individual providers.
 3. INARF fully supports Recommendation IV A 6. In pursuit of this recommendation, INARF urges FSSA to identify additional funding to draw down all available federal matching funds, increase VR staffing levels, and ensure adequate provider capacity, in order to allow BRS to serve all individuals eligible for VR services.
 4. INARF fully supports Recommendation IV B 2. INARF urges FSSA to review the Employment Services model and reimbursement rates to determine how to better support adequate provider capacity and recruitment and retention of skilled employment professionals.
 5. Regarding Recommendation IV B 3, many providers are currently experiencing challenges in recruiting and retaining employment professionals. Adding specific

statewide training and certification requirements without a sufficient transition period could increase these challenges. INARF urges the Commission to consider a phase-in of any training and certification requirements to avoid unintended consequences of further limiting provider capacity.

6. INARF fully supports Recommendation VI C 4 and continues to urge DDRS to include benefits planning/counseling as a reimbursable waiver service in DDRS' redesigned waivers.
7. Consider adding a recommendation such as: Identify opportunities, through the Ability Indiana Program and other avenues, for State Agencies, counties, municipalities, and private businesses to purchase products and services from vendors who employ individuals with disabilities.
8. Consider adding a recommendation such as: To assure individuals have the necessary information to make informed choices regarding their employment options and pathways, Career Counseling and Information and Referral Services must be provided in accordance with best practices. Best practices to consider include providing the CCIR one on one; assuring that at least one VR Counselor is present at each CCIR session to immediately meet with individuals who express interest in exploring their employment options; accommodating diverse learning styles with various approaches to delivery of CCIR; and ensure the needs of individuals of all abilities are accommodated.
9. Consider adding a recommendation such as: Ensure VR Counselors are present at students' Individualized Education Plan/transition meetings to work with students and their families to develop a plan for their chosen post-secondary employment pathway.

Thank you very much for your consideration of our comments on the Indiana Employment First Plan 2019 draft. We hope you find that they are constructive as you draft the final versions of the plan.