August 20, 2014

Diane Cashman
Department of Public Welfare
Office of Developmental Programs
Post Office Box 2675
Harrisburg, PA

Dear Ms. Cashman:

This letter is in regards to Objective 8 of the Futures Planning process on behalf of the Pennsylvania Association of County Administrators of Mental Health and Developmental Services (PACA MH/DS), which represents the county mental health/intellectual disability program administrators for all 48 counties/joinders, as well as behavioral HealthChoices oversight entities and both county and private supports coordination organizations for intellectual disability services.

PACA MH/DS’s Intellectual Disability Committee established employment as a priority for their activities during 2012 with a general employment position statement and an action plan. Many of the steps taken mirror the approach for Objective 8. This letter is intended to share insights gained during our continued efforts.

Cross-Agency Leadership and Culture

Alignment of policy and practice where feasible between state agencies increases the potential for stated expectations and outcomes. PACA MH/Ds would suggest ODP expand their critical partnerships beyond the Office of Vocational Rehabilitation (OVR). Local county efforts that are engaging families, OVR and local school officials are providing information and alternative perspectives for employment options. The Department of Education (PDE) and OVR share our challenge in shaping employable young adults in integrated and competitive work. Alignment of efforts from the three different administrative state agencies in policy would assist in sustaining local efforts and maximize state resources to create an employment first state.

In addition, cross-agency leadership should also consider engaging the Department of Community and Economic Development (DCED) as their goal to foster opportunities for business to grow and for communities to succeed in a global economy dovetails with an employment first approach. DCED’s focus is on creating jobs, economic growth, sustainable development and improved standards of living for all Americans by working in partnership with businesses, university, community and the workforce. DCED has a focus similar to stakeholders involved in employment for individuals with intellectual disability and should be included in any statewide effort.

Services and Service Definitions
State rates for sheltered workshops are too low to sustain a major change to employment without an influx of resources to create the capacity of providers. Supported and customized employment are not less expensive to operate, but are time intensive activities with trained staff. Ideally, ODP would create a system that would pay incentives for meeting performance based outcomes for individuals to promote sustainable employment approaches.

In addition to employment services, ODP must consider options for individuals that are not employed full-time. There is currently no discussion on creating meaningful alternatives to supplement work hours for individuals who gain part-time employment. The continued effort to assure health and safety have outweighed the challenge to establish alternative services and supports either natural or funded. Without funding for peer services or community development options, continued pressure to have paid staff oversight for individuals will continue regardless of employment efforts.

**Focus on Transition**

Until recently, schools were able to default to sheltered workshops for in-school or after graduation placement. With the Department of Justice now enforcing the Olmstead decision, schools are challenged to identify options for employing individuals with intellectual disability.

Employment first requires the current systems and roles to transform. Parents, educators, community supports and services need to be collaborative and offer opportunities to transition age children. Work experience, whether through employment, internship, or volunteering, acknowledges that individuals do have skills and are able to secure employment and meaningful daytime activities prior to graduation. All stakeholders need to have information regarding the opportunities to develop employment related skills while still in school. County programs have established summer work programs with state funds which have met with success in employing transition age youth that move on to competitive employment after graduation.

**Building Resources**

Numerous county programs invest in employment and employment-related activities. In PACA MH/DS efforts to increase awareness and information on employment, counties have noted the positive impact of local activities including:

- Involvement with local Transition Councils
- Annual employment day
- Recognition of local employers for their engagement with individuals with intellectual disability
- Development of local Employment First coalitions with students, teachers, parents
- Create career portfolios for transition age youth or recent graduates
- Hold informational sessions on benefits and employment
- Establish an employment database (created by Networks for Training)
- Summer employment programs

These projects are using state only funds, which are becoming scarce with increased reliance on federally matched dollars making it difficult to create opportunities statewide. In PACA MH/DS search for quality employment services, we found that statewide providers need information to change their business model to increase capacity for promising and best practices.
PACA MH/DS applauds ODP for their prioritization of employment in the visioning process. We are willing to partner with stakeholders to support transition to an employment first approach.

Thank you for the opportunity to comment.

Sincerely,

[Signature]

Executive Director