



The Massachusetts Chapter of the Association for Persons Supporting EmploymentFirst (Massachusetts APSE) is the state chapter of a 3,000+ member national advocacy organization focused exclusively on increasing the number of people with disabilities fully integrated within the general workforce, in real jobs at real wages. MA-APSE is pleased to offer the following comments on the state's WIOA plan.

- We would first like to compliment the plan in terms of the integration of disability issues within the general discussions regarding meeting the needs of job seekers with barriers to employment. The plan provides a thoughtful commitment to building an integrated service model across workforce development agencies, and we are happy to see the inclusion of the needs of individuals with disabilities within these discussions. The shared customer model for individuals with disabilities contained in the plan's appendices is a great example of this. Our hope is that this approach will be translated from paper into reality in terms of service delivery, eliminating silos, and enabling job seekers with disabilities to gain access to the full array of services and supports needed to become successfully employed and advance in their careers.
- We are pleased to see in the appendix a discussion about a possibly higher level of engagement between the Title I WIOA services for youth and adults and the Departments of Developmental Services and Mental Health. Given the increasing focus of both DDS and DMH in advancing employment for the individuals they serve, we feel strengthening the linkages between the general workforce programs, including those services that can be accessed via One-Stop Career Centers, and DDS and DMH, would be of great benefit.
- We are pleased to see the commitment on pages 109-110 regarding ongoing improvements in accessibility to One-Stop Career Centers. We feel this section could be enhanced by more specific language regarding how accessibility will be integrated within the state standards for One-Stop Career Centers.
- One of the major initiatives for employment of individuals with disabilities are new requirements under Section 503 of the Rehabilitation Act for federal contractors in terms of taking affirmative actions to recruit and hire employees with disabilities. While there is some references to Section 503 within the plan in terms of federal contractor hiring events, we feel a more systematic approach is called for. We feel the plan could be improved with a more systematic approach to engaging federal contractors, with inclusion of these plans both within the first section of the plan's general discussion regarding business engagement, as well as in the sections of the plan specific to MRC and MCB. Similarly we would like to see greater emphasis within the plan on efforts to increase the employment of people with disabilities within federal, state, and local government, which is also alluded to, but without any sort of systematic plan.
- For the Title IV programs (MRC and MCB), we were pleased to see within the plan how each of these programs are focused on ongoing enhancements to align with the new

requirements under WIOA. We also appreciate the references to MRC's partnership with our organization, a relationship which we highly value. While there are many positive aspects of the section focused on the state's two VR programs, we would like to note the following issues:

- While the first portion of the overall plan discusses efforts to leverage resources across the workforce development programs in terms of service delivery for individuals and businesses (particularly on pages 35 and 55, and later on pages 77 to 81), the portion of the plan focused on the public VR programs provides minimal reference to this overall effort of service coordination and leveraging with other components of the workforce system. The reason for this lack of connection within the plan is not clear. However, if the plan is intended as one that is truly unified, we feel it is important that sections regarding individual workforce programs (including VR) should reflect the overall vision of this unified plan. In our view, it is critical that the resources and expertise be leveraged across workforce development programs to ensure the system is as efficient and effective as possible. Given the complex needs of many job seekers with disabilities, it is critical that they fully benefit from all available resources.
- Within the discussion about relationships with Medicaid, DDS, and DMH (starting on page 194), we felt that the MOU with DMH was a particular strength. On the other hand, we felt the MOU with DDS was very much lacking in terms of specific details, and we would suggest that language be added to the plan regarding future efforts to create a partnership with DDS that mirrors that within the DMH MOU.
- We felt the plan could more specifically address the new requirements under Section 511 of WIOA, that place new restrictions on the use of sub-minimum wage. While we were pleased to see the new prohibition on subcontracting for subminimum wage for students with disabilities addressed within the agreement with DESE, we feel this agreement should also address how MRC and DESE will work in partnership to ensure all of the required steps under Section 511 are taken to divert youth with disabilities from sub-minimum wage employment. Similarly, we would to see language added regarding how MRC and DDS will work in a cooperative fashion to maximize the effectiveness of Section 511, in terms of the annual reviews required of all individuals currently in sub-minimum wage important. This is critically important given that most of the individuals earning subminimum wage are employed by service providers that contract with DDS.
- One of the major changes under WIOA are the enhanced requirements for public VR in terms of transition, and we are pleased to see the attention paid to these changes within the plan. At the same time, we feel the plan's discussion regarding these issues could be improved as follows:
  - Including more specific language regarding how MRC and DESE will work together to identify the students with disabilities in need of pre-employment transition services, in order to ensure that those most in need and who could most benefit are receiving these services.
  - Plans for how the youth services administered by local workforce boards (both in-school and out-of-school) could be leveraged to support effective

transition for young people with disabilities resulting in employment success. This would also include linkages to Connecting Activities, which are administered by the local workforce boards, supporting work-based learning efforts within schools across the states (this seems like a natural fit with the work-based learning requirements of pre-employment transition services). We also feel the plan should discuss how One-Stop Career Centers can be used more effectively over the next few years to support transition efforts in partnership with MRC and MCB.

- The discussion of state strategies, beginning on page 229, does not address in any way how MRC will address the needs of students with disabilities, despite this being a requirement in the plan instructions. We would like to see a response provided specific to services for students, which includes an outline of MRC's plans for implementation of pre-employment transition services (PETS), how young people will be targeted and referred for PETS, how the five required PETS services will be defined, and how MRC will assure consistent and ongoing quality in terms of the delivery of these services.

Thank you again for the opportunity to provide this feedback.

Sincerely,

The Board of Massachusetts APSE