



Centre for Disability Employment Research and Practice
Research – Consulting – Training

ENSURING A STRONG FUTURE FOR SUPPORTED EMPLOYMENT

Discussion Paper Response



Work First[™]

A Customised Approach to Employment



Centre for Disability Employment Research and Practice
Research – Consulting – Training

ENSURING A STRONG FUTURE FOR SUPPORTED EMPLOYMENT

Level 24, 570 Bourke St., Melbourne 3000

www.cderp.com.au

info@cderp.com.au

Suggested Citation

Smith, P. (2018). *Ensuring a Strong Future for Supported Employment Inquiry Response*. Melbourne. Centre for Disability Employment Research and Practice.

Introduction.

The **Centre for Disability Employment Research and Practice (CDERP)** was established to provide a singular focus on improving the evidence base for disability employment practice within Australia. We believe that for employment outcomes to improve there must be a shift to a whole of life approach for people with a disability. Current disability employment practice, which centres on an economic philosophy fails to recognise employment as one part of a larger picture.

CDERP conducts research, consulting and training that focuses on policy and practice change, through consultation with business and government, and through on-site data collection and analysis. Our training targets organisational change through consultation at multiple levels including, upper management, staff & families, to deliver better client outcomes based on the best available evidence.

To achieve change we have gathered like-minded practitioners and researchers to work on the issues and improve the evidence base to support change in disability employment practice. We draw on resources locally and internationally to ensure that our work meets the standards for critical peer review.

This inquiry response draws on local and international evidence and our experience in those settings that support change to segregated employment settings. As part of the response, we have chosen to shine a light on innovative possibilities that will stretch government thinking, along with practical advice on what is possible right now with minimal investment by government in policy and financial settings.

Underlying Principles supporting Disability Employment Practice in Australia.

Before embarking on this discussion, it is worth revisiting the guiding principles that modern disability employment services are founded on; The Disability Services Act, 1986 (DSA). It is worth measuring our intentions against the Principles (Section 2) and Objectives Section 3) of Section Five of the Act.

The following principles from Section Two are particularly relevant.

Principles

Section 2.

(2) People with disabilities, whatever the origin, nature, type and degree of disability, have the same basic human rights as other members of Australian society.

(4) People with disabilities have the same right as other members of Australian society to services which will support their attaining a reasonable quality of life.

(5) People with disabilities have the same right as other members of Australian society to participate in the decisions which affect their lives.

(6) People with disabilities receiving services have the same right as other members of Australian society to receive those services in a manner which results in the least restriction of their rights and opportunities.

Within Section Three the following objectives are relevant.

Objectives

3. (1) Services should have as their focus the achievement of positive outcomes for people with disabilities, such as increased independence, employment opportunities and integration into the community.

(2) Services should contribute to ensuring that the conditions of the every-day life of people with disabilities are the same as, or as close as possible to, norms and patterns which are valued in the general community.

(3) Services should be provided as part of local co-ordinated service systems and be integrated with services generally available to members of the community, wherever possible.

(4) Services should be tailored to meet the individual needs and goals of the people with disabilities receiving those services.

(6) Programs and services should be designed and administered so as to promote recognition of the competence of, and enhance the image of, people with disabilities.

(7) Programs and services should be designed and administered so as to promote the participation of people with disabilities in the life of the local community through maximum physical and social integration in that community.

As the title of this discussion is about the capacity to create a strong future for supported employment, the inclusion of Australian Disability Enterprises (ADEs) in the discussion highlights the quagmire that has been created by ADEs being held as something of a “protected species” in the disability employment support area. The National Disability Insurance Scheme Act 2013 (NDIS) tends to reinforce this position by stipulating that the NDIS will not fund anything that is funded by any other Commonwealth program – specifically without mentioning it, the Disability Employment Service (DES).

A cursory reading of the DSA would illustrate that DES does not function to meet many of the Act’s objectives, case in point Objective Three. The NDIS Act has within it the capacity for review every few years, it would be appropriate to revisit the exclusions as part of the reimagining of supported employment and remove what is in effect the quasi market barrier that is DES from the equation and align service delivery under the NDIS to reflect the objectives of the DSA. There is a certain irony in excluding services that may be funded by DES in that the DES providers under the NDIS, do not deliver services with any level of client choice and control consistent with the DSA or the NDIS Act. What we have seen through our research is DES providers trying to fit the NDIS employment supports into the DES model of practice (Smith, Rhodes, Newton and McVilly, 2017).

If we accept the proposition that ADEs are a welfare program, then there is conflict with NDIS act as NDIS does not fund welfare programs, only reasonable and necessary supports. As such, it should be reinforced that employment under the NDIS is about the provision of reasonable and necessary supports as part of a participant insurance package.

Employment in this context is not a program and as such should be free to operate in whatever manner that is deemed appropriate for the participant to achieve their goals in line with the NDIS Act – social and economic participation. This does not mean moving to another program, simply purchasing appropriate supports from whoever is in the market place with the supports that the participant believes will meet their needs – not the program needs.

What will the Supported Employment Landscape Look Like at the Full Rollout of the NDIS?

Q1: Are there other principles which should guide the Government’s policy direction for supported employment?

To add context to this discussion, it is worth benchmarking the discussion against the **NDIS Act**, in particular this section from **Part Two – Objectives and Principles**, section 3 Objectives of the Act;

“(g) promote the provision of high quality and innovative supports that enable people with disability to maximise independent lifestyles and full inclusion in the mainstream community”

I also draw your attention to the following parts of the NDIS Act.

The functions of the Agency include delivering the National Disability Insurance Scheme.

The Agency also has more general functions, such as:

(a) developing and enhancing the disability sector, including by facilitating innovation, research and contemporary best practice in the sector.

It is worth taking the intention and written description of what the agency is required to do as a reasonable yardstick for this discussion.

The discussion paper describes four guiding principles highlighting an ‘Employment First’ approach that will rely on Local Area Co-ordinators (LAC) and NDIS planners. In the first instance, this is a false economy as very few plans have any level of support for economic participation, despite it being written in the Act. The most recent quarterly report published by the NDIS (Q2, Dec 2017) shows that economic participation is included in less than 2.5% of plans. Out of the current 130,455 participants this represents 3300 participants. Based on published data, the NDIS has invested \$7.6bn in the supports with little real investment in economic participation. NDIS actuarial reporting suggests minimal attention has been paid to employment outcomes, and it is unclear the extent to which LACs and Planners have

been prepared with respect to the specialist knowledge required to support participants to consider employment options and have them included in their plans. The common refrain is “*we don’t do employment*”. Clearly, they have little understanding of the Act or the scheme that they are administering.

The provision of employment supports within the NDIS is being constrained by the lack of innovation in the delivery of supports. This has been highlighted in research that has shown a variety of methods being used by DES providers delivering SLES supports, many of which illustrate the absence of innovation by way of DES providers simply trying to fit SLES support services into their existing DES practices (Smith et al., 2017). The current provision of SLES supports would benefit from detailed research that highlights innovative practices that could serve as a guide to the SLES support providers.

The entry of new employers to the market is an unlikely outcome whilst the current system favours established providers who are in the main ‘waiting’ for something to happen. Coupled with the idea of transition of ADEs to something ‘strong and viable’ is unlikely to happen whilst providers cling to their old models. The experience in the USA of providers transitioning to new practice and business models highlights the steps to be taken, something that few providers in Australia are likely to grasp and pursue. This is in part due to under investment in existing facilities and staff development that would support transition.

Our experience to date has been that few staff have the capacity to tolerate the cultural and mind-set shift that needs to accompany what is a seismic shift (Smith, Rhodes, Pavlidis and McVilly, 2018b). Yet the NDIS will drive a new mind-set that open employment is possible and will be driven by younger parents who view open integrated employment in the community as the pathway to citizenship for their children. Better informed parents demand better outcomes!

This type of employment support will require the provision of holistic services that address lifestyle and social supports, something that ADEs have the capacity to provide within the NDIS framework. This capacity does not exist within the DES system.

It needs to be acknowledged that globalisation and trade liberalisation policies set in place by successive Commonwealth governments have set a stopwatch on the life span of existing disability enterprises and the industries that they operate in. It follows that what is being interpreted as a ‘social enterprise’ by ADEs is not a valid outcome unless the employees are in receipt of a full award wage and that the business itself is profitable, consistent with known research outcomes (Smith, McVilly, McGillivray & Chan, 2018a).

Whilst the ‘ADE’ industry continue to rely on underpaying ‘employees’ based on modified wage assessment tools, it will lack legitimacy as an employer. ADEs should grasp training, automation and niche industries as a path to true citizenship for their “employees” along with the provision and support for clients to pursue open employment and self-employment, consistent with overseas evidence for change (Smith et al., 2018a). This does not mean transitioning to another program (DES) is an acceptable outcome, in the main like

existing Transition to Work (TTW) programs that count transition to DES or another government program as an outcome. (Xu & Stancliffe, 2017).

Question One asks if there are any other principles that should guide government policy. I recommend that the government get re-acquainted with the **United Nations Convention on the Rights of People with a Disability (UNCRPD), Article 27**.

Article 27 states;

“Parties recognize the right of persons with disabilities to work, on an equal basis with others; this includes the right to the opportunity to gain a living by work freely chosen or accepted in a labour market and work environment that is open, inclusive and accessible to persons with disabilities”

Australia is a signatory to it and it spells out in clear terms what we should be doing, something that I’d suggest we haven’t taken up fully.

Additionally, the government needs to reference the following two Acts.

The **Australian Human Right Commission Act 1986**, and in particular: **Schedule 1—Convention concerning Discrimination in respect of Employment and Occupation**, which among other things require the Commonwealth to establish policies designed to;

“promote, by methods appropriate to national conditions and practice, equality of opportunity and treatment in respect of employment and occupation, with a view to eliminating any discrimination in respect thereof”

and,

The Disability Discrimination Act of 1992 – Section 15, which supports the rights of people with disability to employment by making it unlawful to discriminate on the basis of disability stating specifically;

Discrimination in employment

(1) It is unlawful for an employer or a person acting or purporting to act on behalf of an employer to discriminate against a person on the ground of the other person’s disability:

- (a) in the arrangements made for the purpose of determining who should be offered employment; or
- (b) in determining who should be offered employment; or
- (c) in the terms or conditions on which employment is offered.

(2) It is unlawful for an employer or a person acting or purporting to act on behalf of an employer to discriminate against an employee on the ground of the employee’s disability:

- (a) in the terms or conditions of employment that the employer affords the employee; or

- (b) by denying the employee access, or limiting the employee's access, to opportunities for promotion, transfer or training, or to any other benefits associated with employment; or
- (c) by dismissing the employee; or
- (d) by subjecting the employee to any other detriment.

The **NDIS Act (2013)** has similar guidance – simply stating that social and economic participation is a goal without prioritising one over the other. This, I am sure is about fostering innovative employment outcomes and supports that lead to economic independence, not maintaining the status quo.

Strategies to Support Employment Participation for People with a Disability

Q2: What is a 'good' participation outcome for a supported employee and how can good outcomes be measured?

This question requires the individual to define what is “meaningful employment” for them. It is not as simple as the process used within Disability Employment Services to measure providers by using the Star Rating System. This is simply a measure of provider compliance and employment outcomes measured against other providers.

In an individualised funding world, outcome measures will need to understand factors highlighted by Social Quality Theory (SQT). SQT measures personal outcomes against four domains; Economic Security, Social Inclusion, Social Cohesion and Social Empowerment. In simple terms we are concerned with how employment allowed the participant to live in the community, participate in the community, exercised self-determination and attained a level of financial security. Whilst this may seem a little abstract, it is what the able-bodied community take for granted. I have money in my pocket, I have friends and go out to social events in my community, I feel a part of my community and I make decisions for myself. The development of an outcome measure that is based on SQT is something that we have embarked on as it is closely aligned with individual freedoms, rights and self-determination not compliance.

Whilst the NDIA has undertaken development of an outcomes framework, no framework exists within current service provision within the NDIS or DES that specifically measures the outcomes of employment beyond getting a job, longevity of employment or the provision of employment supports. Research into disability employment highlighted a lack of any systems model that properly accounted for the system factors that support employment outcomes. This research highlighted factors at play in developing employment outcomes for people with a disability and factors that promote innovation in service delivery (Smith, 2018).

Relationships emerge as the primary driver in employment outcomes and the role of family and community in driving both outcomes and innovation in service delivery. These factors are absent from service provision within the DES system, however are factors in an

individualised system such as the NDIS, certainly within a system that seeks to encourage innovation and individualised service provision. There is role for the NDIA to play in leading research into the development of a robust personal outcomes measure that is underpinned by social quality theory, particularly as the NDIS supports fall under the category of reasonable and necessary.

Q3: What do supported employees most value about working in an ADE?

This question can only be answered by ADE participants and families, which raises the question as to whether they have been asked across all ADEs? I suspect that participants and families may have differing answers based on length of time in ADE and family situation.

Carey (2015) explored the issue of the value of ADEs by interviewing a cohort of supported employees finding the following;

- Productive work was seen by the participants to have an intrinsic value that gave social status, contributed to a healthy lifestyle and provide an income which gave discretion and choice and,
- The workplace and not the work was most important with the workplace providing the opportunity to build relationships and develop friendships and,
- Participants developed relationships within the workplace with fellow workers, with others they came into contact with through the workplace and with those within the organisation in positions of power and/or authority. These relationships appeared not to be strong enough to carry over outside of the work setting and,
- The workers with an intellectual disability interviewed in this study could be said to have developed bonding workplace social capital with their workgroup, and functional bridging workplace social capital with others they came in contact with as a worker, while linking workplace social capital is evolving with those in positions of power or authority and,
- The most influential motivation to gain and maintain employment for the participants in this study appears to have an internal and psychological locus and,
- The isolation and loneliness associated with staying at home may be the motivation of this cohort to develop relationships and friendships through being employed. It may be that gaining and maintaining employment is perceived by the participants in this study as combating the loneliness they may experience if they choose not to be employed and stayed at home.

Understanding in detail these factors will provide evidence for the types of services that ADEs will offer in the future to support clients to have a life in the community. Migliore, Grossi, Mank, & Rogan (2008) examined this question as to why adults with intellectual disabilities work in sheltered workshops. They summarise their findings as;

..... when deciding about day services, some adults with ID and their families had concerns about safety, transportation, long-term placement, work hours, disability benefits, social environment, and work skills issues. Long-term placement, safety, and social environment emerged as the most important concerns. (p29)

Their study concluded that whilst individuals with disabilities and their families preferred open employment in the community, they had concerns over entering segregated employment.

They recommended;

- prioritizing initiatives that lead to long-term employment and career paths,
- addressing safety concerns,
- supporting workplaces that foster good social environments, and
- educating case managers, teachers, workshop staff, residential staff, and most importantly, individuals with disabilities and their families to ensure that employment is the first option for people with disabilities. (p38)

There is an urgent need for this question to be asked of existing clients in a global sense and use this information to inform what are reasonable and necessary supports to encourage employment success.

Q4: Why do most supported employees transition back to supported employment from open employment?

This is an area lacking in any real understanding and warrants investigation to ensure that whatever is lacking in open employment supports that produces this type of response is understood and addressed. One part of this equation may well highlight an urgent need to reconsider the client type appropriate to DES.

My sense based on experience is that it employment supports post ADE are lacking and possibly only focus on employment, a single job, not a career approach and eschewing a holistic approach that would ensure other areas of the client's life are in equilibrium. It may well be a case of taking a dream job approach that results in placing clients in less than ideal employment situations.

Relationships, in particular, the trust factor, are significant enablers of employment. Given the importance placed on a safety net and security offered by ADEs it is not unreasonable to see why people would transition back to an ADE. This is not to discount the "Job in Jeopardy" type supports that exist in DES, it is simply a recognition that this type of program does not have the proximity of relationship and security offered by ADEs to participants. Possibly if DES provided a fuller suite of lifestyle supports this type of program would not need to exist. Returning to the issue of trust, parental security considerations have been undermined by the actions of employers highlighted in the media paying open employment employees as little as \$3 per hour. It would be easy to mount an argument that employment

security for those that are vulnerable, bullied and subject to exploitation warrants investigation by Fair Work Australia and the Human Rights Commission to develop a better understanding of what settings need to be in place. Another possibility may well be found in the work of Job Path in the USA that found supports post-employment also needed to develop connections and relationships in the participants neighbourhood and community to address the issue of social relationships post ADE (Walker, 2007). Job Path utilise Customised Employment as their program to employment (www.jobpathnyc.org).

Q5: How can more supported employees be provided the opportunity to choose open employment?

This is an area where work is needed to ensure that policy and practice settings support the development of integrated employment opportunities in the community (Migliore et al., 2008). This takes on a matter of urgency if the NDIS is to honour its stated goals of individual choice and control in utilising reasonable and necessary supports to pursue employment opportunities within the confines of the NDIS settings. I would make the point that if the government is to honour its obligations under the NDIS, participants should be supported to purchase employment supports from whatever provider they feel is appropriate for their dreams and ambitions. It will not be necessary to force clients into any system, whether it is DES or NDIS if providers are offering the right service. Service provision and success should be predicated on offering exemplary service, not system factors and artificial barriers.

Evidence from the USA (Cimera, 2011) comparing sheltered workshops (SW) (US ADE equivalent) to supported or open employment pathways illustrates that outcomes for clients that transition directly to open employment versus those that transition via a sheltered workshop are nearly identical suggesting that few if any clients of sheltered workshops received any significant employment skills training that would support open employment. Alexander, Ford, Raghavendra & Clark (2017) found similar outcomes in Australian settings. This hints at possible pathways for ADEs to redefine their skills development proposition. The success of the organisational transition from sheltered workshop to open employment support provider for significant numbers of providers in the USA has been predicated on the delivery of a range of services that support individual personal growth and development (see response Q11). One of the strengths of ADEs is their capacity to develop long standing relationships with their client cohort, with relationships shown to be one of the most significant factors in the development of long term employment outcomes (Smith, 2018). This fact places ADEs at a significant advantage over DES providers whose compliance and process-based program mitigates against the development of real relationships.

Transition to employment for significant numbers of sheltered workshop participants in the USA was built on examples of small numbers of people within an organisation being properly supported, creating an increasing wave of people transitioning based on those that went before (Rogan & Strully, 2007). Significant amongst the activities that were provided to those wishing to explore open or integrated employment was the provision career exploration activities to allay any fear of working in the community. This type of activity would be consistent with the idea of informational interviews that are part of the Discovery process in Customised Employment. This activity is being successfully explored by a small

number of ADEs in Australia that are taking a forward-looking view of the future. As part of the support or new service being developed is the capacity to provide a safety net to those that successfully transitioned, but at some time in the future may be retrenched. This service provision would satisfy the real concerns of parents and participants about the safety of open employment.

The challenge for ADEs and Government starts by recognising that there are three parallel client pathways that will need managing for existing clients and future clients (Figure 1).

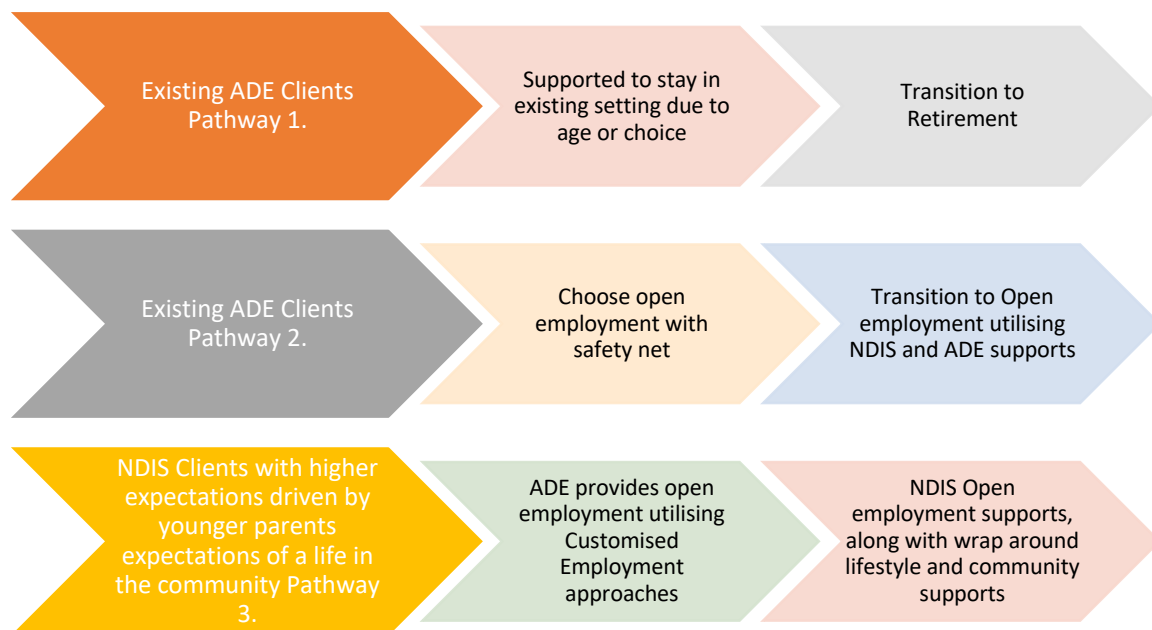


Figure 1. ADE Program Pathway Model (APPM).©

Highlighted within the ADE Program Pathway Model © (APPM),(Fig 1.) are three possible scenarios that ADEs will have to manage. Existing clients are likely to fall into one of two categories; staying as is and transitioning to retirement or social supports, depending on their age, or transition to open employment using a range of NDIS funded supports and having a safety net in the event if retrenchment. New clients will demand a different pathway but will choose an ADE as the pathway due to the ability of the ADE to develop and support the client with a full suite of services that enhance lifestyle, social and employment options in the community. It should be recognised that ADEs that operate commercially viable business models should be encouraged to transition into for purpose social enterprises. Those that have not achieved this state should be encouraged to consider the viability of continuing their operations.

Existing ADE Clients Pathway 1.

These are clients that are nearing retirement or choose to stay as they are and in likelihood see the ADE as a centre for social respite and day services. It is worth considering that retirement for some people with a disability may start earlier than the recognised retirement age for the wider community in part due to cognitive decline and the relatively similar levels of support provided by the age pension versus the disability support pension

(Brotherton, Stancliffe, Wilson, & O’Loughlin, 2016). These clients would benefit from the ADE delivering lifestyle and social supports that enhance independence and support a progression away from the ADE setting as they near retirement. Younger clients who choose this path should be supported to develop more advanced skill sets that would enable them to undertake more value-added work within the centre.

Existing ADE Clients Pathway 2.

These clients will look to try open employment and as is our experience in Australian and overseas, this process starts with those clients that are enthusiastic about open employment. The success of these clients will create a wave or snowballing effect on other ADE participants who see their success and want to enjoy that pathway as well. These clients with support and encouragement of families will need to receive what is referred to as braided services which support the delivery of a range of on the job and off the job supports that will enable the client to live a life in the community. These clients will be empowered to pursue open employment with the knowledge that the ADE will offer a safety net service in the event of retrenchment. This would consist of counselling, behavioural and training supports to enable the client to pursue new employment opportunities and a new understanding of the employment processes. Examples of these types of services can be found in the work of Worklink, San Francisco California (<https://www.transcen.org/direct-services/worklink>) and Champlain Community Services in Vermont (<http://ccs-vt.org>). It is also the model that we are developing at Brite Services.

NDIS Clients Higher Expectation Pathway 3.

This client will have a different expectation in that younger parents will demand a different path for their children – a normal life in the community. ADEs are ideally placed to deliver this service, either separately or in community partnerships like AtWork! and Provail in Washington State. Parents will be looking at service providers to address all support needs that will flow out of employment in the community. Transition from school via SLES supports or directly into an employment pathway that encompasses training, employment and independent living possibly on site, at home or in the community. Either way, parents and clients will demand and expect to be supported to develop lifestyle skills in tandem with employment skills and importantly career pathways, as highlighted by the Self Determined Career Development Model (www.ngsd.org).

This pathway also provides ADEs with the opportunity to work with other disadvantaged community groups to further enhance their position as a community resource. ADE clients are unlikely to be potential clients of DES due to their initially reduced work capacity, cultural barriers and need for higher levels of support. In a system that prefaces individual choice and control, clients would be free to move to any provider; DES, ADE or other community option based on the capacity of that service to deliver what the clients wants, not due to policy mandates that in a sense are nothing more than quasi market drivers. It may also go some way to answering the question about the missing “system” participants.

Q6: Why is participant access to concurrent DES and ADE support services so low?

I believe that the answer to this question can be found in the response to Q4. To add further to this, it may well be that each of these services are currently viewed as end points and not having the capacity to deliver a range of services to support a full life in the community. This is something of an unknown and may have a bearing on the substantial number of potential participants between the age of 15 – 25 who anecdotally are missing from the system. I suggest that this should be viewed as a research priority, as this group may hold the answers to improving NDIS supports. Bear in mind that Des is very much a programmatic approach and despite having deeds that stipulate being person-centred, they are far from any measure of person-centred, something that is an easy stretch for ADE to achieve.

Q7: What is the role a supported employer can play in building employee capacity for transition to open employment?

In early 2017, Brite Services, an ADE in the northern suburbs of Melbourne engaged the Centre for Disability Employment Research and Practice (CDERP) to assist Brite to develop an open employment model of practice. Brite have recognised that pathways to real open employment will only be achieved by having true open employment practices. CDERP and its principal, Peter Smith have for many years worked in the field of customised employment (CE) partnering with Cary Griffin at Griffin Hammis Associates in the USA. Cary Griffin is acknowledged as one of the pioneers and originators of customised employment and is held as the global leaders in the field. Using proprietary and joint IP and research, CDERP engaged with Brite to deliver and support Brite staff to learn and deliver CE. CE is an evidence-based employment process that requires a mandatory 40 hours of intense training, followed by up to twelve months of face to face support for staff to develop competency and base skills. Evidence highlights that anything less than this fails to meet benchmarks for fidelity of practice and is in effect short cutting the process, resulting in ad-hoc approaches and inconsistent results.

In late 2017, CDERP and its research partner, Keith McVilly at the University of Melbourne received an Innovative Workforce grant that has allowed this project to extend to two other providers on a smaller scale. This project will demonstrate on a small scale the role of ADEs in delivering employment support services that support open employment, in tandem with existing services for clients who do not wish to pursue open employment, at this point in time.

Lessons from the USA.

Lulinski, Timmons, and Leblois (2017) in their paper on transition lessons interviewed eight organisations that had transitioned from a pool of twenty-eight providers that had offered to be part of their study. The eight provider organizations all shared the same three characteristics:

- 1) they underwent successful transformation to competitive integrated employment within the past 10 years,
- 2) they no longer use sub-minimum wage, and
- 3) the majority of individuals whom they support have intellectual or developmental disabilities (IDD).

They found that provider advice fell into four categories, these being:

1. Commit
2. Plan
3. Implement
4. Engage

Commit.

Consistent with our experience and that of providers that we know, all expressed the view that transition requires a full commitment from board level down. This has been our experience in Australia with organisations that we have worked with. Those that had full commitment from their board are slowly progressing as they learn the lessons and deal with the unexpected events normal to transition. Those providers that haven't had full support but simply trained staff and not committed resources to them have by and large not adopted any of the learnings in to practice. Commitment also requires a financial investment in the future and a belief that anyone can work. To display anything less sends the message to potential employers that you don't believe!

Plan.

Having a strong vision is necessary to create goals, plans and objectives. Lulinski et al. (2017) reported that;

Many agencies engaged in strategic planning processes, which were often facilitated by an independent third party. Strategic plans were created using input from individuals with IDD, family members, and front-line staff, as well as organization leadership. (p2)

This is consistent with our experience locally. We have found that organisations need to set up work groups to create champions for change that support each other much like peer support. These work groups also engaged with families and participants at the start and along the journey to address any concerns that may arise out of what is a challenging process. Families are both the champions of change and potentially the most resistant

(Dague, 2012). That said, if given the chance families would prefer employment in the community for their siblings (Migliore, Mank, Grossi, and Rogan, 2007). We have also found that weekly external support for staff is essential, along with monthly catch ups with management and staff to ensure that staff undertaking the transition have their needs met and any impediments examined, and solutions found (Smith et al., 2018b).

Implement.

The process of transition is a long-term exercise for an organisation suggesting a pathway of at least five years, possibly longer depending on your setting and client mix. This would also be consistent with the pathways described in the response to Q5 in this submission that deals with potential client pathways.

Lulinski et al. (2017) suggest the following strategies;

- Understanding who will be impacted and implementing targeted and triaged movement of one individual at a time into integrated employment supports.
- Using the workshop only for specific days of the week or specific times of day, and spending the remainder of the work week engaging in job search and community engagement activities.
- Emphasizing the creation of each individual's human and social capital, job search skill building, and soft skills during exploration activities.
- Monitoring outcomes through the collection and analysis of outcome data, including number of days to obtain a job, hourly wage, hours worked, etc.(p2)

It is worth remembering that for many parents and ADE participants what they experience at the ADE is a result of what was proper at that time and should not be viewed through the prism of today's support offerings and increased opportunities.

Dague (2012) highlighted the following parent views;

The long-time parents reported seeing the younger people today as benefiting from better education and services and recognizing that they never had that option. One mother commented, "I think people are capable and I notice the younger kids these days are being prepared and educated for that. They're gaining a lot more skills. You see, [my son] wasn't". One mother opposed to the conversion said, "We didn't prepare them for this. The younger kids have the potential, our kids don't. They have been too taken care of. It's not fair to them". Some seemed to express regret of missed opportunity as one parent spoke of the workshop conversion, "I realized what they were trying to do, you know, in their minds they were trying to help [my son] to get out in the community, but it was too late for [him]". Another reflected on it as a societal issue, "Like I always said, [my son] was ready for society, but society wasn't ready for [my son]". Or if they had received a better education and services, things might have been different, "If [my son] had been given the opportunity way back when, like the kids are given today, like we fought for the kids to have today, he could have gone to college. He could have, he's smart". (p9)

It is not hard to see the ideas of missed opportunity and being a perpetual child in these statements.

Our experience has been that the use of the Discovery tool has aided this process by engaging with the family. This is not simply because it provides the opportunity to explore employment from the client strengths perspective highlighting hidden skills, but that it has aided in developing greater understanding of the client away from the workshop and the level of social capital that exists in the client's personal domain. This in turn offers providers the opportunity to develop other service offerings consistent with the NDIS offer.

Engage.

Our experience overseas, those shared by colleagues and local experience has highlighted the importance of engaging with all parties and having an open-door approach to communication. In other words, anyone that is going to go on this journey needs to have their office door open! Services also need to recognise that service delivery to clients will likely mean delivering "braided" services. In simple terms, no one can be all things to everyone. As an example, AtWork! in Bellevue, Seattle transitioned and recognising they needed to deliver seamless services to clients, partner with other providers such as Provail, Seattle to ensure that clients get the services they need. From the client view it is seamless with all accounting and funding splits happening behind the scenes. We have some way to go to reach this level of cooperative service delivery, but with the right policy settings this is possible, actually desirable.

Remember, individuals and families become the most valuable and persuasive allies over time (Lulinski et al.,2017), something that we have also found in Australia to be true.

"If we don't believe people can work, why would anyone else?"
(Lulinski et al.,2017)

I will simply conclude the response to this question with the following extract from Dague (2012).

Now that community inclusion through supported employment and leisure/recreational activities is becoming the norm for this agency, people are discovering a sense of place outside the walls of the sheltered workshop. With the closure of the sheltered workshop, the parents who opposed the conversion have found their adult children to be increasing their skills and finding satisfaction in their community-based lives. The hours and location may not be as consistent as the workshop, but the fears of being ridiculed and unsafe in the community have not become reality. The families and participants with a long history of sheltered employment may miss the nostalgic sense of place and community they were accustomed to, but seem to be adjusting to the new realities of community-based services. (p10)

Q8: What will attract NDIS participants to employment opportunities in the future?

Part of the solution to this is contained within the APPM discussed in Question Five in particular, pathways 2 & 3. The other obvious solution would be to simply survey existing supported employees and other NDIS participants who are not currently accessing any employment supports. It has been suggested that accessing the DSP and incorrect advice regarding capacity to work may be factors.

Strategies to Support Employer / Providers to Offer Effective Employment Opportunities

Q9: How are ADEs marketing their services to an expanded market of potential NDIS participants?

I have limited knowledge of this process; however, I understand that some providers are using job fairs to alert potential clients to their services. It has also been reported that providers are also marketing directly to schools and assisting with work experience for students in Special Schools (Alexander et al., 2017). Marketing of services require some ethical standards to prevent providers from making unsustainable promises. The Department should consider issuing guidance on the types of claims that providers can make about their service delivery capacity.

Q10: What is the range of NDIS supports that ADEs currently offer?

This would be difficult to know without a full audit of existing ADE's. The data may be available from the NDIS list of registered providers. However, Alexander et al., (2017) did find that ADEs provide significant supports (outside of training for production/workplace task completion) this included a large variety of personal development training/support such as, supporting communication skills, working in a team, behaviour support, recreational activities, social skills, banking, transport and mental health issues.

Q11: What costs would be involved for ADEs that choose to:

a) Reform to more open employment models?

There is much to be learnt from providers in the USA that have undertaken this transformation process. It is clear that overhead costs in employment services in Australia are too high, in part due to extensive personnel in administrative roles in head offices. Most services that I have seen overseas function with minimal head office staff and achieve this by utilising cloud-based systems for all admin functions. Case in point, Easterseals, California deliver employment services in an area that covers three quarters of the population of that state. Staff are equipped with digital technology that allows them to be out in the field and not have to visit their office every day. Because of the use of digital technology, management can check in on staff at will. At its simplest staff only need a laptop and smart phone, however this can be further enhanced by using an iPad Pro size device, allowing staff to complete digital paperwork on-site electronically. In real terms, it should cost no more than \$5000 per person to put someone in the field plus the added investment in cloud-

based systems. This of course excludes wages etc. Other cost factors to consider relate to the employment of outside experts to assist in training and systems development.

b) Redevelop as service providers offering other NDIS supports?

This should not be a difficult exercise in that ADEs are already delivering a number of personal services that could easily be evolved into full services. ADEs have within them expertise in behavioural support, transport training, lifestyle supports and social supports. This is not a difficult proposition and should be an easy exercise for providers to undertake. Open employment supports could typically be offered as part of braided service delivery model that offers day services, lifestyle support services and employment (Murphy, Easterbrook, Benderson, & Lieberman, 2014).

c) Specialise in the provision of employment support as a non-employer?

Consistent with the models proposed in Q5, the development of a change model offering parallel business pathways to open or supported employment matched to a ADE pathway that is focused on training, work skills development and personal development. ADEs should be offering support to assist clients create a self-identity which ameliorates behaviours of concern and increases self-development, inclusion opportunities and the capacity to live independently in the community (Ferrari, Sgaramella, & Soresi, 2015). These services can sit beside the pathway to retirement service that could and should be developed to assist clients reaching the end of their work life or who choose social supports.

Q12: Should the Government have a role in supporting new market entrants and start-ups in the short-term?

I believe that the government could support and encourage providers by offering a range of supports such as;

- Competitive grants
- Direct programmatic funding
- Demonstration projects
- Pilot initiatives
- Transition Leadership Mentoring Programs

These are initiatives that should be explored in detail and could be funded through ILC grants and other methods to highlight pathways for existing and new providers. It is my view that new providers could be encouraged to enter the market as small providers servicing only a handful of clients whilst they build up systems and outcome records. Small providers with adequate supervision would be nimble and responsive to local demands.

Q13: What investment, or industry adjustment will promote viable expansion in the employer/provider market?

The University of Massachusetts Think Work program has identified ten elements that support provider transformation and by extension the capacity to create viable businesses

that can deliver employment services. This work is based on sheltered workshop transition, so it has relevance to the ADE question. Built on a holistic service delivery model, the ten elements identified are;

- Clear and Consistent Goals
- Agency Culture
- An Active Person-Centred Job Placement Process (one person one job at a time)
- Communicate Expectations Often and to All
- Reallocate and Restructure all Resources
- Ongoing Professional Development of Staff
- Customer Focus and Engagement
- Employment Performance Measurements, Quality Assurance and Program Oversight
- Embrace a Holistic Approach to the Employment Process
- Develop Multiple and Diverse Community Partnerships

These elements are consistent with existing evidence and what is being trialled in Australia. (<https://www.thinkwork.org>). Coupled with department support noted in Q12, this is a possible model for the department to support.

Q14: How could employer/providers share learnings of their success and failures within a competitive market?

There is a role here for the department to highlight successes to the wider community. This should focus on the individual, not the provider. By focusing on individual success, potential clients will seek out both those individuals and those providers that supported that successful outcomes. There is no need for a “star” type system, as parents and communities talk and with social media, it is not hard to find the good and bad stories. Possibly the department could support and moderate an ongoing social media type news campaign.

Q15: How can wage supplementation be better targeted?

The discussion document states that all supported employees are in receipt of the Disability Support Pension (DSP). Taking the current 21+ single rate with supplements as a starting point, it is possible that DSP participants could be in receipt of a pension of \$894.40 per fortnight. Based on the current minimum wage is \$18.29 per hour or \$694.90 per week as at July 2017 or \$1389.80 per fortnight, the DSP could provide a supported employee approximately 64% of the minimum wage outcome for a full-time worker.

The discussion document states that the average cost of employment support per supported employee is \$11,800 p.a. or the \$226.92 per week. Whilst the \$11,800 is not something that goes to the client, it is a cost to simply fund ADE supports. Thinking laterally, taken together the DSP and employment support cost are \$1348.24 per fortnight, roughly equal to the minimum wage. Taken at face value it appears that people within this cohort are funded directly and indirectly to what could be described as the level of a Universal Basic Income (UBI). This adds some support the proposition that a UBI for recipients of the

DSP who are NDIS clients would be a simple solution to the current system of funding ADEs. This pathway would be a radical innovative departure from current practice and thinking but let us explore it anyway. How would it work?

The NDIS does not fund ADEs, only individuals. If the government is serious about supporting a Work First ethos, then it follows that the target of the government program is the individual with a disability, not the organisations that profit from service provision. A reasonable assumption given that ADEs and their forebears were created to support people with a disability who were considered unemployable to develop work skills in a simulated work setting, with the idea that as skills developed they would be supported to find work in the community equal with their desires and abilities.

If we view the UBI as a strategy that provides economic security, it would free people with a disability and their carers from concerns for basic safety and economic security (Mays, 2016). Carers would be free to pursue economic participation (creating improved GDP and reduced outlays) on their own terms and it would also address the insecurity issue that concerns parents of people with a disability who are themselves entered their twilight years. In that sense it is a human rights issue, something that as a signatory to the UNCRPD compels us to address. Likewise, the NDIS Act requires us to support the economic participation of people with a disability. The question now becomes one of how to we encourage someone on a UBI to pursue employment and at the same time address the question of the future of ADEs in Australia?

The answer to that may lie in making receipt of the UBI subject to conditions of mutuality. In other words, receipt of the BUI in subject to mutual obligation, the expectation that those in receipt of the UBI will pursue employment and supported to do so through employment support funding being part of their NDIS package. This funding could be directed to ADEs to support skills acquisition in their setting and job development that can be obtained in the open market or potentially through self-employment. If open or self-employment is obtained, the ADE can deliver the added post-employment supports. It also follows that ADEs could and should be encouraged to deliver lifestyle supports for clients, generating another income stream.

Issues needing to be resolved as part of the potential application of a UBI relate to taxation, income offsets, potential exploitation, award wages, sunset clauses for economic supports and what happens to ADEs? These issues need to be fully explored in the context of a potential new model, whether they be in the context of a UBI or the wider issue of how to deliver sustainable employment supports whilst keeping a lid on costs.

Looking at the history of sheltered workshops and ADEs over the past sixty years and as is reported in the discussion document, very few people with a disability ever leave an ADE and progress to integrated employment in the community. Those workers who have developed employability skills and have demonstrated the capacity to work in open employment are likely to be those workers that ADEs rely on to ensure that they meet commercial contracts. ADEs argue that without them, they are not viable businesses (Smith et al., 2017). The argument to support this proposition of retention is that it makes the service viable for those that do not have the capacity for open employment. The argument

ignores Marc Gold's work that demonstrated how everyone with the right supports has the capacity to develop work skills. This highlights that work skills are not the priority for this cohort, socialisation is. In essence, they function as day programs set in under-utilised capital-intensive settings. In a sense, ADEs suffer from the idea that people with a disability need to prepare to exist in the community through earning that right in segregated employment, a readiness mentality that supports the proposition that ADEs are about readiness (Rogan & Strully, 2007). These assets of ADEs could be utilised supporting other aspects of support organisation functions.

One issue that the government needs to address as a matter of urgency and which is the driver for this is the future of ADEs under the NDIS. Overseas experience has highlighted how sheltered workshops in the USA transitioned to open employment settings. Transition in the USA is not without its challenges, nonetheless it has been and is being done with considerable success. There are several states in the USA with no sheltered workshops and evidence to highlight that no person that previously existed within a sheltered workshop was left behind, with most people transitioned highlighting that the ability to maintain their existing social network as their priority (Dague, 2012). This again reinforces the idea that sheltered workshops or ADEs function as social or day centres.

The idea of a UBI and organisational transformation are not mutually inclusive of each other, they simply represent two potential pathways that would see scarce government resources better targeted. Separately, they represent potential pathways for ADEs and pathways to full citizenship for people with a disability.

Strategies to Facilitate Greater Choice and Control for NDIS Participants

Q16: How can the NDIS enable an Employment First approach in planning?

This is not a difficult proposition. Anecdotal evidence highlights that very few NDIS clients have employment supports. Evidence highlights that planners take the view that the NDIS does not support employment (Smith et al., 2017). Given that the NDIS Act highlights and does not differentiate between social and economic supports, employment supports should be built into every participant's plan. Employment should be an opt out process, not fight your way in. Supports must focus on employment outcomes, not transition to another program as is common in TTW programs (Xu & Stancliffe, 2017) and the current SLES reasonable and necessary supports (Smith et al., 2017).

Over a decade ago the USA embarked on an "Employment First" initiative, which provides some lessons for Australia. The big picture headings were; Build a Coalition of the Willing, Clarify Employment and Employment First, Emphasise Real Systems Change Policies, Focus on Strengths Based Practices and Measure and Evaluate Progress (Niemic, Lavin & Owens, 2009). Under these headings are no less than seventeen recommendations. At its simplest it highlights that there is no "cookie cutter" formula and that transformation to a real "Employment First" mind-set and practice will require innovation, determination and pain.

The question I pose is does the government have the will to go down this path, one that will no doubt create pushback from vested interests' intent on maintaining the status quo?

Similarly, innovation is unlikely to be led by the sector, as innovation requires investment and a level of chaos and disruption that very few organisations have a will for. Innovation is the product of chaos, bounded chaos that forces change driven by families and participants (Smith, 2018). This will create opportunities for providers to offer a range of services that support the social and economic participation of NDIS and non NDIS clients. In that sense providers should be looking to become true community support organisations that also partner with their communities.

Q17: How do current assessment processes drive the inclusion of employment supports in an NDIS participant's plan?

a) Are existing employment assessment processes appropriate for NDIS participants?

To be clear the current NDIS planning process does not foster inclusion through economic participation. The SLES supports process is focused on deficits and disregards the evidence that the best place to determine employment capacity is in an employment setting (Griffin, Hammis & Geary, 2007). Open employment for people with a disability in the USA is based on the strengths-based process of Discovery, something that was recently mandated into service delivery (Workforce Innovation and Opportunity Act of 2014 (WIOA)). Existing supports and services based on the idea of benchmark work capacity measured in hours lacks validity and certainly is at odds with the evidence base that highlights everyone can work with the right supports.

Q18: Are there different approaches to planning that could be explored for different groups of supported employees (e.g. younger workers, established workers, retirement transition)?

The use of the evidence-based processes of customised employment have been applied to various groups within the community and has been shown to be effective with any group that have barriers to employment. An obvious example is its use with veterans by Easter seals California (<http://www.easterseals.com/our-programs/military-veterans/operation-employ-veterans.html>). It is worth remembering that customised employment came out of rural areas where there was considered to be no employment opportunities. Discovery, the core element is about answering the question; Who is this person and what are their ideal conditions of employment? Discovery has been developed to suit different settings through three versions; Consultant Guided, Self-Guided and Group Guided.

a) How could SLES better support school leavers to build skills and confidence in order to move from school to employment?

The evidence-based process of Discovery which underpins the accredited full version of Customised Employment, has application across all cohorts of people that face barriers to employment (Griffin et al., 2007). This process could be encapsulated within a "life design" approach to planning that could be driven by a partnering ADEs with the education system

and community to support life stage transitions that offer pathways to training, development and transition to an independent life in the community. This would significantly enhance the NDIS planning process and produce sustainable outcomes that meet the clients' needs and community expectations of the NDIS. With regards to the SLES reasonable and necessary supports, please refer to the recent SLES review undertaken for the NDIS in 2017 (Smith et al., 2017).

Q19: What role could or should an NDIA Local Area Coordinator or planner have in linking participants to an employment opportunity?

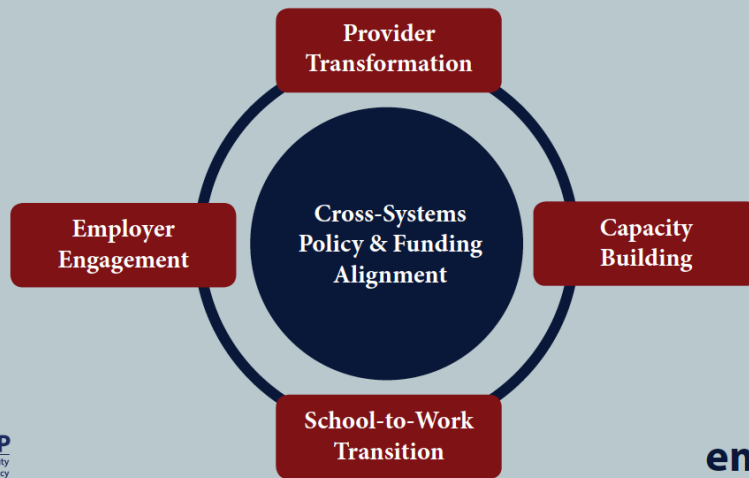
The role of the LAC or planner is to support an NDIS participant achieve the correct funding for their needs and aspirations. As this outcome has yet to achieve any level of consistency and the anecdotal evidence that highlights the absence of employment supports in plans, it highlights little understanding of employment and by extension suggest that there is no role for LAC's and planners. LAC's and planners need to have a detailed understanding of what employment supports exist in the community and not automatically refer clients to "programs" but to actual service providers that provide the types of services that clients need. I suggest a new approach that requires LAC's and planners to have a detailed understanding of this aspect, however if this is considered onerous, then no role is recommended. It is important that NDIS clients be aware of all possible support avenues, not simply existing program providers, as innovative personal services have not been shown to be the hallmark of existing service providers. It has been noted that there is a need to educate the "gatekeepers" to service provision and funding along with need to ensure that parents are educated with similar knowledge (Migliore et al., 2008).

Q20: What role could or should NDIA market stewardship have in developing a market with a range of employment, other support, or participation options for existing supported employees?

The NDIA could take a focus like the US Office of Disability Employment Policy (ODEP) who have adopted a model to support transition as illustrated below.

ODEP's Technical Assistance Model Key Areas of Foci

EMPLOYMENT FIRST STATE LEADERSHIP MENTORING PROGRAM



employment

ODEP has produced a provider transformation program that could offer clues to an Australian pathway. The ODEP model could be contextualised to the Australian setting by working with ODEP and Australian specialists in this area.

References

Alexander, J., Ford, J., Raghavendra, P., & Clark, J. (2017). Nature and extent of on-the-job training for employees with an intellectual disability: a pilot study. *Research and Practice in Intellectual and Developmental Disabilities*, 1-12. doi:10.1080/23297018.2017.1359661

Australian Human Rights Commission Act 1986. Commonwealth of Australia (1986).

Carey, G. J. (2015). *Game to work: The social capital of employees with an intellectual disability in a supported workplace* (Doctoral dissertation, University of South Australia).

Cimera, R.E. (2011). Does being in sheltered workshops improve the employment outcomes of supported employees with intellectual disabilities? *Journal of Vocational Rehabilitation*, 35 21–27 DOI:10.3233/JVR-2011-0550

Brotherton, M., Stancliffe, R.J., Wilson, N.J., & O'Loughlin, K. (2016). Supporting workers with intellectual disability in mainstream employment to transition to a socially inclusive retirement. *Journal of Intellectual & Developmental Disability*, Vol. 41, No. 1, 75–80 <http://dx.doi.org/10.3109/13668250.2015.1078878>

Dague, B. (2012). Sheltered employment, sheltered lives: Family perspectives of conversion to community-based employment. *Journal of Vocational Rehabilitation*, 37 1–11 DOI:10.3233/JVR-2012-0595

Disability Discrimination Act of 1992 – Section 15. Commonwealth of Australia (1992).

Disability Services Act, 1986, Principles and Objectives for The Purposes of Section 5. Commonwealth of Australia (1987).

Ferrari, L., Sgaramella, T. M., & Soresi, S. (2015). Bridging disability and work: Contribution and challenges of life design. In L. Nota & J. Rossier (Eds.), *Handbook of life design: From practice to theory and from theory to practice* (pp. 219–232). Göttingen, Germany: Hogrefe.

Griffin, C., Hammis, D., & Geary, T. (2007). *The Job Developer's Handbook: Practical Tactics for Customised Employment*. Baltimore: Paul H. Brookes Publishing Co.

Lulinski, Amie; Timmons, Jaimie Ciulla; Leblois, Stephane; and ThinkWork! at the Institute for Community Inclusion at UMass Boston, "From Sheltered Work to Competitive Integrated Employment: Lessons from the Field (Bringing Employment First to Scale, Issue No. 11)" (2017). *All Institute for Community Inclusion Publications*. 68.

Mays, J.M. (2016). Countering disablism: an alternative universal income support system based on egalitarianism. *Scandinavian Journal of Disability Research*, Vol. 18, NO. 2, 106–117

Migliore, A., Mank, D., Grossi, T., & Rogan, P. (2007) Integrated employment or sheltered workshops: Preferences of adults with intellectual disabilities, their families, and staff, *Journal of Vocational Rehabilitation* 26(1), 5–19.

Migliore, A., Grossi, T., Mank, D., & Rogan, P. (2008). Why do adults with intellectual disabilities work in sheltered workshops? *Journal of Vocational Rehabilitation* 28. 29–40

Murphy, S., Easterbrook, E., Bendetson, S., & Lieberman, S. (2014). Transcen, Inc.'s WorkLink program: A new day for day services. *Journal of Vocational Rehabilitation* 40 125–130 DOI:10.3233/JVR-130678

National Disability Insurance Scheme Act 2013, Commonwealth of Australia (2013).

Niemiec, B., Lavin, D., & Owens, L. (2009) Establishing a national Employment First Agenda. *Journal of Vocational Rehabilitation* 31. 139–144 DOI:10.3233/JVR-2009-0483

Rogan, P., & Strully, J.L. (2007). Moving from Facility Based Day Services to Integrated Employment and Community Supports. In Walker, P.M., & Rogan, P. (Eds.). *Make the Day Matter! Promoting Typical Lifestyles for Adults with Significant Disabilities*. Baltimore, Maryland. Paul H. Brookes Publishing Co.

Smith, P. (2018). *A Systems Analysis of Factors that lead to the Employment of People with a Disability*. Unpublished Doctoral Thesis. Sydney, Australia. University of Sydney.

Smith, P., Rhodes, P., Newton, D., & McVilly, K. (2017). *Investigating good practice in promoting and supporting employment for people with disability in Australia: School Leavers Employment Supports (SLES)*. National Disability Insurance Agency (NDIA): Canberra, ACT.

Smith, P., McVilly, K., McGillivray, J., Chan, J. (2018a). Developing Open Employment Outcomes for People with an Intellectual Disability utilising a Social Enterprise Framework. *Journal of Vocational Rehabilitation*. Vol. 48, no, 1, pp. 59-77

Smith, P., Rhodes, P., Pavlidis, L., and McVilly, K. (2018b). *Investigating good practice in promoting and supporting employment for people with disability across Australia*. Early Outcome Data Preliminary Report. Department of Social Services (DSS): Canberra, ACT.

Tianxi Xu & Roger J. Stancliffe (2017). An evaluation of employment outcomes achieved by transition to work service providers in Sydney, Australia, *Journal of Intellectual & Developmental Disability*, DOI: 10.3109/13668250.2017.1310809

United Nations. (2006). *United Nations Convention on the Rights of Persons with Disabilities*. New York: United Nations Convention on the Rights of Persons with Disabilities.

Walker, P.M. (2007). Promoting Meaningful Leisure and Social Connections: More than Just Work. In Walker, P.M., & Rogan, P. (Ed.). *Make the Day Matter! Promoting Typical Lifestyles for Adults with Significant Disabilities*. Baltimore, Maryland. Paul H. Brookes Publishing Co.

Workforce Innovation and Opportunity Act of 2014, Pub. L. 113-128
128, STAT, 1634.