# MaKing Collaboration REal

Building a Progressive Vision for a Policy and Service Delivery Framework that Promotes the Effective Leveraging of Resources to Improve Employment & Socioeconomic Advancement of Youth and Adults with Disabilities

**Prepared for the National LEAD Center’s First Annual National Policy Roundtable**

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**Making Collaboration Real:**

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**“Far and away the best prize that life offers   
is the chance to work hard at work worth doing.”**

-Theodore Roosevelt

## Overview

The purpose of this paper is to summarize current challenges and opportunities related to the leveraging of public resources across systems to achieve improved employment outcomes and socioeconomic advancement for individuals with disabilities. The analysis, observations and recommendations will serve as a framework to inform the dialogue at the National LEAD Center’s First Annual Policy Roundtable on July 17-18, 2013 in Washington DC.

## Introduction

In the report entitled *Unfinished Business: Making Employment of People with Disabilities a National Priority* (US Senate, 2012), Senator Tom Harkin, Chairman of the Senate Health, Education, Labor, and Pensions (HELP) Committee called for increasing the number of persons with disabilities in the workforce from under 5 million to 6 million by 2015. He also challenged every level of government to engage in systems-change efforts that focus on the true causes of unemployment:

In order to address this stubborn problem {of unemployment} we need to focus on root causes. This will include rethinking the way our support programs for people with disabilities are structured…I am convinced that we must develop and implement bipartisan strategies to modernize these programs in a way that consistently promotes long-term employment and economic self-sufficiency and security without harming millions of current and future beneficiaries and recipients. [p. 2-3]

Modernizing disability programs means updating and re-engineering outdated public policy, system practices and service models that currently fail to enable the vast majority of Americans with disabilities to engage in careers and achieve economic self-sufficiency. Paving the way for this modernization requires a comprehensive review and potential changes to landmark legislative statutes, Federal regulations and guidance in order to ensure a strategic, well-coordinated investment of public dollars that accurately reflects and supports the high expectations that individuals with disabilities should have, and increasingly do have, for themselves. Effective modernization means tackling the misalignment of the complex policies, operational practices, and funding priorities across government systems. As the Government Accounting Office (GAO) concluded, the 175+ disability-focused programs funded primarily by the Federal government currently have no “centralized consensus-based Federal strategy to serve individuals with disabilities” (GAO-08-635). Successful systems change must also guarantee that public programs prioritize investments in integrated employment for individuals with disabilities. Indeed the cost of continuing to operate publicly-funded disability programs, based on assumptions that people with disabilities will be unemployed and without income, is a cost the country will soon be unable to bear (Livermore, Stapleton & O’Toole, 2011).

Yet against this backdrop, there is increasing work going on at the state level to spur systems change that translates into significant improvements in the employment and socioeconomic advancement of individuals with disabilities, and this activity is fueling a movement for change. The Federal government must be proactively engaged in this emerging momentum and must commit to raising the bar in relation to the outcomes for youth and adults with disabilities produced as a result of Federal funding.

## Responding to the Challenge: The Current Federal Approach

The current Federal approach to financing and delivering services designed to support integrated employment for youth and adults with disabilities involves multiple agencies administering a variety of funding streams at the Federal, state and local levels. Across different states, the agencies responsible for administering diverse Federally-funded programs can also vary. At a minimum, these can include Labor, Vocational Rehabilitation, Education, Mental Health, Developmental Disability, Medicaid, Housing and Transportation. One consequence is that no single source of funds or resources is likely to respond effectively to individuals with disabilities who often face multiple barriers to employment (NCWD-Adult, 2006).

Given this reality, it is not surprising that for more than a decade, there has been widespread acknowledgement that integrating and coordinating funding and services across the multiple systems can result in a greater quantity and quality of employment outcomes for youth and adults with disabilities.[[1]](#footnote-1) Yet the fact remains that each system was created in response to varying public policy priorities, is governed by separate Federal statutes and regulations, and operates differently with regards to eligibility determination methods and service authorization processes. These circumstances create significant challenges in establishing truly integrated and coordinated service provision for common customers as the norm rather than the exception. There is little doubt that the complexities created by the current fragmented approach have hindered the nation’s ability to meaningfully improve the integrated employment rate of working-age Americans with disabilities.

### Blending and Braiding as Strategies to Address the Consequences of a Fragmented Federal Approach

To date, two concepts, “blending” and “braiding”, have been coined to describe the effective integration of multiple funding streams and the coordinated delivery of services financed by those funding streams. Blending and braiding are both cost-sharing strategies designed to use resources in more coordinated and flexible ways. For this discussion, blended and braided funding is defined as follows:

* **Blended funding** occurs when dollars from multiple funding streams are combined to create a single “pot” of dollars that is then used to purchase one or more specific services that support an individual with a disability in pursuing, obtaining or maintaining integrated employment.
* **Braided funding** occurs when multiple funding streams separately and ***simultaneously***, purchase and provide specific services that support an individual with a disability in pursuing, obtaining or maintaining integrated employment.

In the last decade, the Federal government has sponsored a number of efforts to facilitate and demonstrate the benefits of blending and braiding across systems that otherwise operate in siloes. Federal legislation and regulation have been established to support these efforts by requiring state-level, inter-agency agreements and required partnerships with other key systems, both of which are intended to promote more effective service delivery through collaboration, including the establishment of cost-sharing relationships.

There is no doubt that resource scarcity is also propelling forward efforts to design effective blending and braiding strategies. Resource scarcity is impacting the ability of all systems to adequately finance a sufficient array and intensity of employment services in a timely manner for individuals with disabilities, thus requiring more strategic approaches to leverage resources to optimize effectiveness.[[2]](#footnote-2) Yet while resource scarcity increases the need for blending and braiding, it can also create more challenges to such efforts, which will be discussed later in the paper.

### The Impact of Current Federal Statute, Regulation and Guidance on Efforts to Effectively Leverage Disability Employment Resources and Services in a Multi-System Context

It has become clear that blended and braided funding approaches require a heightened level of coordination and collaboration among public funders which is not necessarily supported by or clarified in existing Federal rules governing those public funders and their respective funding streams. Indeed, the content of Federal statutes, regulations and guidance that is specifically relevant to implementation of blending and braiding across multiple systems and funding streams is sometimes interpreted as prohibiting such strategies.

One requirement contributing to this is the term “payer of last resort” which exists for multiple agencies charged with utilizing Federal funding streams to provide employment services to individuals with disabilities, and illustrates one fundamental problem with utilizing a multi-system approach to deliver employment services that is not coordinated. The fact that each system operates under separate legislative intent and federal regulations has resulted in more than one system being identified as the payer of last resort. Examples include the Rehabilitation Act, Medicaid, and the Workforce Investment Act:

1. Rehabilitation Act: Under the Rehabilitation Act, state VR agencies are required to have a state plan that includes the following assurance:

Prior to providing any vocational rehabilitation service to an eligible individual…the designated State unit will determine whether comparable services and benefits are available under any other program (other than a program carried out under this title). [Rehabilitation Act, Section 101(a)(8)(A)(i)]

While there are some exceptions to this requirement,[[3]](#footnote-3) and while this requirement can be waived if such a determination would interrupt or delay an eligible individual’s progress, an immediate job placement, or the provision of services to an individual at extreme medical risk, the general nature of this requirement has hampered the effective blending and braiding of VR funding and services with those from other systems for which a VR consumer is eligible. In particular, supported employment services provided under the Rehabilitation Act are not excluded from the payer of last resort requirement.

1. Medicaid: A second major funder of employment services for working-age individuals with a range of disabilities is Medicaid. Through Federal statute and regulation, Medicaid funding is also subject to payer of last resort requirements. Under Title XIX of the Social Security Act and Title 42 of the Code of Federal Regulations, Medicaid is intended to be the payer of last resort with few exceptions. State Medicaid agencies must “take all reasonable measures to ascertain the legal liability of third parties to pay for care and services” that would otherwise be paid by Medicaid [42 U.S.C. § 1396a(a)(25)(A)]. When Medicaid funds employment-related services and supports, it typically does so under the Home and Community-Based Services (HCBS) waivers. However, according to both Federal regulation and statute, HCBS waivers may fund employment services only if such services are not otherwise available to the waiver participant through Special Education or Vocational Rehabilitation. When states seek Federal approval to operate HCBS waivers that include employment services, they are required to provide this assurance:

When a state covers prevocational and/or supported employment services in a waiver, the waiver service definition of each service must specifically provide that the services do not include services that are available under the Rehabilitation Act (or, in the case of youth, under the provisions of the IDEA) as well as describe how the state will determine that such services are not available to the participant before authorizing their provision as a waiver service. [CMS, 2008, p. 131-132]

1. Workforce Investment Act:  The Workforce Investment Act (WIA) also includes “payer of last resort language” in relation to training services.  WIA section 134(d)(4)(B) limits the use of WIA funds for training services to instances when there is no or insufficient grant assistance from other sources available to pay for those costs. The statute specifically requires that funds not be used to pay for the costs of training when Pell Grant funds or grant assistance from other sources are available to pay those costs. (Source: 20 CFR Part 652 et al., Workforce Investment Act, Final Rules, pp. 492328-9:  August 11, 2000)  As is the case in other systems, WIA personnel report that there are many programmatic interpretations of the statute and regulation.

Yet the statutory authority for the Workforce development system and the delivery of core, intensive and training services through American Job Centers (previously called One-Stops) offers a platform that encourages partnerships and collaboration. There is an expectation that mandated partners coordinate resources to respond to individual job seeker needs. As with other systems, federally mandated performance outcomes drive system behavior. With additional support of Disability Resource Coordinators, 23 states are testing structures and processes to improve cross system resource integration and collaborative decision making through the Disability Employment Initiative.

### The Link between Blended and Braided Funding and Implementation of Evidence-Based Practices

Over recent decades, a number of innovative service delivery strategies have been developed to increase employment outcomes for youth and adults with disabilities. These include Customized Employment, Individualized Supported Employment, Transition Service Integration Model (seamless transition), Entrepreneurism (self-employment and micro-enterprise), and the Youth Guideposts for Success. These methodologies have enabled people with a range of disabilities, including those with significant disabilities, to become employed. What these and other contemporary best practices have in common is an acknowledged need for resource and service coordination across multiple systems and funding streams.

For example, ODEP found that when implementing Customized Employment services, using funding from multiple sources allowed for more creative planning and contributed to a successful outcome.[[4]](#footnote-4) Even early adopters recognized that a diversified funding base was a necessary strategy for organizations seeking to provide effective Customized Employment services, and many Customized Employment outcomes were realized through the blending of multiple funding sources.[[5]](#footnote-5) Braided resources are also considered critical for assisting individuals with disabilities to achieve self-employment (Start-Up USA, 2009); but key resources like Ticket to Work and Workforce Investment Act funding continue to be very difficult to use in support of self-employment (New York Makes Work Pay, 2009). Furthermore, seamless transition fundamentally involves coordination of services from multiple systems, yet is hampered by policies that are interpreted as preventing school districts from contracting with adult employment service providers and by the lack of access to Medicaid long-term employment supports in many states (Certo, et al., 2009).

As efforts are focused on taking these innovative and effective practices to scale, there is increased urgency to solve the challenges associated with seamlessly and sufficiently financing these strategies. In recent years, efforts to stimulate and demonstrate new models for braiding and blending have been made in large part to advance these and other newly recognized best practices from the field.

## Recent Efforts and Innovations in Blending & Braiding

Since the importance of blending and braiding was first recognized in the field, there have been local demonstrations of how disparate funding and service systems have been brought together in creative and productive ways to address fragmentation of resources. To add to this knowledge base, recent, promising examples of blending and braiding are highlighted here, along with examples that have stood the test of time and produced very good outcomes. These examples illustrate how braiding categorical funding and resources can occur, but also provide insight as to why these models may not be more common across the country.

### American Job Centers Leveraging Ticket to Work: Tompkins County Workforce New York Career Center

Through the current Disability Employment Initiative (DEI) grants jointly funded by ODEP and the Employment and Training Administration within the US Department of Labor, state workforce systems are being assisted to leverage Social Security’s Ticket to Work (TTW) resources as part of enhancing their ability to serve jobseekers with disabilities. The Social Security Administration has pre-qualified American Job Centers (AJCs) to be Employment Networks (ENs). This means they have met the requirements necessary to serve the employment and training needs of individuals with disabilities.

In Tompkins County, New York, the workforce system has learned first-hand how to use the TTW to provide another means of funding supports to job seekers with disabilities. Integration of the TTW has allowed the Tompkins Career Center to braid services with the goal to get people employed at levels not typically otherwise achieved by individuals with disabilities on SSI or SSDI. Keys to the success of this effort involve the strategic leadership role of the Disability Resource Coordinator (DRC), who spearheads TTW efforts at Tompkins Career Center and possesses over twenty years of experience with work incentives. His longevity with this AJC has also played a role. Because of the initiatives that he has helped lead and demonstrate in Tompkins County, the New York state workforce investment system has made a commitment to having all DRCs trained in work incentive benefits counseling.

Longevity in the workforce investment system contributes substantially to systems change efforts, and provides a sufficient understanding of all partner systems that the workforce investment system can involve in holistically serving job seekers with disabilities through blended and/or braided resources and services. Efforts are also facilitated by the creation of the *Integrated Resource Team (IRT)*, a cross-systems collaboration model being supported by the DEI grant efforts. *Integrated Resource Teams* (IRTs) involve key partners coming together to provide guidance to individual job seekers with disabilities who have had difficulty obtaining employment through core services within the AJC. This team approach seeks to bring together multiple resources for the individual job seeker with a disability, such as state vocational rehabilitation funds, intensive training funds through the AJC, and partner agency-funded opportunities including but not limited to wage subsidy programs (Nickerson, 2009).

New York’s workforce system is the highest paid in terms of TTW revenues and Tompkins Career Center reports that over 60% of their TTW income accrues from individuals with disabilities in outcome status, meaning people who are no longer receiving SSI or SSDI as a result of becoming employed with assistance from the AJC. The remainder of TTW income comes from people with disabilities achieving the milestones and continuing to receive partial benefit payments. This success is attributed to the AJC’s careful evaluation of each job seeker by the experienced DRC. When people assign their Ticket to VR instead of the AJC, Tompkins Career Center is committed to keeping the individual’s registration open so blending and/or braiding resources is still possible, particularly so that the AJC can provide appropriate services (e.g. assessment of skills and interests; resume development) during the time the individual is going through eligibility determination and planning with VR. The roles are distinguished as “primary” versus “partner”. Whether the AJC or VR agency is primary depends on the nature of the individual job seeker’s needs at the time of registration at the AJC. If the VR agency is primary, the AJC remains involved as a partner. The EN should focus on what is best for the individual, and be motivated to identify possible collaborators to meet those identified individual needs rather than a focus on generating revenues.

Tompkins Career Center has also had success utilizing the TTW with Medicaid participants, particularly since the TTW Phase Two milestones were introduced in 2008. This allows the AJC to be involved in developing supported employment opportunities that Medicaid long-term support can then sustain. The involvement of the AJC and their focus on utilizing the TTW results in individuals with significant disabilities earning above Substantial Gainful Activity (SGA).

### WorkLink: A Hybrid Service Model for Adults with Significant Disabilities

An increasing number of adults with I/DD receiving Medicaid long-term support services are enrolled in segregated non-work activities (Butterworth, et al. 2010), despite growing public policy promoting the presumption of employability in integrated settings for all citizens with disabilities. The myriad of complex rules and processes that individuals with disabilities and their families face in order to receive integrated employment services is often a great deterrent. Additionally, the lion’s share of waiver dollars continue to be tied to state contracts with disability service providers that are focused on segregated group or center-based services as the primary path for individuals with significant disabilities who are eligible to receive waiver supports. Taking the road less traveled typically requires circumventing a great deal of bureaucratic red tape and hurdles across systems in order to secure and sustain integrated employment services, and this reality is often considered more difficult by families than the traditional path of segregated work or non-work options. As a result, families are often forced to relinquish the expectation that their family member with a disability will be gainfully employed in the community because they lack provider options that offer a hybrid service model that combines integrated employment with wrap-around day service supports.

To address this dilemma, and improve employment outcomes for individuals with significant disabilities enrolled in its San Francisco-based WorkLink program, TransCen Inc. created a hybrid service model that combines supports that ensure integrated employment coupled with other community-based activities based on individual needs and circumstances. This approach provides flexible supports and wrap-around services so people with more significant disabilities can work in integrated jobs and continue to live active, meaningful lives with the supports they need when they are not at work. The *Integrated Work* (IW) model braids ommunity day services (CDS) funded by the Intellectual/ Developmental Disabilities Services (DDS) with VR employment resources, enabling different levels of support and a variety of services to each person enrolled. WorkLink tailors service plans to address each individual’s needs and respond rapidly if a person’s situation changes, such as a sudden job hire or loss. For WorkLink participants, access to both DDS and VR eliminates the need to choose between community engagement (day services) and integrated employment (SE/customized employment services).

The model also works because WorkLink and the Medicaid waiver agency have an agreement that services will be delivered on an hourly basis, allowing a participant’s services to be “built to order.” By braiding services and delivering them on an hourly basis, people can tap I/DD Medicaid waiver services and VR funds for employment supports in the course of the same day. For individuals with more complex support needs, this hybrid approach has proven to be extremely beneficial. Day services funding can be used to explore work options and develop employability skills through volunteer experiences. People with limited stamina can move into work more slowly (i.e. 6 to 10 hours/week), and have access to job coaching through VR, without giving up non-work activities. Thus, WorkLink can quickly adjust the balance of day and employment supports if work opportunities change. When an individual completes the VR process, the Medicaid waiver authorizes a flexible mix of community-based day service and supported employment job coaching hours so the hybrid model can continue over the long-term. As a person progresses in his/her job, becoming more independent and self-sufficient, WorkLink reduces the individual’s supported employment service hours accordingly.

### Delaware Vocational Rehabilitation System

The demand for VR services significantly outpaces the agency’s available funding, particularly in challenging economic times where two things occur simultaneously: first, job losses associated with an economic downturn impact people with disabilities to a much greater extent than people without disabilities; and second, state government revenues decrease, often leading to reductions in overall VR agency funding. In the face of these challenges, Delaware’s VR agency stays focused on building alliances across public and private systems who serve common customers. Delaware’s VR agency has taken a particular approach to working with other systems: they assert themselves, and offer to take the lead when employment is the issue so that there is one agency that everyone recognizes as the lead agency. This results in collaborations that involve the VR agency administering other agencies’ funding through a comprehensive, detailed set of Memorandums of Understanding. For example, by partnering with Active Community Treatment (ACT) teams in Delaware, the VR agency is able to leverage ACT funding and increase the ACT team’s focus on the importance of employment for individuals with mental illness.

With regard to collaboration between Delaware’s state VR, special education, and I/DD adult services agencies, the focus is on getting agreement to work together: for each agency to come to the table with what they have and then figure out specifically what each agency’s role and responsibilities will be in a seamless delivery of transition school-to-work supports. This has led to an MOU to operate an “Early Start” initiative aimed at youth with significant disabilities. The focus of the initiative is to get students with significant disabilities started in SE services before they leave high school so that they leave school with a job and already enrolled in the adult service system. With this initiative, VR will pay the adult employment service provider before the student leaves school rather than waiting for school funding to end before VR funding can begin. This has led to successful diversions of students from entering sheltered workshops or day programs to integrated employment opportunities.

From the VR director’s perspective, good relationships are seen as key to the successful inter-agency collaboration and blending and braiding of resources. Longevity of dedicated senior leadership is another key factor -- the Delaware’s VR director has been in her position for over ten years, and has been dedicated to forging strong relationships with her peers and colleagues across systems. Finally, a key to success in Delaware is the alignment of policy goals in the state planning processes across agencies serving people with disabilities. Just as critical, and still a work in progress, is the alignment of public funds to support consistent policy goals, including the adoption of coordinated, cross-agency agreements that ensure public funds are directed toward the desired outcomes in the most coordinated and cost-effective fashion.

### Integrating Systems for a Seamless Transition for Youth with Significant Disabilities

Public schools, vocational rehabilitation and Medicaid waivers each play an important role in helping youth with the most significant disabilities bridge the gap as they exit school and seek connection with services that will enable them to maintain integrated employment and careers. However, without careful and well organized collaboration the result can frequently be disjointed, uncoordinated service and/or interrupted delivery of services that consequently lead to poor employment outcomes. One approach to creating a framework for seamless transition service delivery involves intentional and coordinated braiding of the resources of these various collaborating entities to provide sequential, uninterrupted services, which results in youth exiting school with a job and the supports needed to keep that job.

In Charles County, Maryland, the county’s public school system implemented a model of seamless transition in the late 1990’s as part of a demonstration project to test the utility of integrating resources to ensure that upon graduation from high school, youth with disabilities are employed in jobs intended to continue into adulthood. Since that time, Charles County Public Schools (CCPS) has continually refined the model so that in 2013, representative of the typical outcomes over the last 15 years, all youth with intellectual/development disabilities who exited school had an integrated job, based on their preferences, and accompanied by the long term supports necessary to maintain the job. The outcomes were achieved through the following progression of activities.

First, work experiences are provided throughout the secondary school years to help students identify interests, skills and supports relevant to the attainment of adult employment.  Second, a resource team is formed two years before the projected date for school exit. This team includes the teacher, a VR counselor, a representative of the state I/DD agency, a local community rehabilitation provider (CRP), the youth and the youth’s family. The VR agency opens a case so that VR services such as authorization for assistive devices, job development and short-term job coaching can be available as needed immediately upon school exit. At the same time, the state I/DD agency insures that eligibility is confirmed and authorizations are put in place so that long-term post school employment support can begin as soon as school ends and the VR short-term support is exhausted. The employment service provider (CRP) staff works under contract with the school system and is paid by that system to assist the teacher locate integrated employment in the last year of school. The CRP is also a vendor for VR and I/DD agency services so that it receives on-going reimbursement for the staff working with the transitioning youth as the youth’s services are funded by the different partner agencies. Thus, a consistent employment service provider insures that the youth enters post-school life with the same job acquired while in school. The CRP receives funding from three distinct funding sources that is braided so that the youth makes a successful and seamless transition to employment.

### Individual Placement and Support (the IPS model)

While Maryland’s Mental Health Administration (MHA) and Department of Rehabilitation Services (DORS) have had a cooperative agreement around supported employment (SE) since 1987, the depth of collaboration, policy alignment, and integrated funding greatly increased in 2001 when the two agencies committed to jointly serving individuals with mental health needs using Evidence-Based Supported Employment (EBSE). The agencies’ exceptional level of partnership started with a commitment to jointly serving a cohort of common customers using EBSE and data tracking based on jointly agreed outcomes that were used to evaluate results. When the effort demonstrated improved outcomes for both systems, further commitment was made to statewide implementation as well as identifying and addressing barriers to implementation that were impeding optimal execution of the approach.

Critical policy and practice changes were made by MHA and DORS to support the effort:

**1.** At the outset, MHA made a policy change that allowed all MA funding for SE to be directed to integrated employment rather than continuing to allow that funding to be used for agency-based, segregated employment. While there was pushback at the time, within 5-6 years, most providers switched from providing agency employment to SE. Through collaboration between MHA and DORS, and grant funding leveraged from the Johnson & Johnson Foundation, significant technical assistance was put in place to support provider transitions to EBSE.

**2.** The two agencies cross-walked their eligibility requirements, allowing for a dual eligibility determination. With this, DORS accepts eligibility for MHA services as evidence of eligibility for DORS services. This coordination of policy also led to DORS agreeing that individuals eligible for MHA services also have a “most significant disability” under DORS order of selection. And finally, to streamline practice to reflect these commitments, the partners adopted a single point of entry approach which allows an individual to submit relevant information into a single web-based electronic care management portal that then prepopulates the DORS application and automatically sends the application to DORS with electronic authorization for long-term employment supports to be provided by MHA upon DORS case closure.

**3.** MHA mandated that all MHA consumers interested in integrated employment would be referred to DORS, thus leveraging DORS funding to support SE. However, instead of reducing MHA investment as a result, MHA maintained its investment and targeted it toward pre- and post- DORS services, as well as an incentive payment for placements that providers could earn from MHA while also being paid by DORS, and a monthly payment to providers doing EBSE for efforts related to coordination of clinical and employment services.

While individualized SE services that do not meet EBSE fidelity are still reimbursable by both partners, MHA took deliberate steps to ensure the highest reimbursement rates available to providers were for EBSE.

In terms of braiding and blending efforts, there is a sequencing approach being utilized with MHA using state dollars to fund pre-DORS services for one month, then DORS funds services that lead to job placement, and finally MHA uses MA dollars (under an 1115 Medicaid waiver) to fund long-term support. Pre-DORS services involve providers being reimbursed for completing assessment, career plan, work incentives counseling, training on disclosure and referral to DORS. While some of these services could be funded by federal MA, MHA concluded that using state dollars gives the agency more flexibility. Braiding takes place when EBSE providers are able to be paid the monthly clinical coordination service fee while a common customer is also being served by DORS. A variation on blending occurs when MHA pays an outcome payment for a placement otherwise being funded by DORS. MHA feels they cannot pay this placement incentive using federal MA dollars, due to lack of clear approval of outcome payments from CMS and concerns that those conducting MA audits aren’t yet embracing some of the more visionary and innovative approaches that CMS program staff are attempting to advance nationally. And MHA has also created an administrative EN to reduce burden on providers while also ensuring that TTW revenues earned through SE placements of MHA consumers can be collected. A pilot involving 5 providers has already resulted in $100,000 of TTW reimbursement for Maryland MHA. Individual work plans required for TTW are also integrated into the electronic care management system, allowing inputted information to be simultaneously formatted to meet both TTW and state regulatory requirements.

Efforts are also now underway to enable MHA to collaborate more closely with AJCs. TTW revenues are being used to support mental health awareness training for each workforce area in the state. The workforce system and MHA are partnering to develop the training modules. MHA leadership would like to explore opportunities for braiding or blending resources for common customers as a next step, using a model similar to the one used with DORS. Overall, the success in Maryland appears to be due to a long-standing inter-agency partnership, between MHA and DORS, focused on a commitment to jointly serving customers eligible for both system and utilizing service delivery strategies (e.g. EBSE) that produce the best outcomes for the individuals served and the partner systems. From a focus on ensuring the systems interface to produce positive outcomes for individuals, a range of policy, procedure, information system funding and provider capacity-building strategies have been identified and implemented with each successive strategy increasing the systems’ joint ability to seamlessly and effectively serve those with mental health needs.

## Reflecting on Lessons Learned through Efforts to Facilitate Blending and Braiding

While state and local examples like those previously highlighted continue to demonstrate the potential of effective inter-agency collaboration and blended and/or braided funding strategies, there is currently insufficient evidence that these or similar strategies are being taken to scale and sustained to the extent necessary to make a substantial impact on national employment outcomes for people with disabilities. Despite years of much needed efforts to promote these models, many states and localities still have not successfully adopted effective blending and braiding models, even though inter-agency agreements and increased inter-agency communication is occurring at the state and sometimes local levels.[[6]](#footnote-6) Identifying the range of reasons why promising local examples continue to remain the exception rather than the rule may help inform how future efforts in this area should be focused.

### Confluence of Unique, Local Factors are Often Credited with Causing Success in Highlighted Models

Each example described above suggests the presence of some unique factors that contributed to the success of the efforts and that could not necessarily be replicated on a widespread scale and in a short period of time. For example, the unique experience and knowledge base of the Tompkins County AJC Disability Resource Coordinator, the positive and truly personal relationships among system leaders that can be more easily established and sustained in the governments of small states like Delaware, and the successful outcomes resulting from Charles County’s unique 15+ year commitment to seamless transition.

It is sometimes the case that certain parts of the coordinated set of services being delivered through blended or braided demonstration models are funded in whole or in part by unsustainable or non-Federal sources, both of which are likely to inhibit scalability. For example, braided funding case studies highlighted in the most recently published paper on the topic (NTAR, 2011) involved the use of Medicaid Infrastructure Grant funds (no longer available) and relied on the employment service provider’s discretionary funds for long-term support. In other examples, it appears the fact that the models blend or braid a single Federal funding stream with state or local funding not subject to federal requirements is one reason why the model can be carried out successfully. For example, in Dane County, Wisconsin, youth with I/DD in transition are supported to obtain integrated employment by the vocational rehabilitation agency, but due to the insufficient on-the-job support payments available through the VR agency ($600/month regardless of hours worked), the county I/DD agency uses county tax levy to supplement the VR funding. The results have been exemplary -- 80% of youth with I/DD are going from high school directly into integrated employment. The primary reason the county I/DD agency uses county tax levy is because state/federal waiver funding is not available due to waiting lists. Yet as the state moves to end waiting lists for its Medicaid waivers, the county will want to use Medicaid waiver funding rather than county tax levy to continue to supplement the VR on-the-job support payments. The transition to blending two Federal funding sources (VR and Medicaid waiver) is likely to seriously compromise the continuation of this model, given existing Medicaid waiver and VR regulations.

### Skilled and Committed Leadership a Common Denominator in Many Successful Case Examples, Yet Still Considered Uncommon Across the Country

Almost every positive case example highlights the exceptional impact of system leaders as a critical key to success. Collaborative service delivery and cost-sharing often starts with leadership personnel who recognize the values and objectives they have in common with other potential public partners, and who adopt a clear commitment to effectively serving all eligible applicants whether or not some may also be eligible for assistance from other systems. Collaboration is also aided when system leaders share a heightened level of expectations about the talent and potential contributions of individuals with disabilities being utilized in an inclusive workforce, and a commitment to be solution and innovation oriented in order to overcome challenges associated with integrated service delivery and blending or braiding of funding. Trust and respect must exist between system personnel at every level, with at least one system’s leadership acting as the catalyst for development of innovative collaborative agreements and practices, which include blending and braiding of resources in support of individuals who are common customers. The final element necessary for effective leveraging of resources results from individual leadership that includes persistence, strong communication and negotiation skills, and a commitment to ensure these types of efforts are not stalled or sidelined for any reason. An attitude of “whatever it takes” to solve challenges can bring multiple funders together to overcome barriers of policy or traditional practice.

## Fundamental Barriers to Scaling and Sustaining Blending and Braiding

Even when some of the unique contributors to success discussed above are present, and even with the knowledge that there are several, well-documented advantages to blending or braiding funds (see Box 1), there are still a number of major challenges that inhibit efforts to scale and sustain effective practices that successfully leverage resources across systems.

**BOX 1: Advantages of Blending or Braiding Funds**

* Permit systems to fund activities that may fall outside the specified limits of categorical programs
* Allow separate funding streams to be used in flexible and coordinated ways to implement an individual’s employment and/or service plan objective more effectively
* Result in more efficient use of limited resources as agencies work together to overcome barriers, address gaps and eliminate duplication
* Create greater direction and control of public resources by the job seeker
* Establish a method for meeting the range of a job seeker's needs that any single funder could not effectively respond to alone

*Source: ODEP*

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### 1. Lack of Alignment between Individual Systems

Because the current Federal approach to financing and delivering services designed to support integrated employment for youth and adults with disabilities involves multiple agencies administering multiple funding streams, blending and braiding are currently the only strategies to leverage the array and intensity of employment services that many individuals with disabilities need to obtain and sustain integrated employment. Yet blending and braiding is difficult because each system has different reporting requirements, payment arrangements, funding cycles, and approaches to evaluating return on investment. As a result of this lack of alignment, ODEP has found that some public funders are reluctant to blend their dollars because of the loss of control over how the funds will be spent, while other funders have reporting requirements that expect all funds to be tracked and accounted for after being allocated to an eligible job seeker in need of specific supports and services. Inconsistent requirements across the multiple systems expected to partner, combined with the fact that individual system policies and practices typically do not specifically address the need to facilitate blending and braiding, has resulted in limited operational alignment and flexibility, both across and within systems.

### 2. Existing Federal Statutes, Regulations and Guidance that Addresses Blending and Braiding is Limited and Appears to Work Against the Goal

In addition to the complexities related to multiple systems each operating in unique ways, it is also the case that each system is expected to leverage other systems resources in order to judiciously manage their own limited resources. While Federal policy, regulation and guidance may pay some attention to the value of blending and braiding to enhance and improve services and outcomes for common customers, minimal information has been provided, across systems, providing examples and promoting ways that respective systems CAN blend or braid resources on behalf of existing customers. Clearly, the content of existing Federal statutes, regulations and guidance remains one of the key challenges to blending and braiding of the multiple federal funding streams otherwise available to support employment outcomes for youth and adults with disabilities.

Additionally, some localities that did implement innovative models for blending or braiding have been unable to sustain them due to federal intervention. In Denver Colorado, for example, the agency administering Medicaid waiver funding created a blended funding model in 1999 to enhance payments to employment service providers who were providing VR-funded assessment and job placement to Medicaid waiver participants with disabilities. Over the initial three-year period, the model led to a 37% increase in integrated employment placements (Block et al., 2002). The model was initiated because VR payments were extremely low ($3,153 for supported employment assessment, job development and initial job coaching), making it impossible to serve most individuals with disabilities enrolled in Medicaid waivers. Yet after a review of the state’s Medicaid waivers by CMS, the Colorado I/DD agency prohibited the continued use of the Denver blended funding model. Across the country, difficulties with Federal regulatory and financial compliance to implement nontraditional approaches to cross system collaboration deters implementation and scaling of innovative practices. It also limits the knowledge dissemination and translation to peers in the same or other states.

### 3. The Impact of Resource Scarcity on Partners’ Inclination and Approach to Collaboration and Blending and Braiding of Resources

Underpinning much of the Federal policy approach is the need to prevent fraud and waste; but it seems clear that this strategy, combined with resource scarcity across systems, inhibits blending, braiding and sequencing of resources. As scarcity of resources impacts each separate system, the dynamics for collaboration and cost-sharing are impacted. Increased motivation to collaborate may be perceived to be aimed at cost-shifting rather than cost-sharing, and as a result, distrust between agencies regarding funding could overshadow efforts at the state, local and individual levels. This was recognized as an issue in AJC efforts to collaborate given that AJCs, like all systems, have in part been motivated to collaborate by the scarcity of resources in the workforce system. Boeltzig and Cohen (2005) found that:

Shrinking budgets, high unemployment, and an increasingly diverse workforce have placed mounting pressure on AJCs to be thoughtful about, and creative with, their financial resources. To meet this challenge, AJCs increased their efforts to partner with additional agencies and share available resources. However, there continued to be pockets of competitiveness and distrust between agencies regarding funding. [p. 1]

### 4. Shortcomings Related to the Impact of a Fragmented Approach for Supporting the Employment of People with Disabilities

Additional barriers to scaling and sustaining coordinated service delivery and blending or braiding of various systems’ resource relate to the fundamental challenges associated with a fragmented multi-system approach to delivering employment services and supports to people with disabilities. Many professionals in the various systems lack the time and expertise necessary to identify opportunities for cost-sharing at an individual level (Boeltzig and Cohen, 2005). Nationally, there is a lack of clarity about who is primarily responsible for initiating efforts to develop cost-sharing strategies. Early technical assistance and demonstration efforts were focused on employment service providers taking the lead in blending and braiding services and funding, while more recent efforts have shifted the focus to expect that the funders themselves will take primary responsibility for ensuring blending and braiding occurs. There is also a clear lack of consistent performance requirements established across systems that should be collaboratively achieving employment outcomes and sharing both the costs and credit for those outcomes. Finally, the fragmented approach creates the need for consumers (jobseekers) to possess adequate knowledge of each system and how the systems are supposed to work together in support of the individual. The fragmented system further requires individuals with disabilities to have the skills necessary to navigate the maze of system requirements that are currently in place.

## **Determining the Way Forward**

*“The significant problems that we face cannot be solved at*

*the same level of thinking we were at when they were created.”*

***-Albert Einstein***

It is apparent that there is no over-arching policy framework that requires the implementation and broad scale adoption of practice and funding strategies that have been proven to result in integrated employment and a clear career path for job seekers with disabilities of all ages. At the same time, there are questions about how to take successful models at the local level to scale. When considered within the context of the challenges associated with successfully blending and braiding resources discussed in this paper, the urgent need to improve employment opportunities and outcomes for working-age Americans with disabilities raises the question of whether future efforts to improve employment outcomes might be best focused on: continuing efforts to take braiding to scale; refocusing efforts on increasing blending approaches; or streamlining fragmented Federally-financed systems by creating a unified funding stream. For purposes of stimulating a robust discussion at the upcoming first annual policy roundtable of the National LEAD Center, recommendations under each broad strategy will be discussed.

### 1. Continuing Efforts to Take Effective Braiding to Scale Nationally

Braiding resources available through multiple systems, in support of a jobseeker with a disability, offers great potential for ensuring successful outcomes (NCWD, 2006); yet many examples written about in the literature appear to be sequencing rather than braiding. While not yet a recognized term in the field, “sequencing” is distinguished from braiding by the timing of the use of resources from different systems. In braiding, resources from different systems are used simultaneously, resulting in enhanced and more holistic services and supports being made available to the individual. In contrast, sequencing involves one funding stream’s services and supports following another funding stream’s services and supports with special attention to ensuring no gap in needed services occurs as an individual is handed off from one system to another. While sequencing has been an important, formative practice that has resulted in improved outcomes for individuals with disabilities, braiding offers greater opportunities to ensure continuity in service delivery and to provide holistic supports of sufficient intensity for individuals with the most significant disabilities. To increase braiding of resources, supports and services at the individual level, it is important to distinguish between braiding and sequencing, and to focus efforts on the development and scaling of models that involve true braiding. Because braiding involves simultaneous service delivery by two or more systems, it necessitates - by design - greater inter-agency coordination and collaboration. This in turn is likely to result in more effective and coordinated application of each system’s respective resources on behalf of the common customer. To facilitate braiding as a common practice across the country, there is a critical need for three things:

* Revision of Federal statutes, regulations and guidance that currently include language widely interpreted as prohibiting braiding (or waivers of particular statutory or regulatory language that impedes braiding if proper safeguards against fraud and waste have been put in place);
* Federal guidance, issued jointly by the relevant federal agencies (e.g. OSERS, RSA, CMS and ETA), articulating strong expectations that braiding ***can, should and will*** occur at the individual service delivery level and that each system’s individual service authorization plan will reflect the full scope of services being provided to the individual, by all involved systems, in support of the identified employment goal/needs – if the content of existing Federal statutes, regulations and guidance is not considered a barrier. The guidance should offer practical examples of optimal braiding models that are acceptable given federal law.
* A state-by-state policy audit carried out to identify and correct existing state or local policies that are based on an overly restrictive interpretation of federal statutes, regulations or guidance.

Despite the creation of Innovation Funds across the Federal landscape and repeated discussions about the importance of cross-system collaboration, states and communities are eager for practical guidance and acknowledgment of strategies to effectively braid resources across key systems and programs supporting individuals with disabilities. Joint Federal action conveying tacit approval of braiding resources[[7]](#footnote-7) and strategies to overcome the current barriers created by “payer of last resort” expectations would accelerate replication of innovative practices and sustain novel infrastructure demonstrations that have a positive association with improved employment outcomes.

### 2. Developing and Testing New Strategies to Blend Resources at the Individual Level

Most states do not have effective options to blend funds from multiple systems/programs/funding streams into single accounts that can support a comprehensive individualized employment plan which all participating funders acknowledge and approve. Yet blending of funds has the potential to yield the most seamless and effective service delivery to the individual, and to allow multiple system’s resources to be leveraged in order to provide an adequate level and intensity of service to individuals with the most significant disabilities for whom braiding would otherwise be insufficient. System partners have been asking for ways to accomplish blending in order to improve services and outcomes to individuals with disabilities (Boeltzig and Cohen, 2005).

Given these facts, there is an immediate need for Federally-supported demonstrations to establish state models that blend funding (from the various systems/programs that an individual is eligible for) into a single account so the different funding streams are indistinguishable at the point of service authorization/delivery and can thus be utilized to fund a truly comprehensive individualized employment plan. The demonstrations should allow for the single funding stream to be managed via either a self-directed model or single-system managed model where each participating state is permitted to identify the single system designated to manage the blended funding accounts. Support for these demonstrations should include waivers of federal statutes and regulations that currently prohibit such blending, with participating states being required to provide assurances and test practical models that protect against fraud, waste, and abuse. To be considered could be a streamlined super waver approach from a single Federal point of contact across multiple federal funders to allow a state a single system design that is individualized and person centered.

### 3. A Different Approach: Tackling the Root of the Problem

One solution to explore is the creation of a new Federal model for organizing, financing and delivering employment services to transition-age youth and working-age adults with disabilities. If contemplated, a pilot to test the efficacy of this approach would need to involve the Federal government soliciting the participation of a small number of states to test a radically different approach to the financing and delivery of employment services for individuals with disabilities. For a pre-defined population of individuals with disabilities, Federal agencies would need to participate together in establishing a single funding stream that would flow to participating states, each of which would identify the specific state agency that will administer the funding stream for the pilot.

## Conclusion

Our fragmented employment service delivery system does not deliver the success rates we need to make a meaningful impact in the integrated employment rates of transition-age youth and working-age individuals with disabilities in our country. Years of special efforts, through grants and demonstrations, to find ways to lessen the negative impact of fragmentation have led to a limited number of local examples, sometimes unsustainable and almost always resulting from a unique and difficult to replicate set of factors, including exceptional leadership. While heartening, these demonstrations have not been taken to scale and as a result, the fragmented system continues to have little impact on the tremendous problems of unemployment and underemployment among Americans with disabilities.

For many years, expectations regarding the outcomes that should be realized from public investments in services delivered to persons with disabilities have been extremely low. The monumental costs of this, for individuals with disabilities, taxpayers and the American economy, are now being realized. While invitees to the upcoming policy summit are recognized as individual system actors who have engaged in innovative, creative, and cutting-edge strategies to facilitate inter-agency collaboration and blending/braiding of resources, the reality is that most system actors are not approaching the challenges in the same way. We are, in a sense, at a crossroads with at least three very different ways our future efforts could be targeted, but with a universal need to engage the Federal government in leading the charge.

It seems clear that efforts from this point forward require a more radical departure from the status quo, led by leaders who recognize the barriers to improved outcomes that are fundamentally created by the current fragmented approach. Federal efforts must include establishing a new set of performance requirements and innovation opportunities for states that:

* Focuses on integrated, holistic efforts to increase integrated employment outcomes through integrated planning, service delivery and resource coordination to support the implementation of effective practices;
* Rebalances public resources based on benchmarks designed to increase allocations to an *Employment First* framework;
* Includes the implementation of a rigorous set of integrated employment outcome measures;
* Establishes an infrastructure that supports a single point of entry, a streamlined and consolidated eligibility determinations process, a single, comprehensive individual employment plan, and a single account that holds all resources to support that plan;
* Ensures the delivery of services and the investment of resources occurs for each individual in a way that is non-duplicative and seamless; and
* Provides meaningful incentives to reward states for improved performance, and reasonable penalties for states that fail to improve performance.

The leadership, commitment and tenacity of the Federal government in reengineering every aspect of the nation’s approach to supporting the employment and economic advancement of individuals with disabilities must reflect the recognition that continuing the status quo is now more costly and detrimental than ever previously recognized. The weight of the problem must be fully acknowledged and there must be accountability to Congress, the general public and people with disabilities which results in a long needed recognition of employment as the first priority when addressing the full citizenship, civil rights and economic equality of individuals with disabilities.

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1. NCWD-Youth, 2006; NGA, 2004; NTAR, 2011; Certo et al., 2009; NCWD-Adult, 2006 [↑](#footnote-ref-1)
2. For example, the overall number of customers served by America’s Job Centers (AJCs) has increased as a result of higher unemployment rates, yet funding for AJCs has been reduced in many states (Boeltzig and Cohen, 2005). Many state VR agencies are now operating under Order of Selection, due to the combination of an increased demand for services as a result of the nation’s economic recession and decreased funding due to state-level revenue shortfalls which have resulted in cutbacks in state VR agency budgets at precisely the time demand for the services has risen. At the same time, Medicaid agencies are experiencing similar budget shortfalls and have been forced to implement significant budget cuts which, in many states, have increased Medicaid waiver waiting lists and reduced funding for services for individuals with disabilities already enrolled in Medicaid waivers. Finally, primary and secondary education, including special education, is also absorbing funding cuts. [↑](#footnote-ref-2)
3. These services include information and referral services, assessment for determining eligibility and vocational rehabilitation needs, counseling and guidance, referral services to other agencies, job‑related services, including job search and placement assistance, job retention services, follow-up services, follow‑along services and rehabilitation technology. [↑](#footnote-ref-3)
4. <http://www.onestops.info/print.php?article_id=420#section5> [↑](#footnote-ref-4)
5. Customized Employment Q&A: Creating a Diversified Funding Base; T-TAP; 2004 [↑](#footnote-ref-5)
6. For example, when 44 state I/DD agencies were surveyed in 2011 about their involvement in blending or braiding with state VR and state or local education agencies, only 23 state I/DD agencies reported blending/braiding funding with state VR agency and only 17 state I/DD agencies reported blending/braiding funding with state and/or local education agencies. With regard to transition-age youth, only 10 of the 44 state I/DD agencies reported providing funding for services and supports to transition age youth (18-21) during the school year, while only 9 of the 44 state I/DD agencies reported funding employment services/supports during the summer for youth age 18-21. [Source: ICI, 2012] [↑](#footnote-ref-6)
7. An example is the recent guidance issued by CMS regarding the ability of waiver funded employment service providers to be paid by both the waiver and Ticket to Work when assisting individuals with disabilities to secure and maintain integrated employment. [http://downloads.cms.gov/cmsgov/archived-downloads/SMDL/downloads/SMD10002.pdf] [↑](#footnote-ref-7)