



RECOMMENDATION #3: INCREASE EMPLOYMENT

WHY IS THIS IMPORTANT? The benefits of employment for people with disabilities are significant and are the same for people without disabilities.



Hello!

Since the last time Recommendation #3 was reviewed with ISAC, 2 new staff members have joined ODP's Division of Policy and Program Innovation:

- Nolan Schaaf is the new Statewide Employment Lead.
 - Nolan has been with ODP since May 2024.
- Jamie Bonser is the new Policy Supervisor working with ODP's Employment Initiatives.
 - Jamie has been working with ODP's Employment Supports and Services since February 2024.



Agenda

- Review of ODP's recent employment data.
- Strategy # 8- Benefits Counseling Guidance
- Strategy # 2
 - ODP Employment Symposiums
 - Outreach Activities throughout 2024
- Strategy # 11- County Race and Employment Reports
- Strategies #3, #4, and #6
 - Updates on the InVEST Project
 - Recent Developments on Paying Individuals with Disabilities Subminimum Wage
- Strategies #10 and #14
 - New Transition Age Youth Data
- Plans for the Future of Recommendation #3

ODP Employment Data for Fiscal Year 23/24

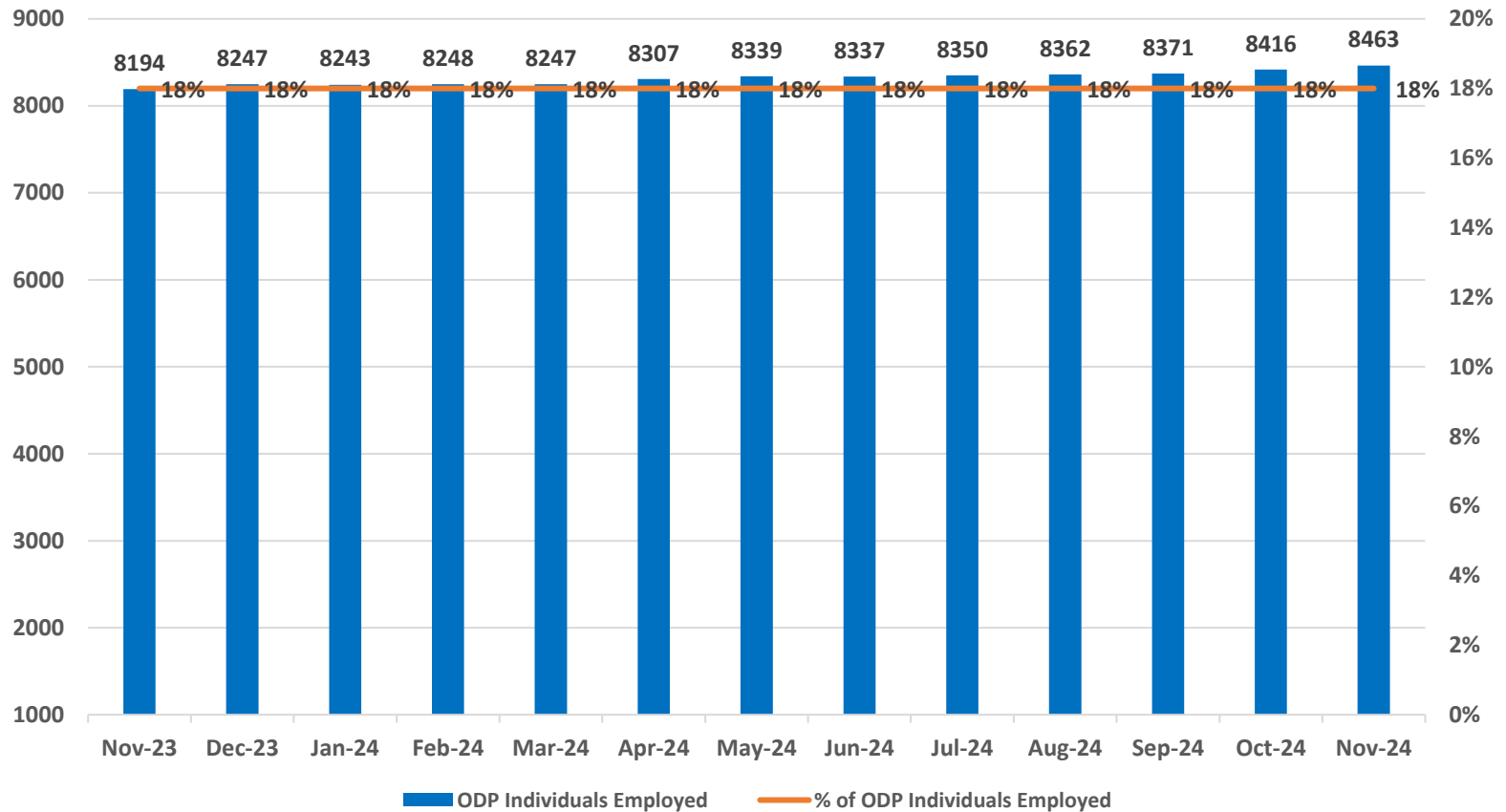
As of June 30, 2024-

- **8,326** individuals enrolled with ODP have competitive integrated employment or CIE.
 - On average 23 additional individuals enrolled with ODP entered the workforce every month of FY 23/24.
- **14,206** individuals had an Employment Goal in their ISP.
- **4,667** individuals were authorized for ODP funded Advanced Supported Employment, Supported Employment and Career Planning.
- **3,590** individuals or **77%** of those authorized for services utilized ODP funded Advanced Supported Employment, Supported Employment and Career Planning.

*Unless otherwise noted the data contained in this presentation was obtained from the following sources: ODP's Employment Dashboard; Individuals Monitoring Employment Questions, and HCSIS. Data extraction dates are included with individual charts and graphs.

▶ Number and Percent of Individuals Employed

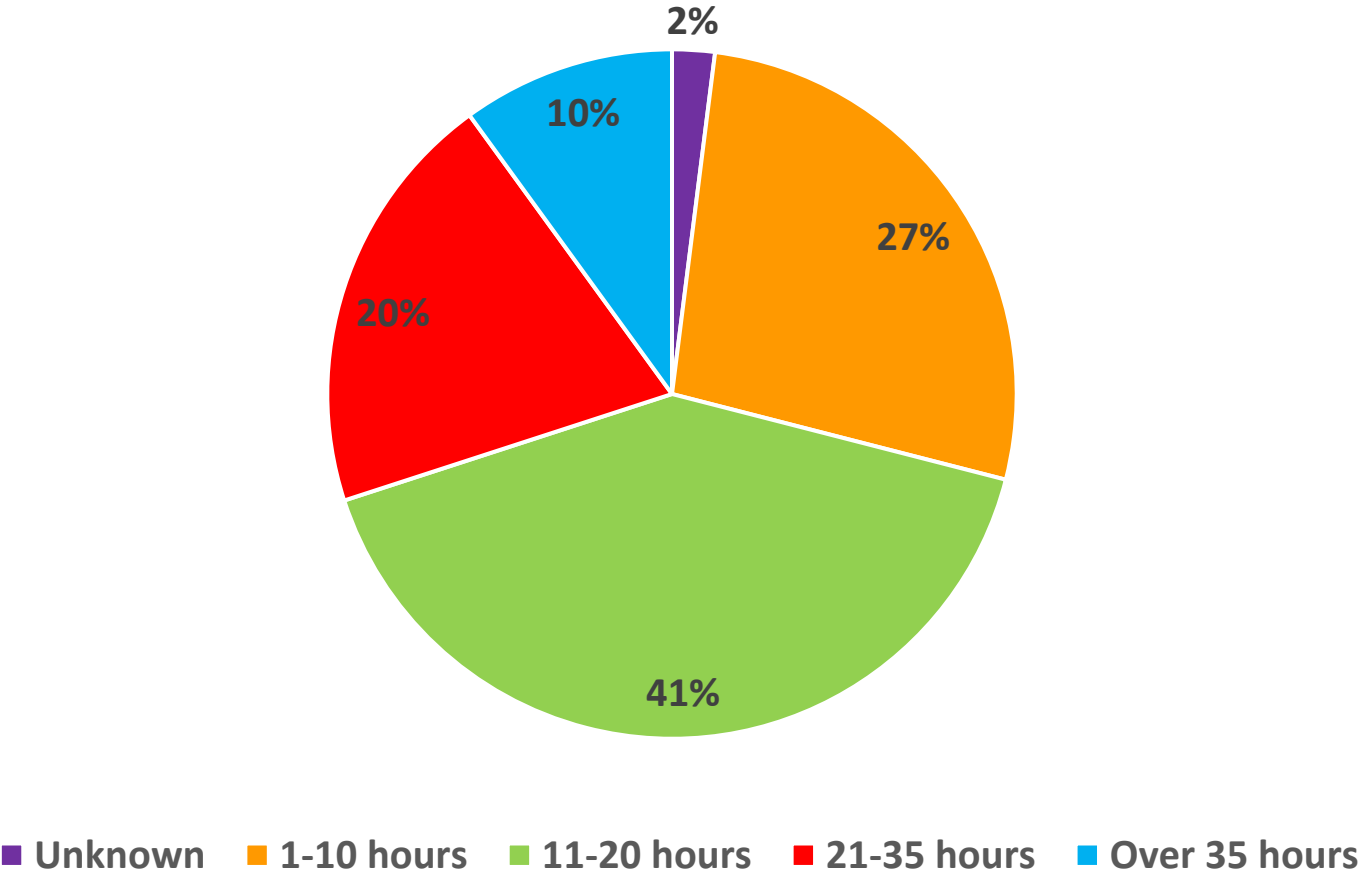
Number and Percent of Individuals ages 18 to 64 Enrolled with ODP that have Competitive Integrated Employment



Data extraction date: 1/30/2025

Hours Worked Per Week

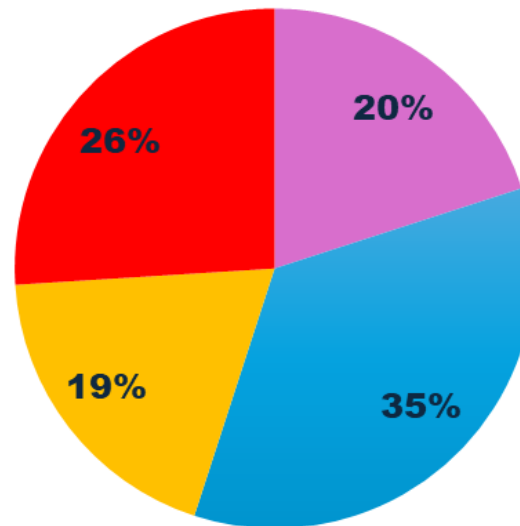
Average # of Hours Worked Per Week



Data extraction date 1/22/2025

Job Type Data

Percentage of Individuals Employed by Job Type



- **Building and Grounds, Cleaning and Maintenance**
- **Food Preparation and Serving Related**
- **Sales and Related**
- **Other**

Data extraction date: 11/16/2024

Strategy # 8

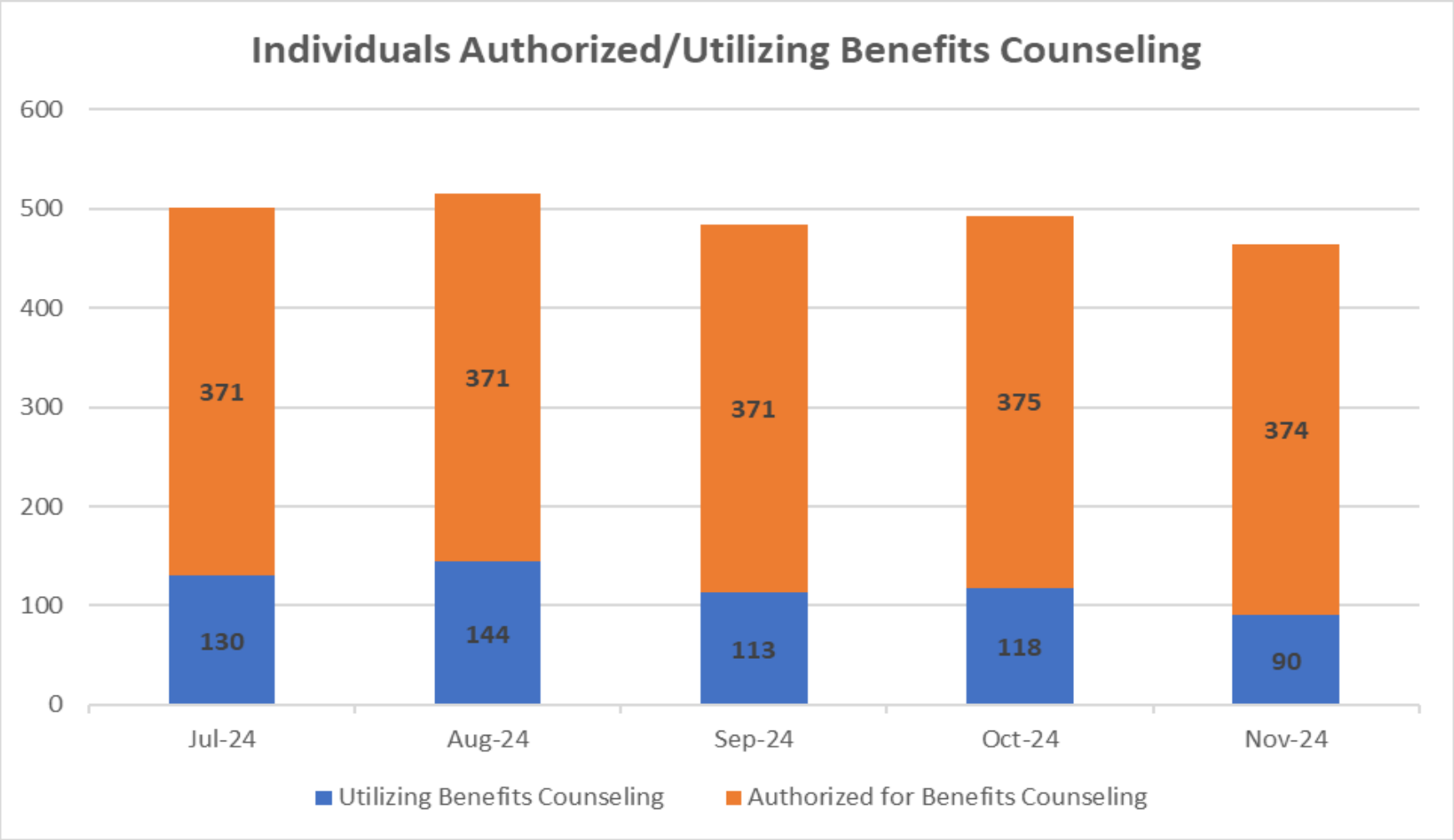
Strategy # 8 – Provide training and technical assistance to supports coordinators (SCs), individuals, and families to increase awareness of benefits counseling supports CIE and transitions from subminimum wage to CIE.

ODP continued to work to increase awareness and access to benefits counseling services.

- **Waiver amendments in 2025 allowed individuals not eligible for benefits counseling from other programs to use ODP funded benefits counseling services without waiting for an ineligibility determination.**
 - This is intended to:
 - Increased access for more individuals.
 - Decreased wait time for the service.

[ODP Announcement 25-001: Guidance for Benefits Counseling Services](#)

Benefits Counseling Data



Data extraction date: 1/23/2025

Strategy # 2

Strategy # 2 – Strengthen outreach to businesses through local employment coalitions to support individuals to obtain competitive integrated employment.

In 2024, ODP hosted the second annual series of Employment Symposiums.

- **There was an in-person symposium held in each of ODP's 4 regions.**
- **The Symposiums hosted a total of 357 participants, including:**
 - **Leadership from County ID Programs/Administrative Entities (AEs)**
 - **Supports Coordination Organizations (SCOs)**
 - **Employment Service Providers, and**
 - **Staff from the Office of Vocational Rehabilitation (OVR) and ODP.**

▶ ODP Employment Symposiums

Attendees had the opportunity to:

- Engage with speaker panels comprised of successfully employed individuals, their supports teams, and employers.
- Network, share resources, and learn best practices for employer engagement.
- Learn from OVR and ODP staff about cross-system navigation when working with both offices.



Additional Outreach Activities

In 2024, ODP staff also increased participation in outreach activities to connect with potential employers and raise awareness of ODP's employment supports and services.

Outreach activities included:

- Partnering with the Office of Long-Term Living (OLTL) for a presentation at the PA Dept. of Treasury National Disability Employment Awareness Month (NDEAM) Virtual Day of Learning.**
- Partnering with OVR for ODP's Policy Conversations with Individuals and Families about Employment.**
- Multiple presentations and tabling at the Capital Area Employment 1st Coalition: Job Fair and Resource Symposium.**
- Introduction of new staff at meetings with multiple local employment coalitions.**

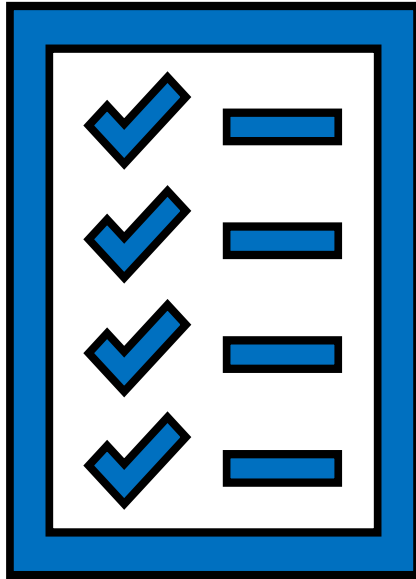
Strategy # 11

Strategy # 11 – Disseminate county-level employment reports that include comparisons by race to AEs and local employment coalitions. Engage employment leads and coalitions in discussion about racial disparities and support adoption of local strategies to address the disparities.

ODP continued to provide county specific data related to competitive integrated employment, employment services, and employment goals evaluated by race to help identify racial disparities in employment at the local level.



Feedback from 2022 Race and Employment Reports



Following the release of the 2022 County Race and Employment Reports, ODP solicited informal feedback from County/Joinders. This feedback helped to inform improvements for the 2023 Race and Employment Reports.

What We Learned?

In every region at least one County/Joinder reported using the provided data to identify racial disparities.

Some reasons for the identified disparities included:

- Lack of outreach to minority populations.**
- Higher acuity levels among enrollees from minority populations.**
- Data reporting errors.**
- Increased barriers to employment for minority populations, such as lack of transportation.**

Strategies County/Joinders Employed

Based on the feedback from the 2022 County Race and Employment Reports, County/Joinders reported planning to implement the following strategies to address identified racial disparities:

- Utilizing Quality Management Plans.
- Increasing outreach efforts to minority populations.
- Improvements to data tracking and utilization.



▶ ODP Technical Assistance

As a result of feedback, ODP sought to increase technical assistance to County/Joinders for the 2023 Race and Employment Reports, including:

- Development and distribution of analysis guidance to assist in the evaluation of employment data.
- Information and support in utilizing quality management tools to continue to address identified disparities.
- Distribution of an enhanced survey to learn more about ongoing efforts to address disparities and ways in which future reports could be improved.



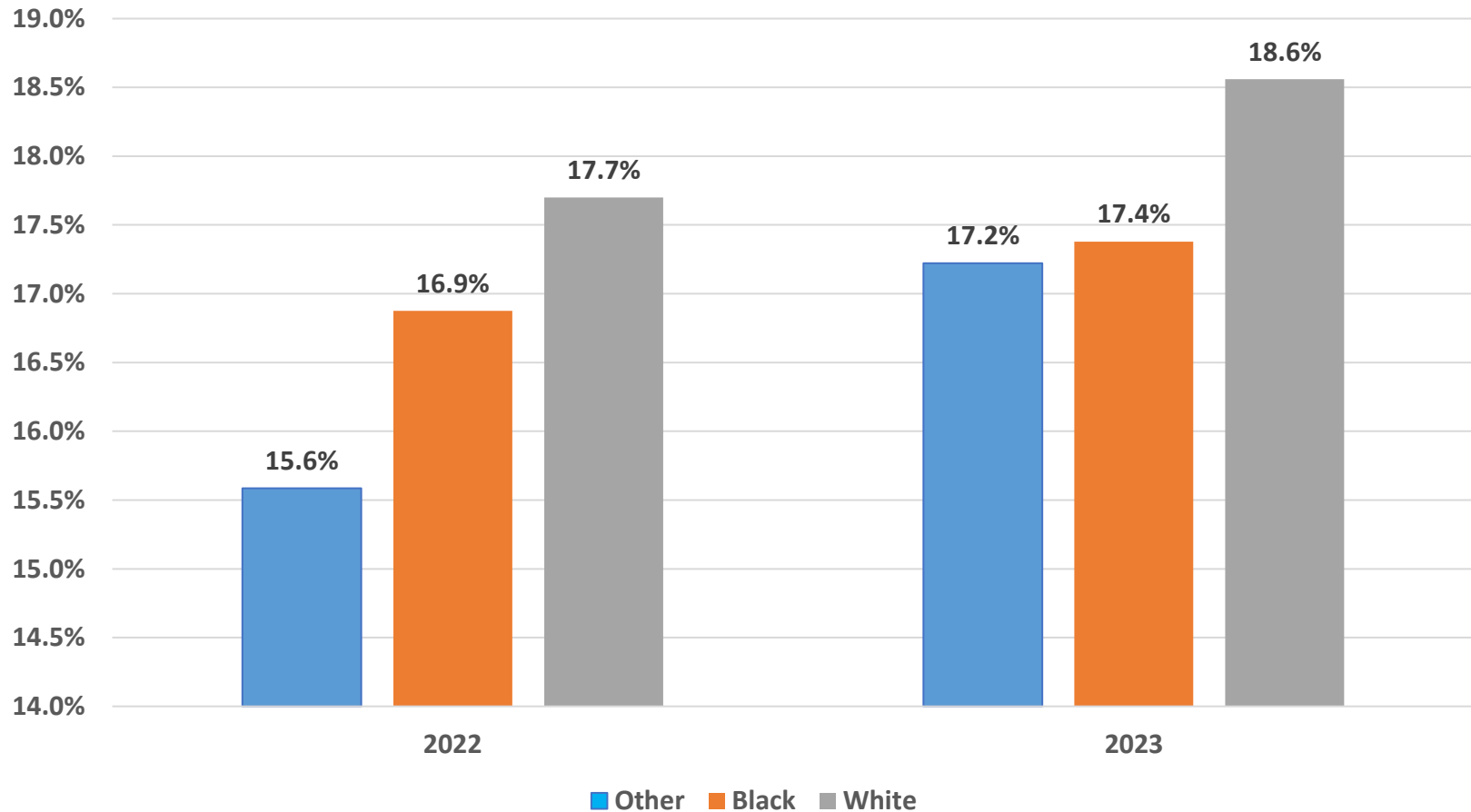
2023 Statewide Race and Employment Data

Important things to know about the reported data:

- Reported data is from December 31, 2023.
- Ethnicity- While ODP does collect ethnicity data, this data is not reflected in the Race and Employment Reports.
- Reported Races
 - White
 - Black or African American
 - Other- All races that are not white or black (American Indian/Alaskan Native, Asian, Native Hawaiian/Other Pacific Islander, Multiple Races, Other/System Default, Unknown)

2022-2023 Race/Employment Statewide Enrolled with CIE

Rates of Employment by Race



Note: Percentages calculated by dividing the total number of individuals aged 18 to 64 (working age) with CIE by race, by the total number of individuals ages 18 to 64 enrolled with ODP by race.

➤ **Strategies #3, #4, & #6**

Strategy # 3 - Support individuals receiving subminimum wage to gain CIE.

Strategy # 4 - Support families before, during, and after an individual's transition to CIE.

Strategy # 6 – Support provider transformation from focusing on workshop/subminimum wage activities to services that support CIE.

Highlights:

- **InVEST Project continues to support individuals and families in transitioning from subminimum wage.**
- **U.S. Department of Labor Notice of Proposed Rulemaking to phase out 14(c) certificates which allow employers to pay individuals with disabilities subminimum wage.**

The Integrated Vocational Engagement & Support Team or InVEST project is part of a \$13.9 million federal grant for the Subminimum Wage to Competitive Integrated Employment (SWTCIE) demonstration project.

- InVest is designed to help individuals and families address concerns and barriers related transitioning from sheltered workshops and obtaining competitive integrated employment
- InVest provides peer support and person-centered planning, including the Charting the LifeCourse to successfully transition from subminimum wage to competitive integrated employment.
- In 2024 ODP continued our partnership with OVR and the PA Family Network for the InVEST Project.

InVEST Accomplishments

- **Employers have been designated for participation in the program:**
 - **West and Central Regions- Sheetz**
 - Sheetz has identified 3 positions in their corporate headquarters and is working to fill them.
 - **Eastern Region- Cintas**
- **Service providers have also been designated:**
 - **Western Region- Achieva**
 - **Eastern Region- Kencrest/CIS**
- **The Pennsylvania Family Network has successfully filled 5 out of 6 advisor positions and is currently supporting 40 individuals and families.**

Incorporating Person-Centered Planning

To enhance person-centered planning and practice:

- **A cross-system collaboration involving ODP, OVR, and the Pennsylvania Department of Education (PDE) has been established.**
- **A training plan for the University of Missouri-Kansas City Center for Transition and Charting the LifeCourse (UMKC-CtLC) has been developed for the term of the grant.**
- **More than 600 professionals have participated in the "Introduction to Charting the LifeCourse" training.**
 - **This training has also been recorded and posted on MyODP.**

A Proposal to End Subminimum Wage

Background:

On December 4, 2024, the U.S. Dept of Labor, Wage and Hour Division (WHD) published a proposed change to 29 CFR Part 525, pertaining to section 14(c) of the Fair Labor Standards Act of 1938 (29 U.S.C. 201).

The proposed changes are the first substantive changes to the section 14(c) regulations since 1989, and represent the U.S. Dept of Labor's acknowledgement that a "comprehensive system of new approaches has rendered it unnecessary to depend upon subminimum wages to secure employment opportunities for individuals with disabilities..."

Proposed Changes to End Subminimum Wage

Wage and Hour Division's proposed changes include:

- **An immediate stop to the issuance of any new 14(c) certificates upon promulgation of the amended regulations.**
- **The phase out of any current 14(c) certificates within 3 years of the promulgation of the amended regulations.**
- **At the conclusion of the phase out period, the end of payment of subminimum wages to workers with disabilities.**

Public Comment on the NPRM

Public Comment for the proposed rule was open through January 17, 2025.

WHD specifically requested comments on:

- **The length of the proposed phase out period;**
- **The need for extensions beyond the phase out period for individual 14(c) certificate holders;**
- **The frequency and length of any extensions; and**
- **Whether there should be a showing of "good cause" for any extensions.**

There were a total of 17,772 public comments received on the proposed rule change nationwide.

U.S. Dept. Of Labor Information on Subminimum Wage

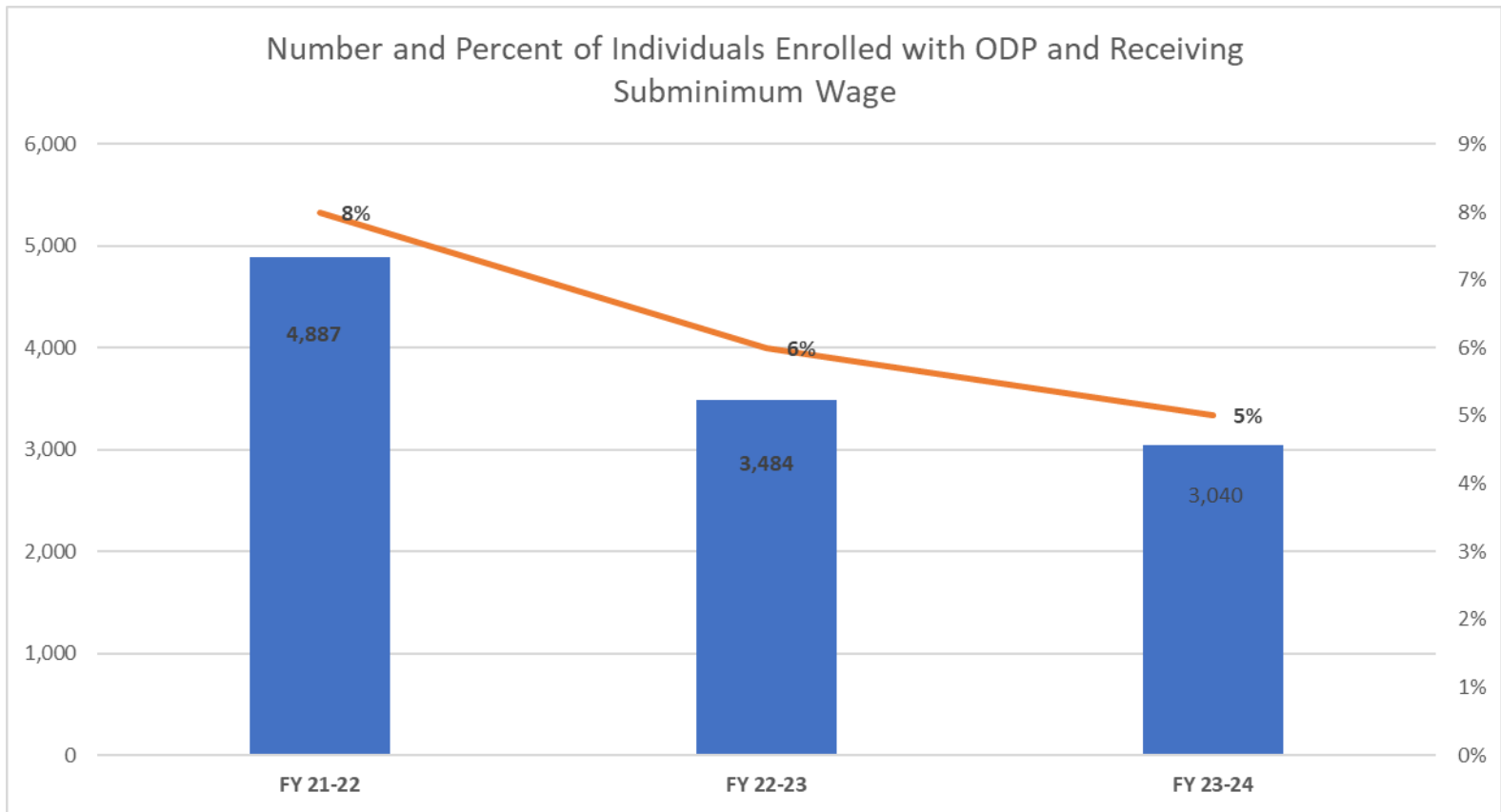
There are 780 employers that hold a 14(c) certificate, and 39,499 workers are paid subminimum wage nation wide.

- 91% of workers earning subminimum wage under a 14(c) certificate have I/DD as their primary disability.
- PA has the 3rd highest number of workers paid subminimum wage and has the 5th highest number of employers with 14(c) certificates in the nation.

As of September 1, 2024, there were 45 employers in PA that hold a 14(c) certificate.

- The employers report that 3,287 workers are paid subminimum wage.

▶ ODP and Subminimum Wage



Data Source: Office of Vocational Rehabilitation
511 Data and ODP Enrollment Data. Data Extraction
Date 1/16/2025

▶ Strategies #10 & # 14

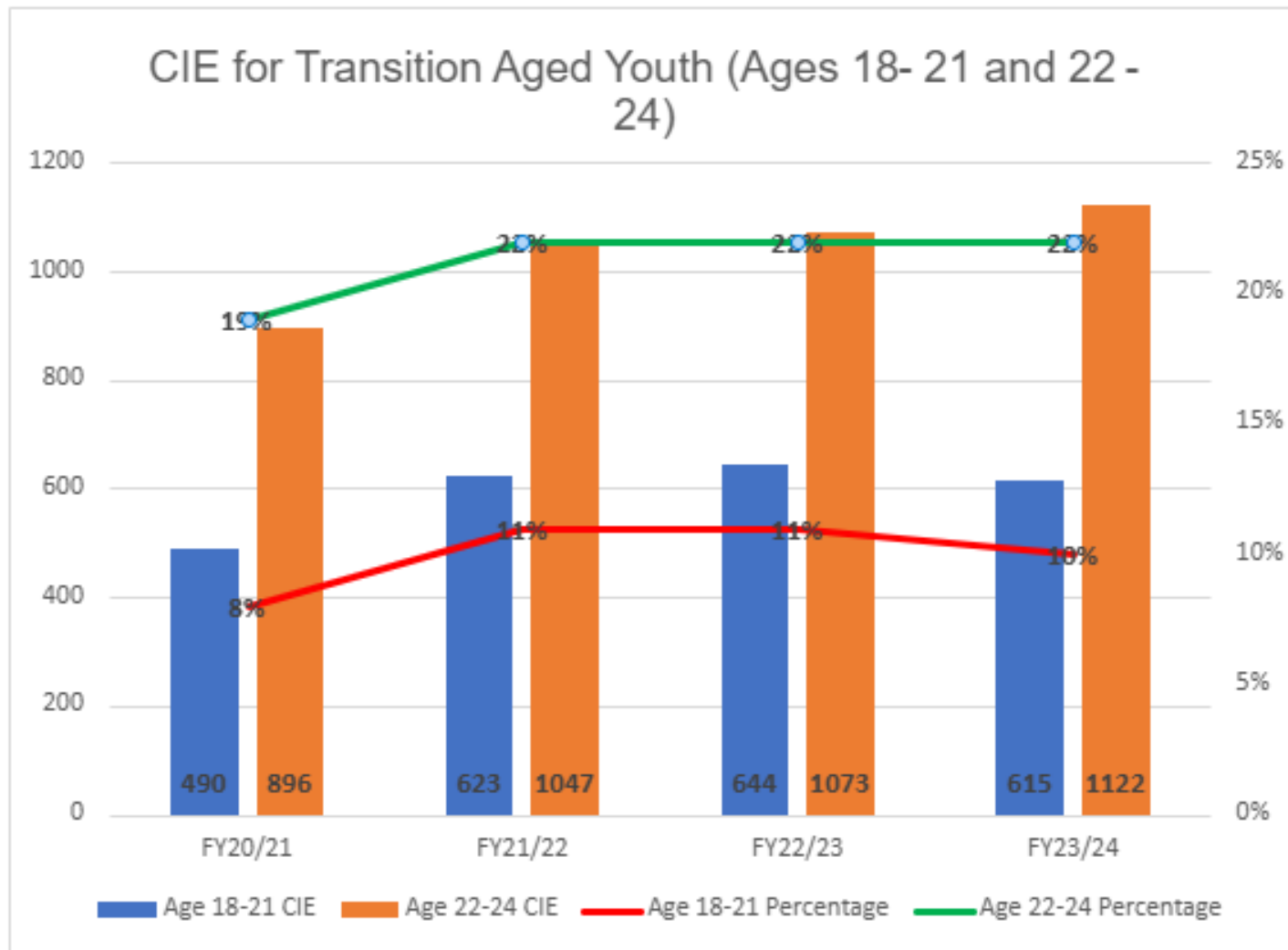
Strategy # 10 – Support the growth and advancement of post-secondary education programs.

Strategy # 14 – Provide training and ongoing technical assistance to providers and SCs on barriers to employment and potential solutions such as how CPS can be used as a wraparound service for people with CIE and services that support employment that are available through other agencies.

Late in 2024, ODP began a deep dive into the data surrounding transition age youth (individuals between the ages of 18 and 24) and employment.

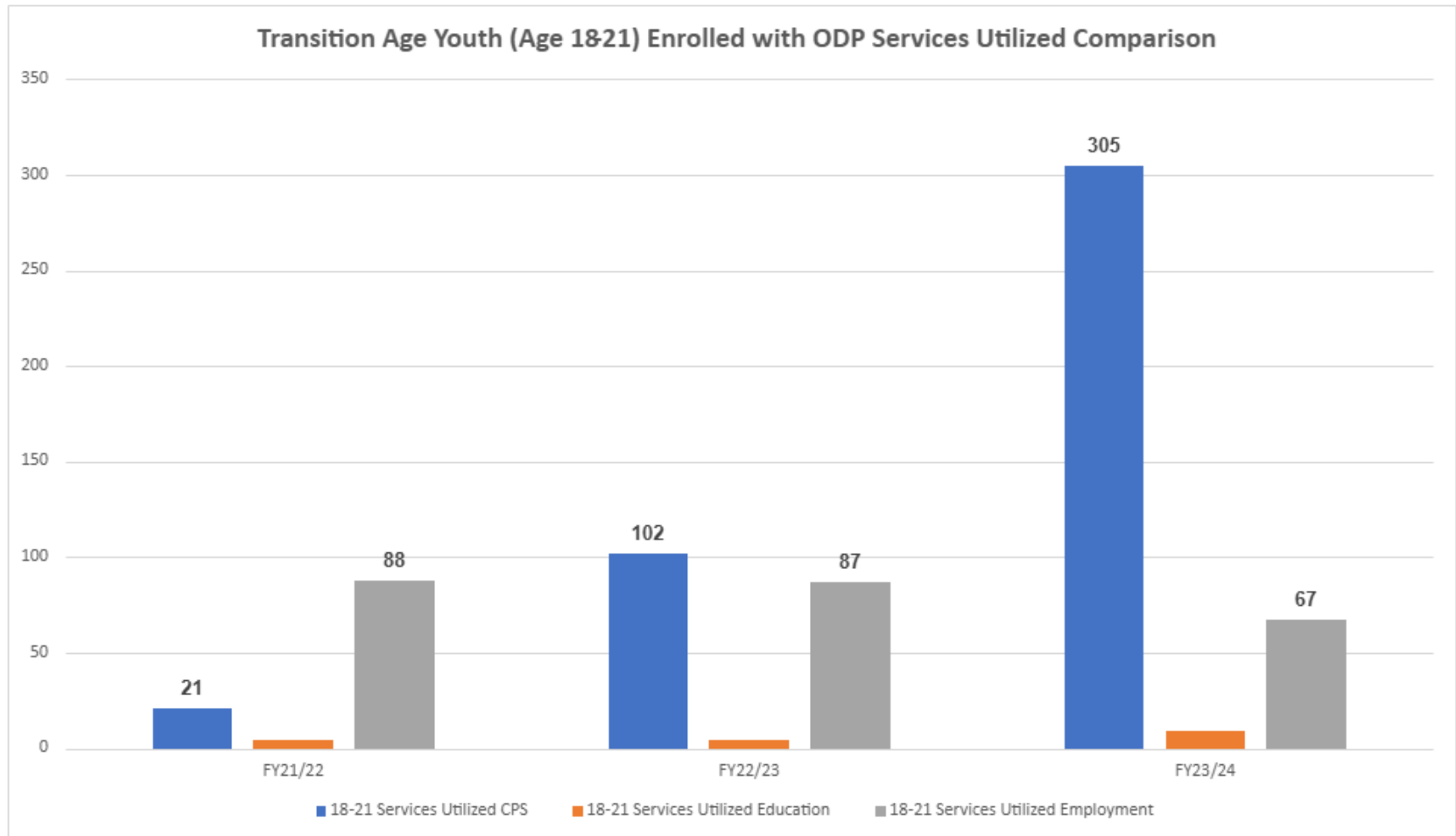
- **The data reviewed shows**
 - Significant differences in CIE for individuals between the ages of 18-21 as compared to ages 22 –24.
 - Increased utilization for Community Participation Support (CPS) services across the last 3 fiscal years as compared to relatively stable numbers for employment services during the same time period.

CIE and Transition Age Youth



Data extraction date: 1/23/2025

Service Utilization Ages 18 - 21

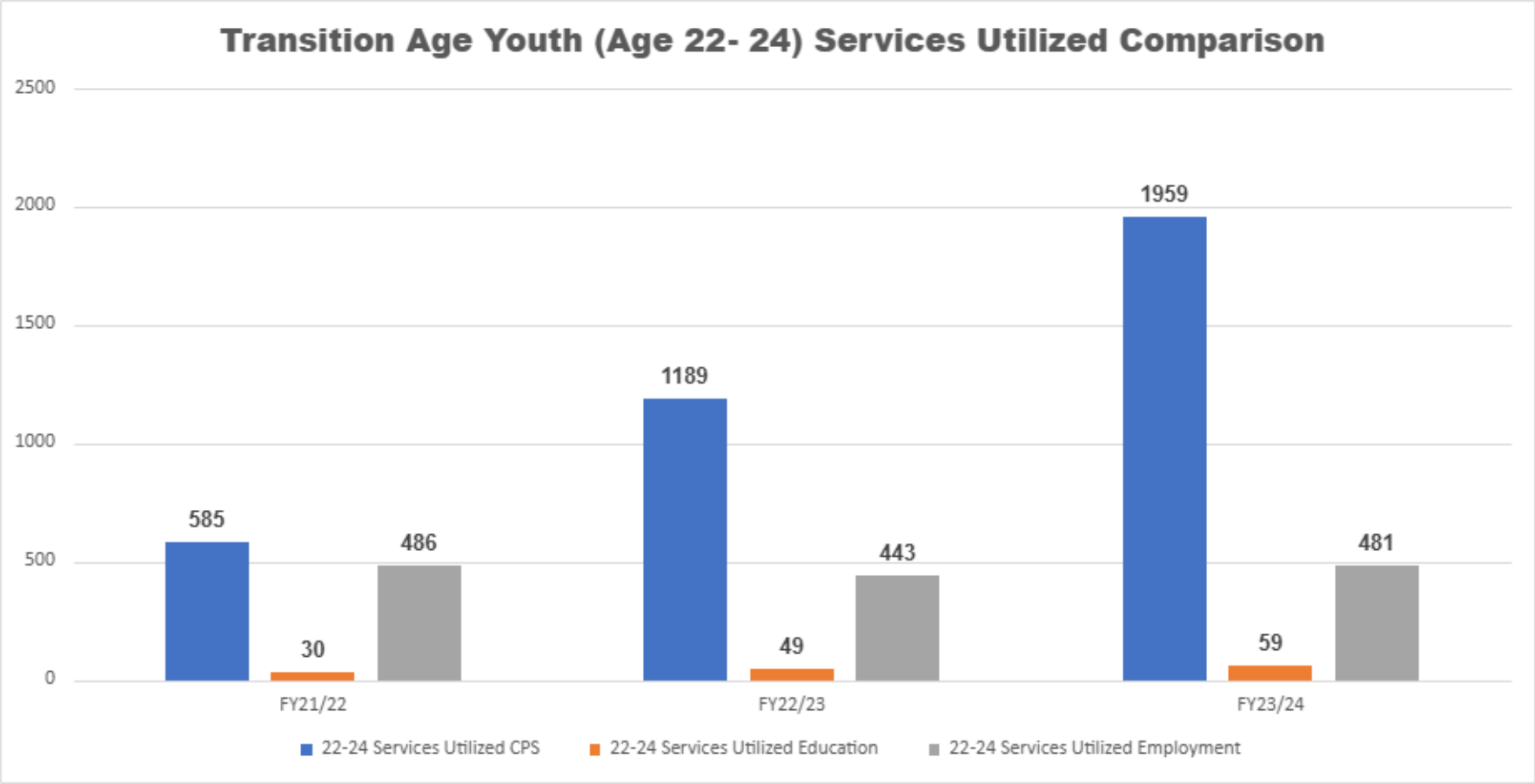


** Numbers under 11 are suppressed.

Data sources: EDW database and ODP Employment Dashboard

Data Extraction dates: 11/16/2024, 11/25/2024, and 1/22/2025

Service Utilization Ages 22 - 24



Data sources: EDW database and ODP Employment Dashboard
Data Extraction dates: 11/16/2024, 11/25/2024, and 1/22/2025

➤ The Road Ahead for Recommendation #3

In 2025:

- We are working to create partnerships with local Chambers of Commerce for the continued growth of ODP's Employment Symposiums.
- 3rd Annual County Race and Employment Reports will be distributed to County/Joinders
- New Employment Overview Training for Supports Coordinators.
- Continuing to update employment related guidance, tools, and resources for individuals, families, and providers.

In 2026:

- Performance Based Contracting for Supports Coordination Organizations, which will include employment related performance measures.

