



HawaiiAPSE.org
1050 Queen St #100
Honolulu HI 96814

To: State of Hawaii
Department of Health
Developmental Disabilities Division
Community Resource Branch

Re: 2021 Waiver, Amendment #7

10 July 2023

Aloha,

I am writing to you as a representative of the Hawaii Employment First Taskforce, National Expansion of Employment Opportunities Network planning team to provide comments and suggestions for enhancing the rate of successful employment for the people of Hawaii with Intellectual and Developmental Disabilities (IDD). We believe that improving communication and collaboration between the Department of Developmental Disabilities (DDD), family members, people with disabilities, service providers and other state and local agencies is crucial and as a result, we propose implementing clear and consistent messaging regarding to achieve this goal.

Recommendation 1: Use consistent language in all three services.

To effectively promote the supports necessary for individuals currently working, contemplating employment, or aspiring to work, we recommend changes to the Home and Community Based Waiver in three specific services: Community Learning Services (CLS), Discovery and Career Planning, and Individual Employment Supports. To ensure a consistent understanding and implementation, we suggest first and foremost that DDD adopt the federal definition of supported and customized employment. Integrating the federal definitions will give clarity consistency with other languages, research, and best practices. This will align Hawaii's practices with established national standards.

Furthermore, we propose using the term "CIE" or Competitive Integrated Employment the service of and practice of assisting a job seeker or employee to obtain and maintain employment. We have identified a variety of terms used within the Hawaii's HCBS to describe employment. Creating nomenclature that is consistent with national best practice and research ensures consistency with current best practice. This terminology will help eliminate confusion and establish a common language across stakeholders. It is essential to maintain consistency in language and definitions throughout the system to avoid any misunderstandings or conflicting interpretations.

Recommendation 2: Create a flow of support between the Community Learning Services, Discovery and Career Planning and Individual Employment Supports

Presently, it seems that the three services described in this letter do not allow for stacking, braiding, or bending. We recognize that to remain in compliance with HCBS rules, the scope and duration of each service must be unique, however, we know that best practice and policy allows for the braiding, blending and stacking of these services. We strongly recommend incorporating these strategies to create more flexibility and better accommodate individual needs and preferences of waiver recipients that would like to work. By doing so, we can enhance the effectiveness and impact of the services provided. Because many of the people supported by DDD through the HCBS waiver lack the experience of employment, they may benefit from receiving support through Community Engagement or Discovery and Career Planning while beginning their journey to work. In addition, using Community Engagement to support someone who is working full time as a wraparound support would also benefit the person to increase their social capital and network or a multitude of other benefits.

Recommendation 3: As “Discovery” is a term used in the customized employment process the definition of “Discovery and Career Planning” should include the steps of customized employment.

We suggest that the definition of "discovery" reflect the practice of discovery or assessment consistent with the practices of supported employment and customized employment. The current definition of discovery per the waiver does not reflect the practices defined in federal policy. Adding in the practice of discovery as defined by the Office Of Disability Employment Policy and Rehabilitation Services Administration will give job seekers with little or no employment experience opportunities to learn about professions, their own personal strength and contributions as well as identify employers that are in need of the skills of the job seeker. In addition, we request that the other two phases of customized employment, negotiated job development and systematic instruction or job site analysis be added to the service definitions.

In addition, we encourage the use of language that clearly defines supported employment, including Customized Employment, Self-Employment, and Micro Enterprises. By providing explicit definitions, we can ensure that all stakeholders share a common understanding and work towards the same goals.

Recommendation 4: Use Community Life Engagement guideposts in the definitions, description, and examples of Community Learning Services.

The Community Life Engagement (CLE) guideposts present a clear, thoughtful way of creating opportunities for t Hawaiians with disabilities to have the same opportunity to live in and use their community as their nondisabled peers. The HCBS service system has traditionally provided supports in segregated settings where people are isolated and not able to take advantage of the richness of opportunities in Hawaii. By supporting people away from a center-based program, people have a clear opportunity to discover their many contributions, skills and interests that can lead to greater relationships, independence and possibly even work. By refocusing the CLS definitions to be consistent with the CLE guideposts, the trajectory to employment is more likely.

In addition, we recommend limiting volunteering to 6 months unless the person is also working. Volunteering should not be considered a replacement for work but can be useful in giving a person opportunities to learn new skills and work behaviors. Volunteering in perpetuity should not be an acceptable outcome when work is possible. We also suggest not having employment support be a funded activity under CLS, the service of supporting people at work should be exclusively in Individual Employment Services.

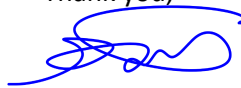
Recommendation 5: Review and revise the definition for Discovery and Career Planning

In addition to the definition recommendation above, we also recommend a change to the focus of the Career Planning service. Incorporating the practice used in Oregon's pathway to employment model could be of great benefit to people in Hawaii with disabilities. The model identifies four phases a job seeker may go through on their journey to employment. 1. understand work, 2. explore work, 3. getting ready to work, and 4. working. By using these four steps to employment, waiver recipients can be ensured their trajectory will lead to employment. We also recognize that each person comes to their pathway to employment with different skills and experience, by defining situational assessment rather than describing it, the individual nuances of service support are less likely. Some people may need more than one experience on a job trail, while others may not need any. Taking the definition out allows for greater flexibility per person.

We believe that implementing these suggestions will lead to improved employment outcomes for individuals with IDD, as well as enhanced communication and collaboration among DDD, family members, and service providers. Our aim is to create an inclusive and supportive environment where individuals with IDD can thrive and contribute to the workforce. Please see the resource page with references to the definitions and resources mentioned in this document.

Thank you for considering our comments and suggestions. We look forward to continued collaboration and positive changes that will benefit individuals with IDD in our community. Please feel free to reach out to me if you have any questions or require further information. As representative of the Employment First Taskforce, we submit the following comments to improve the rates of successful employment for persons with IDD; and improve communication between DDD and family members, and service providers with clear and consistent messaging.

Thank you,



Patrick Gartside

Hawaii Association of People Supporting Employment First

Resources:

Competitive Integrated Employment (CIE)

<https://www.dol.gov/agencies/odep/featured/bbs>

Supported Employment

<https://www.congress.gov/113/bills/hr803/BILLS-113hr803enr.pdf#page=212>

Customized Employment

<https://www.dol.gov/agencies/odep/program-areas/customized-employment>

Four Guideposts for CLE

<https://cletoolkit.communityinclusion.org/introduction-new/high-quality-community-life-engagement-supports-fo>