



# Annual Report



**2025 Report to Governor Shapiro and the General Assembly**

**October 1, 2025**

*"Employment First ...Competitive Integrated Employment is the first consideration and preferred outcome of publicly funded education, training, employment and related services, and long-term services and support for individuals with a disability."*

*- Act 36 of 2018*

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# Introduction

## Background

### [Employment First Pennsylvania: Act 36 Of 2018 – Summary and Purpose](#)

The Employment First Act in Pennsylvania aims to help people with disabilities find competitive integrated employment (jobs in regular workplaces where they can earn at least minimum wage). The law says that all local or state agencies that get funding from the government must follow these rules. Agencies need to work together to make sure they are spending money wisely to support this goal.

As federal guidance and requirements evolve, Pennsylvania's departments are working hard to carry out Act 36. The Employment First Oversight Commission appreciates this effort and will help sustain and accelerate it with clear data, coordinated support, and practical, evidence-based recommendations. Our steady goal remains the same: Expand access to competitive, integrated employment for Pennsylvanians with disabilities.

### [Employment First Oversight Commission](#)

The Employment First Oversight Commission (EFOC) was created by the Employment First Act to ensure the law is followed. The EFOC sets goals, tracks progress and drafts a yearly public report on how well government agencies meet the Act's objectives. The report also suggests improvements. The EFOC's main tasks are:

- Setting goals and plans for the Act.
- Monitoring public agencies' implementation.
- Drafting an annual report on progress and offering improvement ideas

## The Past Year

### [Appointments](#)

In the last year, all the Commission seats mentioned in Act 36 were filled, except for one that was supposed to be appointed by the Senate president pro-tempore (which has never been filled). At the end of 2025, additional seats on the commission will be vacant. The commission has been working with the Shapiro Administration to fill vacancies as soon as feasibly possible.

### [Position Letters](#)

In 2025 the Employment First Oversight Commission identified a pending cut to public transportation that would impact the successful employment of people with disabilities. Based on this concern, the commission wrote a letter to the Governor, Governor's office, and General Assembly regarding the importance of public transportation for workers with disabilities and the potential impact that cuts would have.

## **State Collaboration**

### **Acknowledgement of Administration Staff**

The Commission would like to thank the staff in the Governor's Office who helped to get information and data the Commission needed, made sure people from different agencies came to Commission meetings, supported the development of the report, and managed the logistics of the meetings, including setting up real-time captions, finding meeting places, and announcements. Special thanks go to Thomas Foley, Erin Corrigan, and Rose McCarthy in the Governor's Office. The Commission also wishes to express its gratitude to many other people in state agencies who have been part of the Commission's work and supported our efforts.

### **Acknowledgements to State Departments and Agencies**

This year, state departments and agencies worked closely with the EFOC officers to review the recommendations from the previous report and discuss recommendations for the upcoming report. Although this process was very time-consuming, we believe that it will greatly improve the work of the Commission and the future reports and recommendations.

## **Act 36 of 2018 Applicability to All State Agencies**

*\*\* When discussing Act 36 of 2018 all references to Pennsylvanians with disabilities refer to those of working-age.*

Act 36 applies to all state agencies, departments, and contracts. In Section 4.a it says that ensuring that Competitive Integrated Employment (CIE) is the preferred outcome for all working-age Pennsylvanians with disabilities. This rule applies to all working-age people with disabilities, regardless of what kind of help they need. Additionally, this Act encourages work-based learning experiences for all youth with a disability. Everyone with a disability who gets publicly funded services must be offered employment services and opportunities regardless of whether they live in their own home or in a residential setting.

Many state agencies that deal with disability employment have worked to move toward Employment First. Some of them include the Office of

Vocational Rehabilitation (OVR), the Office of Developmental Programs (ODP), the Office of Long-Term Living (OLTL), the Office of Mental Health and Substance Abuse Services (OMHSAS), the Bureau of Special Education (BSE), and the Office of Administration (OA). These agencies worked closely with the Commission and additional agencies have joined in the meetings held by the Governor's Cabinet for People with Disabilities. The Commission is grateful for these agencies and believes that Act 36 applies to all state entities.

### **Governor's January 2025 Update and Progress Annual Report**

In Section Four of the Act, the Office of the Governor is required to submit an annual report to the General Assembly, it should include:

- Clear expectations for employment that include annual baseline employment data and specific goals for working-age individuals with a disability gaining Competitive Integrated Employment developed by State and county agencies providing publicly funded education, training, employment and related services and long-term services and support for individuals with a disability
- An assessment of progress toward meeting these goals annually, and
- Documentation of continued and improved State agency compliance with the Act.

The 2025 Employment First Cabinet Report outlines Pennsylvania's efforts to improve employment opportunities for people with disabilities. Key updates include over \$5 million in recovery payments to providers who increased service delivery post-pandemic and the continued implementation of the InVEST Project to support the transition from subminimum wage to competitive employment.

The report highlights agency-wide efforts, including expanded OVR internships in state government, improved digital accessibility through the CODE PA initiative, and new training programs like the early childhood education diploma at the Hiram G. Andrews Center. Updates also include expanded youth employment programs, targeted outreach to underserved communities, and revised data dashboards for better transparency and tracking.

### **Data in this Report**

Again, this year, the Governor's Office, Governor's Employment First Cabinet, and the Enterprise Data Office in the Office for Information Technology worked to streamline Employment First data throughout state departments.

Data in this report comes from [Employment First Open Data Portal](#) with some supplemental information from the federal Department of Labor and data directly provided by state departments that had not been uploaded to the Portal at the time this report was written.

### **Department Self-Evaluations**

This year, the departments that provide data for the Employment First Oversight Commission's efforts conducted internal self-assessments. They reflected on their goals for Employment First, progress, and barriers. These assessments have been used in developing this year's recommendations. Information from the assessments has also been included in the "Department Progress" portion of each department section, with the full self-assessments in the appendices. We are grateful for these efforts.

### **Cross-Agency Goals**

These goals are broad and are meant for all Pennsylvania departments and agencies, particularly those who are a member of the Governor's Employment First Cabinet. To create more collaborative efforts throughout the states and departments, the EFOC has created nine Cross-Agency Goals with department-specific objectives that align with at least one of the goals, which will be listed at the end of each objective's descriptions.

#### **PA Goal 1: Increase Competitive Integrated Employment (CIE)**

By 2027, 39% of Pennsylvanians with disabilities ages 16 to 64 will have Competitive Integrated Employment (CIE).

#### **PA Goal 2: End Subminimum Wage**

By 2030, Pennsylvania will phase out subminimum wage through robust legislation and comprehensive planning to ensure that no one is left behind as changes occur to the system.

#### **PA Goal 3: Ensure Access to Clear, Coordinated Information About CIE Supports**

By July 2027, departments will continue and improve public-facing materials on services and supports. This includes 508 compliance, WCAG 2.2 standards, with an emphasis on plain language materials. Additionally, it must align with WCAG POUR (Perceivable, Operable, Understandable, and Robust) standards.

Perceivable: Information must be perceivable to people using only one of their senses, so they understand all related content.

**Operable:** End users must be able to interact with all webpage elements. For instance, your website should be easy to navigate with just a keyboard or voice controls for non-mouse users.

**Understandable:** The principle is just what it seems—end users must be able to understand web page content and functionality information.

**Robust:** Your website must effectively communicate information to all users, including users of assistive technologies, and remain compatible with evolving technologies and user needs.

#### **PA Goal 4: Strengthen Feedback and Accountability**

By 2027, departments will adopt accessible feedback tools and demonstrate use of results.

#### **PA Goal 5: Eliminate Barriers to CIE**

By January 2026, each Department or Agency will identify at least three key systems-level barriers to CIE, if any, that will be addressed by the department.

#### **PA Goal 6: Advance Representation**

By July 2026, the state will report increased or improved efforts to address intersectionality in all disability CIE efforts. Work to expand disability employment must also take into consideration other demographics including age, location, race, gender, disability, language, and identity.

#### **PA Goal 7: Develop 3-Year Employment First Plan**

By April 2026, a cross-agency Employment First plan will be created and published in the EF Cabinet and the EFOC Annual Reports.

#### **PA Goal 8: Students with Disabilities Ready for Work and Life**

Pennsylvania data will show that all students with disabilities graduate high school with the skills, experiences, and supports needed to enter competitive integrated employment or postsecondary education. The goal is to eliminate the “school-to-sheltered workshop” pipeline or “graduating to the couch,” and instead, create a seamless, inclusive pathway to adulthood.

#### **PA Goal 9: EFOC and Employment First Cabinet Support and Transparency**

The goal is to actively support the Employment First Oversight Commission (EFOC) and the Employment First Cabinet by aligning strategies with their statewide vision for employment equity. The team will contribute expertise, policy recommendations, and community-driven solutions to strengthen efforts in expanding competitive integrated employment opportunities.

Through collaboration, the initiative will ensure that individuals with disabilities are at the forefront of decision-making, that systemic barriers are reduced, and that sustainable employment pathways are created. This goal reflects a strong commitment to advancing Employment First principles and ensuring measurable impact for the disability community.

## **General Assembly (GA)**

*Authors: Josie Badger, Representative Dan Miller, Susan Tachau, and Heidi Tuszynski*

### **Abstract and Role in Employment First**

The Pennsylvania's General Assembly consists of the state Senate and House of Representatives. They must work together to lead the state in being truly Employment First. In this section of the report, we talk about different ideas for new laws and rules. These ideas aim to make it easier for people with disabilities to find jobs.

### **Agency Objectives (Obj.) and EFOC Recommendations (Rec.)**

#### **GA. Obj. 1: Subminimum Wage Hearings**

Host annual hearings on the status of 14Cs, 2380s, and 2390s (segregated settings) and progress made to move employees into CIE and the use of public funding for subminimum wage. These hearings should lead to the development of a comprehensive plan to phase out subminimum wage and segregated work. (*Cross-Agency Goals 1 and 2*)

#### **GA. Obj. 2: End State Contracts that Support Subminimum Wage**

The state should not enter into new contracts with companies that pay subminimum wage or have employees working in a segregated setting and should promptly phase out existing contracts with 14c employers. 14c certificates let companies pay less than the minimum wage.

Under Section 520 of the Commonwealth Procurement Code,<sup>1</sup> companies that have a workforce where 75% of the direct labor is provided by

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<sup>1</sup> Title 62, Commonwealth Procurement Code, Chapter 5, Subchapter B - <https://www.legis.state.pa.us/WU01/LI/LI/CT/HTM/62/62.HTM>

employees with disabilities get state contracts for things they make or services they provide without having to compete with other companies.

By ending subminimum wage and changing the percentage of employees that must have disabilities, contracts under Section 520 would still provide jobs for employees with disabilities but would also pay at least minimum wage and be integrated.<sup>2</sup> (*Cross-Agency Goals 1 and 2*)

### **GA. Obj 3: Support Effectiveness of EFOC and EF Cabinet**

Use the General Assembly's powers and responsibilities to help the EFOC and Cabinet work better and be more effective.

#### **GA. Rec. 3.A: EFOC Appointments**

At the end of 2026, there will be five commissioner seats unfilled. We ask that the Governor fill two open seats reserved for individuals with experience with high school students with disabilities, and a seat for a parent/family member of a person with disability. We ask that the Senate President Pro-Tempore appoint a new EFOC Commissioner. We further ask that the Speaker of the House appoint a new commissioner. The Commission feels strongly that these seats need to be appointed by November 2025 so that the new commissioners can begin their terms when the terms sunset for current commissioners, at the end of the year. All unfilled seats must be filled for the commission to fulfill duties as envisioned by the General Assembly when Act 36 was passed. (*Cross-Agency Goal 9*)

#### **GA. Rec. 3.B: EFOC Executive Director**

By December 2026, the Commission recommends that Act 36 of 2018 be amended to create an Executive Director position for the EFOC. The Commission's work is detailed and time-consuming, requiring the support of an Executive Director. This person would handle tasks such as organizing Commission and committee meetings, managing data requests, reviewing and analyzing Employment First plans from the executive branch, and helping the Commission draft, finalize, and publish its annual report.

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<sup>2</sup> PA's procurement initiative is the State Use Program under the Department of General Services (DGS). This program awards contracts to nonprofit

agencies that employ individuals with disabilities to supply goods and services to state agencies. The program aligns with Section 520's objective by providing opportunities for employment to individuals with significant disabilities.

In addition to the Commission's support of this bill, it also supports **two amendments** to this bill.

**The first would be to move the EFOC's annual report date from October 1 to November 1.** The October 1 deadline for the Commission's yearly report is difficult to achieve. After receiving the data from each department at the end of July or beginning of August, it often takes three months to develop the report.

**The second amendment would be to add the Department of Corrections (DOC) and Secretary of Administration to the EF Cabinet.**

Including the DOC in the Employment First Cabinet would help improve reentry opportunities for individuals with disabilities by aligning employment programs with reentry efforts. It would enhance collaboration across agencies, reduce barriers to employment, and support initiatives that lower recidivism. By doing so, the DOC can play a vital role in creating more inclusive employment opportunities for formerly incarcerated individuals. Including OA on the cabinet would further promote Commonwealth internal policy and hiring guidance to continue to support individuals with disabilities entering the Commonwealth workforce. (*Cross-Agency Goal 9*)

#### **GA. Obj. 4: Allocate Adequately Funding for Services that Promote CIE**

There will likely be significant cuts to federal funding for state programs including but not limited to Medicaid, education, and OVR. Difficult decisions will need to be made in future budget negotiations. The EFOC requests that the Governor and General Assembly fully fund all disability-related supports and services that encourage competitive integrated employment. This includes but is not limited to funding for direct care workers and employment services. (*Cross-Agency Goal 1*)

#### **GA. Obj 5: Hearing on Impact of Waivers on Employment**

Starting in 2026, the General Assembly should host annual hearings with the Secretary of the DHS, Deputy Secretaries from relevant offices, and individuals who have waivers to better understand how different types of support services and the money for those services impact job opportunities and CIE for people in ODP and OLTL.

The hearings should examine employment data, employment service utilization, and employment outcomes. It would be useful to know more about what OLTL and ODP have done to try to improve the CIE of their

participants and their needs from the state to improve employment opportunities for people with disabilities.

Additionally, the hearings should review potential reasons for the low employment rates, including the impact of inadequate or lack of services within and between ODP and OLTL. These may include reimbursement rates, pay and incentives to Direct Care Providers (also known as Direct Support Professionals), rates for employment services (e.g. supported employment), etc.

The General Assembly should work to address the identified gaps between the provider systems and develop the necessary policy and procedure to ensure that the waivers are able to truly support community living, including CIE. (*Cross-Agency Goal 1*)

### **GA. Obj 6: Support Education in Preparing Students for CIE**

The General Assembly should use its powers and responsibilities to help the education system in preparing students for CIE.

#### **GA. Rec. 6.A: Full-Time Transition Counselors**

During this session, pass legislation to establish full-time transition counselors in each school district.

Currently, most local education agencies (LEAs) assign “transition coordinator” responsibilities to someone who already has a different full-time job in the school. Just following the rule to have a transition coordinator is not enough.

The EFOC proposes that the General Assembly create a new law and provide the money needed to make sure every school district has at least one full-time (or a reasonable equivalent based on student numbers) Transition Coordinator to help students with their transition plans, especially integrated into local jobs and community activities. These coordinators will be well-trained and skilled in helping students transition from school to work. Additionally, the Pennsylvania Department of Education would be responsible for making sure this rule is followed by all school districts. This change will help students prepare for jobs better. (*Cross-Agency Goal 8*)

#### **GA. Rev. 6.B: Study on Hiram G. Andrews Center**

By 2026, the General Assembly should call for a study and report on the return on investment of the Office of Vocational Rehabilitation on Hiram G. Andrews Center (HGAC) as compared to traditional customer services delivered by OVR.

The Commission continues to believe an in-depth review of this facility-based program and its return on investment (ROI) ought to be conducted by the General Assembly. Approximately \$25 million is directed from OVR's traditional services to fund this 24/7 campus operation. OVR's per-customer cost for HGAC students is significantly higher than its traditional customers and it is unknown whether the students at HGAC have improved transition outcomes compared to OVR customers who attend typical post-secondary vocational programs. The review should consider whether these resources could be effectively re-directed to traditional OVR services and/or regional or county career technical programs and/or community colleges where individuals with disabilities can learn alongside other students, which will enhance their skills to work and live in their community. The study should also look at the employment outcomes in comparison to outcomes of OVR participants who receive higher education or training in other integrated settings. This could be done through the Legislative Budget and Finance Committee Report or a separate study. This recommendation has been included in each of the multiple previous EFOC reports. (*Cross-Agency Goal 8*)

### **GA. Obj 7: Establish a Schedule A-Like Program and Customized Employment Classification**

By 2026, amend the Civil Service Reform Act to establish a Schedule A-like program and a customized employment job classification in state jobs.

The Shapiro Administration is working with the General Assembly to introduce the Civil Service Modernization Act (CSMA), which, among other things, would empower OA to create expedited and unique pathways within civil service employment for individuals with disabilities.

The General Assembly should amend the state Civil Service Reform Act to remove roadblocks to employment and ensure access and inclusion for people with disabilities to be hired by state government agencies (see 2023-2024 HB 348).

By creating a program like the federal government's "Schedule A" process, agencies can hire people with disabilities for jobs without making them go through the usual competitive process. This would make it easier for qualified people with disabilities to get jobs in the state government. This program could help remove or reduce the problems caused by a lot of rules and paperwork, making it simpler for people with disabilities to get hired. It may be possible for the Executive Branch to implement such improvements

without legislation, but it remains unclear, and the General Assembly should hold hearings on this topic.

OVR should be included as a key partner with OA in this endeavor.

Pennsylvania may look to the federal government's "[Schedule A Excepted Service Hiring Authority for Individuals with Disabilities](#)" as a model.

Schedule A allows federal agencies to access a diverse talent pool without using the traditional, often lengthy hiring process. Through Schedule A, individuals with disabilities can apply for federal jobs through a noncompetitive process. If an applicant meets the eligibility requirements and the minimum qualifications for a job, they can be hired without competing with the public. (*Cross-Agency Goal 1*)

### **GA. Obj 8: Establish a Customized Employment Classification**

The General Assembly should pass legislation that establishes in law a "customized employment" job classification and require OA to utilize it. This would enable people with disabilities to be hired who can perform many of the specific job duties in an off-the-shelf job description but not all.

Customized employment is a strength-based approach that benefits the employer by getting a qualified, motivated employee who provides value to the employer but who, due to their disability, may not be able to perform every task as crafted in the off-the-shelf job description.

OVR should be included as a key partner with OA in this endeavor because of their rehab counselor expertise and its normal program funding can be used to help identify customized employment opportunities within state agencies, identify qualified applicants, and pay for job development and supported employment services so there can be a successful employment outcome.

The Commission suggests that education regarding customized employment, Schedule A, and other disability-related programs be provided throughout the departments to improve the use of these employment supports. (*Cross-Agency Goal 1*)

# **Executive Branch (EB) and Office of Administration (OA) (including Civil Service Policy Office)**

*Authors: Julia Barol, Richard Edley, Mary Hartley, Andrew Pennington, Steve Suroviec, Heidi Tuszynski*

The Governor's Office of Administration plays a crucial role in Pennsylvania's Executive Branch by providing support, policy guidance and enforcement to all Executive Branch agencies under the Governor's jurisdiction. This includes:

## **Technology Management**

Overseeing the state's technology deployment, which involves setting standards, prioritizing projects, managing infrastructure, ensuring security, developing applications, overseeing project management, and staffing.

## **Employee Support**

Managing various aspects related to Commonwealth employees, such as handling salaries, benefits, promoting diversity, providing training, ensuring workplace safety, and managing labor relations.

## **Emergency Coordination**

Coordinating planning and cooperation among state agencies to ensure the continuous provision of essential government services during emergencies and critical situations.

## **Records Management**

Administering the state's records management program. This includes creating policies, standards, and procedures to regulate the use, maintenance, retention, and disposal of records.

## **Hiring**

Managing outreach, applications, new employee surveys, and achieving the objective that 7% of the government workforce consists of people with disabilities.

## Human Resources

Supporting the needs and accommodations of state employees, including disability accommodations.

Indeed, OA holds a unique and pivotal position within Pennsylvania's government structure. Given its broad responsibilities, OA has a significant opportunity to make a foundational impact on the employment of people with disabilities. By influencing policies, procedures, and practices related to technology deployment, employee support, emergency coordination, and records management, OA can play a key role in promoting inclusivity, accessibility, and equitable employment opportunities for individuals with disabilities throughout the state's government agencies.

The Pennsylvania Office of Administration (OA) has the following plans to improve outcomes for people with disabilities in the labor market:

- Forward job openings to OVR counselors, who will then refer potential candidates to apply. The pilot program will target long-term care facility custodial and food service positions.
- Coordinate presentations and facility tours between DMVA and OVR to raise awareness of the partnership and to understand the work performed in these positions.
- The Bureau of Employee Relations (OA-BER) will continue to collaborate with the Bureau of Organization Management (BOOM) and the Equal Employment Opportunity Office (EEOO) to create training for agencies on how to write accessible and plain language job descriptions and outline essential job functions.

## Employment First Progress (as reported in department self-assessment) - OA

OA focused on OVR intern placements, tracking disability disclosure, and refining job postings to ensure accessibility. A pilot to hire OVR customers in Department of Military and Veterans Affairs (DMVA) positions had limited success due to the readiness of candidates. The disability identification survey was delayed by the Governor's Office to ensure alignment of outreach across agency staff.

### Insights:

- Structural barriers remain in sourcing job-ready OVR candidates.

- OA's policy design is sound, but execution is affected by external holds and candidate pipeline gaps.
- Increased emphasis on training for hiring managers is a key strength.

## **Employment First Progress (as reported in department self-assessment) - SCSC**

The State Civil Service Commission (SCSC) does not directly implement Employment First programs but supports broader statewide efforts. While EFOC's 2024 recommendations applied to other offices, SCSC participates in Cabinet-level conversations and explores equitable employment practices. The Commission is committed to ensuring fairness in civil service appeals and processes.

### **Insights:**

- SCSC supports Employment First through interagency collaboration rather than direct service delivery.
- Plans to improve civil service appeal processes may reduce barriers for individuals with disabilities.
- No specific goals, Key Performance Indicators (KPI), or new initiatives reported.
- No barriers identified by the Commission.

*See appendices for full self-assessments.*

## **Progress Reported by Office of Administration Since the Previous Report and EFOC Recommendations**

### **1. Targeted Hiring Pilot for OVR Customers**

- 2024 (baseline progress):
  - OA, through DMVA and DCED, began a pilot for hard-to-fill non-civil service positions.
  - Vacancies were forwarded to OVR counselors, and positions were identified statewide .
- 2025 (follow-up progress):
  - The pilot with DMVA was not successful — no OVR customers were ultimately hired.
  - 54 requisitions were shared, 21 OVR customers applied, and 8 interviewed, but none were placed.

- Expansion to other agencies was postponed until issues with candidate readiness, interest, and availability are resolved.

*Progress:* Initial implementation in 2024, but by 2025 the effort stalled with no hires, highlighting issues with the job-readiness, interest, and availability of OVR candidates.

## **2. OVR Intern Participation**

- 2024:
  - 23 OVR interns were onboarded for summer 2024.
  - More positions were available than candidates completed onboarding.
- 2025:
  - 33 requests from agencies led to 10 interns ultimately hired (smaller cohort).
  - Smaller size allowed more developmental programming (professionalism, resiliency, critical thinking, etc.).
  - OVR counselors were actively engaged with interns and supervisors to support learning and success.

*Progress:* Numbers declined, but program quality improved with structured developmental supports and stronger counselor involvement.

## **3. Accessible Position Descriptions & Essential Functions**

- 2024:
  - OA-BER and BOOM partnered with OVR and Temple University to present on accessible job descriptions.
  - Training ideas were being gathered for agency HR staff.
- 2025:
  - Fully implemented. BOOM
  - Templates standardized; supervisors trained.
  - Marked as "completed."

*Progress:* Transitioned from development stage in 2024 to full implementation by 2025.

## **4. Tracking and Disability Disclosure**

- 2024:
  - Workforce surveys were not conducted due to poor past response rates.

- Reliance on new hire data — 6.3% of new hires between July 2023–May 2024 identified as disabled.
- 2025:
  - OA-BER developed an anonymous, voluntary employee disability survey, reviewed by Legal/General Counsel.
  - Launch was delayed until Fall 2025 by the Governor's Office to ensure alignment of outreach across agency staff.
  - Accompanying disclosure awareness campaign planned.
  - Current voluntary disclosure rates: applicants 8.72%, new hires 7.11%.

*Progress:* Moved from limited reliance on hire data in 2024 to preparing an enterprise-wide survey and outreach campaign in 2025.

## 5. New Initiatives

- 2024:
  - Disability awareness training in development with OVR.
  - Workgroup on disability employment organized with OA, OVR, and Governor's Office.
- 2025:
  - Plans for July 2025 training on Disability Awareness for hiring managers.
  - Training OVR counselors on the state hiring process.
  - Ongoing research on best practices from other states.

*Progress:* From planning in 2024 to active scheduling and rollout in 2025.

## 6. Biggest Barriers

- 2024: Civil service regulations restricting hiring preferences for non-veterans.
- 2025: Lack of interested, qualified, and job-ready OVR candidates identified as the primary barrier.

## Overall Trends

- Strengths:
  - Significant advancement in accessibility of job descriptions.
  - Improved structure and quality of the OVR intern program.
  - Stronger efforts toward disability disclosure and data collection.
- Challenges:
  - Targeted hiring pilot failed to produce placements in 2025.

- Smaller intern numbers indicate a recruitment and readiness gap.
- Barriers shifting from policy (2024) to pipeline/candidate readiness (2025).

## **Office of Administration (OA) Objectives**

### **OA Obj 1: Expand Pilot to Other Agencies**

The Employment First Oversight Commission recommends expanding the OA's pilot project with the DMVA to other agencies to increase employment opportunities for Office of Vocational Rehabilitation (OVR) customers and job seekers. This initiative aligns with the Employment First mandate by actively creating employment pathways for working-age individuals with disabilities. The program will launch by January 1, 2026.

### **OA Obj. 2: OVR Intern Participation**

By June 2026, OVR will partner with OA to place at least 15 interns with disabilities in state government roles, to continue to implement an accessible onboarding process, and achieve at least a 50% intern-to-hire conversion rate. Success will be measured through internal satisfaction surveys (target  $\geq 85\%$  satisfaction) and annual reporting of placements and conversion outcomes to the Employment First Oversight Commission.

### **OA Obj. 3: Accessible Position Descriptions and Essential Functions**

The Employment First Oversight Commission aims to promote and ensure the use of accessible job descriptions with clearly defined essential functions across all state agencies. Starting in 2026, OA will provide instructions (at least 2 written materials and resources to all departments) on how to write accessible essential functions in job descriptions.

### **OA Obj. 4: OA Employment First Plan**

In 2026, the Employment First Oversight Commission proposes that OA review the results of the optional, anonymous disability employment survey conducted in 2025 to develop an annual Employment First action plan.

### **OA Obj. 5: Disability Disclosure Campaign**

Annually, OA will provide annual disability disclosure awareness campaigns to Commonwealth employees to encourage self-disclosure. This will be achieved and measured through two awareness activities each year.

### **OA Obj. 6: Disability Welcoming Materials**

By the second quarter of 2026, OA will increase the visibility of disability images and disability welcoming information on public facing materials and website.

### **OA Obj. 7. Customized Employment**

OA will utilize existing authority to create a Customized Employment job classification and encourage state agencies to use this classification to hire 30 people with disabilities with customized job descriptions. OA will partner with OVR, which will work with state agencies across the Commonwealth to identify customized job opportunities, identify qualified people with disabilities to fill the positions, develop customized job descriptions, and pay for job development and supported employment services with its normal program funding to enable the new employees to be successful.

## **Executive Branch (EB) Objectives**

### **EB Obj. 1: Organize a Disability Employment Workgroup**

The Employment First Oversight Commission proposes organizing a disability employment workgroup to develop strategies for improving employment opportunities in state government for individuals with disabilities. The workgroup will involve the Governor's Policy Office, the Office of Administration (OA), and the Office of Vocational Rehabilitation (OVR). The group will consist of at least 10 members representing various stakeholders, with a minimum of six meetings scheduled within the first year. Key stakeholders, including representatives from the Governor's Policy Office, OA, OVR, The Arc, PEAL, disability advocacy groups, employers, and employees with disabilities, will be invited to participate. This initiative supports the Objective of enhancing employment opportunities and creating an inclusive work environment for individuals with disabilities. The workgroup should be established by December 1, 2025, with the first meeting held by January 15, 2026, and an initial report with recommendations completed by June 30, 2026.

## **EB Obj. 2: Emphasize Transportation Matters in the Governor's Employment First Cabinet**

The Employment First Oversight Commission recommends that the Governor's Employment First Cabinet increase its focus on transportation issues affecting individuals with disabilities, including enabling transportation on demand for job interviews via smart devices through the waiver payment system (per EFOC's DHS recommendations). The initiative will enhance transportation options for individuals with disabilities, allowing those in waivers to use waiver dollars for services like Uber and Lyft for interviews or competitive integrated employment (CIE). The Objective is to develop and implement at least three new transportation initiatives or policy recommendations within the next 12 months. A transportation subcommittee will be formed within the Employment First Cabinet, involving transportation experts, disability advocacy groups, and individuals with disabilities. This initiative is essential to improving accessibility and mobility, which are crucial for the independence and employment opportunities of individuals with disabilities. The subcommittee will be established by December 1, 2025, with the three new transportation initiatives or recommendations developed and presented by June 30, 2026.

## **EB Obj. 3: Establish an Employment First Executive Director Position**

The Governor's Office should create a state-funded "Employment First Executive Director" position housed within the Governor's Office, the Department of Labor and Industry, or the Department of Human Services. This dedicated role is essential for managing the requirements of the Employment First law, which includes reviewing policies and data, coordinating with various governmental entities, and supporting the drafting of annual reports.

The Executive Director will be responsible for:

- Convening and preparing for Commission and committee meetings.
- Facilitating data requests.
- Reviewing and analyzing employment first plans published by the executive branch.
- Assisting the commission in drafting, finalizing, and publishing its annual report.

Given the complexity and scope of these tasks, it is unrealistic to expect an all-volunteer commission to manage these responsibilities effectively without dedicated staff support.

## **Civil Service Objectives**

### **CS Obj. 1: Civil Service Data**

Civil Services will provide data on the number and types of disability discrimination complaints that they receive annually. This data will be monitored for changes or patterns and will be used to develop strategies to improve hiring practices in the Commonwealth. This data will be made available for the annual EFOC report, starting in 2026.

## **Labor and Industry (L&I) and OVR**

*Authors: Julia Barol, Lisa Biggica, Cindy Duch, Andrew Pennington*

The Pennsylvania Office of Vocational Rehabilitation (OVR) is a leading agency that supports Pennsylvanians with disabilities in achieving their employment and professional development goals. OVR's website states, "The Pennsylvania Office of Vocational Rehabilitation provides vocational rehabilitation services to help persons with disabilities prepare for, obtain, or maintain employment." OVR offers a comprehensive array of services, including diagnostic services, vocational evaluation, vocational counseling, benefits counseling, training and education, restorative services, placement assistance, assistive technology, and support services. OVR is crucial in promoting Pennsylvania's Employment First initiatives.

## **Progress as reported by Department Since Previous Report and Recommendations**

### **Employment First Progress (as reported in department self-assessment) - OVR**

The Office of Vocational Rehabilitation (OVR) made notable strides toward competitive integrated employment (CIE), particularly around ending subminimum wage employment and enhancing Pre-ETS effectiveness. OVR is addressing funding challenges while maintaining service quality and accountability through data-driven evaluation efforts.

## Insights:

- OVR is advancing the shift away from subminimum wage jobs via Project InVEST and stakeholder engagement.
- A new evaluation plan strengthens how Pre-ETS outcomes are measured using tools, surveys, data, and case reviews.
- Efficient and timely service delivery remains a focus amid tight budget conditions.
- Barriers include limited and unstable funding, public attitudes, workforce shortages, and transportation issues.
- Federal performance indicators (e.g., employment outcomes, earnings, credentials) are tracked consistently.

## **Overview**

This summarizes the progress reported by the Pennsylvania Office of Vocational Rehabilitation (OVR) in the 2024 and 2025 Employment First Self-Assessments. It highlights key shifts from program launch and infrastructure-building in 2024 to system-level advocacy, evaluation, and sustainability planning in 2025.

## Key Areas of Progress

### **1. Transition from Section 14(c) to Competitive Integrated Employment (CIE)**

- 2024: Focused on the rollout of the InVEST project (SWTCIE grant), including onboarding family advisors, outreach campaigns, evaluation partnerships, and launching an advisory panel.
- 2025: Advanced to policy leadership, submitting joint recommendations for a five-year phase-out of subminimum wage, holding listening sessions, and aligning with workforce boards to promote career pathways and employer recruitment.

### **2. Strengthening Pre-Employment Transition Services (Pre-ETS)**

- 2024: Dedicated 15% of federal VR funds (~\$20M) to Pre-ETS, creating 1,000 work-based learning experiences and serving a youth-majority caseload.

- 2025: Implemented a comprehensive evaluation framework including provider report cards, transition assessments, external evaluations, and a standardized statewide performance report.

### **3. Improving Service Delivery Speed**

- 2024: Emphasized training and rapid engagement strategies to meet 60-day eligibility and 90-day IPE timelines.
- 2025: Focused on consistency and sustainment, ensuring timely decisions remain a priority.

### **4. Data and Performance Metrics**

- 2024: Expanded data transparency efforts through the Center for Workforce Information & Analysis (CWIA) dashboards and monitoring case movement.
- 2025: Explicitly reported federal performance indicators, aligning with WIOA requirements and federal outcome measures.

### **5. Barriers and Systemic Challenges**

- 2024: Identified operational barriers such as transportation and credential documentation.
- 2025: Highlighted funding adequacy, risk of service waitlists, and systemic issues like attitudinal barriers and direct care workforce shortages.

### **6. Innovation vs. Consolidation**

- 2024: Expanded initiatives such as Pathways to Partnership, Connecting 4 Employment, and Mobile Fab Lab.
- 2025: No new initiatives; focus shifted to cost containment, staff capacity management, and program sustainment.

## **Key Takeaways**

OVR has progressed from building capacity to embedding systemic change, with a strong focus on:

- Policy advocacy (support for 14(c) phase-out)
- Data-driven decision-making and evaluation of Pre-ETS

- Maintaining service timeliness despite fiscal pressures
- Aligning with federal performance indicators
- Preparing for sustainability while managing flat funding

*See appendices for full self-assessment.*

## **Labor and Industry Objectives**

### **L&I Obj. 1: Transition from Section 14(c) Wage Employment to CIE**

By 2027, there will be 25% fewer individuals employed under Section 14(c), based on 2024 data.

This will be achieved through tailored Individualized Plans for Employment (IPEs), collaboration with ODP or CHC, WIPA consultations, and consistent communication throughout the SWTCIE Grant. Progress will be measured by 511 data. Resources like the SWTCIE Grant and existing partnerships will be leveraged to ensure achievable outcomes, with quarterly reports ensuring continuous improvement and accountability. This initiative directly supports OVR's mission of enhancing employment opportunities and will be completed by December 2027. Information will also be requested from OVR's 511 data regarding the number of individuals employed under Section 14(c) who have talked with an OVR counselor and the number of active cases.

### **L&I Obj. 2: Promote Workforce Development Funds**

Increase awareness and access to Workforce Development funds designated to advance Employment First initiatives for individuals with disabilities. To achieve this, a targeted promotional campaign will be developed and implemented to raise awareness about these funds among individuals with disabilities and their support networks. Success will be measured by a 30% increase in inquiries and applications for Workforce Development funds from individuals with disabilities within 12 months of the campaign's launch. This will be accomplished by leveraging multiple communication channels such as social media, email newsletters, webinars, and partnerships with disability advocacy groups to effectively reach the target audience. Promoting these funds is crucial for empowering individuals with disabilities to access resources that support their employment goals, aligning with the broader mission of advancing Employment First initiatives. The campaign will be launched within 3 months and is expected to achieve a 30% increase in inquiries and applications within 12 months. A mid-campaign review will be

provided at the EFOC meeting to discuss progress and adjust strategies as needed.

### **L&I Obj. 3: Dedicated Resources**

Sustaining Goal: By June 2026, OVR will implement a standardized statewide Pre-ETS performance report that tracks employment rates, post-secondary enrollment, and service engagement for all students receiving Pre-ETS. At least 80% of providers will receive performance "report cards," and OVR will use these results to implement at least two statewide quality improvement initiatives annually, with progress reviewed each quarter.

### **L&I Obj. 4: Work Experience**

In 2026, PDE, L&I, and DCED will work together to increase apprenticeships, work-based learning experiences, job coaching, and other opportunities in local and private businesses.

### **L&I Obj. 5: Barrier Remediation**

In 2025-2026, PDE will work with L&I to support L&I in implementing Barrier Remediation subgoals from the 2024-2028 Pennsylvania Workforce Innovation and Opportunity Act (WIOA) State Plan to strengthen workplace flexibilities.

## **OVR Objectives**

### **OVR Obj. 1: Measure the effectiveness of Pre-ETS**

In 2026, a structured electronic evaluation system will be implemented for Pre-ETS, incorporating pre- and post-intervention assessments, long-term outcome tracking, and stakeholder feedback collection to measure changes in student skills, knowledge, and employment experiences. The goal is to ensure that 90% of students complete both pre- and post-assessments, achieve a 70% response rate for long-term outcome surveys six months after the program, and collect feedback from at least 80% of stakeholders, including students, parents, educators, and employers. To achieve this, collaboration with School Transition Counselors, Bureau of Special Education (BSE), OVR staff, and stakeholders will be essential to effectively integrate assessments and feedback into the program. This initiative aligns with the objective of measuring and improving the effectiveness of Pre-ETS to meet the needs of students and stakeholders. The assessment and feedback

system will be implemented by 2026, with initial data analysis completed in 2027.

### **OVR Obj. 2: Speedy Service Delivery**

OVR will maintain and strive to surpass RSA timeliness standards. Pennsylvania's Office of Vocational Rehabilitation (OVR) is required by the Rehabilitation Act to determine a customer's eligibility for services within 60 days of application and to develop an Individual Plan for Employment (IPE) within 90 days of the eligibility determination. While these are the minimum standards, OVR encourages staff to make these decisions as quickly as possible, based on available disability documentation. Rapid engagement in vocational rehabilitation services has been a national focus, and OVR has reinforced this initiative across the agency through guidance, training, and setting clear expectations. The agency is continuously seeking improvements in its systems and processes to ensure timely service delivery, as early engagement increases the likelihood of sustained participation and successful outcomes for customers. OVR will be asked to provide their timeliness scores each year.

### **OVR Obj. 3: Greater collaboration between OVR and BSE for Transition Age Youth**

Sustaining Goal: OVR and BSE will continue to increase relationships and collaboration to improve transition outcomes for youth with disabilities.

This will be monitored through Disability Innovation Fund (DIF) data regarding the products from the collaboration of multiple state agencies.

### **OVR Obj. 4: Investigate 911 Data**

Continue to investigate strategies to improve response rates to OVR 911 exit surveys, to better understand reasons individuals exited OVR without employment outcomes.

### **OVR Obj. 5: Promote Workforce Development's Designated Funds**

Workforce (WF) and OVR can further enhance their collaboration by sharing grant announcements through their social media platforms and listservs. Both organizations already work together on several initiatives and aim to expand their partnerships. The OVR Executive Director is a member of the Statewide Workforce Board, while an OVR district manager sits on each local

workforce development board. At PA CareerLink® centers, OVR and WF staff work together to provide direct support to individuals with disabilities, helping to reduce barriers to employment and education. OVR also has Business Service Representatives who participate in PA CareerLink® Business Services meetings to coordinate employer connections. Additionally, OVR actively participates in the Governor’s Advisory Council for Veteran Services, focusing on strategic service delivery for veterans with disabilities.

### **OVR Obj. 6: Identify Under Collaborating Districts**

By April 2025, identify high school/districts that are currently not collaborating with OVR to provide Pre-ETS and CIE transitions and to support IDEA requirements.

### **OVR Obj. 7: Students in Act 26 Categories**

By June 2026, include annual counts of students served in each Act 26 category in OVR quarterly reports, broken down by county.

### **OVR Obj. 8: State Worker Customized Employment**

OVR will work with OA to create a Customized Employment job classification and then work with state agencies across the Commonwealth to use this classification to hire 30 people with disabilities in state customized jobs. OVR’s district offices will work with state agencies across the Commonwealth to identify customized job opportunities, identify qualified people with disabilities to fill the positions, develop customized job descriptions, and pay for job development and supported employment services with its normal program funding to enable the new employees to be successful.

### **Recommendations for OA:**

- Expand hiring pilots beyond DMVA by January 2026 and actively address candidate readiness through partnership with OVR.
- Fully launch the disability disclosure survey in Fall 2025 and pair it with a robust awareness campaign to increase voluntary reporting.
- Continue disability awareness training to all hiring managers and evaluate impact through pre- and post-training surveys.

- Increase visibility of disability inclusion materials across OA's websites and job postings by Q2 2026.

## **Recommendations for OVR:**

- Strengthen the pipeline by recruiting, preparing, and referring job-ready candidates for OA openings, with a target of at least 15 interns placed annually and a 50% intern-to-hire conversion rate by June 2026.
- Implement the Pre-ETS performance report by mid-2026, use provider report cards to drive two annual quality improvement initiatives, and report progress quarterly to the EFOC.
- Continue advocacy for the phase-out of Section 14(c) and integrate transition supports for individuals currently in subminimum wage jobs.
- Monitor and publish service timeliness and outcome data, ensuring consistent improvement toward WIOA performance measures.

By acting on these priorities, OA and OVR can transform structural improvements into measurable employment gains, advancing Pennsylvania's goal of becoming a national leader in Employment First implementation.

## **Conclusion**

OA and OVR have laid important groundwork to expand opportunities for Pennsylvanians with disabilities, from refining job descriptions and supporting internships to implementing evaluation frameworks for Pre-ETS. The next phase requires moving from planning and pilot efforts to scaling and sustaining results.

## Department of Human Services (DHS)

*Authors: Josie Badger, Richard Edley, Representative Dan Miller, Stephen Suroviec, Susan Tachau, Susan Tomasic*

The Department of Human Services (DHS) plays a vital role in helping people with disabilities find jobs. Many of these individuals have low incomes and can receive assistance from Medical Assistance (Medicaid), a government program that covers medical care and long-term support services. These services can be provided in facilities or at home.

Through Medicaid, tens of thousands of people with disabilities receive home and community-based services (HCBS). HCBS makes it possible for people to get support at home or in the community rather than in a care facility like a nursing home. This option, known as a "waiver," gives them more freedom and support. People with a waiver can also access employment services, after using OVR or other community services which help them get and keep a job.

People with waivers have Support Coordinators (SCs) (also known as a Service Coordinator in different programs). SCs can influence whether someone chooses a Competitive Integrated Employment (CIE) job or an activity in a segregated place. The SC works closely with people with disabilities to create plans. This is sometimes called Individualized Service/Supports Plan (ISP) or, in OLTL, Person-Centered Service Plan (PCSP). The state's Employment First Act (a law called Act 36 of 2018) says that CIE should be the first choice for working-age participants of any program that gets public funding, like HCBS. So, the SC's role is important in making sure this law is followed. They help put the spirit of the Employment First Act into action by collaborating with individuals to choose CIE.

DHS also plays a role in Employment First by providing money for Supported Employment Services as a payor of last resort. The Employment First Act says DHS and Commonwealth Agencies should provide publicly funded education, training, employment and related services and long-term services and supports for working-age Pennsylvanians with a disability.

Lastly, DHS can also impact Employment First through the rules they make about services in their Medicaid HCBS waivers. These rules (service definitions) determine what services are allowed, how they are provided, what qualifications providers need, and how long the service can be given. If these rules are too strict, inflexible, or have a lot of requirements it can cost too much, it can become hard to find providers to offer the service. This can

make it hard for people who want CIE to find a Supported Employment Service provider to help them.

## Department Progress (as reported in department self-assessment)

DHS emphasized moving away from subminimum wage employment, collaborating with OVR and other partners via Project InVEST. ODP’s performance-based contracting for Supports Coordination is being phased in (starting Jan 2026). DHS also supports benefit protection safeguards and transportation access under waiver programs.

### Insights:

- Strong focus on systemic change (e.g., licensing, employment incentives).
- DHS reports that it is engaging in national reforms (14(c) certificate phase-out).
- Long-term vision is evident, though some plans (like advanced supported employment) are deferred to 2026.

*See appendices for full self-assessment.*

## Progress on EFOC Recommendations as Reported by Department Since Previous Report

### DHS Employment First Goals, Recommendations & Status Updates (2024-25)

#	Goal / Recommendation	Lead Entity	Key Activity	Status	Progress / Notes
1	Merge Subminimum Wage Licenses	ODP	License structure review	<i>No Additional Action</i>	Joint federal comment submitted
2	Public Awareness of Medical Assistance for Workers with Disabilities (MAWD)	DHS	Monthly outreach mailers	<i>Ongoing</i>	Targeting former MA individuals over income with disabilities

<b>#</b>	<b>Goal / Recommendation</b>	<b>Lead Entity</b>	<b>Key Activity</b>	<b>Status</b>	<b>Progress / Notes</b>
3	Improve Benefit Loss Safeguards	DHS / CAO	Manual checklist & flags	<i>In Progress</i>	DHS improving error systems; requested error examples from EFOC
4	On-Demand Transportation Support	ODP / OLTL	Waiver policy review	<i>Partially Implemented</i>	Lyft/Uber use allowed via MCOs; only 6% cite transport as barrier
5	Financial Education as Standalone Service	ODP	Benefits counseling embedded	<i>No Action Needed</i>	CMS discourages duplicative services; embedded in existing support
6	Improve Training for Incarcerated Youth	DHS / PDE	Joint initiative	<i>Awaiting Guidance</i>	DHS awaiting clarification; presentation scheduled June 2025
7	Update Advanced Supported Employment Definitions	ODP	Review planned 2026–27	<i>Deferred</i>	Low usage (<20); review postponed due to ARPA funding constraints
8	Annual MCO Employment Rate Review	OLTL	Rate reviews & access checks	<i>Ongoing</i>	OLTL sets minimums and monitors network access per CHC agreement
9	Increase Direct Caregiver Wages	OLTL	CHC wage enhancement plan	<i>Funding Proposed</i>	\$21M budgeted for wage parity, paid time off,

#	Goal / Recommendation	Lead Entity	Key Activity	Status	Progress / Notes
					insurance for 8,500 workers
10	Add Employment Services to BH Care Management	OMHSAS	County collaboration	<i>Modified</i>	OMHSAS will hold quarterly county meetings instead
11	Expand CAPS Statewide	OMHSAS	Facilitate MCO sharing	<i>Not Feasible</i>	Statewide expansion not feasible; OMHSAS will encourage collaboration

### Key Employment Metrics (Competitive Integrated Employment)

Working Age Population	Year	Employed	CIE Count	CIE Growth
ODP	2024	8,358	8,082 customers	up 36% since 2018
OLTL (CHC)	2024	1,036	979 customers	up 45.85% from 2022

### Planned Initiatives & Timeline (2025–26)

Initiative	Start	End / Target	Notes
Performance-based contracting (SCOs)	April 2025	Jan 2026	Public comment closed May 2025

<b>Initiative</b>	<b>Start</b>	<b>End / Target</b>	<b>Notes</b>
Outcome-based payments for residential providers	FY 24–25	FY 25–26	0.3% of residential revenue tied to performance
Transportation workgroup report	2025	TBD	Modeled on prior participant-directed model workgroup
ODP County Employment Reports	Annual (since 2023)	Ongoing	Includes race-based evaluation & disparity analysis

**Data Updates**

**DHS Objectives**

**DHS Obj. 1: Improve System Software**

By 2027, the Pennsylvania Department of Human Services (DHS) will introduce or enhance system software used by County Assistance Office (CAO) staff to proactively support employed clients with disabilities. These improvements will focus on increasing awareness of available benefits, ensuring timely communication of eligibility changes, and minimizing the risk of benefit disruption due to system or administrative errors.

**Enhanced Notifications for CAO Staff**

The updated software will include intelligent notifications that alert CAO staff when employed clients may qualify for specific benefits tailored to individuals with disabilities. These include programs such as:

- Medical Assistance for Workers with Disabilities (MAWD), Act 150, Options programs
- Work Incentive programs through Social Security
- Supplemental Nutrition Assistance Program (SNAP) Employment and Training benefits
- Ticket to Work supports

**Example:**

When a client begins reporting earned income that exceeds the traditional Medicaid income limit, the system will **flag them as potentially eligible**

for **MAWD** and prompt the CAO worker to initiate outreach or enrollment assistance.

### Eligibility Change Alerts

The system will also monitor real-time data updates (e.g., income changes, household size, employment status) and **proactively notify staff of impending eligibility risks**. These alerts will:

- Inform case workers of benefits at risk of being reduced or terminated.
- Highlight options to maintain coverage (e.g., transferring from standard Medicaid to MAWD).
- Public awareness that after an individual has been without work for over three months, they will no longer be eligible for MAWD or MAWD WJS and that Medicaid financial thresholds will be again required.
- Offer suggested scripts and outreach actions.

#### **Example:**

If wage data reported through the Income Verification System (IVS) suggests a participant's income has increased significantly, the system will generate a **"change in income" alert** and display a recommendation to explore alternative Medicaid categories, such as MAWD or Medicaid Buy-In.

### Error Prevention and Safeguards

To reduce benefit termination due to preventable system or procedural errors, DHS will implement new **data integrity checks and decision safeguards**. These will include:

- **Red flag prompts** when key data is missing or conflicting (e.g., sudden zero income without explanation).
- **Mandatory staff review steps** before terminating benefits tied to disability status.
- **30-day warning prompts** to allow staff and clients time to resolve potential issues before loss of coverage.

#### **Example:**

If a system update leads to an auto-closure of benefits due to a missing disability verification, a **30-day "pending closure" notice** will be sent internally, requiring CAO staff to review and confirm the decision before it becomes final. This time buffer allows for resolution and avoids unintentional gaps in coverage. (*Cross-Agency Goals 3 and 4*)

## DHS Obj. 2: Increase the number of working-age waiver participants with an Employment Goal or have CIE

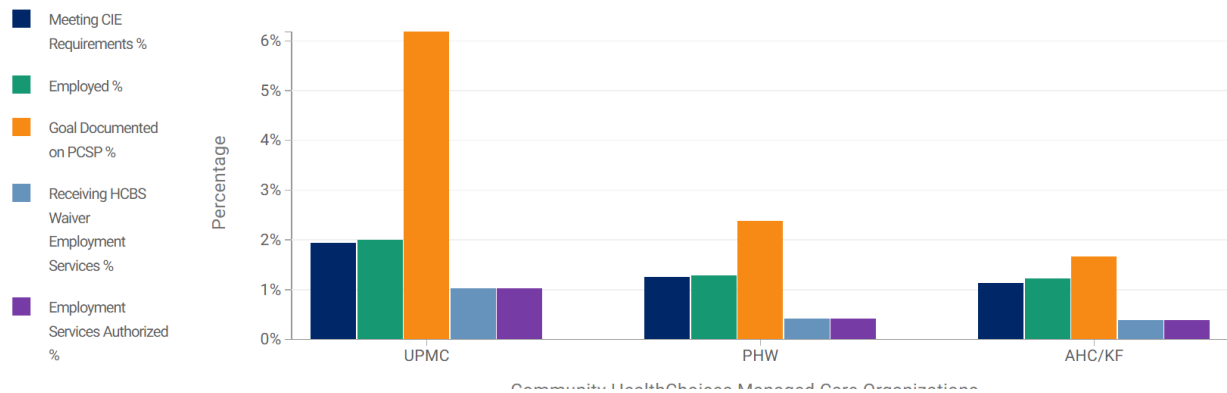
Annually, increase the percentage of participants who have: 1. Competitive Integrated Employment (CIE) or 2. are receiving employment services and Employment Goal in their Individualized Service Plan (ISP) or Person Centered Service Plan (PCSP).

In 2024, about 3.4% of people who are working age OLTL in the waiver had an employment goal in their support plan and 1.44% had CIE. In ODP 14,225 had an employment goal and 8,488 had CIE. (*Cross-Agency Goal 1*)

### OLTL-CHC Employment Data (for working-age participants) [This information can be found on the Open Data Portal.](#)

Community HealthChoices Managed Care Organizations Percentages and Counts

All counts are reflected under each percentage while hovering over the bar or all numbers are seen while hovering over the MCO name under the bars. Current Calendar Year can be ch...



Participants who have:	2023	2024
Employment Goal in PCSP	3.19%	3.4%
Employment Services Authorized	Not available	.06%
Employment Services Utilized	Not available	.06%
Competitive Integrated Employments	1.38%	1.44%

### ODP Waiver Participant Employment Data (for working-age participants)

Participants who have:	2023	2024
Employment Goal in ISP	13,826	14,225

Employment Services Authorized	5,380	5,538
Employment Services Utilized	4,267	4,509
Competitive Integrated Employments	8,247	8,488

**DHS Obj. 3: Annual increase in Supported Employment for working age participants**

In 2025/2026, each waiver program will work with the EFOC to establish employment targets as growth benchmarks, including supported employment. These targets should be used to promote growth. They should be included in the 3-year Employment First Plan. (*Cross-Agency Goal 1*)

**DHS Obj. 5: Public Awareness of Benefits for Workers with Disabilities**

Annually, DHS will provide public education and resources to raise awareness about and enrollment in MAWD and MAWD: Workers with Job Success law. DHS will provide a list of education activities done each year for the annual EFOC report.

Education on these changes should be provided each year to disability organizations, County Assistance Offices (CAO), OVR customers, people with disabilities, and family members.

All departments (including the County Assistance Offices) that work directly with individuals with disabilities and those that may be involved in the employment of people with disabilities should have a working knowledge on Medical Assistance for Workers with Disabilities (MAWD), Medical Assistance for Workers With Disabilities: Workers with Job Success (MAWD:WJS) and other programs that allow individuals with disabilities to work, earn, and save. This will be measured through the number of outreach attempts and methods. Additionally, it will be measured by the change in the use of benefits, such as MAWD and MAWD:WJS. (*Cross-Agency Goal 3*)

**MAWD and MAWD:WJS Enrollment Data**

	<b>2024</b>	<b>2025</b>
<b>Enrollment</b>	35,770	33,521

\* There was a **decrease of 2,249 participants enrolled in MAWD and MAWD:WJS between 2024 and 2025**. This decrease is a significant concern to the commission. Additional information is requested regarding this decrease, why people exited the program, and whether there are additional steps that the department can take to increase the enrollment. The overall pattern suggests the decline is less about sudden demographic shifts and more tied to the post-COVID Medicaid unwinding process. As redeterminations resumed in 2023, many states (including PA) saw people disenrolled for procedural reasons (missed paperwork, returned mail, etc.), not just for income or eligibility changes. The fact that losses are scattered across many counties, but larger in a few, suggests that local administrative capacity and outreach effectiveness may be driving variation.

### **DHS Obj. 6: Financial Education Service Definition**

By 2026, DHS should create a service definition on financial education for HCBS waivers. This definition should have the following components: making a budget, earning money, saving safely, paying taxes, building good credit, protection from identity theft, safe saving programs such as ABLE savings program, MAWD & WJS, Ticket to Work, etc. (*Cross-Agency Goal 3*)

### **DHS Obj. 7: Work with PDE to Improve training for youth who are incarcerated**

By July 2026, DHS and PDE will create and launch 3 joint initiatives to support vocational training and skill development for youth with disabilities who are in the juvenile justice system, incorporating cross-agency relationships to better coordinate educational and employment outcomes. (*Cross-Agency Goal 8*)

## **ODP Objectives**

The Office of Developmental Programs (ODP) will work to ensure that all participants have the supports, services, and opportunities for Competitive Integrated Employment.

### **DHS-ODP Obj. 1: Update Service Definitions for Advanced Supported Employment**

In 2026-27, ODP will review data and outcomes from other initiatives such as value-based purchases to evaluate whether changes would be helpful to the service definition, payment rate, and methodology of Advanced

Supported Employment<sup>3</sup> or whether this service should be eliminated. This should include eligibility, rates, and the method of service reimbursement.

Created in 2016, few people are using Advanced Employment Services. Two reasons may be the issue: First, the rules for who can use the service are strict, so not everyone qualifies. Second, service providers only get paid if they achieve certain outcomes, which might make them less interested in offering the service. While it is a good idea to pay based on results, it works best once the system is well-established. (*Cross-Agency Goal 1*)

### **DHS-ODP Obj 2: 10% More Individuals with Waivers will have CIE**

Each year, the number of working age waiver recipients currently employed within ODP's programs and engaged in CIE (Competitive Integrated Employment) will increase by 10% or by 849 people in 2026. DHS should provide tailored guidance based on each office's policies to support this growth. (*Cross-Agency Goal 1*)

### **DHS-ODP Obj 3: Ages of Workers with Subminimum Wage**

By 2027, ODP will chart the ages of participants who are in subminimum wage employment. (*Cross-Agency Goal 2*)

### **DHS-ODP Obj 4: Reporting Funding and Restructure for Subminimum Wage Activities in 2380 and 2390s**

The Department of Human Services (DHS) should strengthen monitoring and reporting on how waiver and base dollars are used to support subminimum wage activities in licensed facilities. Specifically, the Office of Developmental Programs (ODP) should publicly report, by county, how base funds are used to support subminimum wage activities. This includes detailing how much funding (and for how many individuals) is used to support subminimum wage employment in facilities licensed under chapters 2380 and 2390. These data are essential to inform policy and funding decisions, ensure accountability, and guide progress toward Employment First goals. This information should be included in the 2026 report of the Employment First Oversight Commission (EFOC).

The Department should no longer permit waiver funding to support subminimum wage activities in 2380s. This would return 2380s to their original

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<sup>3</sup> Advanced Supported Employment is a more intensive form of supported employment that adds structured Discovery, targeted job development, systematic instruction, and intensive job coaching to help a person get and keep a competitive, integrated job.

purpose as “training facilities” and make it easier to track progress and make changes in moving people to CIE. (*Cross-Agency Goal 2* )

## **OLTL Objectives**

The Office of Long-Term Living (OLTL) will work to ensure that all participants have the supports, services, and opportunities to become competitively employed in the community.

### **DHS-OLTL Obj. 1: Connection between Care Workers and Employment**

During 2025-26, OLTL will conduct a study of HCBS participants to identify the key reasons they are not pursuing employment. The EFOC will be involved in the study development, methodologies, goals, participant recruitment, etc. (*Cross-Agency Goal 5*)

### **DHS-OLTL Obj. 2: Direct Care Worker Wages**

In 2026, OLTL will release a report on the findings of the Mercer rate study, including a plan to address the barriers faced by participants who rely on direct care workers, homecare nurses, and employment specialists to seek and maintain Competitive Integrated Employment (CIE).

In the study, OLTL and ODP justified lower pay rates for attendants in OLTL programs compared to ODP by noting that OLTL’s service definition for personal assistance services does not include the same range of supports or required qualifications as ODP’s. However, reliable, high-quality caregivers are essential to enabling people with disabilities to obtain and keep CIE.

It is critical that CHC Managed Care Organizations (MCOs) have sufficient numbers of personal assistance providers and homecare nurses in their networks to fully staff the services they authorize. Yet low pay rates leave many waiver participants with authorized hours of personal assistance that go unstaffed or are filled by underqualified caregivers. As a result, some CHC waiver participants are unable to pursue or maintain CIE because they lack the support needed to prepare for work, travel to their jobs, manage personal care during the workday, and use workplace technology effectively.

Reliable, high-quality caregivers are vital to enabling people with disabilities to get and keep Competitive Integrated Employment. It is essential that CHC MCOs have enough personal assistance providers and homecare nurses in their network who can fully staff the services authorized by the MCOs. As a result, many waiver participants go with authorized hours of personal assistance services that are unstaffed or unqualified caregivers. This makes it impossible for some CHC waiver participants to seek and maintain CIE as

they lack the support needed to get dressed for a job, take transportation to work and manage personal care needs while at work.

As a means of ensuring network adequacy of Direct Care Providers, OLTL should consider ways to encourage MCOs to:

- Create a wage equalization fund for the sole purpose of increasing CHC direct care workers' wages to a level equal to direct support professional workers in the ODP waivers or prevailing marketplace wages, whichever is higher. This fund should be separate from the capitated rate paid to the MCOs to ensure it is not used for other purposes.
- Create an enhanced tier of Personal Assistance Services (PAS) for CHC waiver participants with complex conditions with a higher pay rate, like the enhanced in-home and community supports service under the ODP waivers.
- In continuation of the Missed Shift Report, require CHC MCOs to report unfilled PAS hours to OLTL along with their other monthly reports. Review wage rates on an annual basis to determine wage comparability with prevailing wages in the marketplace. (*Cross-Agency Goal 5*)

**Current Rate for Hour of Service to Providers (not the Direct Care Worker) in OLTL's Community HealthChoices**

\*\*Does not include the Monthly PMPM that is paid to the FMS Vendor.

PAS Region	Area	Hourly Rate for Agency Providers **Includes admin costs.	Hourly Rate for Participant Self-Directed Providers **Costs specific to the employment of DCW
1	Pittsburgh/ Washington County	\$19.32	\$15.04
2	Erie	\$21.48	\$14.40
3	Harrisburg	\$20.20	\$15.72

4	Philadelphia and SE PA	\$21.52	\$17.64
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**DHS-OLTL Obj. 3: OBRA Data (new)**

By July 2026, collect and provide the number of The Omnibus Budget Reconciliation Act (OBRA) Waiver participants with CIE, have employment as a goal, have employment services authorized, and employment services provided. *(Cross-Agency Goal 1)*

**DHS-OLTL Obj. 4: Act 150 Data (new)**

By July 2026, collect and provide the number of Act 150 participants with CIE. *(Cross-Agency Goal 1)*

**DHS-OLTL Obj. 5: Incentivize Service Coordinators with Improved Employment Outcomes (new)**

By 2027, OLTL will identify and report ways to further encourage MCOs to directly provide and/or encourage Supports Coordinators or Service Coordinators (SCs) to increase employment outcomes. *(Cross-Agency Goal 5)*

**DHS-OLTL Obj. 6: 25% More Individuals with Waivers will have CIE**

Each year, the number of waiver recipients (of working age) currently employed within OLTL’s HCBS programs and engaged in CIE (Competitive Integrated Employment) will increase by 25% or approximately 260 participants across the MCOs in the coming year. DHS should provide tailored guidance based on each office's policies to support this growth. *(Cross-Agency Goal 1)*

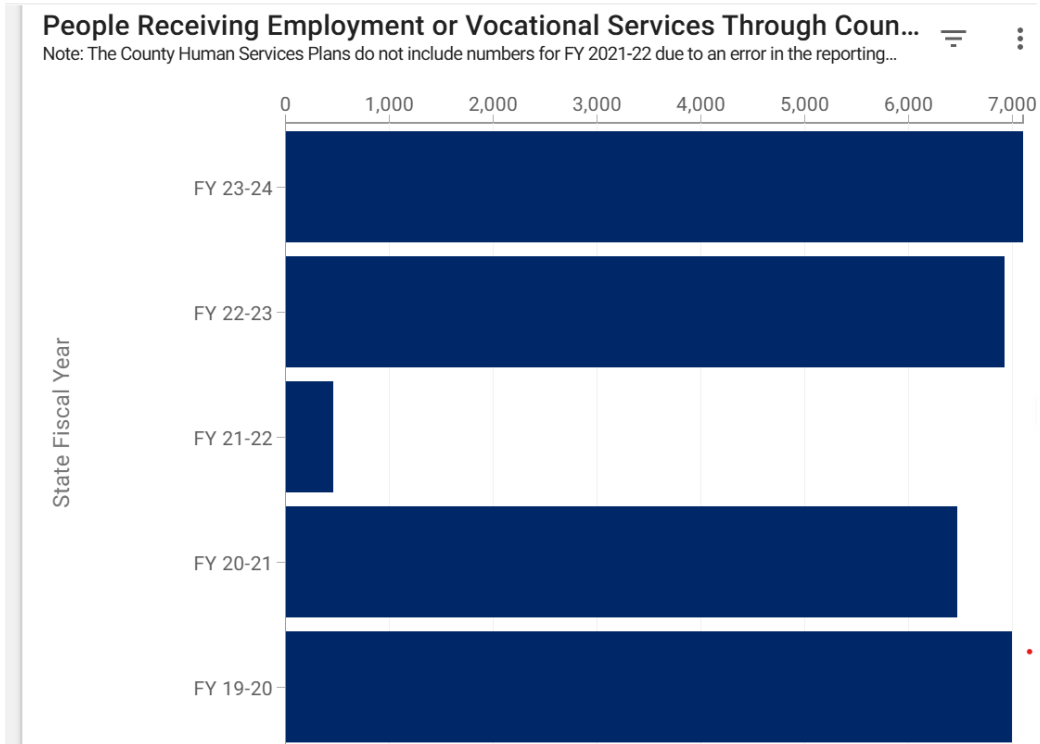
**DHS-OLTL Obj. 7: Encourage Providers to Offer On-Demand Transportation**

By 2027, OLTL should encourage CHC-MCOs to provide on-demand transportation services (like Uber and Lyft) in waiver services for CIE and/or activities that are intended to lead to employment. *(Cross-Agency Goal 5)*

**OMHSAS Objectives**

The Office of Mental Health and Substance Abuse Services (OMHSAS) will work to ensure that all participants have the supports, services, and opportunities to have Competitive Integrated Employment.

## People Receiving Employment or Vocational Services Through County/Joinder Mental Health Program



*\* Data shows great progress in returning to and surpassing service provision level prior to COVID-19.*

### **DHS-OMHSAS Obj. 1: Improve Access to Employment Services for people in the behavioral health system**

Starting in 2026, in recognition of employment being a social determinant of health and its connection to value-based payments, OMHSAS will report to the EFOC how they are tracking employment and successful initiatives that lead to employment. *(Cross-Agency Goal 1)*

People Receiving Employment or Vocational Services Through  
County/Joinder Mental Health Program

<b>Fiscal Year</b>	<b>Individuals Served</b>
FY 23-24	7,100
FY 23-23	3,462
FY 22-23	3,462
FY 21-22	456

**DHS-OMHSAS Obj. 2: Explore Expansion of Community Autism Peer Specialist (CAPS)**

Starting immediately, DHS and OMHSAS should seek funding opportunities to expand the Community Assistance and Peer Support (CAPS) program statewide. *(Cross-Agency Goal 5)*

**DHS-OMHSAS Obj. 3: Meet with Employment Specialists**

Starting in 2025, OMHSAS will hold quarterly meetings with county Employment Specialists who assist individuals with a behavioral health diagnosis to increase collaboration among counties in addressing challenges and promoting solutions to employment services. *(Cross-Agency Goal 5)*

**DHS-Juvenile Justice (JJ)**

**DHS-JJ Obj: 1: Pilot Project in Allegheny County**

By 2027, a pilot project will be conducted in Allegheny County to identify employment supports and services. This pilot will include a resource map and a living document that provides resources and is updated annually. This project will be cross system and will provide resources for adults and youth. *(Cross-Agency Goal 7)*

# Pennsylvania Department of Education (PDE)

*Authors: Dale Verchick, Mary Hartley, Cindy Duch*

Pennsylvania has been a national trailblazer in special education. The 1972 *PARC v. Commonwealth* consent decree became the bedrock of the federal Individuals with Disabilities Education Act (IDEA) and opened classroom doors for students with intellectual disabilities (ID) across the nation. Fifty-plus years later, our educators, families, and state partners have invested enormous effort to honor that heritage and move inclusion forward.

Yet the most recent IDEA Section 618 static tables (school year 2022–2023, posted February 28, 2024) highlight how far we still must travel: **only about 9%** of Pennsylvania’s K–12 students with ID spend **more than 80%** of the day in general-education classrooms **compared to the national average of 21%**. For all students with disabilities in Pennsylvania, the **overall inclusion rate is about 61.6%**, compared with a **national average of about 67%**. This places Pennsylvania **43rd out of 50 states for inclusion of students with intellectual disabilities** and shows the need for urgent action.<sup>4</sup>

The good news is that 2024-25 saw real progress:

- Pennsylvania Department of Education (PDE) completed the first statewide Least Restrictive Environment (LRE) data pull and will launch an internal **Inclusion Dashboard**.
- More districts are piloting the **Framework for Access & Belonging (FAB)**.
- Paid work-based learning slots expanded, and the **Attract, Prepare & Retain (APR) Transition Institute** sold out in its first offering.

It's positive to see these efforts, but more action is needed to turn inclusion rates around. Inclusion is a key indicator for future employment.

PDE continues to be a critical partner in advancing Employment First by ensuring that students with disabilities leave school prepared for competitive integrated employment (CIE) and post-secondary success. Building on the seven strategic goals the Commission set in 2024, PDE and its partners have

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<sup>4</sup> <https://nces.ed.gov/programs/coe/indicator/cgg/students-with-disabilities>  
<https://catalog.data.gov/dataset/idea-section-618-data-products-static-tables-part-b-child-count-educational-environments-t-370b0>

introduced new initiatives, expanded evidence-based practices, and begun to close data gaps that had limited earlier progress.

## Employment First Progress (as reported in department self-assessment)

PDE is working to improve inclusive education and employment outcomes for students with disabilities. In 2024–25, progress included increased training for educators, expanded job coaching supports, and enhanced business partnerships through interagency efforts. Although a research initiative on restrictive settings was canceled, PDE continues to refine data collection and oversight. Student-led Individualized Education Plans (IEPs) (special education plans) remain a key strategy for promoting youth leadership.

### Insights:

- About 61.6% of Pennsylvania’s students with disabilities learned in general-education classrooms for more than 80% of the day in the 2022-2023 school year (a modest uptick). For students with intellectual disability, inclusion remains about 9%, underscoring persistent gaps.
- Interagency collaboration (with Office of Vocational Rehabilitation (OVR) and through grants) is strengthening work-based learning.
- Student voice and self-advocacy are being elevated through leadership-focused initiatives.
- Tools and training are helping families understand how work affects benefits.
- Ongoing use of post-school outcome data is guiding improvements statewide.

*See appendices for full self-assessment.*

## Progress Reported by Department Since Previous Report

2024-25 Win	Why it Matters
Least Restrictive Environment (LRE) Public Dashboard launched December 2024	First public baseline of inclusion by Local Education Agency (LEA); underpins Rec A.
Transition System Framework (TSF) coaching embedded in Pathways- to – Partnership (P2P) grant	Gives 40 LEAs a scalable model for inclusive work-based learning
Charting the LifeCourse (CtLC) statewide training cohort	Reinforces Goal 1 (prevent segregation) with 27 Intermediate

	Unit (IU) trainers and 250 family plans
APR learning institute for Transition Consultants	Builds transition capacity; 300+ participants across the Pennsylvania Training and Technical Assistance Network (PaTTAN) offices.
Job-Coaching e-Courses (Essentials & Nuts-and-Bolts)	1,146 completions now tracked as a Key Performance Indicator (KPI)

## Progress on 2024 Recommendations

2024 EFOC Recommendation	2025 Cabinet / PDE Action	Status	Milestone Due	Statewide Goal Alignment
<b>Establish Point-in-Time baseline of moves to restrictive settings</b>	Original external study canceled; Bureau of Special Education (BSE) to partner with OVR data team instead	Delayed	Jan 2026	1 (Increase CIE), 5 (Eliminate Barriers)
<b>Public LRE dashboard</b>	Dashboard live Dec 2024	Done	n/a	1 (Increase CIE), 4 (Strengthen Feedback & Accountability)
<b>Track post-secondary placement</b>	Pennsylvania Higher Education Assistance Agency (PHEAA) data-share pilot designed	In development	Sept 2025	1 (Increase CIE), 4 (Strengthen Feedback & Accountability)
<b>Disaggregate and publish Act 26 &amp; dropout data</b>	Draft data specs posted for comment	In development	Dec 2025	4 (Strengthen Feedback & Accountability), 6 (Advance Access & Representation)

<b>Financial literacy/ benefits counseling</b> *Because this data collection is not mandated by federal or state law, LEAs may choose whether to submit the data.	Work Incentives Planning and Assistance (WIPA) referral checkbox added to IEP system	<i>On-track</i>	<i>June 2026</i>	3 (Ensure Clear, Coordinated Information), 1 (Increase CIE)
<b>Inclusive-practice professional development</b>	APR institute + FAB pilot in CTCs	<i>On-track</i>	<i>Feb 2026</i>	1 (Increase CIE), 6 (Advance Access & Representation)
<b>NEW: Public Job-Coaching capacity (Key Performance Indicator)</b>	Learning-management-system (LMS) report built; 1,146 completions	<i>NEW</i>	<i>On going</i>	1 (Increase CIE), 4 (Strengthen Feedback & Accountability)

## Data Updates and Observations

Indicator	2023	2024	Trend
<b>High-school graduation rate (students w/ IEPs)</b>	87.5 %	<b>88.7%</b>	Up 1.2% points
<b>Drop-out – students w/ IEP</b>	12.0 %	<b>10.9%</b>	Down 1.1% points
<b>Students receiving Pre-ETS</b>	17,237	<b>19,247</b>	Up 11.6 %
<b>Share of graduates entering competitive employment within three months</b>	About 1.50%	<b>~1.03</b>	Down about 0.47%
<b>(For Context) Number entering competitive, integrated employment within three months</b>	1,880	<b>1,312</b>	Down about 30 %
<b>Educators completing job-coaching courses</b>	Not tracked	<b>1,146</b>	New key performance indicator (KPI)

**Slightly more students with IEPs are graduating.**

In 2023, about 88 out of every one hundred students with IEPs graduated. That is up from about 87 the year before; in 2024 the rate improved again to about 89.

**Fewer students with IEPs are dropping out.**

The share of graduates entering competitive, integrated employment within three months fell by about 0.47 percentage points from 2023 to 2024; in raw numbers, 1,880 in 2023 versus 1,312 in 2024.

**More students are getting Pre-ETS services and Work Based Learning (WBL) experiences.**

Pre-Employment Transition Services (Pre-ETS) help students with disabilities get ready for work. In 2023, about 2,000 more students got these services than the year before.

**Fewer students are getting jobs right after high school.**

The number of students who got a job within three months of graduation went down from 1,880 in 2023 to 1,312 in 2024.

**Capacity is growing but uneven.**

APR Institute demand exceeded slots and regional disparities persist, especially in rural LEAs.

**Early employment gains dipped in PY 2023.**

While more students accessed Pre-ETS, fewer secured CIE within three months; stakeholders cite transportation and provider shortages as primary barriers. Could also signal a school-to-work disconnect.

**Data transparency improving.**

PDE now publicly posts graduation/drop-out tables; however, real-time Act 26 credential, credential attainment, and longitudinal restrictive-placement data remain pending.

**Inclusive practice pilot shows promise.**

Framework for Access & Belonging pilots in CTCs are producing actionable accessibility checklists but have not yet scaled statewide.

**Funding volatility.**

TSF & CtLC rely on braided grants vulnerable to future cuts

**PDE Objectives**

PDE Objective (2025 draft)	Purpose in plain language	Statewide Goal(s) it advances	Rationale
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<p><b>Obj 1 – Scale Evidence-Based Transition Coaching</b></p> <p>Evolve Attract, Prepare, and Retain (APR) into a standing Transition Academy with stackable micro-credentials for transition coordinators and secondary teachers; prioritize cohorts from high-segregation Local Education Agencies (LEAs)</p>	<p>Boost LEA capacity to deliver quality transition planning and inclusive work-based learning</p>	<p>Goal 1 – Increase CIE; Goal 6 – Advance Access &amp; Representation</p>	<p>Better-trained coordinators drive CIE outcomes and address equity gaps across regions.</p>
<p><b>Obj 2 – Re-energize Early Employment Outcomes</b></p> <p>Pair Pre-Employment Transition Services (Pre-ETS) with paid work-based learning (WBL) incentives in counties where the early-CIE rate (graduates entering Competitive Integrated Employment within ninety days) is below 5%.</p>	<p>Turn transition services into real paychecks within three months of graduation</p>	<p>Goal 1 – Increase CIE; Goal 5 – Eliminate Barriers to CIE</p>	<p>Directly raises the CIE numerator and tackles the “first-job” barrier where outcomes lag most.</p>

<p><b>Obj 3 – Publish Restrictive-Setting &amp; Act 26 Dashboards</b></p> <p>Release regular public updates with LEA, Intermediate Unit (IU) regions, cyber charter, and career and technical center (CTC) breakouts; include the point-in-time baseline and three-year trends.</p>	<p>Make segregation and safety-referral data transparent</p>	<p>Goal 4 – Strengthen Feedback &amp; Accountability; Goal 5 – Eliminate Barriers to CIE</p>	<p>Public dashboards create accountability pressure and highlight systemic barriers that block inclusion and employment.</p>
<p><b>Obj 4 – Embed Financial Literacy &amp; Benefits Counseling</b></p> <p>Adopt statewide personal-finance standards and require an automatic referral at exit to Work Incentives Planning and Assistance (WIPA) and Achieving a Better Life Experience (ABLE) resources; include Medical Assistance for Workers with Disabilities (MAWD) and MAWD—Workers with Job Success</p>	<p>Ensure students and families understand how work affects benefits and know the steps from school to work.</p>	<p>Goal 3 – Ensure Clear, Coordinated Information about CIE Supports; Goal 1 – Increase CIE</p>	<p>Clear benefits info reduces “fear of losing SSI/Medicaid” and supports informed work decisions.</p>

<p>(WJS) information; ensure all students receive uniform transition information and use the “Planning for the Future” checklist as part of the Individualized Education Program (IEP) process. This is to include information about saving safely (PA ABLE account) and learning about identity theft and scams.</p>			
<p><b>Obj 5 – Formalize Cross-System “No Wrong Door” Transition Protocol</b></p> <p>Update the interagency Memorandum of Understanding (MOU) among PDE, Office of Vocational Rehabilitation (OVR), Office of Developmental Programs (ODP), and Office of Long-Term Living (OLTL) to require documented referral</p>	<p>Guarantee seamless hand-offs to employment, post-secondary, or HCBS supports</p>	<p>Goal 3 – Ensure Clear, Coordinated Information; Goal 4 – Strengthen Feedback &amp; Accountability <i>(and the Commission’s added No-Wrong-Door priority)</i></p>	<p>A shared protocol prevents students from falling through cracks and lets agencies track follow-through.</p>

and confirmation to the appropriate agency before graduation, with periodic compliance checks.			
<p><b>Obj 6 – Invest in Accessible Transportation Pilots Linked to Youth Employment</b></p> <p>On-demand job-shift service in three rural IUs</p>	<p>With PennDOT’s Find My Ride, pilot on-demand home-to-shift services in three rural IUs where transportation blocks WBL placements.</p>	<p>Goal 5 – Eliminate Barriers to CIE; Goal 6 – Advance Access &amp; Representation</p>	<p>Transportation is a top structural barrier; targeting rural areas addresses geographic equity.</p>

**Commission’s Recommendations**

**1. Publish and sustain the restrictive-setting baseline.**

Release a statewide point-in-time baseline of restrictive placements with Local Education Agency (LEA) and Intermediate Unit (IU) regions breakouts, and maintain it on a regular refresh cadence.

*Alignment: Goals 1, 5*

**2. Institutionalize the LRE Inclusion Dashboard.**

Make the Least Restrictive Environment dashboard a standing public product with a stable layout, three-year trend lines, and views for LEA, cyber schools, and career and technical centers.

*Alignment: Goals 1, 4*

**3. Report early employment as a rate with percentage-point change.**

Define and publish the share of graduates entering competitive, integrated employment within three months, and present year-over-year movement as percentage-point change; keep raw counts as context only. (Note: OVR reports this data.)

*Alignment: Goals 1, 4*

#### **4. Targeted WBL incentives should be paired with Pre-ETS.**

Use Office of Vocational Rehabilitation and workforce funding to seed paid work-based learning in counties with the lowest early-employment results, prioritizing summer placements tied to transition plans.

*Alignment: Goals 1, 5*

#### **5. Rural transportation pilots should be linked to youth jobs.**

In partnership with PennDOT's Find My Ride, implement on-demand home-to-shift service in three rural IUs to convert unfilled work-based learning slots into actual paid experiences.

*Alignment: Goals 5, 6*

#### **6. Transition Academy and micro-credentials at scale.**

Evolve Attract, Prepare, and Retain into a standing Transition Academy offering stackable micro-credentials, and link completion to observable changes in schedules, co-teaching, and student access to inclusive work.

*Alignment: Goals 1, 6*

#### **7. Quarterly publication of the job-coaching capacity KPI.**

Publish learning-management-system completions for job-coaching courses each quarter, disaggregated by IU, and correlate capacity gains with paid work-based learning and early-employment rates.

*Alignment: Goals 1, 4*

#### **8. Uniform transition information and checklist embedded in the IEP.**

Statewide use of the "Planning for the Future" checklist and uniform transition-services information sheet, and require completion at exit as part of the Individualized Education Program process. The Planning for the Future Checklist must be reviewed and updated annually.

*Alignment: Goals 3, 1*

**9. “No Wrong Door” referral confirmation in the interagency MOU.**

Amend the PDE–OVR–ODP–OLTL Memorandum of Understanding to require documented referral to the appropriate agency before graduation, with periodic compliance auditing.

*Alignment: Goals 3, 4*

**10. Act 26 and dropout transparency package with open access.**

Publish disaggregated Act 26 and dropout datasets by disability, race, school type, and geography, and provide an application programming interface for routine external use.

*Alignment: Goals 4, 6*

**11. Assistive-Technology Adoption Index and matching-grant program.**

Create a statewide adoption index and a matching-grant pool that prioritizes rural and high-segregation LEAs, and track student access and educator utilization.

*Alignment: Goals 5, 6*

**12. Inclusive teacher-residency pathway.**

Partner with educator-preparation programs to place dual-certified teachers in high-segregation LEAs and report placements and first-year retention as standard outputs.

*Alignment: Goals 1, 6*

**13. Multilingual Transition Navigator for families.**

Distribute a concise toolkit with timelines, decision points, and contacts to all Title I high schools and publish it in multiple languages.

*Alignment: Goals 3, 6*

**14. Activate post-secondary tracking via PHEAA data-share.**

Implement the Pennsylvania Higher Education Assistance Agency data-share to report enrollment, persistence, and credentialing for students with disabilities.

*Alignment: Goals 1, 4*

### **15. Sustainability plan for TSF and CtLC.**

Publish a short braided-funding plan to maintain the Transition Systems Framework and Charting the LifeCourse supports if federal grants fluctuate.

*Alignment: Goals 5, 6*

## **Conclusion**

Pennsylvania led the way into inclusive education; now we must close the gap between promises and results. The data show real gains this year due to stronger training, clearer dashboards, and more work-based learning. Yet, too many students still learn apart from peers and too few secure competitive, integrated jobs soon after graduation. Our immediate priorities are to keep the LRE baseline and dashboard public and current, report early employment as a rate, pair Pre-ETS with paid WBL while addressing transportation barriers, embed a uniform "Planning for the Future" checklist in the IEP, and require "No Wrong Door" referral confirmations before exit. With visible milestones and shared accountability, these steps will convert momentum into measurable gains in inclusion and Competitive Integrated Employment statewide.

## Other Agencies/Departments

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### **Role in Employment First**

Pennsylvania's Employment First progress is the product of a truly inter-agency coalition. The **Department of Corrections (DOC)** is integrating vocational pathways into re-entry planning for justice-involved individuals with disabilities. The **Pennsylvania Developmental Disabilities Council (PADDC)** fuels innovation and peer leadership that expand employer demand; the **Pennsylvania Housing Finance Agency (PHFA)** links accessible, affordable housing to job stability; and the **Pennsylvania Human Relations Commission (PHRC)** protects workers' civil rights and equips businesses to hire inclusively.

At the same time, the **Department of Health (DOH)** embeds disability employment metrics in public-health programs; the **Department of Military and Veterans Affairs (DMVA)** channels veterans' services toward competitive civilian careers; the **Department of Aging (PDA)** keeps older adults with disabilities connected to meaningful work; the **Department of Community and Economic Development (DCED)** directs inclusive growth capital and small-business supports; and the **Pennsylvania Department of Transportation (PennDOT)** ensures that accessible, reliable mobility is never the deal-breaker on the road to a paycheck. Collectively, these agencies are turning Employment First from a statutory mandate into a lived reality across the Commonwealth.

### **Employment First Progress (as reported in department self-assessment)**

Below is an at-glance recap of how ten Cabinet-level partners advanced the Employment First agenda this year, based on their self-assessments submitted to the Commission.

Agency	2024-25 Highlights
<p>Department of Community &amp; Economic Development (DCED)</p>	<p>Secured <b>\$20 million</b> in the <i>Main Street Matters</i> initiative, including accessible-housing grants that remove barriers to work.</p> <p>Trained 100+ economic-development organizations with OVR on inclusive hiring and entrepreneurship supports.</p> <p>Hired a Director of Historically Disadvantaged Business Assistance to expand technical help for entrepreneurs with disabilities.</p>
<p>Pennsylvania Department of Transportation (PennDOT)</p>	<p>Convened PennDOT/L&amp;I/OVR workgroup to strengthen the <b>Driving-with-Bioptics</b> and <b>Dual-Control Permit</b> programs, identifying provider-reimbursement and data-sharing fixes.</p> <p>Committed research staff to national study (NCHRP 15-89) on protected-intersection design for pedestrians with vision impairments (implementation underway).</p>
<p>Department of Military &amp; Veterans Affairs (DMVA)</p>	<p>Partnered with OA and OVR to pilot talent pipelines for veterans' homes; regional recruitment and disability-awareness training for HR/hiring managers slated for FY 25-26.</p>
<p>Department of Corrections (DOC)</p>	<p>Launched cross-agency strategy meetings with OVR to improve CIE referrals for re-entrants with disabilities; new "direct-refer" feature for prison staff is in development.</p>
<p>Department of Aging (PDA)</p>	<p>Began redesign of <b>PA Link</b> to embed job referrals and employment resources.</p>
<p>Department of Health (DOH)</p>	<p>Office of Health Equity hosts monthly forums sharing disability-focused resources.</p> <p><i>State Health Assessment</i> now inventories transportation, provider competency, and insurance barriers faced by people with disabilities to guide policy fixes.</p> <p><b>Special Kids Network</b> helpline continues to route families to employment and transition supports.</p>

Pennsylvania Developmental Disabilities Council (PADDC)	Finalized employment-storytelling video series and planned two statewide employment conferences for October 2025 to spread CIE best practices.
Pennsylvania Human Relations Commission (PHRC)	Hosted 2nd Annual Disability Conference with about 200 participants and full legal staff attendance; press-release campaign increases public understanding of disability rights.
Pennsylvania Housing Finance Agency (PHFA)	Maintains <b>PAHousingSearch.com</b> with accessibility filters; however, agency reports it is still stabilizing recruiting processes and lacks a formal CIE program during its Workday transition.

## Agency Objectives & Alignment to Statewide Employment-First Goals

Pennsylvania Department of Transportation (PennDOT)

Goal / Objective	Description	Statewide Goal #
<b>Enhance &amp; Account for Accessible Transportation for Employment</b>		<b>1; 3; 5; 6</b>
Rural & shift-work mobility plan	Publish revised rural strategy centered on job access.	<b>1; 5; 6</b>
Medicaid / HCBS integration	Finalize PennDOT–DHS funding work-plan for job trips.	<b>1; 5</b>
Shared-Ride visibility	Issue ADA-compliant web guidance & benchmark usage.	<b>1; 3; 5</b>
Bioptics & Dual-Control outreach	Boost adaptive-driving participation via OVR co-branding.	<b>1; 5</b>
On-demand rural pilot	Draft RFP & identify funds for <b>3</b> county pilots.	<b>1; 5; 6</b>

Department of Corrections (DOC)

<b>Goal / Objective</b>	<b>Description</b>	<b>Statewide Goal #</b>
<b>Goal 1 – Enhance Vocational Training &amp; Employment Services</b>	Implement tailored EF strategies in <b>3</b> facilities.	<b>1; 5</b>
Obj 1-A	Develop 3 EF initiatives (due 12/25).	<b>1; 5</b>
Obj 1-B	Partner with OVR for discovery & coaching.	<b>1; 4; 5</b>
<b>Goal 2 – Improve Data Systems</b>	Build outcome-tracking for re-entrants with disabilities.	<b>4</b>
Obj 2-A	Implement dashboard by 8/25.	<b>4</b>

Department of Aging (PDA)

<b>Goal / Objective</b>	<b>Description</b>	<b>Statewide Goal #</b>
<b>Goal 1 – Support Employment Opportunities for Older Adults with Disabilities</b>		<b>1; 5; 6</b>
Obj 1-A	Align with L&I on WIOA barrier remediation.	<b>1; 5</b>
Obj 1-B	Outreach with L&I & OVR to employers.	<b>1; 6</b>
Obj 1-C	Develop age-friendly job filters & guides.	<b>3; 5; 6</b>
Obj 1-D	Add older cohorts to labor dashboard.	<b>3; 4; 6</b>

Department of Military and Veterans Affairs (DMVA)

Goal / Objective	Description	Statewide Goal #
<b>Goal 1 – Improve Employment Services for Veterans with Disabilities</b>		<b>1; 6</b>
Obj 1-B	Support EF initiatives with partners.	<b>1; 6</b>
Obj 1-D	Expand resource networks statewide.	<b>1; 3; 6</b>
<b>Goal 2 – Expand PA VETConnect</b>	Link vets to disability-focused jobs/training.	<b>3; 5; 6</b>
Obj 2-A	Raise awareness of employment services.	<b>3; 6</b>

Department of Community and Economic Development (DCED)

Goal / Objective	Description	Statewide Goal #
<b>Goal 1 – Integrate Disability Inclusion into Economic-Development Initiatives</b>		<b>1; 5; 6</b>
1-A: Employment-First job-creation projects	Design <b>3</b> projects targeting PwD (include geography & job numbers).	<b>1; 5</b>
1-B: WDB + OVR partnerships	Execute <b>3</b> MOUs with Workforce Boards by 6/25.	<b>1; 4</b>

1-C: Entrepreneurship pilots	Launch <b>2</b> disability-owned start-up pilots; set metrics.	<b>1; 6</b>
<b>Goal 2 – Measure &amp; Improve Service-Delivery Satisfaction</b>		<b>3; 4; 6</b>
2-A: Tracking system & surveys	Deploy disability dashboard & survey by 6/25.	<b>3; 4</b>
2-B: Advocacy feedback loop	Quarterly consults with advocates; publish “You Spoke → We Did.”	<b>4; 6</b>

### **Recommendations (Rec)**

Based on the self-assessment report received from the following agencies, the EFOC recommends the following:

#### **Department of Health (DOH)**

The Commission commends the Department of Health for spotlighting disability equity in its State Health Assessment and for sustaining the Special Kids Network as a lifeline to local resources. Pennsylvania’s demographic profile and DOH surveillance - such as the Behavioral Risk Factor Surveillance System (BRFSS) data available on the Enterprise Data Dissemination Informatics Exchange (EDDIE), social determinants of health, and environmental exposures through the Adult Blood Lead Epidemiology and Surveillance (ABLES) program - highlight upstream health burdens that predict where employment outcomes lag. These data, when paired with programmatic levers like MAWD and the CHC→WIPA→OVR referral pathway, can guide geographically targeted investments that improve both health and workforce participation for people with disabilities. To build on that momentum, we recommend two priority actions for the coming year.

- (1) Set a clear, measurable workforce target such as having at least 7 percent of DOH employees self-identify as people with disabilities by FY 2027 and publish quarterly progress to model transparent, inclusive hiring.

(2) Weave employment into the next State Health Improvement Plan by adding an additional indicator: the percentage of Medicaid home- and community-based services users in competitive integrated employment.

These steps will convert DOH's strong equity framing into concrete, data-driven results that advance Employment First across the Commonwealth.

### **Pennsylvania Department of Transportation (PennDOT)**

The Commission commends PennDOT for posting clear Employment First goals, partnering with OVR on Bioptics and Dual-Control improvements, participating in national accessible-design research, and making Find My Ride data public. To build on that momentum, we highlight two priorities for the coming year:

(1) Fund and launch the three rural, on-demand employment mobility pilots backed by a dedicated 5% "Employment-First set-aside" within any new transit dollars to ensure shift-friendly service reaches counties with the greatest job-access gaps; and

(2) publish a transparent pilot scorecard and expand Find My Ride with an "employment trip" filter and county-level dashboards, reporting quarterly on cost-per-job trip, ridership, 6- and 12-month job retention, and wage gains.

Together, these steps will convert promising designs into measurable job access for Pennsylvanians with disabilities.

### **Department of Aging (PDA)**

The Commission commends the Department of Aging (PDA) for aligning Aging Our Way PA with workforce barrier-remediation, collaborating with Labor & Industry/OVR, and moving the PA Link refresh toward easier access to employment resources. To build on that progress, we highlight two priorities for the coming year:

(1) launch "PA CareerLink 2.0" with a clear employment entry point including an "accommodation-ready employer" filter and shift/remote options and set a measurable target to increase employment referrals by 40% within 12 months, with quarterly county-level reporting; and

(2) adopt a simple quality metric for outcomes; track 6- and 12-month job retention for older adults with disabilities and aim for a 15% improvement by 2027 publishing results alongside success stories to guide continuous improvement.

## **Department of Community and Economic Development (DCED)**

The Commission applauds the Department of Community & Economic Development (DCED) for weaving Employment First into program guidelines, co-training more than 100 economic-development partners with OVR, expanding Main Street Matters accessibility investments, and standing up entrepreneurship supports for disability-owned firms. To carry that momentum into measurable impact, we underscore two priorities for the coming year:

(1) lock in clear Key Performance Indicators (KPIs) and publish the first Inclusive-Economy report disaggregating by disability, county, and program to track jobs created/retained, accessibility upgrades, capital leveraged, and outcomes from the entrepreneurship pilots; and

(2) upgrade the One-Stop/Customer Service portal with disability identifiers and a concise satisfaction/outcomes survey, paired with a quarterly “You Spoke We Did” feedback loop and simple MOUs for data-sharing with OVR and local workforce boards.

These steps will turn DCED’s strong policy alignment into transparent, repeatable results for inclusive growth.

## **Department of Corrections (DOC)**

The Commission recognizes the Department of Corrections (DOC) for working towards formalizing its partnership work with the Office of Vocational Rehabilitation, advancing a direct-referral pathway, and developing staff training to better support justice-involved people with disabilities as they prepare for competitive employment. To turn this progress into measurable results, we emphasize two priorities:

(1) finalize the five OVR memoranda of understanding and operationalize a “refer → place → retain” workflow in every State Correctional Institution, with 30/90/180-day retention checkpoints and documented accommodations; and

(2) Track referrals, placements, wages, and retention disaggregated by disability type, facility, and region in a reentry section of the existing Employment First Dashboard and report updates quarterly to the Commission.

This will translate DOC’s promising coordination into transparent, job-ready outcomes across the reentry system.

### **Department of Military & Veterans Affairs (DMVA)**

We appreciate DMVA's work with the Office of Administration and OVR to open hiring pathways in State Veterans Homes and to schedule disability-awareness training for hiring teams. To lock in outcomes, we recommend:

- (1) finalize a de-identified data-sharing path with the VA so DMVA can benchmark referrals, hires, and 90/180-day retention for veterans with disabilities; and
- (2) operationalize a standard "refer → hire → retain" workflow across all six Homes with quarterly reporting to the Commission.

### **Pennsylvania Human Relations Commission (PHRC)**

We commend PHRC for expanding its Disability Conference and employer training while continuing public education through case announcements. To deepen impact, we recommend:

- (1) add CEU credit and regional partners to grow conference attendance and employer participation, and
- (2) launch an annual training-impact review that correlates employer training uptake with local employment-discrimination claim trends, publishing a simple "what's working" brief each year.

### **Pennsylvania Developmental Disabilities Council (PADDC)**

PADDC's planned employment conferences and technical assistance to businesses, plus new storytelling assets, are valuable momentum builders. To sharpen results, we recommend:

- (1) attach a wage/benefit benchmark to the 20-business TA effort and track pre/post changes in hiring and retention, and
- (2) publish an annual outcomes digest (what TA elements led to job offers, sustained hours, and advancement) to help other agencies and employers replicate effective practices.

### **Pennsylvania Housing Finance Agency (PHFA)**

We commend PHFA for maintaining an accessible housing search tool and for continuing accessibility investments through its housing finance programs. To align more directly with Employment First, we recommend:

- (1) implement voluntary disability self-identification within the Workday HR rollout and pilot an OVR-supported internship/early-career pathway, and

(2) embed “employment stability” touchpoints in compliance guidance (e.g., documenting accessible-unit availability and tenant employment supports) and set KPIs for the reach of inclusive financial-education offerings.

*For Agencies That Did Not Provide Data, We Strongly Recommend The Following:*

**Work Together:** Encourage different departments to work together to create job programs that address transportation, health, and support services for people with disabilities.

**Raise Public Awareness:** Launch public awareness campaigns to promote the state’s commitment to hiring more people with disabilities.

## Appendices

### Appendix A. Commissioners Names and Biographies

**Josie Badger** DHCE, CRC, Commission Chair. Dr. Badger received her bachelor's degree from Geneva College in Disability Law and Advocacy, a master's from the University of Pittsburgh in Rehabilitation Counseling, and a Doctorate from Duquesne University in Healthcare Ethics. She founded J. Badger Consulting Inc. in 2014 and PEACOCK, a nonprofit organization, in 2023. Dr. Badger is also the Director of the national RSA-Parent Training, Information, technical assistance center (RAISE). Dr. Badger was a founder of the Pennsylvania Youth Leadership Network (PYLN), the Children's Hospital Advocacy Network for Guidance and Empowerment (CHANGE) and created a youth and leadership development training program that serviced all of Pennsylvania. She is a co-chair of the statewide Family Care Coalition.

**Julia Barol**, Commission Vice Chair, is at Temple University Institute on Disabilities working on employment systems issues. She is also President of Transition Consults where her work focuses on giving people the opportunity to live and work in their community, self-directing their lives. She is President of the Pennsylvania chapter of APSE (Association of People Supporting Employment First) and has been working to advance Employment First in Pennsylvania since 2012. She serves as the Chair of Transition and Education of the PA Vocational Rehabilitation Council. Julia was a part of the initial cohort of the BPAOs and the roll out of the TWWIIA and was certified as a benefits counselor in 2001. She has counseled many hundreds on work and its impact on benefits so that people can make informed decisions about their future. She has trained groups on work incentives, SSA benefits, and healthcare options for many years. Julia holds a Masters in Secondary Special Education and Transition from The George Washington University.

**Dale Verchick**, Commission Secretary, has been an advocate at Disability Rights Pennsylvania since 2008. She and her family were refugees during the Persian Gulf War and were forced to relocate to India. Dale is now a US citizen and resides in Schuylkill County with her husband and their two children, Andrew, and Lucy. Lucy was born with congenital femoral deficiency and fibular hemimelia. Dale serves

on the Board of the Pennsylvania Assistive Technology Foundation. She co-authored the book "NRI - The Improbable Adventures of a Non-Resident Indian," which explores the experiences of non-resident Indians navigating life between different countries and cultures. Dale holds a master's degree in law and public policy from PennWest University.

**Stephen Suroviec**, Immediate Past Commission Chair, is President and Chief Executive Officer of Achieva. Before joining Achieva in December 2017, Steve held several disability-related positions in both the public and non-profit sectors, including Chief Operating Officer and Intellectual/Developmental Disabilities Division Director for the Rehabilitation and Community Providers Association, Special Advisor to the PA Secretary of Human Services (for "Employment First" policy), Deputy Secretary for Developmental Programs, Executive Director for the PA Office of Vocational Rehabilitation, Executive Director of The Arc of PA, Deputy Secretary and Policy Director at the PA Department of Health, and Director of the Erie County Department of Human Services. He was a Legislative Assistant for then-Congressman Tom Ridge from 1991 through 1994 and served on the President's Committee for People with Intellectual Disabilities from 2006 to 2008. Steve is a veteran of the U.S. Air Force and holds a master's degree in public and international Affairs from the University of Pittsburgh.

**Mary Hartley**, Inaugural Chair of the Commission, is President of The Arc of Greater Pittsburgh, formerly the Executive Director of Parent Education and Advocacy Leadership (PEAL). She has led statewide policy and legislative change as well as projects supporting transition to adulthood and employment, most notably, the self-advocate managed #IWantToWork campaign at United Way of Southwestern Pennsylvania. With United Way and county leadership, she initiated and launched a successful new model of employment collaboration (now in multiple businesses), the Career Transition Project. Mary is a parent advocate who got started volunteering with the Local Task Force on the Right to Education. She lives with her husband and two children in Pittsburgh; her son is advocating on his own behalf through transition.

**Lisa Biggica** is the President/CEO of UniqueSource Products & Services, a network of organizations affirmatively employing people with disabilities who prioritize providing adaptive technologies, effective accommodations, and supports to not only meet, but exceed

the requirements of the ADA. UniqueSource provides the Central Non-Profit operating under Section 520 of the PA Procurement Code. In 2021 Lisa was named, and continues to serve, as the President of the national State Use Program Association (SUPRA), providing a consolidated source of information, education, and support for State Use Program leaders nationwide. Lisa holds a B.S. in Business Administration from Elizabethtown College and Project Management Certifications from Villanova University. In addition to Lisa's work in advancing employment opportunities for people with disabilities, she has an extensive background in business leadership, financial services, and digital customer service operations.

**Cheryl Bates-Harris** retired as the Senior Disability Advocacy Specialist for the Training and Advocacy Support Center (TASC) of NDRN where she has 23 years of experience and expertise working with people with disabilities. She has an in-depth knowledge of cross disability issues and focuses on employment issues of people with disabilities, including Vocational Rehabilitation, Social Security and Return to Work (PABSS), and other work programs that impact people with disabilities, including DOL One-Stops. Since the passage of the Ticket to Work and Work Incentive Improvement Act, she has conducted national training on TWWIIA and Vocational Rehabilitation Services and has conducted extensive training on the intersection issues of the Ticket to Work with state vocational rehab services. She was appointed by President Bush to the Ticket to Work and Work Incentives Advisory panel in 2004. A prime impetus behind Segregated and Exploited; the Failure of the DD System to Provide Meaningful Work, she provides training and technical assistance to the protection and advocacy and Client Assistance Programs nationwide and has been an invited speaker at many national conferences.

**Cindy Duch** is the Director of Individual Assistance at the PEAL Center. In addition to her work at the PEAL Center, Cindy is a 20-year-old member of the Local Task Force 3 (LTF3) for the Right to Education. Cindy is a former member of the PA Rehabilitation Council and a current member of the OVR- Pittsburgh District Office Citizen Advisory Council. She is a Commissioner on the PA Employment First Oversight Commission. Cindy also serves as a peer monitor assisting the PA Department of Education/Bureau of Special Education in monitoring the Special Education Departments of School Districts in Pennsylvania. Additionally, she represents PEAL on the Office for Dispute Resolution Stakeholder Council. Cindy lives in Allegheny

County with her husband Jim and their two sons. She has a B.S.B.A. in Economics from Robert Morris University.

**Richard S. Edley, PhD**, is the lead executive for the Rehabilitation and Community Providers Association (RCPA) in Pennsylvania, one of the largest state trade associations in the country representing providers of mental health, drug and alcohol, intellectual and developmental disabilities, children's, brain injury, medical rehabilitation, and physical disabilities and aging services. The association includes over 350 members. His professional career began in 1988 and prior to leading the association he was President and CEO of PerformCare/Community Behavioral HealthCare Network of Pennsylvania (CBHNP), a national, full-service, behavioral health managed care organization. Most recently, Dr. Edley was named to the Board of Directors of the National Council, a Washington DC based organization representing behavioral health providers and associations throughout the country. He also is a member of the PA Medical Assistance Advisory Committee (MAAC) and numerous other state task forces. Dr. Edley's baccalaureate degree is from Boston University, and he holds master's and doctorate degrees in clinical psychology from Emory University. He was an intern and post-doctoral fellow at McLean Hospital, where he held a faculty appointment at Harvard Medical School, Department of Psychiatry. Dr. Edley is a national presenter and is published in a broad variety of health care areas.

**Michele Leahy, CPWIC, MS** is the founder and CEO of Leahy Life Plan, a firm dedicated to life planning for those with disabilities as well as their families. In 2009, Michele started her journey by obtaining her Certification in Work Incentive Planning through an approved Social Security Administration (SSA) program established through the SSA Ticket To Work Program. Ms. Leahy has an M.S. in Nonprofit Management from Eastern University and a B.A. in Communications, Division of Humanities, from Penn State. In 2019 Ms. Leahy was appointed by PA Governor Wolf to serve on the PA Rehabilitation Council (PaRC). Ms. Leahy was the first non-veteran Executive Board Member of the United Spinal Association, a national disability rights organization, where she served for over 8 years.

**State Representative Dan Miller.** Dan served his community in the Army National Guard, as a Team Leader in the AmeriCorps National Civilian Community Corps, and as a public-school history teacher. Upon passing the bar, Dan became a public defender in Allegheny

County, primarily representing juveniles. He later joined the Allegheny County Law Department as a county solicitor assigned to Family Court, where he worked to ensure children were safe in their homes and received a proper education. In 2005, Dan joined the Mt. Lebanon Fire Department as a volunteer firefighter and was elected a Mt. Lebanon Commissioner in 2007. Dan was elected to the Pennsylvania House of Representatives in 2013, where he spent most of his time as an advocate on the Judiciary, Labor, Education, and Human Services committees. As a legislative champion of disability and mental health issues, Dan hosted dozens of community events, covering over 100 related topics and partnering with hundreds of community service providers and nonprofits. In 2018, Dan served as Allegheny County Delegation Chair and would go on to join House Democratic leadership as Minority Caucus Chair in 2020. Last term, Dan was unanimously elected to serve in the key Majority Whip position. He currently serves as the Chair of the Committee on Committees and the Chair of the Judiciary Committee's Subcommittee on Crime and Corrections. Dan lives in Mt. Lebanon with his wife, Kim, and their son.

**Andrew Pennington** is the Deputy Director of the Pennsylvania Client Assistance Program (CAP). He is a council member of the PA Rehabilitation Council and serves on multiple Citizens Advisory Councils that meet to discuss potential barriers within the Vocational Rehabilitation Process at the district office level. He participates in the policy development process for the Office of Vocational Rehabilitation. He is an advocate for individuals seeking services from the Office of Vocational Rehabilitation, Centers for Independent Living, and programs, projects and facilities funded under the Rehabilitation Act of 1973 as amended. He also provides individuals and programs training on services funded under the Act and Title 1 of the ADA throughout Pennsylvania.

**Susan Tachau** is the President of Appalachian Assistive Technology Loan Fund. She is also the founder and retired CEO of Pennsylvania Assistive Technology (PATF), Pennsylvania's Alternative Financing Program as designated by the federal Assistive Technology Act. Both AATLF and PATF are Community Development Financial Institutions. Susan is the co-author of many of PATF's publications, including the financial education curriculum, *Cents and Sensibility: A Guide to Money Management and Funding Your Assistive Technology*. Prior to her work at PATF, Susan was the policy director at the Institute on Disabilities, Temple University. Susan serves on several Boards of

Directors including the PA Statewide Independent Living Council and the National Disability Finance Coalition. She received a B.A. from Colorado College, an M.A. from Rutgers University, and an honorary Doctor of Humane Letters from Colorado College. Susan and her husband are the parents of an adult son who has a disability and who lives in his own home and is employed as a policy advocate.

**Susan Miller Tomasic** graduated from Messiah (College) University with a B.S. in education. After more than a dozen years as a classroom teacher, Susan made a career change to corporate training coordination. Susan began working for the PA Statewide Independent Living Council, was later appointed by Gov. Rendell to the PA SILC board, and now serves as its chair. Susan has been an active advocate for the disability community at local, state, and national levels for more than 22 years. Susan, her husband, Frank, and their children, Jason, and Leah, reside in South Hanover Township, Pennsylvania.

**Heidi Tuszynski MS, NCC, LPC** is a national certified counselor and a licensed professional counselor. Heidi holds a bachelor's degree in social work from Mercyhurst University and a master's degree from Gannon University located in Erie, Pennsylvania. Heidi resides in Erie with her family. She has over 25 years of experience working for nonprofits in the Erie community working with grieving children, individuals with visual impairments and blindness, individuals with mental health issues, and advocating for parents and children with disabilities in the educational system. Heidi has previously held the position of Chair of the Pennsylvania Rehabilitation Council and was an active member of the Governor's Advisory Committee for persons with disabilities before it was disbanded. At the present time, Heidi is the owner of Heidi Tuszynski Counseling where she provides counseling to persons with disabilities. She specializes in grief and loss counseling and is a trauma certified therapist

## Appendix B. Glossary

### 14C Certificate

Section 14(c) of the Fair Labor Standard Act allows employers to apply to get a 14C Certificate. A business that has a 14C can pay their employees less than the minimum wage when their disabilities impair their productivity for the work being performed

### 2380 - Adult training facility

A place where services are given to four or more people who are 59 years old or younger and do not have a dementia-related disease. The services include helping with personal needs, daily activities, and providing activities to help them function better.

### 2390 - Vocational facility

A place where people with disabilities go for part of the day to get job training or work that helps them learn new skills or get better at old ones. It can be considered rehabilitative, habilitative or employment training.

### Competitive Integrated Employment (CIE):

This means:

- Work that is performed on a full-time or part-time basis
- Wage is at least the same rate as it would be for employees without a disability in the same position and is At least state or local minimum wage law
- Benefits are the same as for other employees.
- The workplace is at a location where the employee interacts with other persons who are not individuals with disabilities
- As appropriate, there are opportunities for advancement that are like those for other employees who are not individuals with disabilities and who have similar positions.

### Employment First

The idea that Competitive Integrated Employment is the first consideration and preferred outcome for individuals with a disability.

### Section 520 of the Procurement Code

Under Section 520, companies that have a workforce where 75% of the direct labor is provided by employees with disabilities get state contracts for things they make or services they provide without having

to compete with other companies. The state decides a fair price for these things through the PA Department of General Services (DGS).

## Appendix C. Employment First Cabinet Responsibilities

The Cabinet members should answer the question “Is this provision being implemented and if so, how?” for the following applicable requirements.

<b>Applicable Department(s)</b>	<b>Employment First Act Section</b>	<b>Requirement(s)</b>
Governor's Office	6(f)	Provide enough staff, supplies, and money to allow the Commission to perform its duties.
State and county agencies	4(a)	Competitive Integrated Employment should be the first choice for all people with disabilities who are eligible to work under federal or state laws, no matter how severe their disability is or the help they need.
	4(a)	Young people with disabilities should have work-based learning experiences.
	4(a)	Everyone with a disability who gets public services should have a chance to get help with finding a job, no matter if they live on their own or in a group home
	4(d)2	Agencies should recognize exceptional service providers that help people with disabilities find and keep CIE as "Employment Champions." These providers should display their commitment to Employment First and helping

		<p>people with disabilities find and keep CIE.</p> <p>Employment champions will receive support to improve their employment services.</p> <p>A complete list of Employment Champions will be showcased on the State agencies' websites</p>
	4(g)	<p>Agencies should share data and information across systems to track Employment First progress.</p> <p>State agencies are encouraged to establish clear and measurable goals and objectives.</p>
	4(h)(1)	<p>All agencies should try to hire people with disabilities so that they make up at least 7% of the total state workforce.</p>
	4(h)(2)	<p>Every two years, state agencies should review their practices for hiring, jobs placement, and career advancement opportunities for Employment First effectiveness.</p>
State and county organizations that offer publicly funded education,	4(c)	<p>Cross system collaboration should work to make sure that the programs, policies, and funding support people with disabilities to get Competitive integrated Employment (CIE).</p>
	4(d)1	<p>Agencies should review payment policies for providers</p>

training, and services for working-age Pennsylvanians with disabilities		and incentivize, when possible, providers who help people with disabilities find and keep CIE.
	4(e).	Ensure that staff understand and can abide by the policies of Employment First.
	4(f)	Agencies should create clear annual goals for CIE for people with disabilities.  Each agency must annually evaluate their progress in achieving these goals. This information should be easy for the public to access and is posted on their official website.
Office of Administration	4(h)(4)	OA should maintain a system for people to voluntarily disclose their disability.
State and county agencies that provide publicly funded education, training, employment, and related services for working-age individuals with disabilities	4(j)	By October 1 <sup>st</sup> of each year, agencies will provide information based on subsections (f) and (g), and any other needed information to the Governor's Office of Policy and Planning for its annual report for the General Assembly. This report will show how state agencies are following this act and making improvements. The report must be given to the General Assembly by January 30th each year.

<p>Cabinet</p>	<p>5(c)(1)(i &amp; ii)</p> <p>5(c)(2)(i, ii, &amp; iii)</p> <p>5(d)</p> <p>5(e)</p> <p>.</p>	<p>The Cabinet should:</p> <ul style="list-style-type: none"> <li>● Examine the current rules, policies, and steps connected to helping people with disabilities find community integrated employment,</li> <li>● Ensure that the descriptions of services, rules, and how payments are set are the same or match up in state agencies, both within each agency and between different agencies.</li> <li>● Create suggestions for changes in rules, guidelines, and steps that are needed to make sure that Employment First is put into action. These suggestions will go to the Governor, the Secretary of Education, the Secretary of Human Services, the Secretary of Labor and Industry, the Secretary of Administration, and the Secretary of General Services.</li> <li>● Create suggestions for making sure that data is collected in an efficient way and can be shared in a way that can be enforced. These suggestions will be sent to the Governor, the Secretary of Education, the Secretary of Human Services, the Secretary of Labor and Industry, the Secretary of Administration,</li> </ul>
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		<p>and the Secretary of General Services.</p> <ul style="list-style-type: none"><li>● Make recommendations to the Governor regarding changes in the law that are needed to support and put this act into action.</li><li>● Promote collaboration among different state agencies, especially at the local and regional levels, while encouraging the development and adoption of agreements between local entities of these agencies to promote Employment First.</li><li>● Meet quarterly to create policies that ensure that all government departments follow the rules of Employment First.</li></ul>
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## Appendix D: 2025 Department Self-Assessments

### Department of Human Services (DHS) 2025 Employment First Self-Assessment

#### **Q1. What progress has been made to address the EFOC's recommendations from last year's annual report? ([EFOC 2024 Report](#))**

The 2024 EFOC annual report includes goals, objectives, and recommendations. Because this question specifies progress that has been made for recommendations, this response only addresses the EFOC's recommendations for DHS in the 2024 annual report.

##### *Recommendation 1: Merge Subminimum Wage Licenses*

This recommendation suggests that DHS<sup>5</sup> review which licensed facilities can pay subminimum wage and limit payment of subminimum wage to licensed vocational facilities under 2390. The EFOC is concerned that facilities licensed under both 2380 and 2390 being able to pay subminimum wage creates confusion.

55 Pa. Code § 2380 applies to adult training facilities, which are defined as, "A building or portion of a building in which services are provided to four or more individuals, who are 59 years of age or younger and who do not have a dementia-related disease as a primary diagnosis, for part of a 24-hour day, excluding care provided by relatives. Services include the provision of functional activities, assistance in meeting personal needs and assistance in performing basic daily activities." Section 2380.15 states that "If an individual is paid below minimum wage for work performed, the facility shall have a valid Federal or State wage and hour certificate authorizing payment of subminimum wages."

55 Pa. Code § 2390 applies to vocational facilities. Vocational facilities assist clients in the development of skills necessary for placement in a higher-level vocational program and ultimately into competitive employment.

The Office of Developmental Programs (ODP) is in the process of reviewing its licensing structure. In the current licensing structure,

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<sup>5</sup> In the EFOC's annual report, DHS is referred to as the "Department of Homeland Security", that is incorrect.

once a 2380 surpasses a certain threshold for subminimum wage, it must be licensed as a 2390. The emphasis on licensing structure in the EFOC annual report seems misplaced, particularly when the EFOC also includes the objective in a non-DHS section to eliminate the subminimum wage in Pennsylvania. If the EFOC's concern is that some people who are being paid subminimum wage are not being counted, DHS does not share that concern due to federal requirements and the Office of Vocational Rehabilitation's (OVR) reporting.

Employers who hire workers with disabilities who are paid subminimum wages must have been issued a certificate by the Wage and Hour Division of the U.S. Department of Labor. This is known as a 14(c) certificate. The Wage and Hour Division publishes a list of employers that hold or have applied for certificates issued under section 14(c) of the Fair Labor Standards Act. The list contains the following information: certificate type, employer name, employer address, whether the application for the certificate was an initial or renewal application, whether the employer indicated it held government contracts covered by either the Walsh-Healey Public Contracts Act (PCA) or the McNamara O'Hara Service Contract Act (SCA) at the time of application, and the number of workers with disabilities who were paid subminimum wages by the certificate holder during their most recently completed fiscal quarter. Although this list does not provide a census of subminimum wage employment, it is useful for tracking facilities.<sup>6</sup>

In addition, ODP annually reports on the Employment First Data Dashboard the number of ODP enrollees receiving OVR Section 511 Career Information and Referral Sessions counseling, which is annually required for individuals who are working in or seeking jobs that pay subminimum wage.

To help people transition from positions paying subminimum wage to competitive integrated employment, OVR and ODP have recently held a listening session during the ODP Information Sharing Advisory Committee (ISAC) meeting in April 2025 to gather input from the disability community, providers, and other stakeholders on the eventuality that subminimum wage will end. ODP also collaborates with OVR to implement the Disability Innovation Fund (DIF) grant Subminimum Wage to Competitive integrated Employment (SWTCIE)

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<sup>6</sup> [14\(c\) Certificate Holders | U.S. Department of Labor](#)

– known as Project InVEST in PA. InVEST will connect individuals who may be considering or are currently participating in subminimum wage employment to consider and pursue competitive integrated employment through a variety of collaborative and innovative solutions that build supports around the individual and the employer.

DHS submitted a joint comment with the Department of Labor & Industry (L&I) on a proposed federal rule<sup>7</sup> that would stop issuance of new section 14(c) certificates and to phase out existing certificates over several years. DHS and L&I are generally supportive of the proposed rule and recommended a five-year phase out to allow adequate time to create new services, train providers on national best practices, and ensure collaboration between state agencies, community rehabilitation providers, and employers.

Modifying the licensing structure to limit subminimum wage activities is not the fastest or most effective way to pursue the EFOC's goal of eliminating the subminimum wage in Pennsylvania.

*Recommendation 2: Public Awareness of Benefits for Workers with Disabilities*

As noted in the 2024 EFOC annual report, DHS initiated a monthly mailing to increase awareness of Medical Assistance for Workers with Disabilities (MAWD). This mailer is sent to individuals closed in Medical Assistance for being over income who also have a certified disability. This is to target individuals who may be eligible for MAWD.

*Recommendation 3: Improve Safeguards from Loss of Benefits*

This recommendation encourages DHS to work with technology and data organizations to flag potential errors that could cause an individual to lose benefits without adequate time to address the issue before losing services.

Before closing the MAWD budget, the CAO determines whether the individual is eligible for other Medical Assistance groups.<sup>8</sup> The income maintenance caseworker also fills out the Medical Assistance Closure Checklist to serve as a manual check on Medical Assistance closures.<sup>9</sup>

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<sup>7</sup> [Federal Register :: Employment of Workers With Disabilities Under Section 14\(c\) of the Fair Labor Standards Act](#)

<sup>8</sup> Medical Assistance Eligibility Handbook, 316.9 MAWD Closures.

<sup>9</sup> [PA 1961.pdf](#)

DHS consistently works to improve systems to prevent errors. We have requested specific examples of errors from the EFOC during meetings in fall 2024 and winter 2025.

*Recommendation 4: Support On-Demand Transportation*

The EFOC recommends that DHS review home and community-based waiver programs to support on-demand transportation, such as Uber and Lyft, to enable individuals to get to their jobs using waiver funding.

DHS is limited in the ability to support on-demand transportation due to constraints in the Centers for Medicare and Medicaid Services (CMS) waiver requirements. ODP already includes on-demand transportation as a type of public transportation in its waivers.

The Office of Long-Term Living (OLTL) has the following requirement in the 2024 Community HealthChoices (CHC) Managed Care Organization (MCO) agreement, "The CHC-MCO must provide all NFCE [Nursing Facility Clinically Eligible] Participants with non-medical transportation. The CHC-MCO may provide non-medical transportation to other Participants at its own discretion and own cost. Non-medical transportation includes transportation to community activities, grocery shopping, religious services, Adult Daily Living centers, employment and volunteering, and other activities or LTSS services as specified in the Participant's PCSP [Person Centered Service Plan]." This language is consistent in the 2025 CHC agreement. As noted in OLTL Bulletin 07-23-04,<sup>10</sup> service coordinators are responsible for ensuring "that transportation needs to achieve or maintain employment are addressed in the development and monitoring of the participant's PCSP [Person Centered Service Plan]." The CHC MCOs may utilize Uber or Lyft either as a directly enrolled provider or through their transportation broker.

OLTL uses the Consumer Assessment of Healthcare Providers & Systems (CAHPS) survey for CHC that includes questions related to barriers to employment. A summary of CAHPS results is included later in the self-assessment. The employment module of the 2025 home and community-based services (HCBS) CAHPS survey indicated only 6% of respondents considered transportation as an employment

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<sup>10</sup> [Employment-and-Employment-Related-Services-Bulletin-Clean\\_06.13.2023.pdf](#)

related challenge. The biggest and ongoing barrier is health concerns, which was indicated by 76% of the respondents.

*Recommendation 5: Incentivize Support/Service Coordinators with Improved Employment Outcomes*

This recommendation is for DHS to “either directly incentivize or encourage incentivizing Supports Coordinators/Service Coordinators (SC)”. As noted in the 2024 annual report, ODP plans to explore this through “Selective Contracting for SCs in 2026” and OLTL has pay for performance measures for the CHC-MCOs.

On April 19, 2025, ODP announced the opportunity for public comment on proposed changes to implement performance-based contracting for Supports Coordination services in the Consolidated, Person/Family Directed Support (P/FDS) and Community Living Waivers as well as Targeted Support Management. The proposed changes were available for public comment until May 26, 2025. Under the implementation plan,<sup>11</sup> ODP will use performance-based contracting to establish performance standards for SCOs. During the initial three years, ODP will monitor, support, annually evaluate SCOs’ progress toward meeting performance standards, and assign each SCO to a tier. Four of the performance standards and measures are related to employment, including:

- Demonstrated support of individuals to seek and obtain Competitive Integrated Employment (CIE).
- Demonstrate tracking of CIE and percentage of working age individuals (18-64) with CIE.

The proposed changes to the waivers are scheduled to take effect January 1, 2026.

OLTL is monitoring the impact of the pay for performance measures for the CHC-MCOs. These pay for performance measures are designed to encourage the CHC-MCOs to incentivize employment outcomes. In 2024, AmeriHealth Caritas Pennsylvania and Keystone First launched an upside-only Employment Services Value-Based Incentive Payment Program for Employment Services Providers to promote employment retention. AmeriHealth Caritas presented on this program at the March Long-Term Services and Supports subcommittee meeting.

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<sup>11</sup> [performance-based-contracting-supports-coordination-implementation-plan.pdf](#)

Through the AmeriHealth Caritas Pennsylvania and Keystone First program, Employment Services Providers may receive an incentive payment of up to \$10,000, per Participant, who they helped to become employed and who remained employed for 6+ months. AmeriHealth Caritas and Keystone First ended 2024 with 504 employed HCBS Participants, of those Participants, 465 meet Competitive and Integrative Employment (CIE) criteria as outlined in the 2024 CHC Agreement. As of March 2025, AmeriHealth Caritas and Keystone First reported that they have achieved more than 29% growth in CIE employment since January 2024.

*Recommendation 6: Financial Education Program*

The EFOC recommends that by 2026 DHS work with CMS to obtain approval of a standalone service for financial education. The benefits counseling services largely meet this need. For example, ODP has financial education embedded in multiple different services. CMS generally steers states away from additional waiver services that are duplicative.

*Recommendation 7: Work with PDE to Improve Training for Youth who are Incarcerated*

This recommendation is that DHS “create and launch a joint initiative with the Pennsylvania Department of Education (PDE) to support vocational training and skill development for youth with disabilities” by September 2025. Youth who are justice-involved are entitled to the same educational rights as other youth. These youth are already captured in PDE data on youth with disabilities.

DHS has asked for clarity from the EFOC on this recommendation. DHS is presenting to the EFOC on the Bureau of Juvenile Justice Services during the June 2025 EFOC meeting.

*ODP Recommendation 1: Update Service Definitions for Advanced Supported Employment*

This recommendation is for DHS to review the definition of advanced supported employment because not many people are using the service.

ODP does not plan on revisiting this definition until 2026 or 2027 at the earliest due to maintenance of effort requirements tied to American Rescue Plan Act funds. ODP estimates that less than 20 people use advanced supportive employment services. When ODP

developed advanced supported employment services, it was meant to provide an outcome-based payment model.

If ODP does review advanced supported employment, it will be conscious not to duplicate supported employment services. ODP believes that many of the needs that advanced supported employment services could address are already being met by supported employment services.

#### *OLTL Recommendation 1: Review Each MCO's Employment Rates*

The EFOC recommends that OLTL will annually work with the CHC-MCOs to review rates for supported employment services, check how successful these services are, and decide if the rates need to be increased.

OLTL sets a minimum payment requirement for CHC-MCOs. Some MCOs use fee for service and others use pay for performance. The annual CHC agreement has the requirements for provider network composition and service access, which OLTL monitors to ensure participants have access to these services. Supported employment services are based on the full-time equivalent (FTE) calculations developed by the Department for services where the provider is traveling to the participant. For services where the participant is traveling to the provider, the CHC-MCO must ensure a choice of two (2) providers who are accepting new clients within the travel time limits (thirty (30) minutes Urban, sixty (60) minutes Rural).

In addition, OLTL is the payer of last resort. CHC participants go to OVR first. Referrals to OVR must be made before Medicaid waiver-funded employment-related services may be authorized unless the participant has already been deemed ineligible by OVR and/or has a closed OVR case. If OVR has not made an eligibility determination within 120 days of a referral being sent, then OVR services are considered to not be available to the participant, and OLTL employment services may be provided under an OLTL program.

#### *OLTL Recommendation 2: Direct Caregiver Wages*

The EFOC recommends that "OLTL should create a plan to improve direct caregiver services, allowing more participants to obtain CIE [Competitive Integrated Employment]."

As part of this plan the EFOC would like OLTL to:

- Create a wage equalization fund for the sole purpose of increasing CHC direct care workers’ wages to a level equal to direct support professional workers in the ODP waivers or prevailing marketplace wages, whichever is higher. This fund should be separate from the capitated rate paid to the MCOs to ensure it is not used for other purposes.
- Create an enhanced tier of personal assistance services for CHC waiver participants with complex conditions with a higher pay rate, like the enhanced in-home and community supports service under the ODP waivers.
- Require CHC-MCOs to report unfilled personal assistance services hours to OLTL along with their other monthly reports.
- Review wage rates on an annual basis to determine wage comparability with prevailing wages in the marketplace.

The terminology in this recommendation should be direct care worker instead of direct caregiver. Each of the CHC MCOs is required to have someone on staff who supports direct care workers.

This recommendation identifies unfilled personal assistance hours as a barrier to employment and seeks to increase direct care worker payment as a solution. The Consumer Assessment of Healthcare Providers & Systems (CAHPS) survey includes questions related to barriers to employment. Below are the results of the CAHPS survey for what survey respondents who wanted to work identified as their barriers to employment.

2025 HCBS CAHPS Employment Module Results

The results in Chart 4-3a below represent responses from the 16 percent of respondents (n=424) who did not work but wanted to work for pay and provides their responses for what was holding them back from working. Most respondents (76 percent) responded that health concerns holding them back from working. Note that this question is a ‘Mark all that apply’ item so the percentages will not sum to 100 percent.

<b>Chart 4-3a Reasons for Not Working when the Respondent Wanted to Work</b>	
What was holding respondent back from working	
Health Concerns	76%
Other	28%
Looking/Can’t find work	7%
Job resources	7%

Training/Education need	6%
Transportation	6%
Benefits	6%
Advice from others	4%
Issues with previous employment	2%
Nothing holding me back	2%
Child care	0%

The Governor’s proposed budget also invests \$21 million to increase direct care worker wages for those who provide services to adults with physical disabilities and seniors in the participant-directed model through Community HealthChoices. The investment includes a wage increase, paid time off, and increases access to affordable insurance for approximately 8,500 workers.

*Office of Mental Health and Substance Abuse Services (OMHSAS)  
Recommendation 1: Adding Employment Services to the “Community-Based Care Management” Program*

The EFOC recommends that DHS explore adding employment services to the “Community-Based Care Management” program, which, according to the EFOC, would allow Behavioral Health Managed Care Organization (BH-MCOs) “to choose to offer employment services as part of an overarching plan to address social determinants of health.”

Employment services are not required for BH-MCOs to offer. OMHSAS has a strong working relationship with the counties and would be able to support the counties through collaborative efforts to improve the system for employment.

DHS suggests changing the recommendation to: OMHSAS will hold quarterly meetings with county Employment Specialists who assist individuals with a behavioral health diagnosis in order to increase collaboration among counties in addressing challenges and promoting solutions to employment services.

*OMHSAS Recommendation 2: Explore Expansion of Community Autism Peer Specialists (CAPS)*

The EFOC recommends that DHS “explore funding opportunities to expand CAPS across the state, with funding from Behavioral Health Choices, ODP, and/or OVR.” CAPS is a program that the BH-MCO in Philadelphia decided to fund. It is not currently feasible for OMHSAS to

fund the expansion of CAPS. OMHSAS can facilitate collaboration so that BH-MCOs can share the programs they support and the success of those programs.

**Q2. What are your Department's Employment First goals (These should be identified within the Department. Examples could include increase in the percent of employed participants, new programs, new MOUs...)?**

DHS is committed to helping Pennsylvanians with disabilities be a part of an inclusive community that they deserve, and supporting opportunities to work is an important part of building inclusion and fostering independence and empowerment. Employment services are embedded across our Medicaid program, and we work with people covered through Medicaid to understand how they can work and pursue goals without jeopardizing access to necessary services and supports. Through a gradual and systematic approach, we can create a more equitable and inclusive employment landscape for all Pennsylvanians while ensuring that individuals with disabilities have the support they need.

Our goal is to increase the number of individuals we serve with CIE. We do this by working with the provider community and the disability community to ensure that we meet this goal by centering individuals with disabilities.

**Q3. Explain implementation plans and/or timelines for these goals.**

DHS has engaged in a broad-based effort to support providers in transforming their services. In 2022, DHS partnered with OVR on a five-year, \$13M federal grant that will pilot models for provider transformation to support the move from sheltered and subminimum wage work to competitive integrated employment in line with the Employment First Act.

Progress continues to be made in the number and percent of people employed aged 18-64 enrolled with ODP. As of September 2024, there are 8,358 individuals served in ODP home and community base programs who are employed. Of these individuals, 8,082 are in competitive employment positions. From September 2018 to September 2024, there was a 36% increase in persons being competitively employed (increase of 2,208 persons).

In September 2024, ODP developed and disseminated a second year of county level employment reports. The reports included data on competitive integrated employment, employment services, and employment goals evaluated by race for each county or county joiner. ODP also developed an Analysis Guidance tool designed to assist counties in evaluating the provided data, including identifying potential racial disparities or barriers to employment services. ODP also distributed a survey to solicit feedback from the county or county joiners to learn more about existing disparities, plans to address disparities, and ways in which future reports and technical assistance could be improved

As part of performance-based contracting, ODP is implementing pay for performance. Pay for performance is available for providers to develop and implement a plan to increase competitive integrated employment for working age individuals (18-64 years of age) receiving residential services. Funding available for fiscal year 24-25 is 0.3% of annual residential revenue for calendar year 2024. In fiscal year 25-26 outcome-based payments are available for residential providers that have increased the number of people the support who have gained competitive integrated employment.

For those ages 21-64 served by CHC there are 1,036 individuals who are employed of which 979 are in competitive employment positions, as of October 2024. In 2022, 615 participants in CHC had competitive integrated employment. That number rose to 897 in 2023. That's a 45.85 percent increase in the number of individuals with competitive integrated employment in CHC from 2022 to 2023.

Both OLTL and ODP are working to increase CIE for people with disabilities through contracting provisions. ODP has the performance based contracting provisions that are being implemented for residential services and supports coordination, which are described in more detail above. OLTL has pay for performance measures in the CHC MCO contract that are being monitored to determine the effectiveness.

OLTL has also convened a transportation workgroup similar to last year's participant self-direction workgroup. This workgroup will release a public report on transportation concerns and recommendations for OLTL.

DHS also continues to have internal meetings every other month across program offices to review employment data, discuss best practices, and evaluate progress.

**Q4. What do you see as the biggest barrier(s) in reaching your Department's Employment First goals.**

One barrier is a misconception among some home and community-based services recipients about their ability to work and receive benefits. Some recipients believe they will lose Medicaid coverage if they work.

Another substantial barrier is the House budget reconciliation bill, which would result in potentially catastrophic loss of access to health care for Medicaid recipients and jeopardize access to care for the entire Commonwealth.

DHS would also benefit from legislative support to phase out subminimum wage. There is significant division from the stakeholder community on this issue. Having the backing of the General Assembly would assist the Department in transitioning individuals to competitive integrated employment.

**Q5. Is your department implementing any new initiatives to improve competitive integrated employment (CIE) for 2025-26?**

As described above, ODP is moving ahead with performance-based contracting.

Both ODP and OLTL are working to ensure people do not lose access to employment services since OVR implemented an Order of Selection on April 1, 2025.

**Q6. Are there any performance metrics or KPIs that your department already tracks that may be important to the EFOC?**

ODP issues an annual employment first report. These reports are publicly posted and go back to 2018-2019.<sup>12</sup>

The EFOC also requested supplemental data and information from DHS in addition to the data already provided for the Employment First Data Dashboard. Those requests are outlined below.

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<sup>12</sup> [Employment – MyODP](#)

*Consumer Assessment of Healthcare Providers and Systems (CAHPS)  
OLTL Survey Results*

OLTL uses the CAHPS survey for its programs. The survey includes questions on employment such as whether the respondent wanted to work in the last three months, what, if anything, is holding the respondent back from working, and whether the respondent knew that help was available.

2025 HCBS CAHPS Employment Module Results

The results in Chart 4-3a below represent responses from the 16 percent of respondents (n=424) who did not work but wanted to work for pay and provides their responses for what was holding them back from working. Most respondents (76 percent) responded that health concerns holding them back from working. Note that this question is a 'Mark all that apply' item so the percentages will not sum to 100 percent.

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Advice from others	4%
Issues with previous employment	2%
Nothing holding me back	2%
Child care	0%

*Act 150 and OBRA Employment Data*

<b>Legacy Group Employed</b>					
<b>OLTL Program</b>	<b>Year</b>	<b>Participants</b>	<b>Age Group</b>	<b>Employed</b>	<b>Percent Employed</b>
Act 150	2022	679	Under 65	45	6.63%

Act 150	2023	659	Under 65	45	6.83%
Act 150	2024	718	Under 65	52	7.24%
OBRA	2022	559	Under 65	54	9.75%
OBRA	2023	619	Under 65	62	10.02%
OBRA	2024	641	Under 65	64	9.98%

\*Data is based on wage tables and Legacy Waiver Enrollment for December of the years listed.

\*Data is based on participants Under 65 years of age

*Number of 2380 and 2390 Licensed Facilities*

As of December 18, 2024, there are 335 facilities with a 2380 license and 89 facilities with a 2390 license statewide.

Source: ODP Certification and Licensing System (CLS)

**Q1. What progress has been made to address the EFOC's recommendations from last year's annual report? ([EFOC 2024 Report](#))**

The PHRC hosted its Second Annual Disability Conference on July 9, 2024. It was widely attended by staff and members of the public both in person and virtually. All PHRC attorneys attended. It was attended by approximately 200 people.

In addition, to better educate the public, the PHRC issues press releases when it decides cases. These releases may be found here: [Newsroom | Pennsylvania Human Relations Commission | Commonwealth of Pennsylvania](#)

**Q2. What are your Department's Employment First goals (These should be identified within the Department. Examples could include increase in the percent of employed participants, innovative programs, new MOUs...)?**

1. Increase attendance at the PHRC's Annual Disability Conference by 10%
2. Continue to promote knowledge of rights and responsibilities by issuing press releases in cases decided by the PHRC.
3. Offer a minimum of three trainings to employers on disability rights and responsibilities.

**Q3. Explain implementation plans and/or timelines for these goals.**

The Annual Disability Conference this year is July 31, 2025. Over the next two months, to attract more participants, we are seeking continuing education credits. We also met with Representative Dan Miller's Office, who also hosts a successful disability conference to obtain some ideas to increase participation.

The PHRC continues to issue press releases, and we will be discussing how to include more disability rights and responsibilities topics in the trainings that we offer.

**Q4. What do you see as the biggest barrier(s) in reaching your Department's Employment First goals?**

Public engagement.

**Q5. Is your department implementing any new initiatives to improve competitive integrated employment (CIE) for 2025-26?**

N/A

**Q6. Are there any performance metrics or KPIs that your department already tracks that may be important to the EFOC?**

The PHRC makes claim data information available.

## Office of Administration (OA) 2025 Employment First Self-Assessment

### **Q1. What progress has been made to address the EFOC's recommendations from last year's annual report? (EFOC 2024 Report)**

#### Rec A: Launch Targeted Hiring Pilot

Note: Circa is used for recruitment of *non*-OVR job seekers.

The targeted hiring pilot with DMVA has proven unsuccessful. That is, no OVR customers have been successfully hired into the targeted DMVA vacancies. There have been 54 DMVA requisitions that were forwarded to OVR Counselors for referral of their customers. Thus far, only 21 OVR customers have applied to these vacancies with just 8 interviews. Unfortunately, the pilot cannot be expanded to other agencies as originally planned unless and until issues with the job-readiness, interest, and availability of OVR candidates are resolved.

#### Rec B: Increase OVR Intern Participation

The Bureau of Enterprise Recruitment (BER) received 33 requests from 15 different agencies to hire OVR interns for summer 2025. Twenty-nine applications were received from students and 23 were interviewed. Eleven were referred for placements. The end result was that 10 OVR interns were hired for 2025.

While the smaller intern class does not meet the goal to increase participation, it has resulted in important improvements to the OVR intern program. The smaller class size has allowed BER to build more developmental and networking opportunities into the program. These include sessions on professionalism, resiliency, time management, critical thinking, conflict resolution, and interview preparation.

Additionally, OVR Counselors are able to participate in the program this year by meeting with assigned interns and their supervisors to provide a more direct approach to student learning and success. Counselors can also assist with identifying student strengths, obstacles, and goals. *Please note that the Department Self-Assessments will be included as appendices in the EFOC Report*

#### Rec C: Accessible Position Descriptions and Essential Functions

Position Descriptions (PDs) are accessible, and essential functions are clearly defined. OA Bureau of Organization Management reviews all PDs before jobs are posted. Supervisors use existing templates and participate in training as needed. This recommendation should be checked off as completed.

#### Rec D: Improve Tracking of Employees with Disabilities

BER developed an anonymous and voluntary single question survey to be sent to all employees under the Governor's jurisdiction asking if they identify as having a disability or have a history or record of having a disability. The survey and accompanying FAQ sheet, along with the communications plan from our Press Office, were reviewed and edited by OA Legal and the Office of General Counsel. Our Office of Data Analytics also provided all employee email addresses as well as mailing addresses for those without a Commonwealth email account. The survey was ready to launch this month (May) and was set to be open for two weeks. However, the Governor's Office has put this on hold until the fall.

Employees and candidates are able to submit online requests for accommodations at any time during employment and the onboarding process. The number of accommodation requests and approvals/disapprovals is part of the EFOC data portal. Due to legal and confidentiality concerns, we will not be developing an automated tracking system to identify employees with disabilities. At most, we can plan to conduct this survey every few years and track responses.

#### Rec E: Increase Awareness and Participation in Disability Disclosure

Communications explaining the benefits of confidentially disclosing a disability will accompany the employee survey when it is launched. Additional awareness campaigns are being discussed for implementation later this calendar year.

The year-to-date percentages of job applicants and new hires who voluntarily identify as having a disability are 8.72% and 7.11%, respectively, according to the May monthly disability report.

**Q2. What are your Department's Employment First goals (These should be identified within the Department. Examples could include increase in the percent of employed participants, innovative programs, new MOUs...)? Please note that the**

***Department Self-Assessments will be included as appendices in the EFOC Report***

The OA will be focusing on improving the outcomes of our existing programs and goals. This includes increasing OVR intern participation and successful completion of the pilot program to hire OVR customers into non-civil service positions within state agencies. We will also continue researching other states' policies and practices as model employers to determine what we might be able to adopt.

**Q3. Explain implementation plans and/or timelines for these goals.**

We will be working with OVR and our Bureau of Enterprise Recruitment to present training in July to agency hiring managers on Disability Awareness and the benefits of hiring individuals with disabilities. We will also be working towards training OVR counselors on the application process and providing additional detailed information about the non-civil service positions that we are posting that may be of interest to their clients.

**Q4. What do you see as the biggest barrier(s) in reaching your Department's Employment First goals?**

Lack of interested, qualified, and job-ready OVR customers has been the biggest impediment to increasing numbers of OVR interns and targeted hires in the pilot program with DMVA.

**Q5. Is your department implementing any new initiatives to improve competitive integrated employment (CIE) for 2025-26?**

See above.

**Q6. Are there any performance metrics or KPIs that your department already tracks that may be important to the EFOC?**

All relevant OA data is provided to the EFOC through their data portal. There are no other existing performance metrics or KPIs that impact EFOC goals.

## Department of Health 2025 Employment First Self-Assessment

### **Q1. What progress has been made to address the EFOC's recommendations from last year's annual report? ([EFOC 2024 Report](#))**

- DoH has an Office of Health Equity that hosts monthly virtual meetings to discuss several topics and share resources among all internal and external partners, including resources for individuals with disabilities.
- DoH's [State Health Improvement Plan](#), or SHIP, a multi-year strategic plan developed in collaboration with diverse stakeholders across the state, has a focus on equity and addressing social determinants. The overall goal of the SHIP is to improve the health and life expectancy of all Pennsylvanians and eliminate health inequities by focusing on health equity, whole person care, and chronic disease prevention.
- The DOH's [State Health Assessment](#), or SHA, examines inequities by disability, such as barriers in getting the right information, lack of accommodation for people with disabilities, access to transportation, healthcare providers' competencies to treat people with disabilities, and limiting access to health care by insurance companies by denying claims to treatments and equipment. The SHA assesses the impact of social isolation on individuals living with disabilities and mental health.
- DoH program, [Special Kids Network helpline](#), is a resource to assist providers and parents of CYSHCN access local services and supports within communities. Information and resources provided by the helpline include, but not limited to education, transportation, housing, medical assistance programs, waiver programs, transitional resources, employment, equipment and assistive devices, early childhood and childcare, and supports and services.

### **Q2. What are your Department's Employment First goals (These should be identified within the Department. Examples could include increase in the percent of employed participants, innovative programs, new MOUs...)?**

- Raise Awareness: DoH continues to participate in job fairs and posts public health positions to recruit eligible, qualified employees including individuals with disabilities.

- Trainings to DoH Staff: DoH continues to provide relevant, inclusive trainings to all staff, including disability awareness & etiquette, and disability management.
- Support DoH Program(s): DoH continues to support the Special Kids Network and its efforts in assisting providers and parents of children and youth with special health care needs access local services and supports. Improve accessibility to Department services for individuals with disabilities.

**Q3. Explain implementation plans and/or timelines for these goals.**

Work is all year round.

**Q4. What do you see as the biggest barrier(s) in reaching your Department's Employment First goals?**

N/A

**Q5. Is your department implementing any new initiatives to improve competitive integrated employment (CIE) for 2025-26?**

N/A

**Q6. Are there any performance metrics or KPIs that your department already tracks that may be important to the EFOC?**

N/A

Department of Community and Economic Development 2025 Employment  
First Self-Assessment

**Q1. What progress has been made to address the EFOC's recommendations from last year's annual report? ([EFOC 2024 Report](#))**

Goal 1:

**Objective 1.A:** By December 2025, DCED will develop and implement 3 specific Employment First initiatives within its community development programs, aiming to increase job opportunities for individuals with disabilities in both urban and rural areas.

- The Shapiro Administration's passage of the FY 2024-25 bipartisan budget included \$20M for the establishment of the Main Street Matters initiative at DCED. As part of the initiative, funding was included for the establishment of accessible housing grants for people with permanent physical disabilities to allow the individuals to reside in their current home.
- DCED's NAP and NAP SPP programs may be utilized to fund projects pertaining to the advancing independence and employment for individuals with disabilities. Funding for both NAP and NAP SPP was increased in the Shapiro Administration's bipartisan FY 2024-25 passage.
- DCED cooperated with OVR to provide training to PREP and ENGAGE program recipients, who represent over 100 Economic Development Organizations across the state, on ways to increase competitive integrated employment for individuals with disabilities.
- DCED's Multimodal and Greenways, Trails, and Recreation Program are often utilized to increase the accessibility of walkways, trails, and other paths of travel.
- DCED's Manufacturing PA Training to Career may be utilized for projects to increase career training for individuals with disabilities.

**Objective 1.B:** By June 2025, DCED will establish partnerships with at least 3 statewide workforce development boards and the Office of Vocational Rehabilitation (OVR) to ensure that individuals with disabilities are actively included in all economic development projects, with formal agreements (MOUs) in place.

- DCED participates in the Pennsylvania Workforce Development Board Interagency Working Group, which includes department leads from OVR, DHS, and other departments and offices that interface with the

**Objective 1.C:** By September 2025, DCED will create and launch 2 pilot projects focused on promoting entrepreneurship among individuals with disabilities, ensuring that these initiatives are closely monitored for participation and success rates.

- DCED provided training to OVR staff to provide assistance and tools that OVR staff may utilize when providing assistance to individuals with disabilities that are interested in starting businesses.
- In 2025, DCED hired a Director of Historically Disadvantaged Business Assistance that will work with business assistance centers to provide technical assistance for owners of historically disadvantaged businesses, which may include businesses that are owned by individuals with disabilities.

## **Goal 2:**

**Objective 2A.** By June 2025, DCED will implement a service delivery tracking system that monitors the timeliness of economic development services provided to all participants, including the development and distribution of a customer satisfaction survey tailored to individuals with disabilities, with the collected feedback used to continuously improve service delivery.

- DCED's Customer Service Office and Business One Stop Shop continuously provide a touchpoint for grantees to provide feedback to the Department on the availability and accessibility of DCED programs.

**Objective 2.B:** By December 2025, DCED will establish a feedback loop that includes regular consultations with disability advocacy groups to ensure that the needs and concerns of individuals with disabilities are being addressed in all community and economic development programs.

- DCED continuously participates in meetings of the Employment First Oversight Commission.

### **Goal 3:**

**Objective 3.A:** By December 2025, DCED will develop inclusive economic development guidelines that require all funded projects to demonstrate how they will support individuals with disabilities, with compliance monitored through regular audits.

- Language was developed and inserted in DCED guidelines as they were renewed stating the policy of the Department and the Commonwealth established in Act 36 that all individuals with a disability eligible to work under Federal or State law, regardless of severity of disability and assistance required, be employed in competitive integrated environments.

**Objective 3.B:** By June 2025, DCED will train at least 100 staff members and key stakeholders on inclusive economic development practices, ensuring that these principles are embedded in everyday operations and decision-making.

- DCED provided training to OVR staff to provide assistance and tools that OVR staff may utilize when providing assistance to individuals with disabilities that are interested in starting businesses.
- OVR provided training to DCED staff on the employment of individuals with disabilities, including the Commonwealth's competitive integrated employment policy and other inclusive practices.

**Objective 3.C:** By September 2025, DCED will publish an annual report detailing the progress of inclusive economic development initiatives, including metrics on the participation and success of individuals with disabilities in DCED programs.

- DCED participates in the publication of the annual Employment First Oversight Commission and the annual Employment First Cabinet Reports.

**Q2. What are your Department's Employment First goals (These should be identified within the Department. Examples could include increase in the percent of employed participants, innovative programs, new MOUs...)?**

- Strengthen and expand the partnership between DCED and OVR to raise awareness of available services and create greater opportunities for collaborative employment of OVR clients.
- Continue to partner with the office of the First Lady to identify and create opportunities for competitive integrated employment

**Q3. Explain implementation plans and/or timelines for these goals.**

- DCED does not currently have established timelines and implementation plans in place. DCED will work to formalize existing processes and relationships in FY 25-26 to establish timelines and implementation plans.

**Q4. What do you see as the biggest barrier(s) in reaching your Department's Employment First goals?**

One of the biggest barriers to reaching these goals is staff capacity. Additionally, limited ability to track consumer information will create barriers in tracking agency progress. Though we can encourage grantee participation in these tracking programs we do not have the ability to mandate participation.

**Q5. Is your department implementing any new initiatives to improve competitive integrated employment (CIE) for 2025-26?**

The Department of Community and Economic Development continues our active participation in the internship program.

**Q6. Are there any performance metrics or KPIs that your department already tracks that may be important to the EFOC?**

DCED does not have any performance metrics or KPIs we feel are important to the EFOC.

## PennDOT 2025 Employment First Self-Assessment

### **Q1. What progress has been made to address the EFOC's recommendations from last year's annual report? ([EFOC 2024 Report](#))**

PennDOT held a staff meeting with the Office of Vocational Rehabilitation (OVR) to discuss the Driving with Bioptics and Dual Permit Control Programs.

The group identified several opportunities to improve the Driving with Bioptics Program: Refine the online practitioner lists (PennDOT and L&I), Evaluate the potential to improve reimbursement rates for participating providers (L&I), Evaluate options for increasing the number of providers.

The Dual Control Restriction program exists outside of PennDOT. The department provides certain forms and links to an external site with training providers. There may not be any operational improvement opportunities on the department's end.

However, the Policy Office intends to share this material with sister agencies and outside partners at committee meetings in the next 12 months.

PennDOT staff will be participating in a National Cooperative Research Program project NCHRP 15-89 [Anticipated] Identifying and Addressing the Needs of Pedestrians with Vision Impairment at Protected Intersections with Separated Bicycle Lanes over the next 24 months to develop best design / planning practices that will be included in the department's design manual and other publications.

### **Q2. What are your Department's Employment First goals (These should be identified within the Department. Examples could include increase in the percent of employed participants, innovative programs, new MOUs...)?**

Goal 1: Enhance Transportation Accessibility for Employment using PennDOT's available resources – state and federal funding / research funds, and updates as appropriate to our design manuals (PROWAG / AASHTO standards).

Goal 2: Improve Transportation Models for Rural and Non-Traditional Work Shifts Improve transportation models to better serve rural areas and non-traditional work shifts.

**Q3. Explain implementation plans and/or timelines for these goals.**

Work is ongoing and extremely funding dependent – state and federal.

**Q4. What do you see as the biggest barrier(s) in reaching your Department's Employment First goals?**

Transit Funding at the state and federal level is likely to significantly reduce in the next several years leading to potential reductions in service.

**Q5. Is your department implementing any new initiatives to improve competitive integrated employment (CIE) for 2025-26?**

The department is contemplating a transit study to better capture the public needs, including persons with disabilities, and there may be future opportunities if a Shared Ride Advisory Committee is created in 2025.

**Q6. Are there any performance metrics or KPIs that your department already tracks that may be important to the EFOC?**

Nothing beyond what is reported now.

## Department of State 2025 Employment First Self-Assessment

### **Q1. What progress has been made to address the EFOC's recommendations from last year's annual report? ([EFOC 2024 Report](#))**

The Department of State (Department or DOS) was not referenced in the EFOC 2024 Report. The Department was referenced in the January 30, 2025, Cabinet Annual Report, where we noted that we and other departments "have made considerable progress in intentionally creating new processes to make the Commonwealth's employment systems to be more inclusive of individuals with disabilities. We are continuing our work to ensure that DOS is a model Commonwealth employer for individuals with different abilities.

We have also continued our work to reduce barriers to licensure and to ensure less burdensome pathways exist for qualifying individuals, including people with disabilities, to access the gainful employment available in licensed professions.

### **Q2. What are your Department's Employment First goals (These should be identified within the Department. Examples could include increase in the percent of employed participants, innovative programs, new MOUs...)?**

The Department did not have Employment First Goals identified in the 2024 Report. Since then, the Department intends to:

- 1) Set clear Employment First goals.
- 2) Serve as a bridge for the stakeholders representing the disabled to present their concerns, perspectives, and potential solutions to the relevant licensing boards to ensure equal opportunity for gainful employment in a licensed profession.
- 3) Track and evaluate internal programs, initiatives, and partnerships intended to increase opportunities for individuals with disabilities to work for DOS.

### **Q3. Explain implementation plans and/or timelines for these goals.**

The Department intends to:

- 1) Set clear Employment First goals by the end of next quarter, September 30.
- 2) Direct disability stakeholders concerned about a board's licensing processes who reach out to the Department's Bureau of Professional and Occupational Affairs to the relevant licensing board **on an ongoing basis**.
- 3) Track and evaluate internal programs, initiatives, and partnerships on an ongoing basis, with the development of these metrics coinciding with the **September 30** timeline for goal setting.

**Q4. What do you see as the biggest barrier(s) in reaching your Department's Employment First goals?**

The Department is committed to ensuring that internal resources are dedicated to improving gainful employment of differently abled Pennsylvanians. The Department anticipates that it may identify opportunities for reducing licensing barriers for disabled individuals which require legislative action. This remains speculative until the Department is able to further identify licensing barriers. The Department looks forward to working with stakeholders to identify these barriers.

**Q5. Is your department implementing any new initiatives to improve competitive integrated employment (CIE) for 2025-26?**

The Department follows all Commonwealth hiring initiatives, posting positions on the Commonwealth Careers site to reach the most applicants. The Department looks forward to creating a video for K-12 schools to share with students, providing a snapshot of the different job opportunities and career paths with the boards we administer.

**Q6. Are there any performance metrics or KPIs that your department already tracks that may be important to the EFOC?**

As the Department is in the process of setting goals, it does not have currently operational KPIs.

## State Civil Service Commission 2025 Employment First Self-Assessment

**Q1. What progress has been made to address the EFOC's recommendations from last year's annual report? ([EFOC 2024 Report](#))**

EFOC's recommendations related to the Executive Branch (EB) and Office of Administration (OA) (including Civil Service policy office) are services and programs that fall under the administrative jurisdiction of the OA not the State Civil Service Commission.

**Q2. What are your Department's Employment First goals (These should be identified within the Department. Examples could include increase in the percent of employed participants, innovative programs, new MOUs...)?**

To continue to support the efforts of the Governor's Cabinet for People with Disabilities and the Employment First Oversight Commission to improve and enhance the lives of individuals with disabilities.

**Q3. Explain implementation plans and/or timelines for these goals.**

Will attend and be an active participant in meetings to discuss options and potential solutions to promote Competitive Integrated Employment.

**Q4. What do you see as the biggest barrier(s) in reaching your Department's Employment First goals?**

None.

**Q5. Is your department implementing any new initiatives to improve competitive integrated employment (CIE) for 2025-26?**

The State Civil Service Commission will continue to explore opportunities to streamline and enhance civil service employment

appeal processes to ensure individuals or parties who file an appeal challenging a disputed personnel action(s) are afforded full, fair, and equal consideration.

**Q6. Are there any performance metrics or KPIs that your department already tracks that may be important to the EFOC?**

No.

## Pennsylvania Developmental Disabilities Council 2025 Employment First Self-Assessment

### **Q1. What progress has been made to address the EFOC's recommendations from last year's annual report? ([EFOC 2024 Report](#))**

PADDCC employment work is based on the Council State Plan. Since the last report, planning is underway for two employment conferences in October 2025, and the employment storytelling videos are in the final steps of editing for distribution.

### **Q2. What are your Department's Employment First goals (These should be identified within the Department. Examples could include increase in the percent of employed participants, innovative programs, new MOUs...)?**

#### Goal 1: Self Determination

Pennsylvanians with developmental disabilities and their families increase their knowledge in order to make informed decisions, exercise their rights and control their own lives.

Objective 1.B: Everyday Lives By 2026, as a result of peer-to-peer training, the number of people with developmental disabilities who state they make decisions for their own lives in housing, employment, and family life will increase.

#### Goal 2: Social and System Change

Change service systems and community resources so that they are more responsive, accessible, and flexible for Pennsylvanians with developmental disabilities.

Objective 2.A: Employment Each year, 20 businesses will be supported through education and technical assistance focused on promising practices to employ and promote more people with developmental disabilities.

Advocacy Agenda Goal:

Eliminate sub-minimum wage and promote competitive integrated employment for people with developmental disabilities.

**Q3. Explain implementation plans and/or timelines for these goals.**

Implementation occurs over a five-year timeline to align with PADDC State Plan. Our current plan years are 2022-2026.

**Q4. What do you see as the biggest barrier(s) in reaching your Department's Employment First goals?**

Council is facing challenges related to the uncertainty of federal funding for future work.

**Q5. Is your department implementing any new initiatives to improve competitive integrated employment (CIE) for 2025-26?**

No

**Q6. Are there any performance metrics or KPIs that your department already tracks that may be important to the EFOC?**

No

## DMVA 2025 Employment First Agency Self-Assessment

### **Q1. What are your department's Employment First goals?**

DMVA's goals are two-fold:

1. To include disabled veterans in the Employment First initiative; and
2. To hire disabled candidates for DMVA state employment where the position description permits.

### **Q2. Explain implementation plans for these goals?**

1. DMVA continues to provide disabled veterans data to the Employment First Commission.
2. DMVA continues to work with the Governor's Office of Administration, Bureau of Enterprise Recruitment to encourage disabled candidates to apply. DMVA is currently working with the Office of Administration's Bureau of Enterprise Recruitment and OVR on the OVR pilot.

### **Q3. What progress has been made in achieving these goals?**

1. The progress for including disabled veterans in this initiative has been slow. The data regarding disabled veterans in Pennsylvania is housed at the federal Department of Veterans Affairs. In addition, the focus of the Employment First Initiative appears to be on OVR clients.
2. DMVA HR Office has recently worked with the Bureau of Enterprise Recruitment and OA to develop a plan to coordinate regional meetings with DMVA and OVR to explain the pilot program, the nature of the work in the State Veterans Homes, the application, and hiring process. In addition, DMVA will be scheduling disability awareness training for HR staff and hiring managers within the agency.

### **Q4. What percentage of employees within your department have disabilities and how do you measure that number?**

DMVA does not have access to the data.

**Q5. What activities, policies, or projects have been established to address the EFOC's recommendations from last year's annual report?**

DMVA has identified custodial worker and dietary positions at our six veterans' homes for the OVR pilot.

**Q6. Is your department implementing any new Initiatives to improve competitive integrated employment (CIE)?**

The Office of Administration disability recruiter is working on a statewide plan.

**Q7. Are there any performance metrics or KPIs that your department already tracks that may be important to the EFOC?**

DMVA can track accommodation requests; however, we are unable to ask if employees or candidates have a disability.

**Q8. What do you see as your most substantial obstacle in reaching your most important Employment First related priority?**

Advertising the agency's State Veterans Homes, the type of work, and the environment. DMVA is working with OVR to coordinate regional meetings in the next fiscal year, which should alleviate this obstacle.

Pennsylvania Council on the Arts 2025 Employment First Self-Assessment

**Q1. What progress has been made to address the EFOC's recommendations from last year's annual report? ([EFOC 2024 Report](#))**

- Related action has been pending finalization of PCA's new 5-year strategic plan framework, which has been the focus of much of the staff's work for the past fiscal year.
- Implementation of the adopted plan will include the need for changes to job descriptions for agency staff of 11 ½. OA is aware of this schedule.
- There have been no open positions at the agency.

**Q2. What are your Department's Employment First goals (These should be identified within the Department. Examples could include increase in the percent of employed participants, innovative programs, new MOUs...)?**

- PCA defers to OA.

**Q3. Explain implementation plans and/or timelines for these goals.**

- To be determined.

**Q4. What do you see as the biggest barrier(s) in reaching your Department's Employment First goals?**

- To be determined.

**Q5. Is your department implementing any new initiatives to improve competitive integrated employment (CIE) for 2025-26?**

- To be determined.

**Q6. Are there any performance metrics or KPIs that your department already tracks that may be important to the EFOC?**

- PCA defers to OA.

OVR, Department of Labor and Industry 2025 Employment First Self-Assessment

**Q1. What progress has been made to address the EFOC's recommendations from last year's annual report? ([EFOC 2024 Report](#))**

Progression of goal 1: Transition from Section 14c Wage Employment to CIE

OVR in collaboration with the Office of Developmental Programs have submitted comments to the National Public Rule Making regarding the phase out of subminimum wage employment nationally. In solidarity with the State Workforce Board, the State Board of Vocational Rehabilitation also voted to recommend to the governor to phase out subminimum wage strategically over a period of time. The Department of Labor and Industry also submitted a joint letter with the Department of Human Services, suggesting a five-year phase-out. OVR and ODP have also recently held a listening session during the ODP-ISAC meeting in April to gather input from the disability community, providers, and other stakeholders on the eventuality that subminimum wage will end. OVR in partnership with OPD and BSE are also working to implement the Disability Innovation Fund (DIF) grant Subminimum Wage to Competitive Integrated Employment (SWTCIE) – known as Project InVEST in PA. InVEST will connect individuals who may be considering or are currently participating in subminimum wage employment to consider and pursue competitive integrated employment through a variety of collaborative and innovative solutions that build supports around the individual and the employer.

At the May 2025 State Workforce Board meeting, it was discussed that 'OVR continue suggesting recruitment processes for employers, targeting career ladders and pathways, and supporting workers' financial needs, unique aspirations, and talent succession, among others. Disability inclusion training can help facilitate meeting these goals.'

Progression of goal 2: Measure the effectiveness of Pre-ETS

The Office of Vocational Rehabilitation (OVR) is currently required to invest a minimum of 15% of the federal VR grant—an estimated \$20 million annually—on Pre-employment Transition Services (Pre-ETS) for students with disabilities. OVR has invested and will continue to invest significant resources to ensure that students with disabilities are

equipped to enter the competitive labor market. A significant portion of both VR and Pre-ETS funding supports an array of services for students and young adults with disabilities, including post-secondary education, Project SEARCH programs, Supported Employment, and other critical services.

Evidence-based literature has consistently identified key predictors of post-school outcomes for students with disabilities. These include participation in paid work experiences during high school, enrollment in post-secondary education, access to self-advocacy instruction, and involvement in transition planning and services (Test et al., 2009; Mazzotti et al., 2021). Furthermore, studies have shown that early, high-quality Pre-ETS are positively associated with increased employment and education outcomes (Rutkowski et al., 2020; Fabian et al., 2016).

To measure the success of these investments and ensure accountability, OVR is implementing a comprehensive, multi-faceted evaluation plan. This approach leverages both quantitative data and qualitative insights to assess impact and guide continuous improvement. Key components of the plan include:

- **External Evaluation Partnerships:** Utilizing evaluation findings from initiatives such as the Pathways to Partnership (P2P) grant in collaboration with Penn State.
- **Student-focused Tools:** Collecting data from standardized Transition assessments and customer satisfaction surveys to assess student growth and preparedness.
- **Data Analysis:** Reviewing RSA-911 data and Act 26 reports to monitor service delivery and student engagement over time.
- **Case Reviews:** Conducting both targeted and quarterly case reviews to evaluate service quality and consistency.
- **Provider Accountability:** Develop provider performance summaries or “report cards” to support quality improvement efforts.
- **Staff-level Metrics:** Aligning individual staff goals with Pre-ETS delivery and outcome benchmarks.
- **Cross-Unit Collaboration:** Partnering with the newly formed Systems and Evaluations team and Transition Specialists to design a standardized statewide Pre-ETS performance report. The standardized report will track key metrics such as employment rate, enrollment in

post-secondary training, service delivery, and student engagement in Pre-ETS.

This evaluation plan is intended to support data-driven decision-making, improve service quality, and demonstrate the impact of Pre-ETS on the long-term success of students with disabilities.

### OVR Goal 3: Speedy Service Delivery

PA OVR is required by the Rehabilitation Act to determine a customer's eligibility within 60 days of application for services and to develop an Individual Plan for Employment (IPE) within 90 days of the eligibility determination (although there is a waiver process for situations beyond our control). Offices continue to implement OVR's priorities and staff are focused on serving customers effectively through rapid and continued engagement and managing services for both adults and students being served in Pre-ETS.

### **Q2. What are your Department's Employment First goals (These should be identified within the Department. Examples could include increase in the percent of employed participants, innovative programs, new MOUs...)?**

The Department of Labor and Industry prepares job seekers for the global workforce through employment and job training services for adult, youth, older workers and dislocated workers. It is the intention of DLI to provide as many competitive integrated employment opportunities for Pennsylvanians as possible.

### **Q3. Explain implementation plans and/or timelines for these goals.**

OVR is working through the fiscal impacts of this past fiscal year and proposed FFY25 flat funding and what the implications will be for carryover and future service planning. OVR has implemented a variety of cost-saving measures over the past six months, and we are currently reviewing all hiring decisions to curb our personnel costs. This is a delicate balance as we need to ensure we have sufficient staff to serve our existing caseloads but also need to be mindful of rising personnel and service costs throughout the agency. It will take time to see all cost conservation measures to realize savings.

**Q4. What do you see as the biggest barrier(s) in reaching your Department's Employment First goals?**

Adequate funding is crucial for delivering comprehensive services to individuals with disabilities. Limited funding can hinder OVR's ability to provide a wide range of vocational rehabilitation services, including training, assistive technology, and job placement support. A lack of funding could result in a waitlist for services which would be detrimental to PA's Employment First initiative. PA OVR is a federal match program, requiring that Pennsylvania contribute 21.3% for 78.7% in federal funds. Inconsistent funding at the federal level makes managing the program extremely challenging.

Others are attitudinal barriers towards people with disabilities, subminimum wage employment, direct care worker/attendant care crisis, and transportation.

**Q5. Is your department implementing any new initiatives to improve competitive integrated employment (CIE) for 2025-26?**

None at this time. PA OVR is focused on agency control and sustainment.

**Q6. Are there any performance metrics or KPIs that your department already tracks that may be important to the EFOC?**

OVR Federal Performance Indicators are:

- Employment (Second quarter after exit)
- Employment (Fourth quarter after exit)
- Median Earnings (Second Quarter After Exit)
- Credential Attainment Rate
- Measurable Skill Gains

## Pennsylvania Department of Education 2025 Employment First Self-Assessment

### **Q1. What progress has been made to address the EFOC's recommendations from last year's annual report? ([EFOC 2024 Report](#))**

PDE Obj 1.A. Minimize Transitions to More Restrictive Settings: Entered into proposal for research, but research cancelled with change in administration. Rephrasing of data request by commission.

PDE Obj 1.B: Consistent Educational Experience: Reviewed PDE data by disability category and developing increased oversight as allowable by law and increased training and technical assistance for educating students with intellectual disabilities in the least restrictive environment.

PDE Obj 3.B: Work Experience Provide work-based learning experiences, job coaching, and other supports to facilitate employment. Through collaborative efforts with OVR and the DIF grant, training in Transition Systems Framework which includes work-based learning models.

PDE Obj 3.C: Business Partnerships Develop partnerships with local businesses to create more employment opportunities for students with disabilities. Through collaborative efforts with OVR and the DIF grant, training in Transition Systems Framework which includes increasing business partnerships.

Goal 6: Promote Self-Advocacy and Leadership Skills: See BSE specific goal directed toward Student Led IEPs.

### **Q2. What are your Department's Employment First goals (These should be identified within the Department. Examples could include increase in the percent of employed participants, innovative programs, new MOUs...)?**

PDE Goal 1: Prevent Transition to Segregated Settings

- **Charting the LifeCourse (CtLC)**, a central feature of the **Pathways to Partnership (P2P)** grant, supports students and families in identifying meaningful life outcomes in inclusive settings. By equipping

stakeholders with the tools to plan person-centered, community-integrated lives, CtLC reduces reliance on segregated post-school options.

- The **Transition Systems Framework (TSF)** promotes systemic implementation of inclusive transition practices and interagency collaboration that steers students toward competitive integrated employment and away from sheltered or segregated placements.
  - The **PA Community on Transition's Connecting 4 Employment** initiative focuses on creating a seamless, coordinated system of supports that empowers students to access competitive employment—not segregated day programs.
- 

#### PDE Goal 2: Increase Competitive Employment Post-Graduation

- The **Job Coaching Essentials** and **Nuts and Bolts of Job Coaching** online training series equip school and community personnel with the skills to support students in **real-world, community-based employment**, building the bridge between school experiences and post-graduation outcomes.
  - The **Work-Based Learning Implementation Course** ensures educators are trained to deliver high-quality, legally compliant employment experiences that build workplace readiness and align with students' strengths and preferences.
  - **My Plan 4 Success (MP4S)** data collection and follow-up provide essential insights into employment outcomes, allowing LEAs to monitor and adjust transition services to improve post-graduation employment rates.
- 

#### PDE Goal 3: Expand Access to Competitive Integrated Employment

- **Job Coaching Courses** enhance access to CIE by preparing educators and paraeducators to support a wide range of students, including those with intensive needs, in typical work settings.
- 25-26 - The **TSF model**, embedded in coaching provided through P2P grant, will help LEAs scale inclusive employment supports using a multi-tiered, data-informed approach.

- Statewide collaboration through **IU TaC Meetings, Community of Practice**, and **cross-agency planning** ensures that competitive integrated employment is promoted and accessible across diverse educational and geographic contexts.
  - Partner with CTE to provide a training consultant at each PATTAN.
- 

#### PDE Goal 4: Enhance Financial Education for Transition-Age Students

- The **Benefits Counseling Toolkit**, developed by the PA Community on Transition, is a direct response to this goal. It helps educators and families understand how employment and income impact public benefits such as SSI, Medicaid, and SNAP—empowering informed decisions about work and independence.
  - **Charting the LifeCourse trainings** integrate financial planning into life design—encouraging students to identify goals related to income, savings, and housing.
  - Additionally, the PA Secondary Transition events calendar shares national and statewide trainings and materials such as **ABLE account education**, financial fundamentals, and budgeting as key components of transition.
- 

#### PDE Goal 5: Improve Data Transparency and Reporting

- PDE supports robust Indicator 13 and 14 monitoring cycles, with IEP pre- and post-reviews, compliance modules, and MP4S data collection. These processes not only ensure legal compliance but generate actionable data about student outcomes.
  - **TSF coaching connections** guide LEAs in using this data at the systems level, identifying gaps, and implementing targeted improvements.
  - Resources such as the **PA Secondary Transition website**, **Transition Tidbits newsletter**, and Schoology course libraries ensure that data and updates are accessible and used meaningfully by all stakeholders.
- 

#### PDE Goal 6: Promote Self-Advocacy and Leadership

- The **Student-Led IEP (SLIEP)** cross-systems initiative promotes youth voice in transition planning, offering tools and training to empower students to lead their meetings and shape their futures.
- **CtLC tools** used with youth (e.g., trajectory worksheets, one-page profiles, and Good Life planning) promote goal setting, communication, and choice-making—essential self-advocacy skills.
- 25- 26
  - Trainings offered through PaTTAN through **P2P will include** at least 12 annual virtual sessions directly for youth and families to enhance leadership, self-direction, and active engagement in transition.
  - The **Elevatus curriculum** expansion in PA will include addressing key self-advocacy themes such as boundaries, healthy relationships, and communication—all essential for independent adulthood.

**Q3. Explain implementation plans and/or timelines for these goals.**

All work is ongoing.

**Q4. What do you see as the biggest barrier(s) in reaching your Department’s Employment First goals?**

Change in funding streams or processes for funding.

**Q5. Is your department implementing any new initiatives to improve competitive integrated employment (CIE) for 2025-26?**

**Q6. Are there any performance metrics or KPIs that your department already tracks that may be important to the EFOC?**

LRE data

Graduation and Drop Out Data

**Q1. What progress has been made to address the EFOC's recommendations from last year's annual report? (EFOC 2024 Report)**

Goal 1: Support Employment Opportunities for Older Adults with Disabilities

Leverage the Aging Our Way, PA strategic plan to enhance employment and occupational opportunities for older adults, including those with disabilities, through collaboration with relevant agencies.

- Objective 1.A: In 2025-2026, PDA will support L&I in implementing Barrier Remediation subgoals from the 2024-2028 Pennsylvania Workforce Innovation and Opportunity Act (WIOA) State Plan to strengthen workplace flexibilities.

The Pennsylvania Workforce Development Board (PA WDB) includes a committee for Barrier Remediation that supports WIOA Plan Goal 5. Examples of alignment between ***Aging Our Way, PA***, Good Job Principles, and the WIOA State Plan include ensuring equitable access to broadband and digital equity; Diversity, Equity, Inclusion, and Accessibility (DEIA); intergenerational recruitment; transportation; and others.

- Objective 1.B: In 2025-26, PDA will collaborate with L&I and OVR to expand outreach efforts, aiming to increase the number of older adults with disabilities receiving supported employment services.

The Office of Vocational Rehabilitation (OVR) provides services on an individual basis regardless of need to support employment. The network of Area Agencies on Aging (AAAs) continues to refer potential candidates to this program.

- Objective 1.C: In 2025-26, PDA will develop a guide for older adults on how to filter for "age friendly" jobs within PA CareerLink. They will also explore the possibility of adding a filter for jobs that provide accommodations, time flexibility, or remote work options.

PDA has not initiated work on this objective as of June 2025 but will collaborate with the Bureau of Workforce Partnerships and Operations to define PA CareerLink filters that may support older adult employment interests and develop a guide on how to apply those filters.

- Objective 1.D: By 2026, PDA will work with Labor and Industry to include additional age categories for older workers within the "Workers Age by Industry and Area Dashboard."

The Workers Age by Industry and Area Dashboard currently includes 55-65 and 65-99 age groups for this section of the dashboard. PDA will discuss the feasibility of accurately capturing data related subgroups in the 65-99 age group.

Goal 2: Enhance the PA Link as a Resource for Employment

Redesign and expand the PA Link to serve as a comprehensive resource for older adults and individuals with disabilities, including referrals to employment opportunities.

- Objective 2.A: In 2025-26, PDA will consider referrals and assistance to job opportunities as a key activity of the redesign of the PA Link. PDA will also integrate employment-related resources into the redesign.

PDA is currently in the process of evaluating the PA Link and developing a plan to refresh and improve the program. This process will likely be complete at the end of summer 2025. Recommendations will include expanded information about employment opportunities. Upon completion of the redesign, PDA will collaborate with community partners to promote the PA Link as a central hub for employment information.

**Q2. What are your Department's Employment First goals (These should be identified within the Department. Examples could include increase in the percent of employed participants, innovative programs, new MOUs...)?**

- PDA includes key tactics from Aging Our Way, PA that serve as the Department's goals. Aging Our Way, PA is Pennsylvania's 10-year strategic plan to support older adults. This plan was developed using the AARP's 8 Domains of Livability framework, which includes employment, volunteerism, and community service. Many older adults are interested in working, or continuing to work as they age, often with a disability. We included tactics in this plan to strengthen our relationship with the Department of Labor and Industry (L&I) to execute tactics related to occupational accommodation and employment opportunities. However, these tactics are led by L&I with PDA support.

**Q3. Explain implementation plans and/or timelines for these goals.**

- Goal 1: The timelines for the objectives to support Goal 1 are feasible and will be completed within the calendar year.
- Goal 2: The PA Link Refresh Plan will be published in late summer or early fall of 2025. The completed plan will define actions to be implemented over the next three years.

**Q4. What do you see as the biggest barrier(s) in reaching your Department's Employment First goals?**

- Funding to support the implementation of *Aging Our Way, PA*, including the refreshment of the PA Link, is included in the Governor's budget proposal. Additionally, the proposed federal budget cuts apply significant strain on our ability to implement these goals. Additionally, the proposed dissolution of the Senior Community Service Employment Program (SCSEP) threatens the job training and employment opportunities of older adults.

**Q5. Is your department implementing any new initiatives to improve competitive integrated employment (CIE) for 2025-26?**

- The department is not implementing any initiatives to improve CIE specifically.

**Q6. Are there any performance metrics or KPIs that your department already tracks that may be important to the EFOC?**

- Not at this time. Metrics for Aging Our Way, PA tactics are identified at the time of implementation and will be continuously monitored.

**Q1. What progress has been made to address the EFOC's recommendations from last year's annual report? ([EFOC 2024 Report](#))**

The Department of Corrections (DOC) has had several strategy meetings with the Office of Vocational Rehabilitation (OVR) to enhance our partnership in assisting reentrants with disabilities obtain Competitive Integrated Employment (CIE) upon release.

The Department of Corrections offers a robust workforce development program in which we provide vocational training, offer on the job training in a multitude of disciplines, and actively engage with employers in the community highlighting the benefits of hiring justice involved individuals who are returning to the community. Incarcerated individuals with disabilities are integrated into all aspects of our workforce development program. Requests by incarcerated individuals for accommodation are reviewed in accordance with Department Administrative Manual 006, Inmate ADA Accommodations.

Corrections staff complete disability related training for all employees and additional disability related training for management classified employees and supervisors. Should a Department of Corrections employee or prospective employee request an accommodation, the request is reviewed and processed by the Office of Equal Employment Opportunity.

**Q2. What are your Department's Employment First goals (These should be identified within the Department. Examples could include increase in the percent of employed participants, new programs, new MOUs...)?**

DOC goals include:

1. ***Enhancing our partnership with OVR;*** We are working to streamline and expand the DOC to OVR staff assisted referral process. Staff assisted OVR referral process, currently used by field parole agents, would expand to inside of our State Correctional Institutions with the goal of having the applicant assigned an OVR case manager and an OVR application initiated prior to release from incarceration.

2. **Online training;** DOC is working to create an online training on OVR services and Employment First for targeted staff. The targeted training audience will include social workers, corrections counselors, guidance counselors, principals, parole agents, and facility employment coordinators.
3. **Measurables/Tracking;** The DOC in conjunction with OVR, is working to develop systems to track the following: Number of DOC staff that complete the OVR/Employment First training; Number of OVR referrals through DOC staff; Number of referrals that resulted in an open case/actual appointment with OVR; Number of open cases that ultimately led to employment.

**Q3. Explain implementation plans and/or timelines for these goals.**

The Department of Corrections target is to have the tasks identified in Question two in place by March 31, 2026.

**Q4. What do you see as the biggest barrier(s) in reaching your Department's Employment First goals.**

The Department of Corrections does not foresee any barriers in meeting our Employment First goals identified in question two.

**Q5. Is your department implementing any new initiatives to improve competitive integrated employment (CIE) for 2025-26?**

New initiatives will be explored after the Department's initial goals identified in question two are implemented and evaluated.

**Q6. Are there any performance metrics or KPIs that your department already tracks that may be important to the EFOC?**

No.

## **Appendix E: 2025 EFOC Report Approval**

The following Commissioners voted in the affirmative to pass the 2025 Employment First Oversight Commission Report:

Josie Badger (Chair)

Julia Barol (Vice-Chair)

Dale Verchick (Secretary)

Steve Suroviec

Mary Anderson Hartley

Susan Tachau

Richard Edley

Andrew Pennington

Michele Leahy

Heidi Tuszynski