

January 16, 2024

PA Workforce Development Board  
651 Boas Street | Room 514  
Harrisburg, PA 17121

With close to 400 members, the majority of who serve over one million Pennsylvanians annually, Rehabilitation and Community Providers Association (RCPA) is among the largest and most diverse state health and human services trade associations in the nation. RCPA provider members offer mental health, substance use disorder, intellectual and developmental disabilities, children's, brain injury, criminal and juvenile justice, medical and pediatric rehabilitation, and physical disabilities and aging services, across all settings and levels of care.

Many of our members provide employment services to individuals with disabilities. We would like to submit the following feedback regarding the draft Pennsylvania Workforce Innovation and Opportunity Act (WIOA) Combined State Plan Modification for the period of July 1, 2024 through June 30, 2028.

We support and believe strongly in Competitive Integrated Employment and efforts to increase access to CIE. Our members provide a full range of employment services and are grateful for the opportunities to partner with OVR as well as ODP, and school districts. In addition to supporting individuals finding CIE, many of our members provide small group employment and supported employment, as well as facility-based services. The current perception that when individuals are served in these settings they never move to less supported settings is incorrect. We would like to share that many providers are successful in enabling individuals to gain more independent employment as a result of developing both work and soft skills in these programs.

Focusing exclusively on CIE, while well-intentioned, could have an unintended consequence and not increase CIE, but rather hurt individuals who may benefit from services not available to them. You now have individuals that will receive no services at all — including those that could build skills to be prepared for CIE.

Additionally, many families have shared that there is often a delay in obtaining an assessment from OVR (4 to 6 months), during which time the individual is at home, often without any alternative service. When the students graduate, and are either waiting for the assessment or have received the assessment and have not been provided the document that identifies they are not yet ready for CIE, they are left in limbo, not receiving any services whatsoever.

Individuals with serious disabilities and significant medical and/or behavioral complications have a much more complex challenge with seeking employment. We can't leave this population behind by eliminating other possibilities for them.

We believe that there needs to be increased communication and education by the OVR counselor to connect them with alternate services. Increasingly, the Community Rehabilitation Providers (CRPs) hear that, between the ages of 21–24, the individual and family are not aware of other services that are available to them.

We recommend the following language or similar on Page 180 of the plan, in Goal 2:

“Expand communication and linkages between ODP supports coordination, OMHSAS case managers, individuals and families with community CRP’s post-graduation to increase linkages to CIE and/or alternative services determined through the OVR assessment.”

Thank you for this opportunity to submit our comments.

Sincerely,

A handwritten signature in cursive script that reads "Carol Ferenz".

Carol Ferenz  
Director, Intellectual/Developmental Disabilities Division  
RCPA