



Advancing Competitive Integrated Employment through Legal Advocacy Systems

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I. Introduction

People with disabilities want to work, live independently, and be economically self-sufficient. Unfortunately, employment for people with disabilities continues to lag significantly compared to people without disabilities. Despite the undisputed fact that people with disabilities can work and want to work, people with disabilities are still much less likely to be employed (18% of people with disabilities in the United States are employed versus 62% of their non-disabled peers).¹ For too many people with disabilities, the only employment option they are offered is work in segregated sheltered workshops, where they are isolated from co-workers without disabilities and broader society and are legally paid pennies on the dollar under Section 14(c) of the Fair Labor Standards Act (FLSA).²

The passage of the Workforce Innovation and Opportunity Act of 2014 (WIOA) is consistent with the worldwide trend shifting away from segregated work settings and towards Competitive Integrated Employment (CIE).

What is Competitive Integrated Employment (CIE)?

CIE, defined at 34 C.F.R. § 361.5(c)(9), means full or part-time work which:

- (a) pays at or above minimum wage and comparably to the rate paid to employees without disabilities performing similar duties, training, and experience;
- (b) provides the same level of benefits as those offered to other employees without disabilities;
- (c) takes place at a location where the employee interacts with people without disabilities; and
- (d) presents opportunities for advancement similar to employees without disabilities.



The Advisory Committee created by Congress in WIOA wrote an extensive report identifying the significant discrepancy in rates of employment between the disabled and nondisabled American workforce, and made

¹ Bureau of Labor Statistics, U.S. Dept. of Labor. (February 24, 2021). *Persons With a Disability: Labor Force Characteristics — 2020*. Retrieved September 13, 2021, from <https://www.bls.gov/news.release/pdf/disabl.pdf>.

² Collaboration to Promote Self-Determination. (January 25, 2019,). *Statement of Collaboration to Promote Self-Determination, in Support of Transformation to Competitive Employment Act (H.R. 873/S.26)*. Retrieved September 11, 2021, from <http://thecpsd.org/wp-content/uploads/2019/01/CPSD-letter-of-support-for-CIE-transformation-bill-1.25.19.pdf?fbclid=IwAR2h6-70wgBu7XJsXzXtnPvShYdxEIKE4nwtQg6IvWfnyIHH7AxsMrPy1D0>.



detailed recommendation to build capacity at the state and national level for CIE.³

To help people with disabilities, families, professionals, providers, and stakeholders develop strategies to address the discrepant rates of employment and to advance CIE, the [Disability Employment Technical Assistance Center \(DETAC\)](#) is developing four policy briefs for protection and advocacy entities. The [first report](#), posted on the DETAC website in July, 2021, addressed the relevant laws, legal decisions, and legal strategies for challenging unnecessary segregation in sheltered workshops.⁴ This second paper outlines the centrality of CIE for people with disabilities, the importance of pursuing systems reform initiatives that promote CIE, and suggestions for how to develop, implement, and manage these initiatives in legal rights organizations such as Protection and Advocacy (P&A) Systems. The third paper will identify the core components of an integrated employment system and methods for transforming state employment systems. It will also discuss the remedies generated by litigation in landmark cases in Oregon and Rhode Island. The final paper will analyze how the Home and Community-Based Services (HCBS) Settings Rule⁵ can be used to reduce reliance on segregated sheltered workshops.

This series is designed to provide P&A entities the legal context, informational resources, and strategies to expand opportunities for CIE and support people with disabilities to access opportunities for obtaining a real job, at real wages, in the generic workforce.

II. Employment as Key to Independent Living and Economic Well-Being for People with Disabilities

A. People with Disabilities Want to Work – Voices of Self-Advocates

People with disabilities have clearly articulated their desire for real jobs, real careers, and real wages. Efforts to translate that call for autonomy into meaningful employment have evolved over several decades.

In 1969, Dr. Bengt Nirje, Director of what is now the Swedish National Association for Persons with Intellectual Disability, delivered the paper "*Towards Independence*" at the 11th World Congress of the International Society for Rehabilitation of the Disabled in Dublin, Ireland. *Towards Independence* chronicled developments in the self-advocacy movement in

³ See *Advisory Committee on Increasing Competitive Integrated Employment for Individuals with Disabilities, September 15, 2016, Report* at https://www.dol.gov/odep/topics/pdf/ACICEID_Final_Report_9-8-16.pdf

⁴ Schwartz, S., & Moore, R. (July 15, 2021). *Ending Segregated Workshops and Promoting Competitive Integrated Employment (CIE); Legal Foundations for Protection and Advocacy Entities, Part 1. Disability Employment Technical Assistance Center*. Retrieved September 9, 2021, from https://aoddisabilityemploymenttcenter.com/wp-content/uploads/2021/07/DETAC_BY_Resource_PA_Legal_Foundations_Pt_1_Final_508.pdf.

⁵ The HCBS Settings Rule requires that programs offer recipients person-centered planning and the opportunity to live, work, and receive services in integrated settings. The Rule applies to any setting funded under HCBS Medicaid authorities, including: 1915(c) waiver, 1915(i) State Plan Services, 1915(k) Community First Choice, and any HCBS services in 1115 demonstration waivers. The Settings Rule is available at: <https://www.medicare.gov/medicaid/hcbs/guidance/index.html>.



Sweden and spurred new social policy worldwide based on the normalization principle and “dignity of risk.” The paper remarked upon the relatively unprecedented act of including young people with disabilities in the dialogue surrounding their own supports and the trajectory of their lives, saying:

*"Last year, the Swedish Parents' Association arranged a national conference of young adults, active in some of our clubs. This gave them an opportunity to discuss between themselves and bring out their own views on activities and matters which concern them: leisure time activities, vocational training, employment and wages of the sheltered workshops, and vacation questions. It was probably the first time such a conference had ever been held."*⁶

Since then, the progression towards self-advocacy has gained international momentum. Employment continues to be a major focus for people with disabilities and self-advocacy organizations. In 2012, Self-Advocates Becoming Empowered (SABE) developed a position paper on employment, which included this overarching statement:

"We have been prepared enough. Get us real jobs. Close sheltered workshops."⁷ –Self-Advocates Becoming Empowered (SABE)

In 2018, [Inclusion International](#), an international organization of people with developmental disabilities and family members, issued a statement on inclusive employment, calling for people with disabilities to transition out of segregated workshops and access real jobs. Members with disabilities made a clear demand for “real jobs, in the community, with real pay, and the support we need to be successful.”⁸



B. All people with disabilities can work with appropriate support

More than a half century of research and demonstration has led to the consensus in the disability field that, with positive expectations, technology, and individualized supports, virtually any person with a disability who wants to work can work.

⁶ Excerpts from that paper can be found at: <https://mn.gov/mnddc/parallels/seven/7b/2.html>

⁷ Self-Advocates Becoming Empowered. (October 31, 2009). *Position on Employment: SABE Calls for Ending Sub-Minimum Wage in 2012*. Retrieved September 13, 2021, from <https://www.sabeusa.org/meet-sabe/policy-statements/sabe-policy-statement-on-employment/>.

⁸ Inclusion International. (2018). *Real jobs for real pay and the support we need to be successful*. Retrieved September 10, 2021, from <https://inclusion-international.org/wp-content/uploads/2021/03/Inclusion-International-Written-Submission-DGD-Article-27.pdf>.



During the late 1960's, Marc Gold, a special education teacher, developed a framework for teaching complex tasks to students with significant intellectual and developmental disabilities. His work was based on the belief that all people -- regardless of level of disability -- can learn, grow, and engage in productive employment. Gold's work changed the disability field forever. His initial formulation provided tools such as "systemic instruction," that led to higher expectations for people with disabilities and a foundation for broader inclusion in the workforce.

Marc Gold's groundbreaking work led to decades of development of best practices in supported employment: a presumption of employability, individualized assessments based on strengths and capacities, training, and support technologies to include people with more significant disabilities. From supported employment emerged a further refinement: Customized employment.

Customized employment is a process for achieving CIE through a negotiated relationship between employee and employer that is personalized to meet the needs of both. In other instances, customized employment may identify the talents and personal assets of the person to facilitate self-employment. In either instance, customized employment is a universal strategy that benefits many people, including people with disabilities who might not have found success through other employment strategies. Customized employment has evolved over time, is now considered an evidence-based practice. In 2014, customized employment was included in Title IV of WIOA, and its implementing regulations, 34 CFR § 361.5(c)(9).

The [United States Department of Labor's Office of Disability Employment Policy \(ODEP\)](#) has invested significant capital in states to foster CIE and customized employment. ODEP provides technical assistance and training to state vocational rehabilitation (VR) agencies and their partners. When appropriately utilized, these resources can ensure effective and consistent application of customized employment across different service delivery platforms, and advance quality of employment for people with disabilities. One such resource, [The Essential Elements of Customized Employment for Universal Application](#), identified a set of core elements of customized employment and seeks not only to develop the capacity for CIE and customized employment, but also to emphasize sustainable employment services.⁹

Evidence Based Practices in Supported Employment

One of the best-known evidence-based practices in employment is [Individual Placement and Support \(IPS\)](#), a model of employment for people with significant psychiatric disabilities (e.g., schizophrenia spectrum disorder, bipolar disorder, depression). IPS was developed in the early

⁹ WINTAC, Y-TAC, Griffin-Hammis Associates, TransCen, Inc., Marc Gold & Associates, & Virginia Commonwealth University. (2017.). *The Essential Elements of Customized Employment for Universal Application*. Retrieved September 10, 2021, from <https://www2.ed.gov/rschstat/eval/rehab/essential-elements-of-customized-employment-for-universal-application.pdf>.



1900s and helps people living with mental health histories to work in CIE. IPS is based on 8 core principles.¹⁰

Eight Core Principles of IPS Supported Employment
1. Zero Exclusion - Every client who wants to work is eligible for services regardless of “readiness”, work experience, symptoms, or any other issue.
2. Integration of Employment Services with Mental Health Treatment - IPS programs closely integrate with mental health treatment teams.
3. Focus on the Goal of Competitive Employment - Agencies providing IPS are committed to regular jobs in the community as an attainable goal for clients seeking employment.
4. Rapid Job Search - IPS programs help a client look for jobs soon after he/she expresses interest in working, rather than providing lengthy pre-employment assessment, training, and counseling.
5. Systematic Targeted Job Development Based on Clients’ Interests - IPS specialists build relationships with employers through repeated contact, learning about the business needs of employers, and introducing employers to qualified job seekers.
6. Individualized Long-Term Supports - Follow-along supports, tailored for the individual, continue for as long as the client wants and needs them to keep a job or advance career opportunities.
7. Attention to Clients’ Preferences - Services align with clients’ choices, rather than practitioners’ expertise or judgments; IPS specialists help clients find jobs that fit their preferences and skills
8. Personalized Benefits Counseling - IPS specialists help clients obtain personalized, understandable, and accurate information about how working may impact their disability insurance and other government entitlements.

The [Dartmouth Psychiatric Resource Center at the Dartmouth Medical School](#) created a [fidelity scale](#) to assess how well a program adheres to evidence-based employment practices and principles like IPS.¹¹ The instrument provides specific guidance for practitioners on how to improve their implementation of what Dartmouth terms Evidence-Based Supported Employment Services.

Evidence for the effectiveness of IPS continues to grow, starting with early studies in the US in the 1990s and 2000s and extending to replication studies throughout Europe, Canada, Australia, Hong Kong, and Japan. IPS is the most extensively and rigorously researched of all



¹⁰ Kubek, P. M., Shober, S., Clevenger, N., & Boyle, P. E. (2012). Core Principles of Supported Employment/Individual Placement and Support. <https://case.edu/socialwork/centerforebp/resources/coreprinciples-supported-employmentindividual-placement-and-support>. Case Western Reserve University, Mandel School of Applied Social Sciences.

¹¹ Becker, D.R., Swanson, S.J., Reese, S.L., Bond, G.R., McLeman, B.M. (2019) *Supported Employment Fidelity Review Manual (4th ed.)*. The IPS Employment Center at The Rockville Institute, Westat (formerly Dartmouth Psychiatric Resource Center at the Dartmouth Medical School). Retrieved September 10, 2021, from <https://ipsworks.org/wp-content/uploads/2019/12/Final-Fidelity-Manual-Fourth-Edition-112619.pdf>



employment models and the only evidence-based employment model for people with serious mental illness.¹²

Long-term studies show that half of all people enrolled in IPS become steady workers, maintaining employment for 10 years or longer. Rapid expansion of IPS over the past 20 years, and across the world includes at least 19 high-income countries outside the US (Australia, Belgium, Canada, China, Czech Republic, Denmark, France, Germany, Iceland, Ireland, Italy, Japan, New Zealand, the Netherlands, Norway, Spain, Sweden, Switzerland, and the UK). The flexibility and adaptability of the IPS model facilitate successful adoption with high fidelity and good employment outcomes in countries with diverse sociocultural conditions, labor laws, welfare systems, and economic conditions. Yet, even today, even though most people with mental illness want to work and consider it part of their “recovery,” only 2% of people who could benefit have access to effective employment services.¹³

Use of Assistive Technology

In 2014, WIOA reauthorized certain assistive technology programs that were initially established through a series of federal laws, beginning with the [Technology-Related Assistance Act \(Tech Act\) of 1988 \(Public Law 100-407\)](#), which provided financial assistance to states to develop and implement the delivery of assistive technology to people with disabilities. Many innovative uses of person-driven, low and high technology have emerged over the past several decades, resulting in increased independence for people with disabilities and access to a wide variety of employment opportunities across virtually every business sector.

During the COVID-19 pandemic, there has been a global interest in understanding how technology can keep people connected to each other, their communities, and their employers. Emerging innovations designed and advanced during the pandemic to keep people alive, informed, and economically stable must have longer term benefits in advancing employment for people with disabilities. Both low and high-tech assistive technology have been utilized to facilitate effective workplace performance and should be promoted as tools of inclusion, rather than discarded as relics once this pandemic subsides.

The large-scale use of remote meeting platforms in lieu of in-person meetings immediately shed light on society’s ability to function and adapt to previously-eschewed accommodation requests to remote learning and employment requests. Post March-2020, a large segment of the population relied upon various remote technologies to accomplish job tasks. Similarly, “smart screen” tablets equipped with apps like [Work Autonomy](#)¹⁴ significantly increase the ability to work remotely by

¹² Bond, G. R., Drake, R. E., & Becker, D. R. (2020). An update on Individual Placement and Support. *World Psychiatry*, 19, 390-391. Retrieved September 10, 2021, from [online article](#).

¹³ Brinchmann B, Widding-Havneraas T, Modini M et al. *Acta Psychiatr Scand* 2020;141:206-20.

¹⁴ Able Opportunities, Inc. A Person-Centered Accommodation Tool. (n.d.). Work Autonomy. Retrieved September 13, 2021, from <https://www.ableopps.com/work-autonomy>.



creating person-generated communication with coworkers and supervisors, regardless of linguistic or cognitive skill.

Assistive technology that focuses on leveling the playing field for people with disabilities so they can experience the same direct impact of employer relationships and earnings contributes to the broader understanding that with the right accommodation, everyone can work. For example, using pictures and low-tech money jigs is efficient for connecting production and earnings. With the understanding that work brings earning and spending options, motivation, and productivity increases. Moving out of being managed to working for their own earnings, people previously deemed unemployable have become successful employees.

III. Protection and Advocacy Systems are Well-Positioned to Advance Competitive Integrated Employment

People seeking real work and their supporters very often experience significant difficulties navigating the systems intended to foster meaningful employment. [P&A¹⁵ systems](#) can play a central role in overcoming individual and systemic barriers to CIE. Each state, U.S. territory, and the District of Columbia has an independent P&A charged with providing legal representation and other advocacy services to protect against abuse and neglect, and to expand the rights of people with disabilities. Supporting people to obtain CIE should be one of the central tenets of each P&A's approach to effectuating independent living and economic wellbeing for the people they serve.



A primary mandate of the national network of P&A Systems is to address inequities between people with disabilities and their non-disabled peers, including disparities in employment rates. A critical component of any P&A's ability to accomplish that goal is enforcement of rights and protections incorporated in the Americans with Disability Act (ADA), the Rehabilitation Act, and WIOA. Each of these laws, together with state and local regulations, contain a focus on employment and economic self-sufficiency.

Through enabling legislation, P&As are afforded a range of remedies for addressing abuse, neglect, discrimination, and rights violations experienced by people with disabilities. Potent strategies for systems reform are diverse and multi-faceted. For people with disabilities to have equal access to employment and the social, health, and economic benefits of a productive career, often the most potent and enduring change strategies are those that build capacity for CIE and workforce development.

¹⁵ P&A authority is enacted through the following legislation: Part C of Title I of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (PADD Act), 42 U.S.C. 15041-15045; The Protection and Advocacy for Individuals with Mental Illness Act of 1986 (PAIMI Act), 42 U.S.C. 10801 *et seq.*; The Protection and Advocacy of Individual Rights (PAIR) Program of the Rehabilitation Act of 1973, 29 U.S.C. 794e.



P&As have many tools available to them to advance employment that complement legal strategies. The following are a few examples of effective practices used by P&As to change the employment landscape in their states for people with disabilities. These examples are drawn from five P&As across the country and represent a sample of work that has been done and can be done more broadly. These examples demonstrate some of the ways that legal advocacy entities/P&As can advance CIE, but are not intended to be an exhaustive summary of the innovative methods utilized to advance CIE.

A. Use of Media as a Strategy for Change



[Disability Rights Washington \(DRW\)](#) conducted a deep analysis of the core issues that lead to structural poverty and isolation and to people with disabilities being seen as the “other.” DRW recognized the profound impact that individual and societal beliefs – conscious and unconscious -- have on the expectations, opportunities, and supports available for people with disabilities. DRW understood the potential to change those beliefs by engaging a broader audience through compelling and authentic media. DRW decided that one of the most potent strategies to accomplish this was the creation of an affiliate organization, [Rooted in Rights](#).¹⁶

Rooted in Rights creates high impact video productions and social media campaigns for wide distribution. One example of their social reform media strategy is “[Bottom Dollars](#),”¹⁷ which lifts the veil on longstanding practices of paying people with disabilities subminimum wage under the Fair Labor Standards Act (FLSA). The hour-long documentary, produced at a time when nearly 250,000 people were legally paid far below minimum wage, and on average less than \$2 an hour, exposes the exploitation of people with disabilities through personal stories and expert interviews. It also presents clear employment alternatives to create competitive wages and community inclusion.

In their media campaigns, Rooted in Rights identifies distinct obstacles to employment for many people, such as mobility issues related to public transit, street access, and the ability to get to work. Elevating the issue of mobility is now a key focus of DRW/Rooted in Rights’ employment work. As an advocacy and public education strategy, they have created a “story map” focusing on mobility as related to public transit, street access, and ability to get to work.¹⁸

¹⁶ Rooted in Rights. (n.d.). Retrieved September 12, 2021, from <https://rootedinrights.org/>.

¹⁷ *Bottom Dollars | A Rooted in Rights Documentary*. (2018). Rooted in Rights. Retrieved September 12, 2021, from [YouTube](#).

¹⁸ Disability Rights Washington. (n.d.). Transportation Access Storymap. Retrieved September 13, 2021, from <https://www.disabilityrightswa.org/storymap/>.



B. Working Collaboratively with Stakeholders, Policy Makers, and Legislators to Advocate for State Legislation to Eliminate Use of Subminimum Wages



In May 2016, the [Maryland Disability Law Center \(MDLC\)](#) partnered with *People on the Go*, a leading Maryland-based self-advocacy organization, as well as with other advocates and coalition partners, to successfully lobby the state legislature to eliminate the use of subminimum wages for people with disabilities by the year 2020. The bill, named after MDLC Board member and powerful self-advocate, Ken Capone, became a national model. Through this bill, Maryland became the second state to eliminate the discriminatory use of subminimum wages under Section 14c of the FLSA. This led to a 4-year initiative by the Maryland Department of Disabilities to transition people with disabilities from segregated work and day programs to competitive integrated employment assignments of October 1, 2020, 14(c) certificates are no longer permitted in the state.¹⁹

C. Use of Data and Public Reports as a Change Strategy



Over the past several years, [Disability Rights North Carolina \(DRNC\)](#) has worked towards improving the state's employment services system and reducing its overreliance on sheltered work. Their advocacy has taken diverse approaches to achieving this goal. DRNC met in-person with hundreds of workers in sheltered workshops to discuss and learn about their roadblocks to CIE. DRNC shared those barriers with state officials and with the public at large through published reports. In 2019, DRNC reached a Memorandum of Understanding²⁰ with the state's Department of Health and Human Services, which oversees the Designated Vocational Rehabilitation Unit to phase out all VR funding for segregated employment training services by October 1, 2021. DRNC is currently partnering with the Center for Public Representation to advocate for North Carolina to phase out *all* funding and reliance on segregated employment.

D. Litigation to Enforce and Expand Rights under Existing Laws

In 1999, the United States Supreme Court held that the unnecessary segregation of people with disabilities violates the ADA, and that people with disabilities must receive services in the most integrated setting appropriate to their needs.²¹ [Lane v. Kitzhaber](#),²² a class action case in Oregon was the first case to challenge segregated sheltered workshops as a violation of the ADA. The Lane

¹⁹ Goldsmith, T., Herman, S., & Rice, M. (n.d.). *Nothing About Us Without Us: From Subminimum Wage to Meaningful Employment in Maryland*. Retrieved September 10, 2021, from [initiative page](#).

²⁰ *Memorandum of Understanding (MOU) Between the NC Dept. of HHS and DRNC*. (2019, February 11). Retrieved from [Disability Rights NC MOU](#).

²¹ *Olmstead v. L.C.*, 527 U.S. 581 (1999).

²² *Lane v. Kitzhaber*, 841 F.Supp.2d 1199 (2012); Settlement agreement at [Lane v. Brown](#), 166 F.Supp.3d 1180 (D. Or. 2016).



court held that, pursuant to Olmstead, the ADA’s Integration Mandate applies to not only to residential settings, but also to employment. The court opined that it constituted a violation of both Title II of the ADA and the Rehabilitation Act to unnecessarily segregate people in sheltered workshops and deny them integrated supported employment services.

The Lane case changed the employment landscape for people with disabilities and created a ‘test kitchen’ for systems transformation from sheltered work to CIE. [The Lane Settlement Agreement](#) provides a useful blueprint for other states seeking to cut off the pipeline for students transitioning from school to segregated workshops and outlines a coherent strategy for rebalancing systems and building capacity for CIE for people with disabilities.

E. Organize Cross-Disability Employment Unit within the P&A to Advance CIE

The [Georgia Advocacy Office \(GAO\)](#) -- Georgia’s P&A -- organized a cross-disability employment unit within the P&A to reflect its priority on promoting CIE for people with disabilities. GAO integrated its support of self-advocacy, citizen advocacy, individual advocacy, legislative advocacy, litigation, technical assistance, policy and systemic advocacy , grassroots organizing, publications, and promoting the development of new organizations and networks to advance CIE. The following are a few examples of the GAO’s employment work in Georgia:

1. Hosted [Employment First Georgia](#) -- a statewide technical assistance network co-funded by the GAO and the Georgia Council on Development Disabilities.
2. Developed a network of “Employment Stewards” to help providers implement evidence-based practices in employment.
3. Included Evidence-based Supported Employment as a core provision of [U.S. v. State of Georgia Settlement Agreement](#).²³
4. Hosted the planning, launch and several years of development of the [Georgia Micro- board Association](#), so that people with disabilities who wanted an alternative to traditional VR/developmental disabilities (DD) services could form their own agency or microenterprise.
5. Collaborated with state Disability Leadership Network to pass *Employment First* legislation.
6. Established a monitoring project -- post enactment of WIOA -- to ensure youth were not being transitioned from special education systems to sheltered workshops.

²³ *United States v. Georgia*, 1:10-CV-00249--CAP (ND, GA); Settlement agreement page 21



7. Advocated for the elimination of subminimum wages (since 2018, Georgia has reduced number of 14c certificate holders from 49 to 18 in 2021).
8. Provided technical assistance to a network of Citizen Advocacy programs on strategies to advance CIE for people with disabilities who don't want to use formal human service systems to access employment and careers.

IV. Call to Action/Conclusion

Despite comprehensive advances in technology, decades of research demonstrating the capacity of people with disabilities to work in integrated settings, and established data supporting the financial efficacy of those contributions, there continues to be a needless and disproportionately high unemployment rate for people with disabilities. P&As are uniquely well-positioned to use a wide range of tools to remediate antiquated and discriminatory policies and advance evidence-based practices proven to foster CIE. Federal regulations provide P&As with the discretion to use legal strategies, as well as systems reform advocacy independent of litigation, to advance the P&A mandate of protection and advocacy on behalf of people with disabilities. P&As should establish employment as a central priority, engage in intentional outreach to policy makers and people who are knowledgeable about employment in the priority-setting process, and leverage resources to support people served by systems intended to support CIE.

P&As should be strategically organized to advance CIE through directing resources to employment advocacy and integrating employment across litigation, legislation, and policy advocacy. P&As should integrate employment into their school-based special education advocacy and [Supported Decision-Making](#) work. Finally, P&As can promote systemic reform to rebalance systems to advance CIE across multiple service delivery platforms (e.g., DD, mental health, VR, education, workforce systems).

The centerpiece to meaningful inclusion is ensuring people with disabilities are provided with real opportunities to participate in the communities in which they live. To this end, and to fulfill their mandate, P&As must leverage their authority to create, foster, and enforce CIE.

