

Survey results from a national survey of community rehabilitation providers holding special wage certificates

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Abstract. The purpose of this paper is to present the findings from a national survey of a random sample of community rehabilitation programs (CRPs) that hold Special Wage Certificates established under Section 14(c) of the Fair Labor Standards Act (FLSA), 29 U.S.C. 214(c). The intent of the survey was to identify the types of services provided, the trends in the employment services, and the factors that were perceived as inhibiting and facilitating integrated employment outcomes. The survey results are categorized for this report in the following three areas: 1) characteristics of community rehabilitation programs, 2) organizational change trends, and 3) factors that influence the type of employment program utilized by consumers with disabilities.

Representative results from the survey are that overall, facility-based programs continue to be the predominant service provided by community rehabilitation programs holding 14(c) certificates. Of the 20,075 staff members identified as serving consumers, only 1,741 (8.7%) are reported as working with individuals earning at least minimum wage. Although competitive employment and individual supported employment services among these CRPs are growing at a faster rate than other services, use of facility-based services continues to expand. Overall, the findings indicate that the organizations that provide daily services to those Americans with disabilities utilizing 14(c) certificates are continuing to predominately support facility-based work and non-work activities versus services leading to integrated employment outcomes.

Keywords: Community rehabilitation programs, employment of persons with disabilities, national employment survey

1. Introduction

Day programs emerged in large numbers as individuals with developmental disabilities began to leave state residential facilities, also known as state institutions, in the 1970s [44]. Deinstitutionalization was the result of court decisions and new laws that eventually led to over 6,000 to 7,000 day programs nationally [4,5]. These programs, known as “extended employment programs”, are also referred to as sheltered work-

shops/employment and facility-based programs. The Vocational Rehabilitation program regulations define “extended employment” as “work in a non-integrated or sheltered setting for a public or private nonprofit agency or organization that provides compensation in accordance with the Fair Labor Standards Act” (34 CFR 361.5(b)(19)).¹ Individuals with more significant support needs typically are referred to adult activity centers; while those with perceived potential for work are assigned to extended employment programs.

One of the most frequently cited reasons for why

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¹Extended employment, facility-based employment, and sheltered employment/workshops are synonymous terms in this paper.

people with more significant disabilities² are not referred to integrated competitive employment is that they are perceived as “not ready” to leave extended employment/facility-based programs. The belief is that people with significant disabilities can learn work and social skills in segregated settings to prepare them for work in the competitive labor market. Human service professionals have constructed a service continuum designed to move people from the most restrictive, most costly end of an employment continuum through various steps until they are deemed ready for competitive employment, the least restrictive, least costly outcome level [50]. Unfortunately, few people move through the continuum of services to obtain competitive employment [32]. Most people with disabilities in facility-based programs have stayed there for long periods of time and remain on Supplemental Security Income (SSI) from the Social Security Administration (e.g. [37,38]). Nationally it is estimated that over 70% of individuals served in community rehabilitation programs (CRPs) are either in sheltered workshops or segregated non-work day programs [5].

A substantial body of research has demonstrated that people with disabilities can effectively learn skills in inclusive, integrated community settings (e.g. [12,53, 54]). However, segregated facilities have continued as the primary day service option for adults with significant disabilities since the 1960s. The majority of federal and state funding remains largely devoted to segregated services. Approximately \$0.80 of every state and federal rehabilitation dollar spent for day program and employment services in the State Developmental Systems across the country support segregated services. Only \$0.20 of each dollar funds services leading to competitive employment outcomes [5].

Facility-based programs focus on developing skills for work, and individuals in these programs can be paid wages based on their production under Special Wage

Certificates. The US Department of Labor administers the Fair Labor Standards Act (FLSA), Section 14 (c) that allows workers with disabilities to be paid based on their production, which is a “special minimum wage” or “commensurate wage”. A commensurate wage is based on an individual’s productivity, no matter how limited, as compared to the productivity of experienced workers who do not have disabilities performing essentially the same type, quality, and quantity of work [11]. The special minimum wage or commensurate wage can be less than the applicable statutory minimum wage rate required by Section 6(a) of the FLSA and is often referred to within community rehabilitation programs as a subminimum wage. Consider, for example, an individual with a significant disability who is producing at 25% of an experienced worker’s productivity for a job that pays the current statutory minimum wage or \$5.15 per hour. The commensurate or subminimum wage for this individual working at 25% productivity would be approximately \$1.29 per hour.

The dual purpose of this paper is first, to present the findings from a national survey of a sample of CRPs that hold Special Wage Certificates serving individuals with disabilities. The intent of this national survey was to identify the types of services provided by these programs, the trends in their employment services, and the factors that they view as inhibiting and facilitating integrated employment outcomes. The second purpose of the report is to discuss the implications of these findings for a variety of federal programs and the extent, individually and collectively, that these programs have targeted integrated employment as a primary employment outcome.

2. Methodology

2.1. Sample selection

The sample for this study was identified using the US Department of Labor’s mailing list of programs that hold 14 (c) Special Wage Certificates. This list contained 3,391 agency names and addresses when it was obtained through ODEP and included three categories: schools, hospitals, and community rehabilitation programs (CRPs). For the purpose of this survey, schools and hospitals were excluded from the sample, since the target population was CRPs. After excluding these two categories, the list contained 3,075 agency names and addresses from which the sample for the survey was selected.

²Definition of Significant Disability: Individual with a significant disability means an individual with a disability –

- (i) Who has a severe physical or mental impairment that seriously limits one of more functional capacities (such as mobility, communication, self-care, self direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome;
- (ii) Whose vocational rehabilitation can be expected to require multiple rehabilitation services over an extended period of time; and
- (iii) Who has one or more physical or mental disabilities as identified in Section 361.5 (b) (31) (iii) of 34 CFR Part 361, Regulations for the State Vocational Rehabilitation Program. (Federal Register, January 17, 2001, V66(11), page 4386.

SPSS, a computer program, was used to draw a simple random sample of 700 agencies from the list of 3,075 agency names and addresses. All policies set forth by the Department of Health and Human Services for the Protection of Human Subjects were followed. This included the maintenance of confidential records to ensure the privacy of the respondents. Each agency was assigned a code number for confidentiality and for follow-up contacts. The mailing list was maintained on a computer with the addresses and code numbers as an Excel spreadsheet separate from the survey responses. In addition, this spreadsheet did not include the individuals' names associated with the agencies and corresponding code numbers.

2.2. *Survey development*

The development of the questionnaire consisted of five primary activities: (1) generate and select items, (2) internal review and approval by the Department of Labor including review by ODEP staff, (3) review and approval by the Office of Management and Budget (OMB) under the Paperwork Reduction Act including posting of an announcement of the survey in the Federal Register [16,17], (4) review and approval by the University of Massachusetts' and Virginia Commonwealth University's Institutional Review Boards, and (5) revise and submit the survey for final approval. T-TAP staff from both University locations generated the items for the survey that was submitted to the Office of Disability Employment Policy. The initial draft consisted of 55 items grouped in three sections. Section one asked for the respondent's opinion on why individuals with disabilities remain in subminimum wage programs. Section two asked them to identify the factors that facilitate competitive employment, and section three asked the respondent to report on agency demographics.

After review by the Department of Labor, the survey was submitted to the Office of Management and Budget (OMB) under the Paperwork Reduction Act. As part of this process, a notice was published in the Federal Register requesting public comments [16]. This public comment period was open for 30 days from the date of posting. Information was provided in the notice on how to obtain a copy of the survey with the applicable supporting documents. Seven responses were received to the request for public comment, and changes were made to the survey based on these responses. All responses expressed concern over the proposed sample size of 341 respondents. To address this concern, the sample size was raised to 700 CRPs, and a strategy

for an aggressive follow-up by mail and telephone to collect information from non-responders was added. Six of the seven individual responses stated that the questions needed to be re-written to prevent "leading" the respondents. Items were rephrased using "a value neutral approach" to address the concern of respondent bias. Other changes were made to the survey based on the comments to include adding open-ended questions, reducing the length of the survey and numbers of items, and adding a list of definitions for the terminology used. Once this was completed, the revised survey was re-submitted for OMB review and posting in the Federal Register for an additional 30-day comment period [17]. No additional public comments were received in response to the second posting, and the survey was approved through OMB #1230-004.

In addition, the survey and required paperwork was submitted the University of Massachusetts and Virginia Commonwealth University's Institutional Review Boards (IRB). The study was reviewed as expedited, meaning that federal regulations permit the IRB chairperson or one of more experienced members to review a study if it involves no more than minimal risk for the subjects and consist of research activities that fall within specified guidelines. Both Universities' IRBs approved the survey under the expedited review process.

2.3. *Survey description*

The items were grouped into three sections to include 1) Factors That Maintain Sub-minimum Wage Employment, 2) Factors That Support Integrated Community Employment, and 3) Organizational Demographics and Characteristics. This grouping placed the questions that might be perceived by the respondents as most important at the beginning of the survey and the demographic section at the close [13]. The format consisted of 11" by 17" full-sized printed pages resulting in an 8 1/2" by 11" booklet when folded and stapled. The cover of the survey prominently identified it as a national survey of sub-minimum wage 14 (c) certificate recipients as supported by the Office of Disability Employment Policy, US Department of Labor.

Section One, Factors that Maintain Sub-minimum Wage Employment, included 21 items on such topics as fear of losing benefits, choice of program placement by parents and consumers, inability of individuals with significant disabilities to earn minimum wage or better, lack of transportation, need for facility-based programs for training and support, and funding barriers.

Section Two, Factors that Support Integrated Community Employment, included 22 items on such topics as funding options supporting community placement, consumer control and choice, parent advocacy, staff skills and knowledge, and organizational resources and mission. Items in these two sections consisted of Likert scale responses to include strongly disagree, disagree, no opinion, agree, and strongly agree.

Section Three focused on organizational demographics and included 17 questions such as organization location, number of staff employed, types of services provided, disability groups served, number of individuals served, and wages earned. These items consisted of multiple choice and item completion questions including areas where the respondent could write in comments. Specifically, respondents were asked to write-in comments on policies, organizational or individual factors that serve to maintain 14(c) programs, as well as those that would assist in expanding competitive employment opportunities for individuals with disabilities. They were also asked to write-in information on the training and technical assistance resources needed to expand their programs as well as any other comments on the survey.

2.4. Administration procedures

The survey was mailed using first class postage with a cover letter and a business reply envelope for the respondent's convenience. The survey included general instructions for completion specifying that the organization's Executive Director or Chief Executive Officer should serve as the respondent. Or, if appropriate, the CEO was asked to assign the survey to the person who was responsible for employment and other day services at the CRP. The mailing included the goals of the study, a description of T-TAP, information on ODEP, general definitions related to employment services, and an offer for a free online T-TAP training for completion of the survey. The questionnaire also provided instructions on how respondents could complete the survey online at a specific secure URL using the survey code number.

The initial mailing took place from June 16 to June 28, 2004, and a follow-up postcard reminder was mailed July 2, 2004. All programs received a follow-up phone call to encourage participation except for 70 CRPs for whom a phone number could not be identified. A final repeat mailing of the questionnaire and supporting materials was completed on September 22, 2004 with 516 surveys mailed to non-respondents. Data entry ended as of December 2004.

2.5. Data management

Surveys received through first class mail were entered into an Internet database by project staff. Or, a respondent could login to the database and enter his/her responses. Multiple responses from a single CRP or dissemination to other agencies not included in the sample were prevented, since the database accepted a code number only once. The database sorted the responses to produce a list of the code numbers representing CRPs that had returned their surveys or entered them online. This list was used to compare to the Excel Spreadsheet of names and addresses that was housed on a computer at the Institute for Community Inclusion. This was used to generate follow-up contacts and mailings assuring confidentiality of all agencies responding.

3. Results

A total of 700 surveys were mailed to the identified CRPs from the Department of Labor's mailing list of 14 (c) Certificate Recipients. From this mailing, thirty-six surveys were returned as undeliverable. Staff located the address for 15 of these agencies, and the survey was resent. No additional contact information could be located for the other agencies. Five organizations returned the survey indicating that they no longer provided 14 (c) services. Four reported that they did not provide extended employment services. Two agencies indicated that they were no longer in operation; and one reported that it did not provide employment services. Therefore, 32 of the CRPs in the initial sample of 700 were considered to be invalid sample members and were deleted, leaving 668 CRPs as the sample size. Of this number, 292 surveys were returned completed for a 43.7% response rate. The survey results are categorized for this report in the following three areas:

- Characteristics of community rehabilitation programs,
- Organizational change trends,
- Factors that influence type of employment program utilized by consumers with disabilities.

3.1. Characteristics of community rehabilitation programs

Respondents were asked to report the types of services provided by their agencies and the total number of individuals with disabilities served in each category. They were then asked to indicate how many

Table 1
Employment services and definitions

Competitive Employment: Employment at an integrated job site; making at least minimum wage; where most people do not have disabilities. Individual is an employee of the community business and receives time-limited support from your organization.

Individual Supported Employment: Competitive employment at an integrated job site, making at least minimum wage; where most people do not have disabilities. Individual is an employee of the business community and receives on-going support from your organization.

Self-employment/Entrepreneurism: This service category includes self-employment, home-based employment, and small business ownership controlled/owned by the individual. This category does not include a business that is owned by an organization or provider.

Enclave: Groups of employees who have disabilities and work together on a job site receiving continual support and supervision from your organization.

Mobile Work Crew: Groups of employees with disabilities who typically move to different/multiple work sites receiving continual support and supervision from your agency.

Facility-based Work: Includes sheltered workshops or extended employment programs, including businesses that are owned and operated by your organization where most workers have disabilities. These workers are supported and paid by your organization.

Facility-based Non-Work: This includes but is not limited to psychosocial skills training, activities of daily living, recreation, and/or professional therapies such as occupational therapy, physical and speech therapy. Includes day habilitation, medical day care, and day activity programs.

Community-based Non-Work: This includes programs where people with disabilities spend the majority of their day in the community in places where most people DO NOT have disabilities. The primary focus of the activities may include general community activities, volunteer experiences, recreation and leisure, improving psychosocial skills or activities of daily living.

of these individuals earned no wages or made less than minimum wage. Table 1 contains the definitions for employment and related services that were included in the survey for Community Rehabilitation Programs to use when reporting the types of services provided. This included definitions for competitive employment, individual supported employment, self-employment/entrepreneurship, enclave, mobile work crew, facility-based work, facility-based non-work, and community-based non-work.

Table 2 summarizes the types of services provided, and the total number of people served in each category. Most CRPs offer a variety of employment services. The majority of the agencies ($n = 225$) reported providing facility-based work for a total of 87.9% of the sample. One hundred ninety-three programs (74.2%) reported that they provide individual supported employment services, while 182 CRPs (70%) indicated that they offer competitive employment services to their consumers. CRPs also reported providing facility-based non-work services, with 159 agencies or 62.6% of the sample indicating that they serve individuals in facility-based non-work programs. One hundred forty-nine respondents (58.2%) reported providing enclaves, and 143 (55.0%) mobile work crews. A fewer number of agencies reported involvement in community-based non-work services or 91 (36.7%) of the programs. The least often provided option ($n = 46$) was self-employment/entrepreneurial services or 17.8% of the sample supporting individuals in self-employment.

Of the 52,946 individuals served by the agencies surveyed, the largest number or 55.8% of the total are

in facility-based programming, with 19,042 (36.0%) in facility-based work and 10,489 (19.8%) in facility-based non-work. Although 74.2% of the CRPs reported providing individual supported employment services, only 5,803 individuals were being served in this option or 11% of the total number in all service categories. A similar finding was noted for competitive employment with 70% of the agencies saying they provided this service, but only 3,981 individuals or 7.5% of the total in competitive jobs. It is also interesting to note that 36.7% of the CRPs reported offering community based non-work, but only 4,005 individuals or 7.6% served participate in that service. Of the group placement models, more individuals were served in enclaves or 4,332 (8.2%) as compared to 2,340 (4.4%) individuals in mobile work crews. The fewest number, only 130 (0.2%) individuals, were reported as participating in self-employment/entrepreneurial services.

Table 3 provides wage information for individuals making no wages or less than minimum wage for each service category. The largest number of individuals under the Special Wage Certificate is in facility-based work with 14,029 (73.7%) earning less than minimum wage, and 376 (2%) earning no wages in this category, while 4,637 (24.4%) earned at or above minimum wage. The individuals in the group options, 2,697 (62.3%) were working in enclaves and 1,476 (63.1%) in mobile work crews under a 14 (c) certificate earning less than minimum wage. The number of individuals receiving supported employment services and working for less than minimum wage was 609 (10.5%) of the total served in this category, with 230 (4%) indi-

Table 2
Participation in services provided by community rehabilitation programs

Service	Do you provide this service?		Total # of people in this service category	
Competitive employment	Yes:	182 (70.0%)	Total:	3981
	No:	78 (30.0%)	Percentage:	7.5%
Individual supported employment	Yes:	193 (74.2%)	Total:	5803
	No:	67 (25.8%)	Percentage:	11.0%
Self-employment/Entrepreneurism	Yes:	46 (17.8%)	Total:	130
	No:	213 (82.2%)	Percentage:	0.2%
Enclaves	Yes:	149 (58.2%)	Total:	4332
	No:	107 (41.8%)	Percentage:	8.2%
Mobile work crews	Yes:	143 (55.0%)	Total:	2340
	No:	117 (45.0%)	Percentage:	4.4%
Facility-based work	Yes:	225 (87.9%)	Total:	19042
	No:	31 (12.1%)	Percentage:	36.0%
Facility-based NON-work	Yes:	159 (62.6%)	Total:	10489
	No:	95 (37.4%)	Percentage:	19.8%
Community-based NON-work	Yes:	91 (36.7%)	Total:	4005
	No:	157 (63.3%)	Percentage:	7.6%
Other (please specify)	Yes:	17 (12.9%)	Total:	2824
	No:	115 (87.1%)	Percentage:	5.3%
Column Totals			Total:	52,946

Table 3
Characteristics of community rehabilitation programs

Service	Total # in this category who make NO wages	Total # of 14(c) workers in this category making LESS than minimum wage	Totals for previous 2 columns i.e., those making no wages or below minimum wage
Competitive employment	Total: 261	Total: 332	Total: 593
	Percentage: 6.6%	Percentage: 8.3%	Percentage: 14.9%
Individual Supported Employment	Total: 230	Total: 609	Total: 839
	Percentage: 4.0%	Percentage: 10.5%	Percentage: 14.5%
Self-employment/Entrepreneurism	Total: 2	Total: 83	Total: 85
	Percentage: 1.5%	Percentage: 63.8%	Percentage: 65.3%
Enclaves	Total: 30	Total: 2697	Total: 2727
	Percentage: 0.7%	Percentage: 62.3%	Percentage: 63%
Mobile work crews	Total: 1	Total: 1476	Total: 1477
	Percentage: 0.0%	Percentage: 63.1%	Percentage: 63.1%
Facility-based work	Total: 376	Total: 14029	Total: 14405
	Percentage: 2.0%	Percentage: 73.7%	Percentage: 75.7%

viduals working for no wages. Approximately 4,964 (85.5%) of the individuals in supported employment earned at or above minimum wage. Of the individuals in competitive employment, respondents reported that 3,358 (85%) are working at or above minimum wage, 332 (8.3%) are working under a 14(c) certificate earning less than minimum wage, while surprisingly 261 (6.6%) individuals in this category were working for no wages. Eighty-three individuals in self-employment or 63.8% of the total receiving support in this service category are working under a 14(c) certificate and earning less than minimum wage. While this was the smallest number in a service under the Special Wage Certificate, it represents the greatest percentage earning less than minimum wage of any single category provided by the CRPs completing this survey.

The survey asked respondents to identify the number of staff members that work with individuals who make no wages, sub-minimum wage, or at least minimum wage. Table 4 presents information on the total number of staff reported as providing supports for consumers and the staff assignment in each of these wage categories. Of the 20,075 staff members identified as serving consumers, only 1,741 (8.7%) are reported as working with individuals earning at least minimum wage. The majority, or 11,333 (56.5%), of staff members are providing services to individuals making no wages. The remaining 7,001 (34.9%) staff members work with individuals earning less than minimum wage.

The survey asked that organizations report the primary disability groups for individuals served. Over 80% reported that persons with developmental disabilities

Table 4
Staff distribution

Wage category of consumers	Total # of staff working with consumers in wage category	% staff assignment per wage category
No wages	11,333	56.5%
Less than minimum wage	7,001	34.9%
At least minimum wage	1,741	8.7%
Column Total	20,075	100.1% (Rounding)

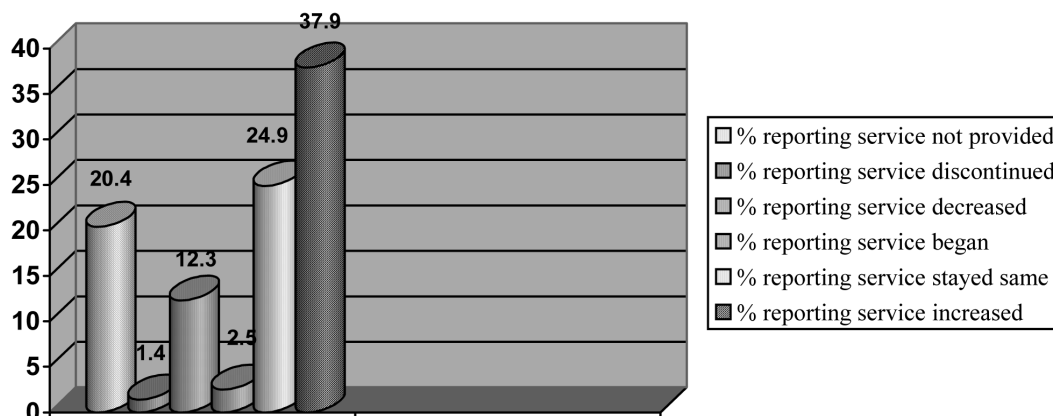


Fig. 1. Reported changes in competitive employment services over the past 3 years.

represented most or nearly all of the individuals they support. Only 4.6% of the organizations reported serving none or few individuals with developmental disabilities. The next most frequently identified disability group served is individuals with mental illness but only 8.7% of the organizations reported that this disability group represents most or nearly all of the individuals that they support. The remaining 61.8% of the agencies reported serving none or few individuals with mental illness.

3.2. Organizational change characteristics for community rehabilitation programs

The survey asked respondents to report what changes had occurred in the services that were provided during the past three years. They were instructed to mark one of the following six choices: service was not provided, service was discontinued, service began, numbers served decreased, numbers served stayed the same, or numbers served increased. Figures 1–8 provide the reported changes for competitive employment, individual supported employment, self-employment/entrepreneurship, enclaves, mobile work crews, facility-based work, facility-based non-work, and community-based non-work. CRPs reported similar trends in service provision for competitive employ-

ment (Fig. 1) and individual supported employment (Fig. 2). Competitive employment was reported as not provided by 20.9% of the agencies during the past three years, was discontinued in 1.4%, decreased in 12.3%, begun in 2.5%, and stayed the same in 24.9% of the agencies. Supported employment services were reported as not provided during the past three years by 20.1% of the agencies, was discontinued in 1.4%, decreased in 12.9%, begun in 2.2%, and stayed the same in 24.4% of the CRPs. In contrast, competitive employment services increased in 37.9% of agencies; while 39.1% of the respondents reported that their agencies had increased the numbers of individuals served in supported employment during the past three years.

Reported changes in self-employment/entrepreneurial services were very small and can be seen in Fig. 3. Of the agencies reporting that they provide this service, 4.3% reported increasing self-employment as an option, 5% said that the service had begun, while 9% of the CRPs indicated that the service had remained the same during the past three years. For those indicating that the service had decreased or been discontinued, 1.4% decreased the service and 0.4% discontinued self-employment as an option.

The changes reported for the group services of enclaves (Fig. 4) and mobile work crews (Fig. 5) were very similar. Of the total CRPs who provide these services, 21.1% of the organizations increased the use of

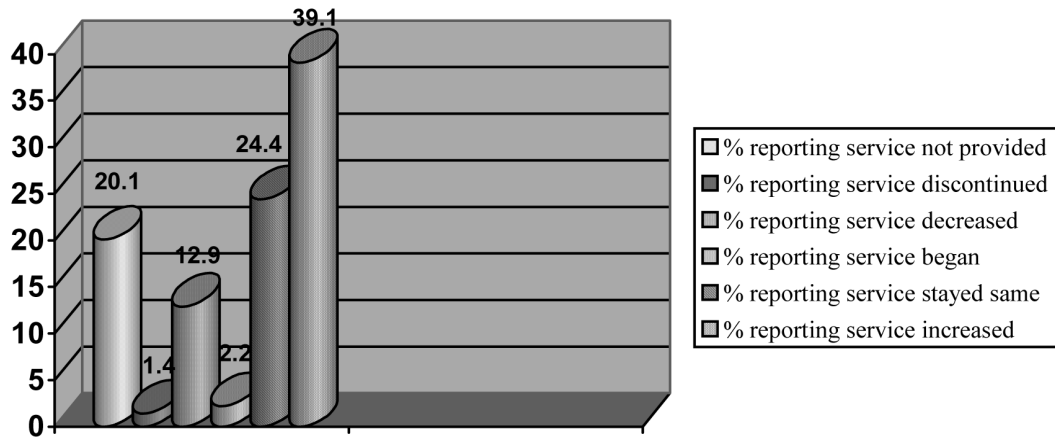


Fig. 2. Reported changes in individual supported employment over the past 3 years.

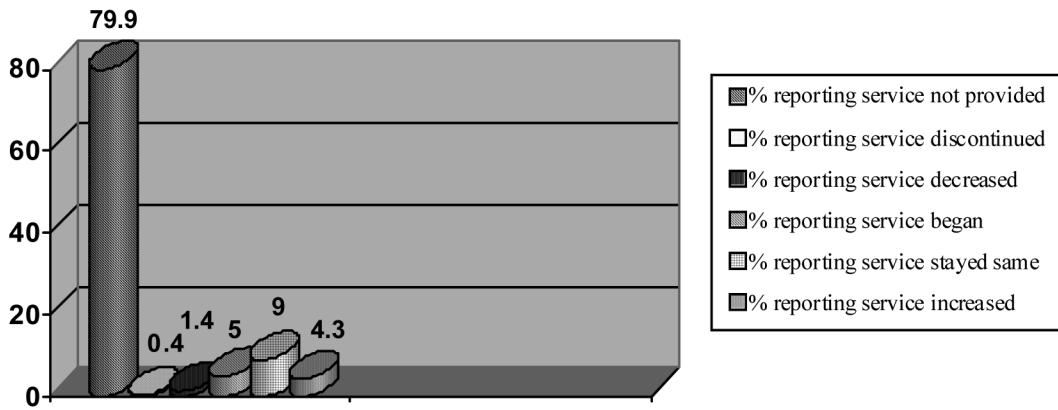


Fig. 3. Reported changes in self-employment over the past 3 years.

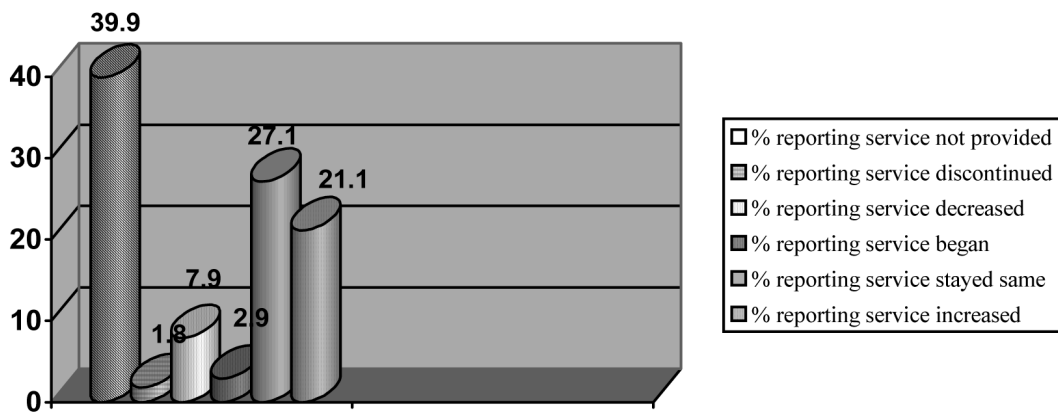


Fig. 4. Reported changes in enclaves over the past 3 years.

enclaves while 22.5% increased the use of mobile work crews. Of those who began the service during the past 3 years, 2.9% began the use of enclaves, with a similar finding for mobile work crews or 3.2% of the agencies

reporting beginning that service. Only a small percentage of the sample decreased or discontinued the use of enclaves or 7.9 decreasing and 1.8% discontinuing the use of enclaves while 5% decreased and 2.9% discon-

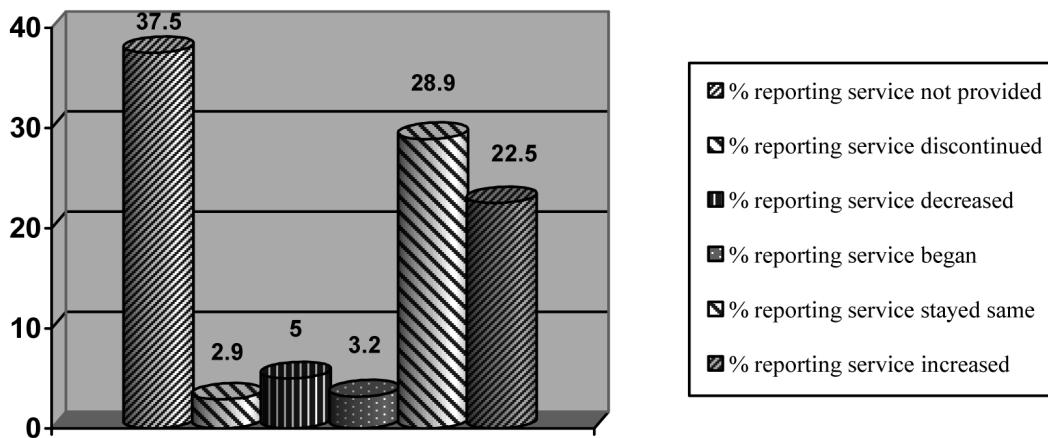


Fig. 5. Reported changes in mobile work crews over the past 3 years.

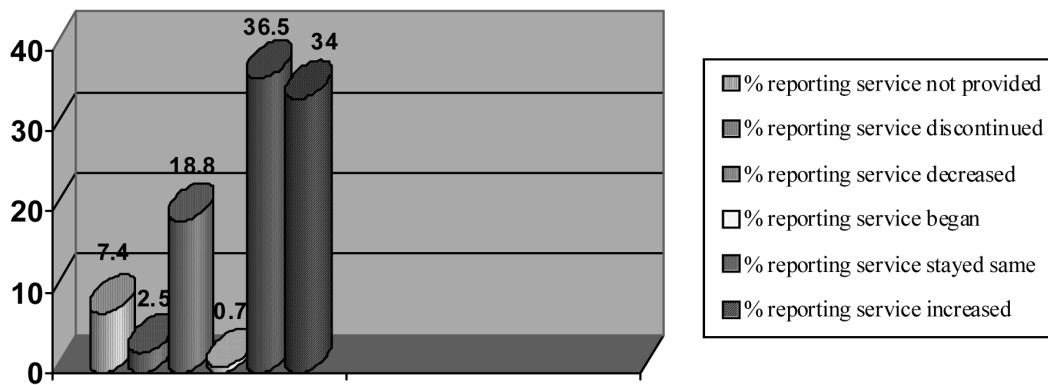


Fig. 6. Reported changes in facility-based work over the past 3 years.

tinued the use of mobile work crews. Finally, 39.9% of the sample reported that they do not provide enclaves and 37.5% do not provide mobile work crews.

Changes reported for Facility-based Work services are particularly notable and can be found in Fig. 6. While 34.7% of the organizations increased or began use of Facility-Based Work services, 36.5% stayed the same, 18.8% decreased the use, 2.5% discontinued, and 7.4% did not provide facility-based work services during the past 3 years. The reported change in decreasing the use of facility-based work (18.8%) was the largest decrease for any of the defined services.

Changes reported for the non-work services of facility-based non-work can be found in Fig. 7 and community-based non-work in Fig. 8. Facility-based non-work was reported as not provided by 28.3% of the agencies during the past three years, was discontinued in 0.7%, was decreased in 11%, was begun in 0.7%, and stayed the same in 31.8% of the agencies. Community-based non-work services were re-

ported as not provided during the past three years by 45.7% of the agencies, was discontinued in 0.7%, was decreased in 4.6%, was begun in 2.1%, and stayed the same in 19.1% of the CRPs. In addition, facility-based non-work services increased in 27.6% of agencies; while 25.9% of the survey respondents reported that their agencies had increased the numbers of individuals served in community-based non-work during the past three years.

Table 5 summarizes the growth trend changes that have occurred in services provided by the responding organizations over the past three years. Competitive employment (+26.7%) and Individual Supported Employment (+27%) have the highest net increase in services. In comparison, the net increases reported for Facility-based Work (+18.4%), Enclaves (+14.3%) and Mobile Work Crews (+18.4%) were noticeably lower than those reported for competitive employment and individual supported employment. Use of community-based non-work (+22.7%) increased at

Table 5
Changes in services provided over the past three years

Service	% of programs that began or increased service	% of programs that decreased or discontinued service	Net change in service over the last three years (difference between previous 2 columns)
Competitive employment	40.4%	13.7%	+26.7%
Individual supported employment	41.3%	14.3%	+27%
Self-Employment	9.3%	1.8%	+7.5%
Enclaves	24%	9.7%	+14.3%
Mobile work crews	25.7%	7.9%	+18.4%
Facility-Based work	34.7%	16.3%	+18.4%
Facility-Based non-work	28.3%	11.7%	+16.6%
Community-Based non-work	28%	5.3%	+22.7%

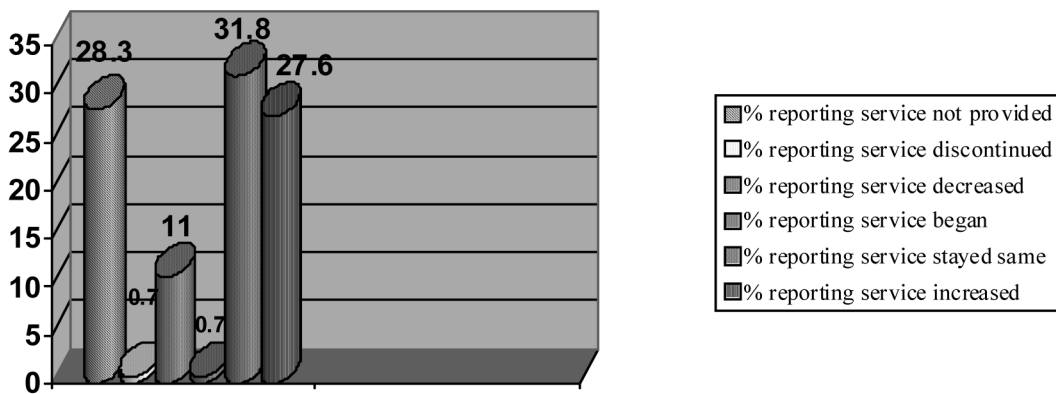


Fig. 7. Reported changes in facility-based non-work over the past 3 years.

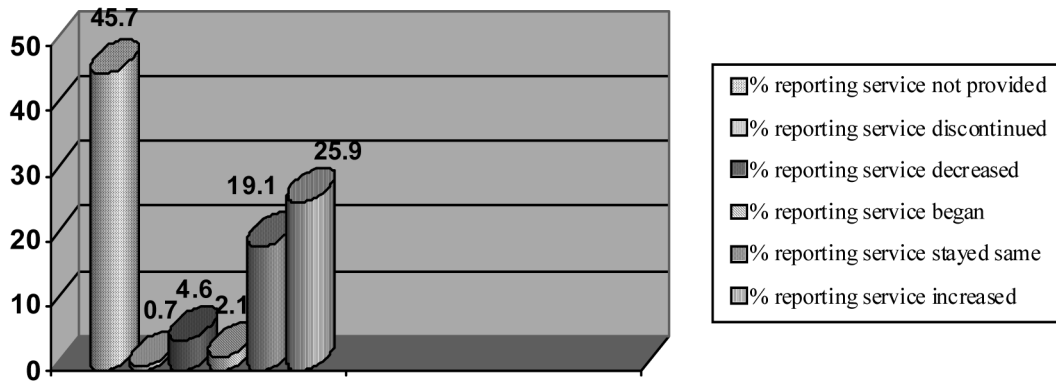


Fig. 8. Reported changes in community-based non-work over the past 3 years.

a higher rate than the change in use of Facility-based non-work (+16.6%).

3.3. Factors that influence type of employment program utilized by consumers with disabilities

The survey sought to identify factors that maintain individuals in subminimum wage employment. Table 6 identifies the response patterns of the respondents. The

two factors ranked highest by respondents as influences that maintain sub-minimum wage employment are that (1) facility-based programs are needed to provide employment opportunities to individuals who have difficulty or are unable to maintain employment in community jobs (88.6% agreement) and (2) there will always be some individuals with disabilities in my organization who will need to have facility-based employment (87.2% agreement). Other factors for which there was

Table 6
Response patterns of respondents to factors that maintain sub-minimum wage employment $n = 290$

	Statement	Agree	Disagree	No Opinion
Item 15*	Facility-based programs are needed to provide employment opportunities to individuals who have difficulty or are unable to maintain employment in community jobs.	88.62% 257	6.55% 19	4.83% 14
Item 11	There will always be some individuals with disabilities in my organization who will need facility-based employment services.	87.24% 253	8.28% 24	4.48% 13
Item 9	Enclaves and mobile work crews are good intermediary steps/work settings for helping individuals move from segregated employment options to integrated community jobs.	84.48% 245	7.93% 23	7.59% 22
Item 10	Facility-based work programs provide valuable training to prepare individuals with disabilities for integrated community employment.	78.97% 229	17.24% 50	3.79% 11
Item 3	Parents of consumers who work in our sub-minimum wage program(s) prefer their sons and daughters remain in these programs.	75.52% 219	11.38% 33	13.10% 38
Item 6	Limited transportation options for individuals with disabilities in my community make access to community jobs difficult.	75.52% 219	20.00% 58	4.48% 13
Item 1	Individuals in our sub-minimum wage programs prefer/choose to stay in these programs.	69.66% 202	20.00% 58	10.34% 30
Item 4	Individuals who are in our sub-minimum wage program(s) are not able to earn minimum wages (e.g., do not have sufficient level of productivity or work skills).	67.93% 197	24.14% 70	7.93% 23
Item 19	The mission of our organization includes providing sub-minimum wage employment options for individuals we support.	66.32% 193	24.05% 70	9.62% 28
Item 7	Facility-based programs are needed to provide additional day services for "unfilled" time such as after hours when the individual is not employed in a competitive community job.	62.07% 180	25.52% 74	12.41% 36
Item 2	Fear of losing benefits such as SSI, SSDI, and/or health care is one of the primary reasons individuals in our sub-minimum wage/14 (c) program(s) do not want competitive jobs.	59.31% 172	32.07% 93	8.62% 25
Item 13	There are not enough direct service staff in my agency to support everyone with disabilities in competitive jobs who want to work in the community.	59.31% 172	33.10% 96	7.59% 22
Item 17	Funding levels for services in our area are too low to support individuals in community jobs.	55.67% 162	27.49% 80	16.84% 49
Item 20	Maintaining sub-minimum wage employment options is a priority for our organization's administration.	51.03% 148	33.45% 97	15.52% 45
Item 12	There are no jobs for individuals with significant disabilities in my community due to the current poor economic climate (e.g., high unemployment rate of individuals without disabilities).	43.64% 127	43.99% 128	12.37% 36
Item 21	Income generated by our facility-based work programs such as sub-contract income is crucial to the survival of our organization.	40.69% 118	48.97% 142	10.34% 30
Item 14	Our integrated employment funders (e.g., Vocational Rehabilitation) will not support/fund services for individuals with significant disabilities, and so they remain in our sub-minimum wage program(s).	40.21% 117	39.18% 114	20.62% 60
Item 16	We receive funding that can only be used to support facility-based programs (e.g., facility-based work and non-paid day activity programs).	36.77% 107	52.92% 154	10.31% 30
Item 8	In general, employers in my community are not receptive to hiring individuals with disabilities from my organization.	30.69% 89	56.55% 164	12.76% 37
Item 18	Integrated community employment is not a priority outcome for funding agencies in our area.	23.79% 69	16.55% 48	59.66% 173
Item 5	There is a long waiting list in my agency for consumers to move to community jobs earning at least minimum wage.	21.03% 61	67.93% 197	11.03% 32

*Item number corresponds to the question location on the survey.

strong agreement among respondents include the importance of enclaves and crews as intermediary steps helping individuals move from segregated employment (84.5%), facility-based work providing valuable training to prepare individuals with disabilities for integrated community employment (79.0%), the preferences of parents for their sons and daughters to work in the sub-minimum wage programs (75.5%), and limited available transportation options making access to community jobs difficult (75.5%).

The factors rated lowest by respondents as influences that maintain sub-minimum wage employment were the presence of long waiting lists in the organizations for consumers to move to jobs earning at least minimum wage (67.9% disagreement), employers in the community not being receptive to hiring individuals with disabilities from the respondent's organization (56.6% disagreement) and funding can only be used to support facility-based programs (52.9%).

The survey sought also to identify factors that sup-

Table 7
Response patterns of respondents to factors that support integrated community employment $n = 290$

	Statement	Agree	Disagree	No Opinion
Item 15*	During annual planning, each individual is asked about his/her interest in integrated community employment.	85.52% 248	7.59% 22	6.90% 20
Item 16	Our organization's administration supports expanding the number of individuals we support in integrated community employment by transitioning individuals from our facility-based programs.	75.86% 220	8.97% 26	15.17% 44
Item 17	Direct support staff have the skills necessary to support individuals in integrated community employment.	71.03% 206	17.93% 52	11.03% 32
Item 5	Intensive training is available in our state or region for support staff that facilitate community employment for individuals with disabilities (e.g., job coaches, employment specialists, employment consultants).	55.86% 162	32.41% 94	11.72% 34
Item 7	Staff have completed an approved training curriculum on how to facilitate competitive employment and support individuals with disabilities in integrated community employment.	52.23% 152	35.74% 104	12.03% 35
Item 19	Our organization has annual performance goals/ objectives for expanding the number of individuals who will move from sub-minimum wage programs to integrated community employment.	51.89% 151	34.02% 99	14.09% 41
Item 1	Dollars or funding traditionally used to support facility-based work or other day program placement can be used to support the individual in integrated community employment.	48.28% 140	37.59% 109	14.14% 41
Item 4	Parents have advocated for access to integrated community employment for their sons or daughters.	48.11% 140	31.27% 91	20.62% 60
Item 18	Our organization has a formal written plan to expand integrated community employment outcomes for individuals we support.	47.08% 137	38.14% 111	14.78% 43
Item 9	Staff who are currently working in our facility-based program(s) are re-trained to support individuals in integrated competitive employment.	41.72% 121	38.97% 113	19.31% 56
Item 3	The consumer with a disability has control over where dollars are spent to support his or her employment goals.	38.62% 112	42.41% 123	18.97% 55
Item 8	There are sufficient staff available in my organization to support individuals served by my agency in community jobs.	38.62% 112	54.48% 158	6.90% 20
Item 21	Individuals in our sub-minimum wage programs are asking for an opportunity to work in integrated community employment.	36.90% 107	48.97% 142	14.14% 41
Item 6	Intensive training is required in our state or region for support staff that facilitate community employment for individuals with disabilities (e.g., job coaches, employment specialists, employment consultants).	34.71% 101	48.45% 141	16.84% 49
Item 14	Employers in our community have a good understanding of how individuals with disabilities can be productive employees.	32.99% 96	51.89% 151	15.12% 44
Item 13	There is reliable public transportation to assist individuals with disabilities in getting to and from work.	23.45% 68	71.38% 207	5.17% 15
Item 2	The Medicaid buy-in program in our state allows the individual in integrated community employment to purchase health care insurance.	22.34% 65	21.65% 63	56.01% 163
Item 11	My organization receives individualized technical assistance from an external consultant(s) on how to find jobs for individuals in the community.	17.24% 50	73.45% 213	9.31% 27
Item 12	My organization receives individualized technical assistance from an external consultant(s) on how to train individuals to successfully perform paid work in integrated community employment.	15.52% 45	73.45% 213	11.03% 32
Item 22	"Bridge funding" is available from our funders to support organizations that are transitioning services from a facility-based model to integrated community employment.	9.66% 28	55.86% 162	34.48% 100
Item 20	Closing our facility-based programs is a goal of our organization.	9.31% 27	76.21% 221	14.48% 42

*Item number corresponds to the question location on the survey.

port integrated community employment. Table 7 identifies the response patterns of respondents. The two factors ranked highest by respondents as influences that support integrated community employment are that (1) during annual planning, each individual is asked about his/her interest in integrated employment (85.5% agreement) and (2) the organization's administration supports expanding the number of individuals supported

in integrated community employment by transitioning individuals from our facility-based programs (75.9% agreement). Another factor for which there was strong agreement among respondents was that direct support staff have the skills necessary to support individuals in integrated community employment (71.3% agreement).

The factors rated lowest by respondents as influences

that support integrated community employment were that the closing of our facility-based programs is a goal of our organization (76.2% disagreement), the organization receives individualized technical assistance from an external consultant(s) on how to find jobs and how to train individuals to successfully perform paid work in integrated community employment (73.5% disagreement), and there is reliable transportation present to assist individuals with disabilities in getting to and from work (71.4% disagreement).

4. Discussion

The purpose of the present study was to examine the characteristics of Community Rehabilitation Programs that participate in the US Department of Labor Special Wage Certificate Program, as well as organizational trends and factors influencing segregated versus integrated employment. This study is the first of its kind of which the authors are aware and as such provides an important baseline of information on facility-based employment.

As noted earlier, Braddock and his colleagues [5] reported that segregated employment is increasing more rapidly than integrated employment. However, this research does not focus exclusively on providers who hold Special Wage Certificates, nor does it provide a more in-depth look at some of the issues influencing these programs. Given the enormous interest in integrated employment by the federal government as demonstrated by the US Senate hearings on October 20, 2005 by Senate Health, Education, Labor and Pensions Committee, the results of this survey provide an important background to the ongoing discussions in this area.

4.1. What are the characteristics of 14 (c) programs?

The 292 community rehabilitation programs that responded to the survey reported serving 52,946 individuals, 180 of these or (62.7%) primarily provided services to individuals with developmental disabilities. The most highly utilized program was facility-based work, with almost 88% of the agencies providing this service. Other services offered included competitive employment and individual and group models of supported employment with the majority of the CRPs offering all of these services. The key finding from this survey is the minimal participation in the integrated employment options. Of the 52,946 participants, 36%

were being served in facility-based work while another 19.8% were in facility-based non-work, for a total of 55.8% receiving segregated services. Even though most CRPs offer both integrated and non-integrated services, the majority of the individuals with disabilities supported by these agencies are not in integrated employment. For example, only 7.5% of the 52,946 participants were being served in competitive employment, 11% in individual supported employment, and 0.2% in self-employment.

These data are consistent with the Wehman, Revell, and Kregel [55] findings that showed dramatic growth in supported employment but not in the context of reducing the number of individuals in segregated services. Likewise, Braddock and his colleagues [5] report an increase in supported employment from 9 to 24% from 1988 to 2002. However, the majority of individuals with significant disabilities continue to be served in segregated employment or non-work services provided by community rehabilitation programs and participation in these services is growing faster than participation in integrated employment [4,5].

Approximately 75% of the individuals with disabilities in the facility-based work category were earning less than minimum wages. Similarly, individuals served in group-supported employment placements were making less than minimum wage, specifically 63% of those in enclaves as well as 63% of the total number in mobile work crews. Subminimum wages and segregated work are inconsistent with full community participation and access to "regular lives" for individuals with disabilities as envisioned by the Americans with Disabilities Act and the Olmstead v. L.C. Supreme Court Decision. Senator Edward Kennedy directly addressed this issue in the United States Senate [47]:

Disabled Americans want to work and contribute to their communities in the same way as their non-disabled friends and families. They have dreams just like everyone else. For far too long, we've been denied the talents and contributions of thousands of our fellow citizens, "Just because they are disabled." As Senator Enzi said, people with disabilities are unemployed at the unacceptably high rate of 70%. When we passed the landmark Americans with Disabilities Act in 1990 that was not the vision we had in mind. The Act was about much more than curb cuts. It was about improving access to opportunities, especially jobs, for people with disabilities.

The ADA itself built on significant progress over the past four decades. In the 1970's, we passed Section 504 of the Rehabilitation Act to end discrimination in the schoolhouse and promote equal opportunities for people with disabilities. We built on this promise in 1975, by passing the Individuals with Disabilities Education Act. Last year we reauthorized this important civil rights law for the 6.5 million students with disabilities and their families. We want them to have greater opportunities after they leave the schoolhouse, but in too many cases they still do not. The promise of IDEA and ADA and the powerful vision of lives in the community that developed out of the Supreme Court's "Olmstead" Decision have failed to penetrate much of the modern workplace.

Given the fact that individuals with disabilities are viewed increasingly as vocationally competent through research efforts [7,8], by demonstration efforts funded by ODEP through the US Department of Labor, as well as through the eyes of the public [43], then it is problematic that CRPs are providing predominantly segregated work and non-work. This is especially underlined when states such as New Hampshire and Washington report a consistent level of integrated employment opportunities for their state individuals with developmental disabilities [7,8,22].

4.2. Demographics of CRPs in the T-TAP survey

According to the survey, there are approximately 20,000 staff serving 52,946 individuals, while only 1,741 (8.7%) work with people who are earning minimum wage. The remaining staff dollars are allocated to those participants who are making less than minimum wage or no wages. Why is this finding critically important? This is important, because the very nature of a dynamic CRP suggests that there should be movement away from segregated to integrated employment [7,8]. Customized employment, supported employment, and self-employment are characterized by immediate employment at a minimum wage or above with the clear knowledge that staff resources and supports are absolutely crucial. In other words, if one looks at the work published by Griffin et al. [6]; Brookes-Lane, Hutcherson, and Revell [6]; Callahan [10]; Wehman [49]; Wehman, Revell and Brooke [54]; Luecking et al. [30]; or Butterworth et al. [9], the critical importance of employment supports by staff is clear. Hence, staff resources must be re-allocated to integrated employment

outcomes if movement away from segregated services is to occur.

The essential importance of workplace supports for success in employment by many individuals with significant disabilities has been clearly demonstrated [51]. These supports include employer negotiations, job coaching, assistive technology, coworker mediated supports, and many other types of supports. This thinking has been reinforced and validated through the American Association on Mental Retardation's Supports Intensity Scale (SIS) [45] that reflects modern day thinking about evaluating an individual with a disability based on their support needs, not a disability label. This thinking is a logical progression from the pioneering behavioral technology work of Marc Gold [18] into the supported employment era [50], the natural supports period [34], and in recent years, self-employment [20, 21] and the customized employment initiatives by the US Department of Labor.

4.3. What trends in participation in different employment models is there over time?

Given the status of these data, it would be very helpful to know if there are any organizational trends over time that might indicate that there is at least a move away from high levels of segregated low paid employment with a disproportionate number of staff assigned to facilitate integrated employment outcomes. Fortunately, the survey allowed for an analysis of the different employment models used over the past three years by the CRPs who responded to the survey. Table 5 addresses this analysis that is both positive and negative.

Competitive employment and individual supported employment programs have each increased by over 40% and decreased about 14% among the CRPs surveyed, leaving a net gain of approximately 27% for each integrated employment model. Unfortunately, these data only show that CRPs reported expanding the use of these models during the past three years. The actual number of individuals with disabilities that exited the CRPs for integrated employment is unknown.

When one looks further at Table 5, it is readily apparent that the numbers being served in facility-based work and non-work options as well as community-based non-work continue to increase. For proponents of integrated employment, persons with disabilities, and hopeful parents whose children are exiting public school, this is disappointing information (see Robert Lawhead, parent, and Michael Nelson, consumer testimony) [47]. The expansion of these nonintegrated em-

ployment models is inconsistent with what the research literature says about the positive vocational capacity of people with developmental and other disabilities [3,42, 49,52].

So what is seen from these organizational characteristics and trends? Facility-based work, facility-based non-work and community-based non-work dominate in number of participants served, and individuals with disabilities are supported by the majority of staff employed by these programs. The data show that only 9,784 individuals are in competitive employment and individual supported employment placements of the total 52,946 served by the respondents. Even though integrated employment models are reported to be rising, there is not a pronounced move away from segregated services.

4.4. What factors influence CRPs' thinking on facility-based programs?

Most respondents to the T-TAP survey, almost 89%, believe facility-based programs are essential for individuals with disabilities who are having difficulty getting or maintaining real work in the labor force. These programs are perceived as valuable training opportunities for preparing individuals with disabilities to work by 79% of the respondents. This vocational preparedness or readiness philosophy is also seen in the very high percentage of respondents, over 84%, who view enclaves and work crews as necessary intermediate steps to integrated employment. Consistent with these findings is the perception that "Individuals who are in our 14 (c) programs are not able to earn minimum wage." Approximately 68 % of the sample agreed with this statement, while over 65% agreed with the statement: "The mission of our organization is to provide subminimum wage employment."

Table 6 documents the belief held by many 14(c) providers that individuals with developmental and other disabilities are unemployable. The survey results are fairly consistent from item to item. Segregated, facility-based programs continue to thrive in spite of the number of laws passed, Medicaid Waivers authorized, customized employment initiatives, evidence-based articles published, or extraordinarily strong statements made from advocacy groups such as the Arc of the United States [28].

There are a number of perceptions as to why supporters of segregated employment believe that these programs are needed as reported in this survey's results. These include:

- Parents prefer segregated employment.
- There is no transportation available.
- People with disabilities choose/prefer to stay in subminimum wage programs.
- Individuals are not able to earn minimum wages.
- Individuals with disabilities fear losing their Social Security Disability benefits.

However, programs that successfully support individuals in competitive employment have addressed these barriers [6]. As an example, in September of 2005, 2400 Americans with disabilities, their family members, and the people who work with them came together to participate in a Summit sponsored by eleven national organizations [1]. These "voices" concluded that people with disabilities have as much to contribute and want the same things as other Americans from American society.

"We do not belong in segregated institutions, sheltered workshops, special schools or nursing homes... We can work in worthwhile jobs. We know how to help each other do this. It is being done in some places just not all places. We hope to be welcomed to work for the American dream alongside other Americans."

4.5. What did CRPs think about ways to support integrated employment?

Perhaps not surprisingly, the responses by CRPs toward expanding integrated employment were not indicative of a strong movement away from facility-based services towards integrated employment. The most heavily agreed upon item was that individuals with disabilities are asked during their annual program planning about their interest in working. Eighty-five per cent of the respondents agreed with the importance of this item. Approximately 75% indicated that their CRP supports expanding the number of integrated employment slots. However, only 52% had annual performance goals for expanding the number of individuals moving from subminimum wage jobs to integrated community employment. Also, previous responses as reported in Table 6 suggest that a large majority of the CRPs maintain a commitment to facility-based programs. There is no obvious reason for these conflicting statements.

Intensive training opportunities, staff retraining and staff having access to an approved training curriculum all received approximately a 50% agreement level. Less than 50% of CRPs had a written plan to expand integrated employment outcomes. Less than 40% indi-

cate that Medicaid buy-in is available, that transportation options are available, that employers are willing to hire, or that individuals with disabilities are asking to go to integrated employment. Perhaps the most revealing item is that only 9% agreed with the statement: "Closing our facility-based programs is a goal of the organization". Not far behind is that less than 20% agreed that there was individualized technical assistance available to help persons find jobs and to perform real work in the community. These attitudes and perceptions give clear insight into the reasons why necessary changes in the majority of CRPs are not being made to facilitate integrated employment outcomes. However, if additional resources and incentives became available for integrated employment, it would be interesting to see if CRPs would begin to prioritize these services vs. facility-based programs.

4.6. Implications and the federal role

There is obviously a rather sharp incongruity between what many of the federal policies, laws and regulations say about integrated employment and what is actually happening in community rehabilitation programs that utilize the Special Certificate program under Section 14(c) of the Fair Labor Standards Act. According to the Developmental Disabilities Act of 1984 and subsequent amendments, integrated employment is a priority for individuals with developmental disabilities. According to the Rehabilitation Act of 1973 and subsequent amendments, competitive employment is a priority outcome. In 2001, the Rehabilitation Services Administration ceased to count sheltered employment as a closure. The Americans with Disabilities Act prohibits discrimination in employment for which an individual with a disability is otherwise qualified. The ADA represents a promise to individuals with disabilities to provide equal access and equal opportunity to competitive employment opportunities.

In addition, the Medicaid Waiver has provided tremendous long-term resources for people needing supported employment in numerous states in instances where the supported employment component of the Waiver has been written in an advantageous fashion [57]. IDEA, the special education law, suggests the importance of productive employment in the context of transition. The Ticket to Work and Work Incentives Improvement Act offers beneficiaries the opportunity to select their own provider for help in competitive employment. In short, the federal statutes are supportive of integrated employment for individuals with dis-

abilities. But, are they really? The fact is that many of federal programs critical to persons with disabilities being successful in integrated employment do not in fact place an emphasis on funding integrated employment outcomes. For example, the Medicaid Waiver can be used to fund supported employment, but it is used more often to support community-based non-work and prevocational activities. Much depends on who writes the waiver and what [5]. stipulations are included. The Fair Labor Standards Act Section 14 (c) provides for the Special Wage Certificate, a commensurate wage that is often less than the statutory subminimum wage. Essentially, this law allows for the segregated employment for thousands of Americans with disabilities. The Javits Wagner O'Day Program (JWOD) is established to offer employment opportunities for individuals with significant disabilities. However, recent hearings in the US Senate noted the very limited movement to integrated employment outcomes occurring through the JWOD program. The following is an excerpt of an opening statement made by Senator Michael Enzi at Senate Hearings on the JWOD program on October 20, 2005:

According to statistics from the Committee for Purchase from Persons Who are Blind or Severely Disabled, which sets JWOD program rules, only 5 percent of JWOD workers move into supported or competitive employment each year. While JWOD program jobs grew 22 percent from 2001 to 2004, the rate of placement out of the JWOD programs into supported or competitive employment fell 1 percent. We can do better than this by getting more workers into the employment mainstream.

The Workforce Investment Act (WIA) offers One-Stop Career Centers that are open to persons with disabilities. However, at the same time, WIA carries rigorous performance standards in terms of numbers served and placed by these Centers that make it more difficult for participation by persons with significant disabilities. A report completed by the Government Accountability Office (GAO) [19] states the following: "The performance measurement system may result in customers being denied services, because local areas may be reluctant to provide WIA-funded services to job seekers who may be less likely to find employment." This is despite the efforts of Labor to ensure comprehensive access to services including the guidance and assistance on the regulatory requirements issued by the Office of Disability Employment Policy [19]. The DOL Employment and Training Administration (ETA) has also attempted to support the One Stop Centers in serving

persons with disabilities through a variety of initiatives including use of program navigators, providing guidance through Training and Employment Guidance Letters (TEGLs) and Training and Employment Information Notices (TEINs), and the ETA Civil Rights Center.

One of these efforts included building the capacity of One-Stops to implement customized employment through ODEP funded demonstration efforts that operated throughout the country. There have been 29 customized employment projects that were conceived as a way for the generic One-Stop System to welcome and serve individuals with disabilities [10]. These were strategic planning, demonstration, and systems change grants to improve the quality of employment outcomes for people with disabilities, resulting in competitive jobs in integrated employment settings in the community that provide career advancement and pay at least minimum wage. However, considering that there are approximately 1,900 one-stops, located in about 600 local areas nationwide [19], there is little wonder that many One-Stops may not be meeting the needs of individuals with disabilities.

Finally, consider the Supplemental Security Income (SSI) and the Social Security Disability Insurance (SSDI) programs. These two programs were designed to provide income and support to those individuals with disabilities who are considered not capable of self-sufficiency. Unfortunately, fear of losing benefits, as well as medical coverage under Medicaid or Medicare, often has persuaded beneficiaries to significantly limit their employment earnings, or to not enter the labor force at all [27]. While the Social Security Administration (SSA) has implemented a number of work incentives to reduce these risks and barriers through the Ticket to Work and Work Incentives Improvement Act of 1999 such as the Benefits Planning, Assistance, and Outreach program, many individuals with disabilities remain unemployed or underemployed. Perhaps, it is not so surprising that millions of Americans who live and work in the community are confused about the true vocational potential and capacity of persons with disabilities.

4.7. Conclusion

In summary, the results of this survey are of concern, because CRPs, the organizations that provide daily services to Americans with disabilities, are continuing to provide predominately facility-based services. This is despite the documented knowledge that many, if not most of their constituents, could be in integrated com-

munity jobs earning at least minimum wage working alongside their non-disabled peers. This paper provides examples of federal statutes and programs that are perhaps being implemented in such a way as to not consistently promote integrated employment. The authors believe that Congress and the federal policy makers in, for example, the Department of Health and Human Services for the Medicaid Waiver; the Social Security Administration for work incentives related to SSI and SSDI; and the Department of Labor for the Javits Wagner O'Day, the Workforce Investment Act, and the Fair Labor Standards Act should reconsider the mixed messages that laws send in content, in interpretation, and in actual implementation. The federal government also needs to significantly expand its investment in integrated employment as the preferred vocational outcome for individuals with disabilities including technical assistance for organizational change that will expand CRPs' integrated employment services.

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