

Feedback about draft plan

To Whom It May Concern,

The Arc Minnesota appreciates the opportunity to provide feedback on the proposed 2026 Amendment to Minnesota's Olmstead Plan. We value the work of the Olmstead Implementation Office, state agencies, and consultants with lived experience of disability who have contributed to updating this important plan.

Minnesota's Olmstead Plan is a critical tool for advancing the civil and human rights of people with disabilities to live fully integrated lives in their communities. Continued public input is important to make sure the Plan reflects the intent of Olmstead v. L.C. and the Americans with Disabilities Act and leads to lasting improvements in policies, services, and supports.

Founded in 1950 by parents of children with intellectual and developmental disabilities, The Arc Minnesota is a statewide nonprofit dedicated to promoting and protecting the human rights of people with intellectual and developmental disabilities. We support people with disabilities and their families so they can be included in their communities, make their own choices, and fully participate in daily life. Our comments are grounded in the experiences of people with disabilities and families across Minnesota.

While we appreciate the effort that has gone into this draft, we do not believe the current version fully meets the goals of Olmstead or creates the level of systems change that is needed.

Vision and Overall Direction

The current vision does not clearly explain the changes needed to improve systems and services. Specifically, it does not clearly establish:

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- Clear expectations for full systems transformation
- Defined goals for full community inclusion
- A commitment to eliminating segregation, not just reducing it
- Establish a plan to track progress and report results to help make sure goals are being met
- A commitment to funding and resources to ensure strategies can be carried out

A strong vision must do more than share values. It must clearly explain what full inclusion looks like in everyday life.

Goals and Ambition

Many of the proposed goals reflect minimal improvement over long timeframes (e.g., 2–4% increases). These goals do not reflect the urgency of the barriers people still face or the need for meaningful changes to systems and services.

When expectations are set low, it sends a message—intentionally or not—that the state does not fully believe in the abilities, contributions, or rights of people with disabilities. The Olmstead Plan should instead reflect high expectations aligned with full inclusion, equity, and opportunity for people with disabilities.

Additionally, compliance with existing law should not be reframed as a future goal. For example, the goal stating that by June 30, 2030, 100% of students with disabilities will have complete postsecondary transition planning in their IEPs is already required by law. This should already be happening and enforced now, not treated as a future target. Presenting it as a long-term goal may suggest a lack of urgency in fixing known gaps in the current system.

The same statewide percentage goals may not work equally well in every part of Minnesota. Different regions have different needs, available services, and staffing levels. Because of this, a 2–4% increase could be much easier in some areas and much harder in others. levels. Because of this, a 2–4% increase could be much easier in some areas and much harder in others.

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Without taking these differences into account, statewide goals may hide gaps and allow inequities to continue, especially in Greater Minnesota and other underserved areas. The Plan should include goals based on the needs and starting points of different regions. It should also include strategies to make sure progress happens fairly across all parts of the state, instead of using the same goals for every community.

Accountability and Responsibility

The Plan often says agencies will “work together” but does not clearly explain who is responsible for what. Without this information, it is harder to hold agencies accountable and make sure action happens.

Each goal must include:

- Defined roles for partner agencies
- Ways to make sure people and agencies are held responsible and progress is tracked
- A plan to make sure enough funding is available to follow through on commitments

Meaningful Involvement of People Directly Impacted

We are concerned that feedback from consultants and people directly impacted by these systems is not meaningfully reflected in the draft.

The Plan references concerns raised by the disability community, such as services not working well together, people losing benefits when their income increases, and lack of coordination between systems. However, the proposed goals and strategies do not fully address these problems or improve the systems causing them.

Meaningful engagement requires more than collecting input. It requires transparency about how that input shaped decisions. The Plan should clearly:

- Show how feedback from people directly affected by these systems was used to make changes to the Plan
- Make sure the goals address the concerns raised by the disability community

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- Make sure the disability community continues to have a voice and that their feedback is used throughout implementation

Conclusion

We recommend substantial revision prior to finalization, including:

- Strengthening the overall vision for full inclusion and systems transformation
- Setting stronger and more meaningful goals
- Creating clear ways to track progress, enforce responsibilities, and provide funding
- Directly addressing known system failures
- Making sure new structures work well with existing systems

Without these revisions, the Plan may continue the current system instead of creating real community inclusion.

Minnesota has consistently demonstrated the ability to rise to complex challenges and lead meaningful systems change. However, plans built on minimal improvements do not create the conditions necessary for growth; they reinforce the current systems.

If this Plan is meant to guide real inclusion, it must set goals that push systems to improve, create better outcomes, and fully support the promise of *Olmstead v. L.C.*

Minnesota has the opportunity to lead, but only if this Plan moves beyond small changes and creates bold, measurable improvements with real accountability.

Thank you for your consideration of our recommendations.

Sincerely,



Naveh Eldar, CEO

The Arc Minnesota

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