

May 29, 2026

## Metropolitan Center for Independent Living Olmstead Plan Comments on Employment Goals

### Introduction

The Metropolitan Center for Independent Living<sup>1</sup> (“MCIL”) appreciates the opportunity to provide comments to Minnesota Draft Olmstead Plan (“Plan”). MCIL is committed to empowering members of the disability community on a pathway to overcome barriers and to discover access, choices, and the possibilities to realize their goals and aspirations. MCIL supports individuals through *7 Life Sustaining Dimensions*.<sup>2</sup> It is imperative for Minnesota’s Olmstead Plan to recognize that these 7 dimensions constitute a broader framework in which to view and understand the consequential experiences and suffering of individuals with disabilities when government fails to provide necessary supports and services in the 7 dimensions. MCIL evidences the seriousness of human suffering every day with Minnesota’s disability communities when these governmental systems fail and/or are ineptly planned, designed and implemented.

Today, people with disabilities are having to every day navigate stabilization in 7 life sustaining dimensions because of the following:

- Sizeable deficits to the state budget,
- withholding of millions of federal funds to the state of Minnesota that support needed services,

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<sup>1</sup> MCIL was established in 1981 and is founded on the [Independent Living Philosophy](#) embraced by more than 400 Centers for Independent Living Centers (CIL) across the United States. [About - Metropolitan Center for Independent Living \(MCIL\)](#)

<sup>2</sup>For a description of the Dimensions, see [MCIL 7 Life Sustaining Dimensions Model - Metropolitan Center for Independent Living \(MCIL\)](#); For a discussion of the Dimensions, see [The Civics of Health Care 7: Life sustaining dimensions](#)

- the formation of the current federal budget that vigorously pursues deep cuts to Medicaid, elimination of Section 504, and new requirements for people with disabilities to earn services for daily living,
- severe disruptions to HCBS services due to waste fraud and abuse,
- additional cuts to federal domestic spending,
- an intractable 43-year fixed asset limitations for certain federal and state services that push all who rely upon these services to deeper structural poverty,
- and a growing severe direct care humanitarian crisis.

In this broader context, there are many drivers of health, well-being, and stability that exist and the Plan must address the broader destabilizing effects on individuals, families, communities, and society. For many people with disabilities, access to healthcare, disability benefits, income support, housing assistance, caregiving, workplace accommodations, and other services can serve as critical stabilizing forces that help maintain safety, functioning, and quality of life. At the same time, navigating these systems can itself become a source of further instability when access is delayed, fragmented, or difficult to obtain. People with disabilities may struggle with activities of daily living, employment, food security, housing stability, and other essential needs. It is critical that they can access benefits, services, and programs intended to support people with disabilities. However, many systems designed to provide support are under strain, including workforce shortages, service backlogs, administrative complexity, and limited system capacity. Disability determination and related processes already present significant barriers. People with disabilities may face additional challenges due to difficulty obtaining a formal diagnosis, fluctuating symptoms, energy limitations, cognitive impacts, and other severe symptoms of their disabilities. A guiding objective should be to ensure that people can access the support they need as quickly, consistently, and equitably as possible to help stabilize their lives and reduce the cascading impacts of destabilizing efforts.

Access to competitive integrated employment (CIE), as one of the 7 life sustaining dimensions, is necessary to support and stabilize individuals with disabilities. While important on its own, access to CIE must be coordinated with other aspects of state policy and the Plan to address all 7 life sustaining dimensions.

Within the context of the 7 life sustaining dimensions that MCIL is committed to, MCIL promotes the employment of individuals with disabilities and overcoming the multiple and significant barriers to employment facing Minnesotans with disabilities. These barriers include workplace inaccessibility, lack of education and training, attitudes and stigma, limited transportation, and, among other barriers, the lack of supports and accommodations.<sup>3</sup>

On the other hand, there are critical reasons for the Plan and government as a whole to overcome these barriers and realize the many benefits to hiring people with disabilities. These benefits include increasing profits, retaining more employees, having better customer connections, and tapping into an expanded talent pool.<sup>4</sup>

Before offering a critique of the Plan's Employment Goals, the next section will show some basic employment statistics and background specific to Minnesota. This section will assist in defining the scope of needs and opportunities for the Plan's Employment Goals.

## **Minnesota Disability Employment Statistics and Background**

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<sup>3</sup> See, e.g. [Barriers to Employment: Conclusions | Minnesota Council on Disability](#) (identifying barriers as including lack of reliable information about available supports, denial of reasonable accommodations because of stereotypes, limited transportation options, support programs that discourage employment, and insufficient legal support to fight discrimination); [MN State Government Public Sector Employment Study](#) (identifying barriers of lack of disability awareness and training; unwelcoming work environments, and lack of support and accommodations); [Barriers to employment for people with a disability : The Economics Daily : U.S. Bureau of Labor Statistics](#) (identifying barriers as limits due to the disability; lack of education or training; lack of transportation; the need for special features at the job; employer or coworker negative attitudes; loss of public benefits due to work, and, among others, lack of job counseling); [Persons with a Disability: Barriers to Employment and Other Labor-Related Issues News Release - 2021 A01 Results](#)

<sup>4</sup> [MN State Government Public Sector Employment Study](#) (identifying benefits as including new employment opportunities for people with disabilities; being good for the economy to employ people who would otherwise not be working; providing the state with an additional talent pool of potential employees; the State's workforce diversity better matches the populations served; having higher retention rates for state employees with disabilities; and people with disabilities bringing new perspectives and abilities to the State's workforce); [The Business Benefits Of Hiring People With Disabilities](#) (identifying benefits as obtaining a talent advantage; increasing innovation and problem solving, building customer connections, and improving workplace culture); [How Hiring People With Disabilities Helps Businesses](#) (identifying benefits as increasing profit margin, diversifying workplace culture, increasing employee motivation and retention rates, expanding talent pool, and being able to access workplace tax credits).

In Minnesota, there are about 350,000 working age Minnesotans with disabilities.<sup>5</sup> Roughly 183,000 of them have some form of full time or part time employment.<sup>6</sup> This leaves about 167,000 individuals without any employment. Even in assuming all of the around 110,000 individuals who receive SSDI on the basis of prior work<sup>7</sup> may be unable to currently work, there are approximately 57,000 individuals with disabilities who could likely work and many others who are *underemployed* and want to increase their work and pay. Additionally, there is a significant employment gap between workers with and without disabilities.<sup>8</sup> This gap exists nationwide.<sup>9</sup> These unemployment and underemployment issues exist despite the passage and enforcement of the Americans with Disabilities Act and the Minnesota Human Rights Act and despite the United States Supreme Court decision in *Olmstead v. L.C.*, [Olmstead v. L. C. | 527 U.S. 581 \(1999\) | Justia U.S. Supreme Court Center](#).

In the context of significant unemployment and underemployment of individuals with disabilities and within the 7 life sustaining dimensions, the Minnesota Olmstead Plan must be comprehensive and robust to prevent and alleviate the human suffering of people with disabilities who have faced governmental failures and barriers.

MCIL will next critique the Plan's two goals related to Employment and its Employment data related goal in the context of Minnesota's experience with the employment of people with disabilities. MCIL will also propose how the Plan may be amended to more fully advance employment of people with disabilities.

### **MCIL Critique of Plan Employment Goals**

Unfortunately, as discussed below, the Plan's Employment Goals fall far short in seven main areas.

First, the actual number of people that will benefit directly from competitive integrated employment (CIE) under the Plan is woefully minimal. For example, in Employment Goal 1a, VRS/SSB's goal

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<sup>5</sup> [By disability status | MN Compass](#); [Minnesotans with Disabilities: Demographic and Economic Characteristics](#)

<sup>6</sup> [By disability status | MN Compass](#); [Minnesotans with Disabilities: Demographic and Economic Characteristics](#)

<sup>7</sup> [OASDI Beneficiaries by State and ZIP Code, 2024 - Minnesota](#)

<sup>8</sup> [Disability and employment in Minnesota | MN Compass](#); [Employment Status \(Employed\) by State in the United States | Northeast ADA Center](#); [Disability Employment Statistics | U.S. Department of Labor](#); [Unemployment and Underemployment of People with Disabilities: An Untapped Resource within the Global Economy | IntechOpen](#); [Disability in the Labor Market: Employment and Participation - Liberty Street Economics](#); [An observational investigation of unemployment, underemployment, and competitive integrated employment of people with intellectual and developmental disabilities in 2021-2022 - ScienceDirect](#)

<sup>9</sup> [People with a Disability: Labor Force Characteristics - 2025](#)

is to assist 45% of VR service recipients in getting CIE. From a practical perspective, this means that (using the 2025 data referred to in the draft plan), by 2030, about 230 additional people will be helped over the current baseline, or about 60 additional people per year over four years. To these 230 (or about 60 per year over four years), this is important, but we note that VR's 2025 annual report indicates that VR/SSB currently serves more than 16,000 individuals on an annual basis and there are many more thousands of underemployed or unemployed people with disabilities. However, Goal 1a only reaches about 2300 individuals over four years. Again, this goal is very minimal in the context of broader measures of people with disabilities seeking employment (around 57,000) and many others who want to increase their work and pay. Similarly, in Employment Goal 1b, VRS/SSB's goal to assist individuals who also are on waivers, is to, by 2030, assist about 100 additional people over the current baseline in the next four years, or about 25 additional people per year. Together, Goals 1a and 1b, even if fully attained by 2030, will mean that only about 330 more Minnesotans will gain access to CIE over the next four years. Minnesota can and should do better. The proposed rate of increasing CIE in Goal 1a and 1b will barely register in Minnesota employment statistics.

Second, there is no mention of DHS' responsibilities in the Plan's substantive Employment Goals.<sup>10</sup> DHS funds a large amount of employment-related supports outside of MDVA, VRS and MDE. Employment First statistics show that of the 58,000 individuals receiving employment waiver services, there are 17,000 individuals who are *already* obtaining wages with the assistance of HCBS services.<sup>11</sup> Yet, this group is essentially absent from the Plan. DHS clearly has responsibilities to assist counties that deliver employment-related HCBS services but DHS is not included in the substantive Plan employment goals. The exclusion of DHS in the Plan's employment goals is a significant oversight and huge opportunity lost.

Third, there is no mention of supporting individuals with disabilities with leaving segregated work settings for CIE. This is a recurrent public policy topic at the national and state levels, yet the Olmstead plan, despite its multiple references to the value of inclusion and integration,<sup>12</sup> the Plan

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<sup>10</sup> DHS is mentioned in the Plan's Employment Data goal, but the data goal by itself does not seek to assist people with disabilities to attain CIE.

<sup>11</sup> [Employment First Data Dashboards / Minnesota Department of Human Services](#) – based on search for employment statistics on “All Waiver Programs.”

<sup>12</sup> See, e.g. Olmstead Plan Draft - “Inclusion and integration benefit everyone, whether they have disabilities or not, Page 8; “Disabled people who experience segregation or institutionalization have what they need to transition into the community and thrive,” Page 9; “At its core, the *Olmstead* decision mandates that people with disabilities transition from institutional and

is silent on reducing segregation in employment settings. There are approximately 3500 individuals with disabilities who are in segregated work settings<sup>13</sup> and some want to attain CIE. There should be a goal, even a modest one, in this area. It is surprising that this area is entirely left out of the Plan given the Plan's repeated references to inclusion and integration is a driving factor of the Plan. The Plan has a data goal to better measure whether someone has CIE, but in the meantime, the Plan can certainly use existing data to identify and support individuals with disabilities who are known to be in segregated work sites and who are seeking CIE.

Fourth, the MDE-related employment goal, Goal 1c, is simply problematic and out of place in an Olmstead Plan. This is because Goal 1c, ensuring 100% of students have transition plans in their IEPs, is federal compliance issue with IDEA. IDEA **already requires** students with IEPs who are 16-21 years of age to have transition goals in their IEPs.<sup>14</sup> In other words, regardless of the existence of a Minnesota Olmstead Plan, school districts and the state need to ensure compliance with federal and state law. This goal should be removed because it is a compliance issue and not a voluntarily directed effort to meet Olmstead principles. At very least, it should be characterized as a strategy to actually support students of transition age in Minnesota.

Fifth, the veteran-related goal, Goal 2, proposes to assist 72 more individuals by 2031, or about 14-15 more people per year. This goal is too modest and is a disservice to our veteran community.

Sixth, in addition to the Plan having very minimal goals to support actual people seeking CIE, the Plan does not include or even refer to many already existing state efforts to support the employment of people with disabilities. It is noteworthy that the State Olmstead Plan includes some efforts through VRS, SSB, MDE, and MDVA, but not others such as the Governor's Executive Order 19-15, Connect 700, MA-EPD, Customized Employment in state jobs, tax credits for employers, and benefits planning. Because some state governmental efforts are included in the Plan and others are excluded, the Plan is not comprehensive and is not seemingly coordinated on a statewide basis.

MCIL recognizes that the Plan's employment data goal seeks to determine a better way to measure whether someone has CIE. MCIL supports this goal but encourages a broader

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segregated settings to community settings when appropriate. It also means people at risk of entering segregated settings are provided the services and supports they need to remain in the communities of their choice," Page 9.

<sup>13</sup> [Employment First Data Dashboards / Minnesota Department of Human Services](#)

<sup>14</sup> Further, Minnesota law goes beyond the federal minimum to require students who are 14-21 to have transition goals in their IEPs.

approach to examining and addressing the overall status of unemployment and underemployment of individuals with disabilities with already existing data that can be used to advance CIE.

Last, there is long-standing research available that discuss barriers to employment of people with disabilities. These barriers, as noted before include workplace physical and programmatic barriers, lack of education and training, attitudes and stigma, limited transportation, loss of public benefits due to work, and, among other barriers, the lack of supports and accommodations. Yet, the Plan is narrowly written and does not address, for example how workplace barriers can be removed, how attitudes and stigma related to employing disabilities may be addressed, how to support workers with obtaining accommodations, how benefits planning can support people making informed choices, and how state and federal options such as MA-EPD, SSI 1619 eligibility and SSI and SSDI work incentives may be more fully used.

Furthermore, and stepping back, the Plan also must recognize and focus on the human experience of people with disabilities as understood through the 7 life sustaining dimensions. In its present form, the Plan is very siloed amongst the different state agencies and goals. The 7 life sustaining dimensions represent a broader framework to not only understand what people with disabilities face on a daily basis but also how governmental agencies, programs and systems may support and facilitate the life experience of people with disabilities.

MCIL maintains that the *Olmstead* decision came about because of the destabilization of people with disabilities who relied upon needed services for stabilizing daily living in integrated settings. In turn, the Plan must comprehensively address the full range of destabilizing conditions.

### **MCIL Proposed Amendments to the Plan**

MCIL proposes to amend the Plan's Employment Goals to include these areas:

- Ensure the overall Plan is aligned with the arc of 1. How Olmstead began, 2. Current efforts to address seemingly intractable barriers toward stabilization of families, children, and individuals with disabilities. 3. Work toward vibrant communities that fully realize who we are as a constitutional society. In doing so, the Plan focuses on the overall human experience of people with disabilities as understood through the 7 life sustaining dimensions and by making explicit connections between the Plan's Employment Goals and other goals, consistent with the 7 dimensions.
- Further promoting increases in employment of people with disabilities in Minnesota State Employment consistent with Executive Order 19-15, [EO 19-15](#) and with Minnesota

Management and Budget's 5 part plan to implement the Order, [Executive Order 19 15 / Minnesota Management and Budget \(MMB\)](#)

- Advancing the use of the Connect 700 program in state government, [Connect 700 / Careers in the State of Minnesota](#); [MN State Government Public Sector Employment Study](#)
- Advancing the use of the Customized/ Supported Work Program in state government; [MN State Government Public Sector Employment Study](#); [Sec. 43A.421 MN Statutes](#)
- Advertising and promoting Tax Credits for Employers to fund reasonable accommodations; [Tax Credits / Minnesota Department of Employment and Economic Development](#)
- Promoting state government efforts to work with employers in hiring more people with disabilities; [Hiring People with Disabilities / Minnesota Department of Employment and Economic Development](#)
- Consider options to identify transportation barriers and to promote and increase effective and accessible transportation to work; [Barriers to Employment: A Lack of Accessible Transportation | Minnesota Council on Disability](#); [Disability Employment: Getting to and Accessing Work Opportunities](#);
- Encouraging employment benefits planning/counseling consistent with current efforts, [Disability Benefits 101 / Minnesota Department of Human Services](#)
- Discussing the availability and use of ABLE accounts to save money for the future while working, [ABLE ACCOUNTS](#); [DB101 Minnesota - ABLE Accounts: The Basics](#)
- Encouraging the use of MA-EPD, [2.3.5 MA for Employed Persons with Disabilities](#), the use of SSI 1619 options, [2.3.7 MA 1619\(a\) or 1619\(b\)](#), and the use of SSI or SSDI work incentives, [DB101 Minnesota - Work Incentives: The Basics](#)
- Reducing the number of people in segregated work and supporting them in competitive integrated employment consistent with the 2024 Task Force; [DHS-8397-ENG \(2023 DSD Legislative Report: Task Force on Eliminating Subminimum Wages\)](#); [Task Force on Eliminating Subminimum Wages / Minnesota Department of Human Services](#) [Employment First Data Dashboards / Minnesota Department of Human Services](#); [Ending the Subminimum Wage in Minnesota](#)

- Educating employers, employees, and job seekers about the value of employment of people with disabilities to address attitudinal and stigma barriers.<sup>15</sup>
- Educating employers, employees, and job seekers about ADA Title I and MHRA rights, responsibilities, and protections to help remove physical and other barriers to employment.

## **Conclusion**

MCIL appreciates the opportunity to comment on the Plan's Employment Goals. Please contact Dan Stewart, ADA Advocacy Response Director, [dans@mcil-mn.org](mailto:dans@mcil-mn.org), with any questions.

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<sup>15</sup> [Disability in the Workplace - 2024 Tracker Insights Report](#)



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