

Spring 2026 Public Comment Summary: Employment

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Introduction

This report shares findings from the spring 2026 public comment period on the draft Olmstead Plan. The public comment period sought feedback about proposed Olmstead Plan goals.

Draft Olmstead Plan background

The first Minnesota Olmstead Plan was adopted in 2015. In 2023, the Olmstead Subcabinet decided it was time for a more comprehensive update. For the plan update, OIO worked with a contractor called Dendros Group. Dendros Group brought on people with lived experience of disability as Inclusion Consultants. Inclusion Consultants worked with state agency staff to write goals and strategies for the draft plan.

The draft plan included both measurable goals and data collection goals. Measurable goals are specific, measurable, achievable, relevant, and time-bound (SMART). Measurable goals are the foundation of an effective Olmstead Plan. Data collection goals represent issues that agencies want to write goals about, but don't have the data to create a measurable goal yet. The draft plan grouped goals into seven topics:

- Crisis services
- Education
- Employment
- Health and safety
- Housing
- Transportation
- Transition

For more information about Olmstead, the 2026 plan drafting process, and to read the draft plan, please visit the OIO website: [MN.gov/olmstead](https://mn.gov/olmstead)

Public comment period background

The Olmstead Implementation Office (OIO) held the public comment period in partnership with the Dendros Group, Inclusion Consultants, and state staff. The public comment period took place in April and May 2026. It included:

- An online survey
- Virtual meetings and individual interviews
- Email comments and submissions from organizations

Online survey

The online survey was available in English, Spanish, Hmong, Somali, and American Sign Language (ASL).

Survey participants could choose which goal topics to share feedback about. They could also choose to give general feedback about topic areas overall, specific feedback about individual goals, or both. The survey was anonymous, and all questions were optional.

Survey questions

The survey asked the following questions about each topic area:

- Do you think reaching these goals will improve the lives of Minnesotans with disabilities? (multiple choice question)
- Are there any topics or issues you feel are missing from these goals? (comment box question)
- Do you have any general feedback about these goals? (comment box question)

The survey asked the following questions about each individual measurable goal:

- Do you think this is an important question for the lead state agency to address? (multiple choice question)
- This measurable goal is... (multiple choice question)
- Do you have any ideas of other strategies and action steps to reach this goal? (comment box question)
- Do you think reaching this goal will improve the lives of Minnesotans with disabilities? (multiple choice question)

For data collection goals, the survey asked, “Do you have any feedback about this goal?” with a comment box.

The survey also included optional demographic questions.

Virtual meetings and individual interviews

Dendros Group planned and implemented virtual meetings as part of the public comment period. Inclusion Consultants facilitated the meetings. Dendros held seven meetings, one for each topic in the plan. The meetings were intended to be an accessible alternative to the online survey. Registration was open to the public, and the meetings took place on Zoom.

Facilitators asked the following questions during virtual meetings:

- What would make these goals more effective to improve the lives of Minnesotans with disabilities?
- What would make these goals more effective to better integrate Minnesotans with disabilities in community life?
- What's missing from these goals?

Dendros Group also offered individual interviews. The interviews were intended to be an accessible alternative to the survey and virtual meetings. Inclusion Consultants conducted the interviews.

Email comments and submissions from organizations

OIO also received public comments through email. These comments came from individuals and organizations.

Goals included in this report

- Employment Goal 1: More people with disabilities will have jobs in the community.
- Employment Goal 2: More Veterans with disabilities will have jobs in the community.
- Employment Data Goal 1: More people with disabilities will have jobs in the community.

Total number of community input submissions and comments

This table shows the number of submissions and comments about employment.

Source	Number of submissions	Number of comments
Survey	43	120
Virtual meeting	19	Not available
Emails and letters	4	15

Notes:

- Submissions from organizations are counted as one respondent.
- The number of comments from virtual meetings is not available.

- Interviews are included in the survey totals.
- The number of survey submissions counts people who answered open-ended questions. Some participants may have only answered multiple-choice questions. For that reason, the number of survey submissions may not match the number of responses to multiple-choice questions.

General feedback

This section summarizes feedback about the topic overall. Feedback about specific goals is included later in this document.

Survey question: Do you think reaching these goals will improve the lives of Minnesotans with disabilities?

Response	Count	Percentage
Yes, good improvement	17	34.7%
Yes, some improvement	17	34.7%
No improvement	8	16.3%
Unsure	7	14.3%
Total	49	100%

Themes from all input

The goal targets are too low.

A high number of respondents felt that the goals lacked ambition and appeared grounded in what could most easily be accomplished by agencies than the needs of disabled Minnesotans.

- From the Employment public comment meeting: “A participant stated they would prefer loftier goals for percentages, noting current goals are only 4% or 7%. Another participant wondered if it would be helpful for the state if goals were broken down by regions, with clearer percentages by region, noting differences between greater Minnesota and the metro.”
- “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.”

- “In general, they seem to have been written for the agency instead of disabled Minnesotans who want to have employment and income. Section ‘about this target’ seems to have been written for the agency instead of people with disabilities. I don't [doubt] there are many challenges but [it comes] across as excuses. I would really like a goal that 75% of students with disabilities leave school with a job. That would lead to great outcomes, students never going to a day program. Instead of ensuring more use getting CIE (competitive, integrated employment) experience, ensure that more students are working PT for graduating and moving into permanent jobs.”

Employers should be incentivized and held accountable.

Respondents noted that some employers continue to discriminate against people with disabilities and would like employment goals to focus on enforcement and accountability. Some suggested offering incentives to employers who hire and retain employees with disabilities.

- From the Employment public comment meeting: “A participant stated, ‘Businesses don't know what CIE (competitive, integrated employment) is,’ and recommended that educating businesses ‘should be a main goal of VRS (Vocational Rehabilitation Services) and DHS (Department of Human Services),’ ... Another participant raised the role of employers and how they will be incentivized to hire people with disabilities, noting that the Work Opportunity Tax Credit ended at the end of 2025. The expiration of the federal tax credit leaves a gap with no replacement identified.”
- “Employers are not interested in hiring neuro diverse employees. There is no benefit to spend the extra time and energy to hire people with disabilities ... Without incentives employers are not interested in community integration.”
- “The plan falls short on how it will work with employers on reasonable accommodations, recruitment and retention strategies for employers.”
- “Unfair barriers, such as ‘must be able to occasionally lift 50 lbs’ when used on the job under a certain amount of times, should be removed from job descriptions as they discriminate against disabled people as an unspoken barrier.”

Subminimum wage

There were differing views on subminimum wage and sheltered workshops, with a higher number of respondents in favor of abolishing subminimum wage in Minnesota. Some suggested doing this through legislation, while others suggested that expanding and improving at- or above- minimum wage employment options and accommodations for people with disabilities would make an impact.

- “Jobs need to be custom employment based with quality wages and jobs that use the skills of the disabled person in a fair way so that subminimum wages do not exist.”

- “DEED (Department of Employment and Economic Development) cannot merely ‘promote hiring;’ it must use its financial leverage to enforce a hard phase-out of the sheltered workshop model. Providers must be forced - via targeted transition grants and strict funding cutoffs - to dismantle their segregated models and transition entirely into individualized CIE (competitive, integrated employment) job development.”

State systems are too complicated and do not hold employers or agencies accountable.

Respondents expressed frustration with complicated systems and an apparent lack of accountability and enforcement for employers.

- “People with disabilities get caught up in a confusing, unclear employment services system that everyone--providers, case managers, families, etc.--struggles to understand and navigate ‘correctly.’ Where are the goals and strategies that acknowledge this and put the responsibility on the state agencies to improve this process?”
- “I encourage the state to continue exploring pilot models and partnerships that strengthen employment pathways while also supporting providers, support workers, and operational sustainability. Successful employment outcomes depend not only on placement, but on continued community inclusion.”
- “A self-advocate spoke in support of employment goals because she is now middle-aged, and she never had access to employment services growing up or navigating employment independently. She lives in rural Minnesota.”
- “... there is no strong emphasis on enforcement and provider accountability ... there is limited focus on removing underperforming providers or tying funding strictly to sustained employment outcomes.”
- “... the goals do not sufficiently address systemic barriers created by over-fragmentation of services. Individuals are often required to navigate multiple programs (DEED, DHS waivers, mental health services, rehabilitation programs, etc.) with overlapping requirements. A clearer, streamlined employment pathway with defined accountability would be more effective than expanding interagency coordination structures.”
- From the Employment public comment meeting: “Several participants questioned the validity of specific benchmarks. One noted Vocational Rehabilitation Services (VRS) ‘has been declining in the number of people they are serving’ and ‘they’re starting to charge for some of their service,’ asking ‘Why would we make that the benchmark?’”
- From the Employment public comment meeting: “Multiple participants described coordination failures. One participant described a ‘terrible experience when three agencies are in charge’ and stated Vocational Rehabilitation Services (VRS) ‘recently, in October 2024, stopped supporting people in transition programs’ while ‘VRS is blaming MDE (Minnesota Department

of Education).’ They observed, ‘People pointing at each other instead of taking responsibility,’ and expressed ‘very little confidence that putting all three agencies in charge will result in action.’”

- From the Employment public comment meeting: “(VRS) restructured in the middle of last year and lost a lot of funding. We still haven’t had very many referrals[since then] ... where are all those individuals going?... I’m sure that there’s a ton of individuals in our high schools [in Bemidji, MN] who are not getting quality transition services because we no longer can provide it.”

People need sustained, quality employment built on person-centeredness.

Respondents emphasized the importance of not just getting but maintaining a job, as well as quality employment with opportunities for growth that center the person and not just statistics.

- From the Employment Public Comment meeting: “Multiple participants criticized the focus on statistics rather than meaningful outcomes. One stated employment is ‘not just about getting a job ... that is aligned with the individual interests and strengths’ and noted ‘this is just about statistics right now - that's not what's going to make people independent.’ The same participant added ‘we do not do person-centered right now’ and ‘person-centered should be in this plan.’”
- From the Employment public comment meeting: “The plan measures initial job placement but not retention. Transition services are understaffed and of low quality, undermining the pipeline to employment. One participant called to follow up with people who leave employment, noting there is no guarantee about long-term or permanent employment.”
- “Please make sure you honor informed choice and person-centered planning to allow those people with disabilities to have employment choices from the widest array of options ...”
- “... there is limited discussion of placement appropriateness and long-term stability. Employment should not only be measured by job placement, but by sustained employment, wage progression, and reduction of dependency on public systems over time.”
- “[The goals] do not help the majority of people with disabilities find sustainable jobs. Not to mention, the HUGE underemployment most folks with disabilities are stuck doing. My DD cousin stopped working and was very frustrated – ‘all they want me to do is clean [redacted] off toilets. Why should I be stuck doing that.’ ADHD and ASD friends find obtaining meaningful, lasting work very difficult. My aspie adult child sat home for over a year, with 3 AA degrees in an in-demand field because she was unable to get past the interview process. I tried to get Voc Rehab help in increasing their interview skills sadly, they didn't ‘qualify.’ They are currently working in a dead-end job, full-time, no health insurance, no leave time, poverty wages. A small, family-owned business finally gave them a chance, but not the standard benefits. This happens to many people with disabilities.”
- “Working one day/two hours a week at minimum wage is considered a successful placement. By the time taxes are taken out, there is not enough to even go out to eat. While it may be a

social outing for the client, there have been many job coaches with the feedback being 'not enough hours.' The client has asked for either more days or more hours but nothing changes. This has been addressed at annual/semi-annual team meetings and still nothing changes. The client has requested vocational rehabilitation services with the goal of finding a better job fit but has been denied since they 'have a job currently.' Anyone without a disability can search for and change jobs at any point they choose to. But not in the disability community."

Income limits are harmful to employees with disabilities.

Respondents felt that the current employment goals do not address income limits for services as a barrier to competitive, integrated employment (CIE).

- "The formula for how much a disabled employee can earn also needs to be addressed, both from Social Security disability benefits and Medical Assistance benefits. It's criminal the way things are now - one cannot support themselves fully without being booted off of any government assistance. Plus, one cannot support themselves only by government assistance without working somewhere. It's all a catch-22, in my opinion - damned if you do, damned if you don't."
- From the Employment public comment meeting: "One participant noted that waivers limit the amount of time that clients can work, which makes it difficult to afford things like groceries."

The shortage of quality, well-trained staff should be directly addressed.

In response to specific goals as well as general feedback, many respondents cited a shortage of employment services staff and/or issues with uncaring or untrained staff.

- From the Employment public comment meeting: "Participants noted that addressing support staff shortages is missing from the goals. Going from person to person to get support is difficult and having one person to take someone through the full process would be better."
- "There are vague references to the workforce who provide support for people with disabilities, but without clear goals around workforce training and retention, these goals won't be met. Chronic understaffing and lack of training available for staff make it difficult for them to do their jobs supporting people to find and keep jobs in the community."
- "There have to be facilities to house such transition programs, led by well trained staff. This seems to be one of the biggest problems. Training of staff."
- "Well trained job coaches are and should be a very important part of this plan. In order to keep people served safe and to protect the business they are working for. Cannot be a one size fits all type of training for job coaches. They need to work with the person served as well as their team for the best outcome."
- "We should consider strategies that provide case managers further training on employment supports for people leading to competitive integrated employment. In many parts of the state

with more limited employment support access, there is an overreliance on subminimum wage and day programming.”

Transportation issues impact employment in Greater Minnesota and rural areas.

Respondents noted that limited transportation options in some areas is a barrier to employment.

- “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. 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.”
- “Address transportation access in every individual’s service plan.”
- From the Employment public comment meeting: “A participant stated, ‘Transportation is a huge barrier to employment in rural Minnesota,’ and gave an example where ‘busing service was taken down and that prevented all but one employee from getting to work.’ They concluded, ‘Goals are great, but there are overarching systemic issues that need to be addressed in relation to employment,’ and there is ‘no easy way to get around employment issues without also addressing transportation issues.’”

Other missing topics

Some of the other topics people mentioned missing from the employment goals were:

- Goals tied to public feedback: “The plan indicates that during the inception - 2000 people provided input - and then a follow up with an additional 500+ respondents - I am struggling to see how many of the goals link back to that feedback - and how that input drove the plan. There should be a very clear linkage between input and the plan - and it is not apparent what that linkage is ...”
- Assistive technology: “Assistive Technology assessments, services and equipment is important for people with disabilities to achieve vocational goals and employment.”
- Working with counties: “County cultures are changing. Case managers are a huge key for employment. I realize they are not under the jurisdiction of DEED (Department of Employment and Economic Development), but a goal about improving case managers belief systems, culture skills is imperative”
- Holistic approach: “These goals would be strengthened by including more focus on workforce ecosystem stability, provider support, and coordinated job coaching systems. Many employment outcomes are impacted by staffing shortages, compliance burdens, transportation between employment services, residential providers, and community supports.”

Feedback about individual goals

Employment Goal 1: More people with disabilities will have jobs in the community.

Lead agencies: Department of Employment and Economic Development (DEED), Minnesota Department of Education (MDE), Department of Human Services (DHS)

This goal has three parts:

- Goal 1A is about people who receive services from Vocational Rehabilitation Services or State Services for the Blind (VRS/SSB)
- Goal 1B is about people who receive both Medicaid waiver services and VRS/SSB services
- Goal 1C is about students ages 16 and up who have Individualized Education Programs (IEPs)

Survey questions about Employment Goal 1

The following tables show results of multiple-choice survey questions.

Do you think this is an important issue for DEED, MDE, and DHS to address?

Response	Count	Percentage
Very important	15	83.3%
Important	3	16.7%
Not very important	0	0%
Not at all	0	0%
Unsure	0	0%
Total	18	100%

Employment Goal 1A: This measurable goal is...

Response	Count	Percentage
Too high	3	17.6%
Just right	2	11.8%
Too low	9	52.94%
Not sure	3	17.6%
Total	17	100%

Employment Goal 1B: This measurable goal is...

Response	Count	Percentage
Too high	3	17.6%
Just right	2	11.8%
Too low	7	41.2%
Not sure	5	29.4%
Total	17	100%

Employment Goal 1C: This measurable goal is...

Response	Count	Percentage
Too high	2	12.5%
Just right	10	62.5%
Too low	2	12.5%
Not sure	2	12.5%
Total	16	100%

Do you think reaching Employment Goal 1 will improve the lives of Minnesotans with disabilities?

Response	Count	Percentage
Yes, good improvement	9	52.9%
Yes, some improvement	4	23.5%
No improvement	3	17.6%
Not sure	1	5.9%
Total	17	100%

Themes from all input about Goal 1 overall

The goal targets are too low, unclear and limited to specific populations.

- “With the draft goal, the hoped-for change is that ~177 (and fewer for 1B) more people with disabilities will have some form of community-integrated employment at the end of 5 years, which would represent .5% of the total population of people served by DHS not in integrated employment in 2023. In that broader context, the goal is just too low. Even taking the modest growth target of 1% improvement and applying it to the larger DHS population numbers (i.e., increasing the number of people with disabilities in integrated community employment from

19.2%-to-24%) would represent far more progress than the current goal envisions (~2,236 more people in integrated community employment as opposed to ~177).”

- “The proposed goal of achieving 45% Competitive Integrated Employment (CIE) by 2030 is unacceptably low. Setting a target where the majority of individuals served by VRS (Vocational Rehabilitation Services) and SSB (State Services for the Blind) will fail to achieve CIE accepts systemic failure as the baseline.”
- “The targets for this goal are too low. OMHDD appreciates the description of the challenges outlined in the draft surrounding the timelines, from start to finish, for someone to find competitive integrated employment. That said, an increase of just 3.5% in the next four years seems low, particularly when considering people already being served by VRS/SSB in various stages of the process.”
- “Why is this goal limited to people eligible for Voc Rehab or SSB benefits only? Is it because that is measurable and achievable. MOST people with disabilities DO NOT qualify for these two programs.”
- “In addition to clearly stating the actual target number for employment, not just an undefined percentage, also explain why no numbers are offered for the students in transition goal.”
- “OMHDD has concerns about a plan continuing to rely on the Employment Capacity Building Cohort as a strategy surrounding students in the transition years. As we have pointed out for many years, this is an extremely small group. Focusing on strategies with a broader impact on more students with disabilities is not only more equitable but will result in a greater return on investment.”

Themes from all input about Goal 1A

Employers should be incentivized and held accountable.

- “Instead of spending state funds on ‘disability awareness training’ for businesses, DEED (Department of Employment and Economic Development) must aggressively expand direct economic interventions to employers. Action steps should include robust, long-term wage subsidies, frictionless funding for on-the-job accommodations, and fully funding job coaching models, making it economically advantageous and risk-free for a business to hire a disabled worker.”
- “The current strategy places too much responsibility on state agencies like VRS (Vocational Rehabilitation Services) and SSB (State Services for the Blind) to directly drive employment outcomes, rather than holding the broader employment services market accountable. This creates an overextended government role and does not build a sustainable, market-driven system.”
- “Use programs like MEED program in 1980s to help people get jobs by subsidizing employers for profit and nonprofit.”

Themes from all input about Goal 1B

Some populations experience increased barriers to employment.

Respondents indicated an overall lack of focus on racial and ethnic disparities throughout the plan and note that it was one of the themes of the public input meant to inform the goals. Specifically, they feel Employment Goal 1B fails to be specific about how barriers will be addressed.

- “... directly address systemic barriers for underserved populations, including BIPOC individuals, by measuring and enforcing equity in employment outcomes rather than simply improving access to services.”
- “The strategy to “address barriers” for BIPOC individuals on waivers is dangerously vague. The primary barrier is systemic racism within the county assessment (MnCHOICES) and VRS (Vocational Rehabilitation Services) eligibility processes, which frequently label Black, Indigenous, and Brown disabled folks as ‘unfeasible’ for CIE (competitive, integrated employment) or divert them to segregated day programs. DHS and DEED (Department of Employment and Economic Development) must fund independent, community-based, culturally specific navigators who operate outside the county system to enforce equity in the authorization of employment waiver funding.”
- “I also encourage stronger inclusion of culturally responsive and community-rooted organizations that often have direct relationships with underserved populations and can help bridge gaps between policy and implementation.”
- “Intersectionality: Community members said the state must address disparities based on other identities held by people with disabilities. These identities can include race, ethnicity, gender, sexuality, socioeconomic status, language, and more.”

Themes from all input about Goal 1C

Questions about the age range used for this goal

- “Transition begins at age 14, but the goal only includes students 16 and up. Correct this if it is an error, and if it is intentional, it should be clearly noted in the goal and an explanation/justification for why the goal does not account for the full transition age population provided.”
- “OMHDD has repeatedly provided comment that in MN, postsecondary transition plan requirements begin at 14 years, not 16 as is the federal requirement. To date, we have not received a substantive response ... Notably, the March 2025 MDE (Minnesota Department of Education) Part B Performance Plan Indicator Guide, while the first paragraph is verbatim for the language in the proposed plan goals, the report goes on to address students in grade 9/14 years of age while the Olmstead draft goals are silent on this requirement.”

- “It would great if transition planning started before age 16, especially related to employment. Most students are already working part time jobs at age 16, but students with disabilities are many times just being introduced to the idea of work at this age.”

This goal is already federally mandated and adds no value.

- “Setting a goal of 100% compliance for ‘complete postsecondary transition planning’ by 2030 is merely an administrative target. Having a completed transition plan in an IEP (Individualized Education Program) is already a long-standing federal requirement under IDEA. Giving districts until the end of the decade to achieve 100% compliance with a basic paperwork mandate-while failing to measure the execution of those plans-is an abdication of systemic responsibility. Furthermore, the strategies proposed completely ignore the current fiscal reality. As of 2025/2026, DEED/VRS (Department of Employment and Economic Development and Vocational Rehabilitation Services) has faced severe budget deficits resulting in the closure of waitlist Categories 2-4, and DHS (Department of Human Services) has faced reductions in waiver program funding. Writing a better transition plan does not secure a disabled youth a job if the state systems they are transitioning into are financially hollowed out.”
- “This goal merely duplicates existing federal requirements and does not add additional value for students with disabilities ... Like other goals that simply duplicate agency responsibilities to state and federal entities, OMHDD considers it a missed opportunity to strive beyond minimum standards in our state’s Olmstead plan. At its core, an Olmstead plan is a forward-thinking roadmap to improve the lives of people with disabilities and maximize integration, not a vehicle to simply regurgitate existing minimum requirements.”
- From the Employment Public Comment meeting: “A third participant stated they were intrigued by Goal 1C but observed that 100% of students with disabilities completing postsecondary transition planning in Individualized Education Programs (IEPs) is already required and represents more compliance than anything.”

This goal should move beyond planning and focus on job experiences.

- “There should be efforts to getting kids jobs (not just experience) before they graduate. I have heard from all over the state that students want to access HCBS EES and EDS-Plan and VRS FIND during school. That would be a great strategy.”
- “A significant gap in the current employment strategy is the reduced emphasis on early exposure to work and career development experiences prior to age 16. Historically, these opportunities were more robustly supported through a combination of community-based organizations, Vocational Rehabilitation Services (VRS), and partnerships outside the traditional school day, allowing students with disabilities to explore work environments, build foundational employment skills, and develop career interests early. In recent years, however, due in part to budget constraints within Vocational Rehabilitation Services and State Services for the Blind

(VRS/SSB) and the shifting of greater responsibility to schools under the Minnesota Department of Education (MDE), this early exposure component has become less consistent and, in some cases, significantly diminished. As a result, families and educators have increasingly reported that students are receiving fewer real-world, hands-on employment experiences prior to high school transition planning.”

- “It would be great for more youth to get CIE (competitive, integrated employment) experience before graduation but give them a variety of experiences.”
- “... strengthening the plan will require greater emphasis on early exposure to work experiences, the quality of jobs in addition to placement rates, workforce capacity and stability, and access to transportation and benefits supports.”

There are inconsistencies in compliance and support across school districts.

- “Secondary transitions service SHOULD NOT be handled by the home school district. Of course they don't want to pay for the service. I spent two years driving my daughter from Battle Lake to Alexandria to transition school, and making the same trip to pick her up. ABSOLUTELY no help from the school district.”
- “Also, there are school districts who likely provide excellent person-centered support for employment goals. However, this is a huge challenge in Greater MN. Schools leave out the ‘individual’ in IEP (Individualized Education Program). A large component to this is likely related to available staffing support.”

Goal 2: More Veterans with disabilities will have jobs in the community.

Lead agency: Minnesota Department of Veterans Affairs (MDVA)

Supporting agency: DEED

Survey questions about Goal 2

Do you think this is an important issue for MDVA to address?

Response	Count	Percentage
Very important	11	68.7%
Important	3	18.7%
Not very important	0	0%
Not at all	1	6.2%
Unsure	1	6.2%
Total	16	100%

This measurable goal is...

Response	Count	Percentage
Too high	1	6.2%
Just right	2	12.5%
Too low	4	25%
Not sure	9	56.2%
Total	16	100%

Do you think reaching Employment Goal 2 will improve the lives of Minnesotans with disabilities?

Response	Count	Percentage
Yes, good improvement	6	35.3%
Yes, some improvement	4	23.5%
No improvement	3	17.6%
Not sure	4	23.5%
Total	17	100%

Themes from all input about Goal 2

The targets for this goal are too low and lack context.

- “The measurable goal of placing only 223 disabled veterans in jobs over five years is an unacceptable administrative target. It requires minimal systemic effort from the state to achieve such a low number.”
- “While 178 and 223 veterans are abstract numbers to me, at least there is a measurable goal. Is this a percentage of veterans in Minnesota?”
- “The discussion of the employment of Veterans needs more context and background. We appreciate the intent, but there is so much work to be done to improve employment rates for people with a wide range of disabilities. This goal does not seem to fit. The Veterans Administration is an entirely different ecosystem. Are there strong parallels or commonalities? If so, please provide that background.”
- “Basic questions 1.) As stated - goal is 178 vets employed in 1 year (2027) 2.) Goal states that 223 vets (does this include the ones from year 1?) total count or new? The metric doesn’t seem to identify if the 178 are included in the 5 year count of 223. Goals and measurement should be very clear. 3.) How can we gain employment for 178 in 1 year and then it takes 4 years to get

another 223 employed (assuming these are new)? Or, back to question #2 - if they are total - then only 45 in 4 years - that doesn't make sense either way."

Veterans face unique challenges and need stronger, streamlined employment assistance.

While there is general support for the spirit of this goal, respondents feel the target is too low, and the strategies are misaligned or missing employment-specific actions.

- "... simplify service pathways. Veterans with disabilities should not need multiple layers of navigation (healthcare systems, navigators, digital outreach networks) to access employment services. The system should be direct, efficient, and outcome-driven."
- "... the proposed strategies are deeply misaligned with the goal of employment. Nearly every action step listed-healthcare navigators, community awareness, and suicide prevention-focuses on clinical and healthcare access. While vital, these are not employment strategies. They rely on the assumption that if a veteran is connected to the VA medical system, they will magically secure a civilian job. This ignores the functional realities of transitioning to the civilian workforce with an acquired disability."
- "... strengthen performance accountability for employment service providers serving Veterans. Providers should be evaluated based on job retention, wage levels, and long-term employment stability, with underperformance resulting in corrective action or contract loss. ... Prioritize employer engagement over system expansion. Employers should be the primary driver of hiring Veterans with disabilities, with public systems focusing on removing barriers rather than building parallel outreach structures."
- "The veteran-specific goals focus entirely on healthcare access rather than directly addressing functional workplace accommodations (e.g., communication technology for service-connected hearing loss)."

Employment Data Goal 1: More people with disabilities will have jobs in the community.

Below are responses related to Data Goal 1 whose subjects are not already covered in the general themes section of this report.

- "The data development goal includes establishes a measure for competitive, integrated employment (CIE) but lack clarity on how new strategies will be different than existing Employment First and other efforts. OMHDD has posed questions and concerns surrounding the \$600 proxy as a measure of competitive, integrated employment (CIE) for many years. In response, we have been told that the data to replace it is not available. Why is it now possible? Will the new data set truly be a reliable source for the number of people in CIE? While we appreciate DEED's (Department of Employment and Economic Development) unemployment

insurance database as one source, along with DHS (Department of Human Services) subminimum wage reports, is there a reason VRS (Vocational Rehabilitation Services) data is omitted? There are existing efforts aimed at increasing awareness of how work affects disability benefits; how will this be different or augment current practices?”

- “One of the barriers to this has been the lack of communication. Many times VRS works with someone who has case management support, but they don't collaborate with the case manager. One goal that would be great is that VRS will communicate with other support providers throughout the entire process 100% of the time.”
- “Expand IPS services beyond just pilot/very small programs! Improve coordination between mental health services and VRS/IPS providers/waivered services providers so that more people with mental health disabilities get IPS services.”
- “While tracking employment outcomes is necessary, this proposed data goal is built on a deeply ableist, capitalist premise: that a disabled person's value, integration, and worthiness in society are strictly defined by their labor productivity. By setting an absolute goal that ‘more people... will have community jobs,’ DEED, DHS, and MDE (Minnesota Department of Education) are conflating the right to work with the coercion to work. Human beings have inherent ways of contributing to society outside of wage labor. If the state's only metric for successful community integration is whether a disabled person is generating value for an employer, the state has lost the plot of the Olmstead mandate.”
- “The intent of increasing competitive, integrated employment is positive, but this goal is framed in a way that expands government planning and coordination rather than improving actual employment outcomes. It risks becoming another layer of administrative goal-setting across multiple systems without clear enforcement or accountability for results.”

Other suggested strategies

This is a list of specific employment strategy ideas submitted through the online written survey. Some of these comments are also quoted above. These suggestions have not been vetted for scope or funding and are submitted as written.

Goal 1A

- “1. Force the End of the Sub-Minimum Wage Pipeline: You cannot achieve CIE outcomes while the state continues to allow parallel systems of exploitation. Despite recommendations from the state task force, legislative efforts to phase out 14(c) certificates have stalled in Minnesota, meaning the state continues to subsidize segregated, sub-minimum wage labor via Community Rehabilitation Providers (CRPs). DEED cannot merely ‘promote hiring;’ it must use its financial leverage to enforce a hard phase-out of the sheltered workshop model. Providers must be forced-via targeted transition grants and strict funding cutoffs-to dismantle their segregated models and transition entirely into individualized CIE job development. 2. Move Beyond

‘Evaluating Feasibility’ via the DIF Grant: DEED currently lists ‘evaluating feasibility’ of Progressive Employment via the Disability Innovation Fund (DIF) SWTCIE grant (the ‘Go MN!’ project) as a primary strategy. While pilot projects are useful, evaluating a demonstration grant cannot be the primary statewide action step for the next four years. DEED must pivot from evaluating to mandating that Progressive Employment, IPS, and Customized Employment are fully funded, universally available statewide standards of practice, without waitlists or geographic restrictions. 3. Direct Economic Subsidies Over ‘Awareness:’ Instead of spending state funds on ‘disability awareness training’ for businesses, DEED must aggressively expand direct economic interventions to employers. Action steps should include robust, long-term wage subsidies, frictionless funding for on-the-job accommodations, and fully funding job coaching models, making it economically advantageous and risk-free for a business to hire a disabled worker. 4. Inter-Agency Alignment on the ‘Benefits Cliff:’ For individuals across the lifespan, achieving CIE is often terrifying because of the ‘benefits cliff’-the immediate threat of losing Medicaid, MA-EPD, or SSI/SSDI upon earning wages. A critical strategy missing here is an inter-agency mandate between DEED and DHS to provide specialized, pre-employment benefits counseling. This must guarantee the protection of healthcare and waiver services before the individual begins their CIE job search, removing the primary economic disincentive to competitive employment.”

- “First, establish strict performance-based contracting. Providers should only receive funding if they demonstrate measurable success in placing individuals into competitive, integrated employment with retention benchmarks. Second, reduce duplication of services across state programs. If private providers are capable of delivering employment services, the state should not be replicating those efforts. Third, redefine the role of VRS and SSB as regulators and performance managers. This includes auditing providers, enforcing standards, and removing underperforming vendors from the system. Fourth, streamline government involvement to focus on barrier removal (such as policy and accessibility issues), rather than direct service delivery.”
- “The only program that has shown success in finding students employment after school is Project Search. Perhaps Project Search should be expanded in order to get more students employed.”
- “... other more granular, qualitative information and measures are also important in considering the number of people working in competitive integrated employment. For example, are people getting their choice of job? Are they getting the number of hours desired? Are they getting fair wages and benefits? OMHDD notes that strategies to achieve this goal include evidence-based and promising practices and supporting existing Individualized Placement and Support Projects (IPS). Why not expand IPS? It is unavailable in many parts of Minnesota. IPS is a highly cost-effective service helping people with mental illness find and maintain employment in a very person-centered model.”

Goal 1B

- “First, establish a clear transition away from subminimum wage employment, with a defined timeline and replacement pathways into competitive employment. This should include accountability for providers currently operating under subminimum wage models. Second, shift funding models toward outcome-based reimbursement. Providers serving Medicaid waiver populations and VRS/SSB clients should only be compensated based on successful competitive, integrated employment placement and retention, not service volume or participation. Third, ensure that “informed choice” is genuinely structured around competitive employment as the default expectation, not a comparative option alongside subminimum wage work. Choice frameworks should not preserve lower-wage segregation as a viable endpoint. Fourth, strengthen accountability for educational transition outcomes. Increasing IEP (Individualized Education Program) employment goals and work-based learning opportunities is appropriate, but must be tied to actual post-graduation employment outcomes, not just planning documentation. Fifth, directly address systemic barriers for underserved populations, including BIPOC individuals, by measuring and enforcing equity in employment outcomes rather than simply improving access to services.”
- “1. Eradicate ‘Informed Choice’ as a Loophole for Segregation: DEED and DHS must not merely ‘streamline’ the informed choice process; they must overhaul it entirely. Currently, disabled adults are asked to choose between the known stability of their sub-minimum wage day program and the unknown, high-risk reality of the competitive job market (which carries the threat of the benefits cliff). Action steps must require that ‘informed choice’ counseling includes a mandatory, fully funded trial period in a CIE setting via Progressive Employment, ensuring the choice is based on actual community experience rather than theoretical discussion. 2. Eliminate the MnCHOICES vs. VRS Funding Bottleneck: A primary barrier to CIE for individuals on waivers is the bureaucratic friction between DHS (county waivers) and DEED (VRS). Often, VRS demands that county waivers fund long-term job coaching, while the county demands VRS fund the initial job development, leaving the disabled individual stranded in a jurisdictional standoff. MDE, DEED, and DHS must mandate a single, unified ‘braided funding’ portal that prevents county workers and VRS counselors from denying services based on jurisdictional disputes. 3. Address BIPOC Barriers Through Independent Navigators, Not Just ‘Awareness:’ The strategy to ‘address barriers’ for BIPOC individuals on waivers is dangerously vague. The primary barrier is systemic racism within the county assessment (MnCHOICES) and VRS eligibility processes, which frequently label Black, Indigenous, and Brown disabled folks as ‘unfeasible’ for CIE or divert them to segregated day programs. DHS and DEED must fund independent, community-based, culturally specific navigators who operate outside the county system to enforce equity in the authorization of employment waiver funding. 4. Mandate Paid Pre-ETS for Youth, Not Just IEP (Individualized Education Program) Goals: Increasing the percentage of IEPs with ‘goals for life after high school’ is merely a paperwork metric.

Transition-age youth do not need more goals written on paper; they need paid labor experience. MDE and DEED must mandate that Pre-Employment Transition Services (Pre-ETS) funding is utilized to guarantee fully paid, integrated internship experiences for disabled youth prior to graduation, completely bypassing the sub-minimum wage pipeline.”

- “We should consider strategies that provide case managers further training on employment supports for people leading to competitive integrated employment. In many parts of the state with more limited employment support access, there is an overreliance on subminimum wage and day programming.”

Goal 1C

- “1. Track Systemic Gatekeeping Caused by Deficits: Because of DEED/VRS waitlists and county waiver budget cuts, schools frequently engage in ‘gatekeeping’-withholding information about VRS, Pre-ETS, or MnCHOICES assessments because they know the state funding is not there. Relying on PACER to ‘expand families’ access to information’ places the burden of navigation entirely on the parents. MDE must mandate that districts provide a frictionless, automatic referral pipeline to DEED and county waiver assessments the moment the student turns 16, and actively track when those state agencies deny or waitlist the student due to budget shortfalls. 2. Shift the Goal from ‘Planning’ to ‘Execution Outcomes:’ The measurable goal must track how many of those transition plans actually resulted in a successful, warm handoff to a Competitive Integrated Employment (CIE) setting, a post-secondary institution, or an active (non-waitlisted) VRS/waiver funding stream within 90 days of graduation. Measuring the completion of the paperwork without measuring the outcome reduces the IEP (Individualized Education Program) process to administrative churn. 3. Mandate Inter-Agency Funding at Age 16, Not Age 21: Transition planning frequently fails because schools defer financial responsibility to county waivers (DHS) or vocational rehab (DEED/VRS), but those agencies often delay authorization until the student is about to ‘age out’ at 21. MDE must institute a binding, inter-agency policy that requires DEED and DHS to actively fund and authorize employment supports (such as Pre-ETS) the moment the transition plan is written at age 16, preventing the sudden ‘services cliff’ upon graduation. 4. Decouple ‘On-the-Job Training’ from the Segregated Pipeline: MDE’s strategy to work with DEED on ‘on-the-job training’ must be strictly defined. Often, school-based transition programs place students in unpaid or sub-minimum wage enclaves and label it ‘training.’ MDE must mandate that all school-coordinated on-the-job training meets the federal WIOA definition of Competitive Integrated Employment (CIE) and is paid at or above the state minimum wage.”
- “First, simplify transition requirements and shift emphasis from documentation completion to verified participation in real employment and training experiences. Students should be measured by actual exposure to work-based learning, internships, apprenticeships, or vocational training-not the presence of planning language in an IEP (Individualized Education

Program). Second, prioritize direct employer-linked pathways over additional training frameworks and communities of practice. Schools should be expected to connect students directly to workforce experiences rather than rely on internal planning systems. Third, reduce duplication between agencies. DEED, MDE, and DHS should not each build parallel systems for transition support. Instead, define clear roles and eliminate redundant programming that adds administrative burden without improving outcomes. Fourth, expand access to hands-on vocational and technical training pathways that lead directly to employment, rather than focusing primarily on planning documentation. Real transition success is measured by skills acquisition and job placement, not paperwork completion. Fifth, ensure that postsecondary transition planning is outcome-based. The only meaningful measure of success is whether students actually move into stable employment, apprenticeships, or further training that leads to work-not whether planning documents are ‘complete.’”

- “OMHDD has concerns about a plan continuing to rely on the Employment Capacity Building Cohort as a strategy surrounding students in the transition years. As we have pointed out for many years, this is an extremely small group. Focusing on strategies with a broader impact on more students with disabilities is not only more equitable but will result in a greater return on investment.”
- “Qualitative interviews with students on how to make this successful and implement their strategies.”

Goal 2

- “1. Address Functional Workplace Accommodations for Acquired Disabilities: MDVA's strategies focus entirely on healthcare access, completely ignoring the functional realities of acquired disabilities in the civilian workplace. For example, the number one service-connected disability for returning veterans is hearing loss/tinnitus. These veterans generally do not know ASL and are thrust into a civilian workforce relying entirely on spoken English, leading to severe communication breakdown and job loss. Likewise, veterans navigating Traumatic Brain Injuries (TBI), PTSD, or limb loss require specific, non-clinical interventions to work. MDVA and DEED must create strategies that directly fund functional workplace accommodations-such as amplified communication technology, cognitive support software for TBI, and sensory-friendly workspaces for PTSD-rather than assuming clinical healthcare connections will naturally lead to employment success. 2. Fund Specialized Benefits Counseling for Veterans: Veterans face a unique and highly complex ‘benefits cliff’ involving federal VA disability compensation, military pensions, and civilian wages. MDVA must provide specialized, pre-employment economic strategy counseling that specifically calculates how civilian earned income will impact their VA rating and tax liabilities. 3. Direct Subsidies for Workplace Accommodations: Healthcare navigators do not pay for workplace accommodations. Often, civilian employers hesitate to hire disabled veterans because they do not understand how to accommodate PTSD triggers or

physical/sensory disabilities. MDVA and DEED must offer direct financial subsidies to civilian employers to fully fund required workplace accommodations, removing the financial risk from the employer. 4. Track Inter-Agency Failures (MDVA to DEED/VRS): The goal relies entirely on DEED's Veteran Employment Services program, yet we know DEED/VRS is facing severe budget deficits and waitlists. MDVA must track how often a disabled veteran is referred to DEED for employment supports, only to be waitlisted or denied due to state funding shortages. The state cannot use DEED as its primary veteran employment vehicle if DEED is structurally underfunded.”

- “First, focus on direct employment placement and retention outcomes rather than expanded outreach systems. Success should be defined by stable competitive employment over time, not just initial job placement through a program. Second, simplify service pathways. Veterans with disabilities should not need multiple layers of navigation (healthcare systems, navigators, digital outreach networks) to access employment services. The system should be direct, efficient, and outcome-driven. Third, strengthen performance accountability for employment service providers serving Veterans. Providers should be evaluated based on job retention, wage levels, and long-term employment stability, with underperformance resulting in corrective action or contract loss. Fourth, prioritize employer engagement over system expansion. Employers should be the primary driver of hiring Veterans with disabilities, with public systems focusing on removing barriers rather than building parallel outreach structures. Fifth, ensure alignment across federal and state systems (MDVA, DEED, VA programs) to reduce duplication. Veterans should experience a single, streamlined employment pathway, not multiple overlapping systems. Sixth, integrate disability-specific employment pathways that emphasize skills-based training and rapid workforce entry, rather than extended service coordination models.”
- “Qualitative interviews with Veterans on how to make this successful, what works and doesn't work in the system and implement those strategies.”

Data Goal 1

- “Qualitative interviews with people to identify what works and doesn't work in systems and implement their strategies.”
- “Expand IPS services beyond just pilot/very small programs! Improve coordination between mental health services and VRS/IPS providers/waivered services providers so that more people with mental health disabilities get IPS services.”
- “1. Track Coercion vs. Informed Choice: There is a massive difference between a disabled person who genuinely wants to work and requires support to overcome barriers, and a disabled person who is being coerced by their case manager into seeking a job to satisfy a state compliance metric. The data goal must track genuine, uncoerced informed choice. It must include metrics that measure how often individuals decline employment goals without facing punitive action, reduction in services, or administrative pressure from their county teams. 2.

Acknowledge and Protect the Right Not to Work: The state must explicitly acknowledge that for many disabled Minnesotans—such as those with Myalgic Encephalomyelitis/Chronic Fatigue Syndrome (ME/CFS), Long COVID, or other severe, energy-limiting conditions—employment of any kind is physically impossible and actively harmful. The data goal must not penalize county waiver programs or mental health teams for individuals who are medically unable to work. ‘Integration’ for these individuals means having their survival needs fully funded and their community presence supported without the prerequisite of economic productivity. 3. Explicitly Track Self-Employment and Business Ownership: When individuals do choose to work, the state’s narrow definition of ‘community jobs’ frequently defaults to traditional W-2 employment. This ignores those whose bodies or neurotypes cannot conform to rigid 9-to-5 schedules. For many, self-employment and LLC creation are the only viable paths to economic autonomy. The data must explicitly track the successful launch and support of self-employment and micro-enterprises, ensuring the state is not forcing disabled individuals into inaccessible W-2 environments when entrepreneurship is a better fit. 4. Decouple ‘Worth’ from ‘Wage:’ Ultimately, the data must reflect that a disabled person’s well-being should not be tied to their capacity to earn money. Until the state decouples survival (healthcare, housing, food) from labor, employment goals will always carry an element of coercion. The agencies must ensure that tracking employment outcomes never results in the reduction of baseline survival supports for those who cannot or choose not to engage in wage labor.”

- “First, require strict outcome-based accountability for all providers serving these populations. Employment services funded through Medicaid waivers, mental health programs, or related supports should be evaluated on sustained competitive employment outcomes, not participation in services or planning activities. Second, reduce interagency goal-setting structures. DEED, DHS, and MDE should not be jointly designing additional layered goals. Their role should be clearly defined: set standards, enforce compliance, and remove underperforming providers. Third, simplify the system for individuals. People should not need to navigate multiple programs (waivers, mental health services, MAEPD, etc.) to access employment supports. The structure should be streamlined into a direct pathway with clear accountability for outcomes. Fourth, prioritize enforcement of existing employment expectations over expanding new planning initiatives. If providers are already funded to support employment, the focus should be on whether they are delivering results, not whether new interagency goals exist.”
- “People on a waiver are forced to work with DEED, even if they already have a job coach in place. Allow the waiver to pay for FIND services.”