

This is a product of the Illinois Employment & Economic Opportunities for People with Disabilities Taskforce's Dignity in Pay Workgroup, in partnership with the Illinois Council on Developmental Disabilities.

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EQUAL WORTH ■ EQUITABLE PAY



Illinois Taskforce on Employment and Economic Opportunity for Persons with Disabilities (EEOPD)

House Bill 793—Dignity in Pay Act Multi-Year Plan

July 2025

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Executive Summary

Since 1938, Section 14(c) of the Fair Labor Standards Act (FLSA) has allowed employers to apply for special certificates from the U.S. Department of Labor (DOL) to pay individuals with disabilities less than the federal minimum wage if their earning or productive capacity is limited because of their disability.¹ Almost 40,000 people with disabilities were employed nationally under 14(c) certificates as of 2024, including nearly 3,500 people in Illinois.² Such employment often takes place in a sheltered workshop setting, where all employees have disabilities—typically intellectual and developmental disabilities (IDD).³

In recent years, there has been an increased emphasis on competitive integrated employment (CIE) for people with disabilities. In 2014, the Workforce Innovation and Opportunity Act (WIOA) amended the Rehabilitation Act of 1973 to state that one of its purposes is “to maximize opportunities for individuals with disabilities, including individuals with significant disabilities, for CIE.”⁴ CIE is defined by these acts, and by the Dignity In Pay (DIP) legislation, as “work that is performed on a full-time or part-time basis for which an individual is: compensated at a rate that shall be not less than the rate specified in the applicable State or local minimum wage law; and is not less than the customary rate paid by the employer for the same or similar work performed by other employees who are not individuals with disabilities, and who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills; or in the case of an individual who is self-employed, yields an income that is comparable to the income received by other individuals who are not individuals with disabilities, and who are self-employed in similar occupations or on similar tasks and who have similar training, experience, and skills; and is eligible for the level of benefits provided to other employees.”⁵

While efforts have been made at the federal level to eliminate the issuance of 14(c) certificates and phase out existing certificates, no action has yet ended the issuance of 14(c) certificates and the practice continues. However, many states have passed state legislation to phase out the use of 14(c) certificates, thereby ending paying Subminimum Wage (SMW) to people with IDD.

In Illinois, there have been years-long efforts to pursue a transition from paying people with disabilities SMW. Legislation related to ending the payment of SMW has been proposed multiple times over the

¹ See 29 U.S.C. § 214(c).

² Based on data from the Department of Labor’s website as of November 1, 2024, for 751 employers who applied for and were certified to pay less than minimum wage and the Illinois DOL December 1, 2024 report.

³ IDD includes a range of conditions that are present from childhood and can require lifelong care and support. Examples of IDD include Down syndrome and autism spectrum disorder—conditions that may result in difficulties with learning, problem solving, and the ability to acquire and use everyday life skills.

⁴ Pub. L. No. 113-128, § 402(b)(3), 128 Stat. 1425, 1631-32 (2014), codified at 29 U.S.C. § 701(b)(2).

⁵ <https://www.dol.gov/agencies/odep/program-areas/cie>

years. While those earlier efforts did not succeed, on October 4, 2021, Governor Pritzker signed Executive Order 26 (2021) which requires all contracts through the Illinois State Use Program to provide payment to workers at no less than the applicable local, if higher, or Illinois minimum wage for all employees performing work on the contract.

All of the efforts of prior years have culminated in the passage of the DIP Act and it being signed into Illinois law in January 2025.

This Multi-Year Plan (MYP) is required by the DIP legislation, and serves as a roadmap of action over the course of five years, to end paying people with disabilities less than minimum wage for their work. Successful implementation of this MYP requires that by December 31, 2029, there will no longer be any 14(c) certificate holding organizations in Illinois, no person will be paid SMW, and those individuals currently being paid SMW will have transitioned into either a job that pays at least minimum wage or a meaningful day activity of their choice.

It is important to note that the individuals transitioning from 14(c) organizations into community employment are individuals who are accustomed to a flexible and extremely supportive and forgiving work environment. In order to work in the community, some will need flexible access to nimble supports, sometimes in an urgent fashion to avoid a job disruption, and need the ability to access supports a second (or even third) time. The successful transition of 3,500 people from SMW work into either employment or their choice of other day programming will take more than increasing funds for existing programs. It requires existing programs to become more flexible and person-centered; current processes to become more efficient and responsive; and investment in innovative, proven practices that have been critical in other states making this transition. The MYP provides recommendations to address this.

Illinois has made great progress in the recent past in improving the landscape of services for people with disabilities, and notably people with IDD. The current Governor has made unprecedented investments to enhance wages for staff working with people with IDD and efforts to make services more community-based, person-centered, and flexible are ongoing.

Continued work is needed, however, to truly make Illinois a community-based and person-centered system of support, including work to incentivize and support CIE. As people with IDD move from working in SMW workshops, change must occur to support them, their families, and the providers who serve them to successfully pursue what is next. This plan is detailed and progressive—and essential to ensure positive outcomes for people who will be leaving SMW work.

Background of DIP and the MYP

This first MYP outlays the work for the next five years to support individuals currently working in SMW jobs to transition to either competitive wage employment options or other meaningful day options. Each current 14(c) certificate holding organization will have five years to transition their organization or their workers from SMW situations, and an annual MYP status report will be provided by July 1st of each year to report on progress towards the transition.

House Bill 793—Dignity in Pay (DIP) Act

As of January 2025, Illinois joins 20 other states who have phased out or are in the process of phasing out the use of SMW.⁶

This DIP Act outlines the five-year transition away from 14(c) certification SMW payment to people with IDD working for competitive wage or engaging in other meaningful activities. The legislation has a series of requirements that are addressed in this plan:

- Increasing the rates for Supported Employment-Small Group Supports;
- Providing transition grants to community agencies with active or pending Section 14(c) certificates;
- Analytics of data on 14(c) entities and workers, as well as state employment programs to support workers with disabilities;
- Recommended actions to assist providers in employing people with disabilities;
- Potential changes to law, regulations, or policies;
- Education and training needs;
- Agreements to promote flexibility and allow for expansion of services;
- Ongoing review of rates and reimbursements that support various employment programs;
- Engagement with the private business community to hire persons with disabilities; and
- Benefits planning, assistive technology, transportation, and supports for those with enhanced support needs.

Illinois Employment and Economic Opportunities for People with Disabilities (EEOPD) Taskforce

The Employment and Economic Opportunity for Persons with Disabilities (EEOPD) Taskforce was established in 2009 via legislation (PA 96-368). The EEOPD Taskforce purpose is to:

⁶ 21 states have either eliminated SMW (14 states) or are in the phaseout process after passing legislation (7 states): Alaska, California, Colorado, Delaware, District of Columbia, Georgia, Hawaii, Kansas, Maine, Maryland, Nevada, New Hampshire, Oregon, Rhode Island, South Carolina, Tennessee, Vermont, Virginia, Washington, Wyoming, and Illinois. Some of these actions relate to legislation, but there have also been other drivers of the phaseouts, including lawsuits, settlements, and consent decrees.

“...analyze programs and policies of the state to determine what changes, modifications, and innovations may be necessary to remove barriers to competitive employment and economic opportunity for persons with disabilities. The Taskforce makes recommendations to the General Assembly and the Governor including regulatory changes to advance employment and economic opportunities for persons with disabilities in Illinois.”

The State of Illinois legislature passed legislation in 2013 declaring Illinois an Employment First State via the Employment First Act (20 ILCS 40) with the objective to ensure people with disabilities are given the option to engage in integrated, competitive employment at or above minimum wage. Executive order 14-08, signed in 2014, set forth a process for Illinois to achieve this goal.

The EEOPD Taskforce involves five Workgroups to support the Employment First initiative: Legislative, Workforce Development, Provider, Employer, and Transition. In 2018, the Taskforce created a Recommendations Report⁷, detailing implementation strategies for the State of Illinois in each of the Workgroup focus areas, which continues to guide the work and priorities of the Taskforce today. In response to the 2018 recommendations, the Taskforce added a Legislative Workgroup and in 2024 a DIP Workgroup.

The Taskforce encompasses seventeen designated State Agencies: Governor’s Office, Illinois State Board of Education (ISBE), Illinois Community Colleges Online (ILCCO), Illinois Board of Higher Education (IBHE), Department of Commerce and Economic Opportunity (DCEO), Department of Human Services, Divisions of: Rehabilitation Services (DRS), Developmental Disabilities (DDD), Substance Use Prevention and Recovery (SUPR), Early Childhood, Family and Community Services (FCS), and Mental Health (DMH), Illinois Council on Developmental Disabilities (ICDD), Illinois Department of Employment Security (IDES), Central Management Services (CMS), Department of Juvenile Justice, Department of Healthcare and Family Services (HFS), and Veterans Affairs. A non-voting advisory position was added through PA 103-1060 for Labor. In addition, there are fifteen public members appointed by the Governor’s Office (at least 5 who have disabilities). The diverse stakeholder group is comprised of representatives from the following sectors:

- Statewide organizations that advocate for persons with physical, developmental, and psychiatric disabilities
- Entities with expertise in assistive technology devices and services for persons with disabilities
- Entities who provide employment and training services to persons with disabilities
- Advocates for veterans with disabilities
- Centers for Independent Living & disability services providers
- Organized labor
- Higher education
- Private sector business community

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https://www.dhs.state.il.us/OneNetLibrary/27897/documents/EEOPD/January_2018_FINAL_EEOPD_Recommendations_Report.pdf

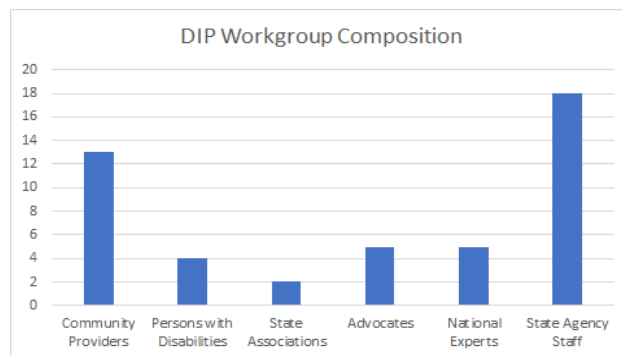
- Entities who provide employment and training services to persons with disabilities

Dignity in Pay (DIP) Workgroup

The DIP Workgroup is a stand-alone Workgroup of EEOPD enacted to be responsive to the DIP legislation. The DIP Workgroup reports to the EEOPD Taskforce quarterly. The work of the DIP initiative is multi-layered to ensure engagement with varied constituents at all levels:

Interagency Committee: The Interagency Committee includes leaders from the Governor’s Office, DDD, DRS, and the ICDD. This group has met every 3 weeks to ensure alignment among state agencies regarding the process and recommendation development. Members of the Interagency Committee were also members of the DIP Workgroup and Subgroups.

DIP Workgroup: The DIP Workgroup numbered more than 50 individuals representing a broad constituency including the following: people with disabilities, including those who had previously worked in sheltered workshops and those who engage in CIE; state agency representation (DRS, DDD, DCEO, ICDD); national experts; provider leaders, including some organizations who currently utilize a 14(c) certificate and those who formerly utilized a certificate; state association leaders; advocates; and others who were wholly engaged in the movement to sunset the utilization of SMW in Illinois.



While a large group, the vastness of this Workgroup was embraced to ensure broad voices had input and the opportunity to learn from each other. The Workgroup met monthly to review updates and ensure progress toward developing recommendations for this MYP.

DIP Subgroups: From the Workgroup membership, three Subgroups were established to focus on the development of recommendations: Systems Transformation; Resources; and Equity and Evaluation. Thorough descriptions were created for each Subgroup. Workgroup members were able to choose the Subgroup they participated in. The Subgroup descriptions were as follows:

- **Systems Transformation:** Dedicated to identifying and recommending Statewide system changes to better align policies, resources, and services.
- **Resources:** Dedicated to identifying the short-term and long-term resources needed to support individuals moving away from 14(c) programming.

- **Equity and Evaluation:** Dedicated to ensuring that the transition from SMW employment is equitable and data driven.

Each Subgroup had two co-chairs to lead the group. The co-chairs received training on the expectations for how the Subgroups were to operate. Each Subgroup was given an organized set of existing recommendations drawn from other state plans and national tools related to phasing out SMW for people with disabilities. The work of the Subgroups was to review the presented recommendations and classify them as follows: Adopt Fully; Modify and Adopt; In Progress (meaning already being implemented in IL); Not applicable; and Need to Discuss. When a Subgroup selected “Modify and Adopt,” that Subgroup would offer revised language for the recommendation. Finally, all Subgroups had the opportunity to create new recommendations.

From all of the work of the Interagency team, Workgroup, and Subgroups, with the support of the ICDD team, the MYP recommendations were created to chart the path forward for current 14(c) workers to move away from work where they are paid SMW.

Additional Information

In addition to the above listed committee structures and engagement, this MYP was developed including many aligned and supportive efforts since the law was signed into effect:

- In 2022, DRS partnered with University of Illinois Urbana-Champaign to implement the 5-year Subminimum Wage to Competitive Integrated Employment for Illinoisans with Disabilities (SWTCIE Illinois) grant, partnering with 6 provider organizations:
 - addresses the need to expand opportunities for Illinoisans with disabilities to obtain high-quality CIE;
 - creates transformative business models for 14(c) certificate holders; and
 - assists and encourages employers in Illinois to fully include youth and adults with disabilities in their workforce.⁸
- Nine current 14(c) certificate holders were interviewed to hear firsthand about their current work and their thinking about transformation.
- A survey was sent to all 14(c) holders to gather information about their current 14(c) workforce and their plans. Details of the 14(c) Provider Survey responses are included in the below section: Illinois Employment Landscape for People with Disabilities.
- Illinois received the National Expansion of Employment Opportunities Network (NEON) Core State grant for the maximum hours of technical assistance from national experts to support the transition from SMW.⁹
- Illinois DRS also received NEON Association of People Supporting Employment First (APSE) technical assistance for 9 current 14(c) providers around the following:
 - Alignment with the agency’s strategic plan.

⁸ <https://publish.illinois.edu/swtcie-il/files/2023/11/2022-23-SWTCIE-brochure-legal-web.pdf>

⁹ <https://icdd.illinois.gov/dignity-in-pay-act/neon-core-state-technical-assistance.html>

- A communication plan to engage stakeholders.
- Financial assessments to ensure cost neutrality or better.
- Career development plans for individuals currently in 14(c) programs.
- Milestones, benchmarks, and innovative funding strategies.
- Over the past three years, Marc Gold & Associates (MG&A) has trained over 100 Illinois employment professionals in Customized Employment (CE), leading to nationally recognized Association of Community Rehabilitation Educators (ACRE) certifications recognizing high quality supported employment services. They supported the advancement of CE policy by advising on strategies that informed amendments to the Illinois Customized Employment Act and aligned service delivery with national best practices. MG&A continues to provide technical assistance to DRS, helping integrate Discovery and other CE tools into vocational rehabilitation services. Their work has strengthened Illinois' capacity to deliver person-centered employment supports that lead to competitive, integrated jobs for people with disabilities.
- Guidance from national experts like the State Exchange on Employment & Disability (SEED), Office of Disability Employment Policy, U.S. Department of Labor on critical topics like transportation.
- Work Incentive Planning and Assistance (WIPA) programs, led by Community Work Incentive Coordinators (CWICs), have been instrumental in helping individuals with disabilities understand how employment impacts their Social Security benefits. A DIP webpage was added to the ICDD webpage to allow for feedback and comment from the community.

Illinois Employment Landscape for People with Disabilities

Illinois has affirmed its commitment to ensuring that people with IDD are paid fairly, at or above minimum wage, and have real opportunities to achieve CIE. Through multiple policies, laws, and initiatives, this foundational understanding is reiterated and reinforced. The DIP MYP offers an opportunity to capitalize on existing efforts and tie this work together to ensure that cross-initiative efforts toward CIE are aligned and moving in concert with one another. It is important to note that the DIP legislation prioritizes the wage and benefits aspects of CIE. Considering Illinois' Employment First commitment and federal WIOA requirements, the recommendations are also oriented to help, as much as possible, a person be employed in an integrated setting.

Employment First

Illinois adopted an Employment First policy via the Employment First Act in 2013. This law states that "competitive and integrated employment shall be considered the first option when serving persons with disabilities of working age" and requires all State agencies to follow the policy as well as ensure its effective implementation within their programs and services.

Illinois is bound by Executive Order (14-08) that requires the participation of multiple state agencies to fully implement Employment First across the State. The state agencies include: the Department of

Human Services, the Department of Healthcare and Family Services, the Department of Commerce and Economic Opportunity, the Department of Employment Security, the Department of Central Management Services, the Department of Labor, the Department of Veterans' Affairs, the State Board of Education, the Board of Higher Education, the Community College Board, and the Council on Developmental Disabilities. The Order requires the above agencies to look at everything from policies, to funding, to partnerships, all focused on the goal of integrated employment for individuals with disabilities.

Workforce Innovation and Opportunity Act (WIOA)

The federal WIOA took effect on July 1, 2015, superseding the Workforce Investment Act of 1998 (WIA) and amended the Adult Education and Family Literacy Act, the Wagner-Peyser Act, and the Rehabilitation Act of 1973.

Under WIOA, each Governor develops a four-year plan for their State's workforce development system to encompass core federal programs, including WIOA Title I-B, Title II (Adult Education), Title III (Wagner-Peyser), and Title IV (Vocational Rehabilitation Services). Illinois has a 2024-2028 Illinois WIOA Unified State Plan.¹⁰ The Unified State Plan has broader employment goals for Illinois, but there is opportunity for collaboration to ensure alignment with the DIP MYP.

Transition from School (Transition)

While DIP is centered on supporting individuals currently working in 14(c) settings, it also intentionally includes provisions focused on students with disabilities who are transitioning out of the school system. This reflects a growing body of national data showing that early exposure to work experiences, coordinated transition planning, and connection to adult service systems significantly increase the likelihood of CIE after high school.¹¹ For example, students who participate in paid work experiences during high school are more than twice as likely to be employed as adults. Additionally, the National Longitudinal Transition Study-2 (NLTS2) found that students who had pre-employment transition services or internships were significantly more likely to be engaged in post-secondary education or employment.¹² By requiring reporting on transition-age youth, DIP strengthens the bridge between school and adulthood, ensuring that systems transformation also benefits the next generation of workers with disabilities. Many recommendations in the MYP are aligned with this goal, improving system coordination and service continuity to ensure young people do not fall through the cracks during this critical transition.

¹⁰ <https://www.illinoisworknet.com/WIOA/Resources/Documents/IllinoisWIOAStatePlanPY2024-2027.pdf>

¹¹ Carter, E. W., Austin, D., & Trainor, A. A. (2012). Predictors of postschool employment outcomes for young adults with severe disabilities. *Journal of Disability Policy Studies*, 23(1), 50–63. <https://doi.org/10.1177/1044207311414680>

¹² Newman, L., Wagner, M., Cameto, R., Knokey, A. M., & Shaver, D. (2011). *The Post-High School Outcomes of Young Adults With Disabilities up to 8 Years After High School: A Report From the National Longitudinal Transition Study-2 (NLTS2)*. National Center for Special Education Research, U.S. Department of Education. <https://ies.ed.gov/ncser/pubs/20113005/>

Illinois Department of Human Services (DHS): Division of Rehabilitation Services and Division of Developmental Disability

The adult service space for people with IDD is building a system that executes on the promise made when Illinois became an Employment First state and committed to every person who wants to work being afforded the opportunity to work. Programming exists—through DDD and DRS as the primary drivers of service to people with IDD, but also in partnership with a variety of other state agencies and entities.

From the perspective of individuals with IDD seeking employment, the process of accessing supports and services can often feel fragmented. Different agencies and funding sources may have varying eligibility criteria, rules, and regulations, which can be confusing and at times contradictory. Even the language and definitions used to describe services may overlap or differ in ways that create additional barriers. To support successful transitions from subminimum wage employment, the MYP will include recommendations to:

- Clarify and map existing service access pathways,
- Improve the overall accessibility and coordination of employment supports, and
- Ensure services remain flexible so that individuals can re-engage if their initial employment efforts are unsuccessful or if their support needs change over time.

Division of Rehabilitation Services (DRS)

DRS works in partnership with people with disabilities and their families to assist them in making informed choices to achieve full community participation through employment, education, and independent living opportunities. DRS is the required first stop for employment support for people with disabilities in Illinois.

DRS offers the following programming:

- Vocational Rehabilitation (VR) Program: Assists individuals with disabilities in preparing for, obtaining, and maintaining CIE.
- Home Services Program (HSP): Enables individuals with severe disabilities to remain in their homes by providing services such as personal assistance, homemaker services, and home modifications.
- Supported Employment (SEP): Employment in an integrated work setting in which an individual with a most significant disability, including a youth with a most significant disability, is working on a short - term basis toward CIE.
- Customized Employment (CE): CIE for an individual with a significant disability that is based on an individual determination of the unique strengths, needs, interests, and abilities and on the needs of the employer and that can be carried out thru flexible strategies.
- Subminimum Wage to Competitive Integrated Employment (SWTCIE) Innovative Model Demonstration Project: Initiative that addresses the need to expand opportunities for Illinoisans with disabilities to obtain high-quality CIE that leads to economic security and assists

and encourages employers in Illinois to fully include youth and adults with disabilities in their workforce.

- Secondary Transitional Experience Program (STEP): STEP is a program within transition services provided through cooperative agreement of DHS-DRS and a Local Educational Agency (LEA).
- Project SEARCH: Project SEARCH is a yearlong immersion program at a Host Business site for students with disabilities in high school.
- Fast Track Transition Program: Serves students with disabilities who qualify under WIOA as potentially eligible individuals. These individuals must be: at least 14 and not older than 21 years of age; be enrolled in an education program; and not already a participant in the DRS vocational rehabilitation program.
- Benefits Planning: Available to help individuals receiving SSI/SSDI make informed choices about employment.
- Centers for Independent Living (CIL): CILs are a non-residential, community-based organization, directed and managed by persons with disabilities, which are dedicated to the philosophy that all people with disabilities have the right and the responsibility to make choices to control the direction of their lives and participate fully and equally in their communities.
- The Workforce Development Unit partners with organizations (employers) to create an effective, inclusive, and productive workplace place. It offers a no cost value to businesses by:
 - Providing a pool of job ready candidates from entry level to high executive level positions to expand their diverse workforce.
 - Job retention services and follow up services to keep productive employees.
 - Access labor market information and provide workforce resources.
 - Assist with financial incentives, accommodations, and workplace trainings.

Division of Developmental Disability (DDD)

DDD provides leadership for the effective management of the design and delivery of quality outcome-based, person-centered services and supports for individuals who have developmental disabilities. These services and supports will be appropriate to their needs, gifts, talents and strengths; accessible; life-spanning; based on informed choice; and monitored to ensure individual progress, quality of life, and safety.

Most individuals receiving services and supports from DDD have been selected from PUNS, a database of individuals awaiting selection. While wait time for PUNS selection has decreased significantly over the past several years, and eligible individuals who are enrolled by age 18 are likely to be selected shortly after Transition, it is critical that families engage in PUNS enrollment early.¹³

DDD offers the following programming:

- DDD Community Day Services (CDS): Long term, HCBS Waiver funded supports which include structured programs that support skill development, community integration, and personal growth. These services focus on helping individuals gain independence, participate in their

¹³ [IDHS: PUNS snapshot as of 4/30/25](#)

communities, and explore employment or volunteer opportunities. CDS programs offer a range of activities, including adaptive skill training, job exploration, educational experiences, socialization, and recreational activities. Services are tailored to each participant's individualized desires, skills, preferences and choice. CDS may include individual or small-group instruction and engagement to enhance daily living skills, motor development, problem-solving, and self-determination. A key component of CDS is community integration, ensuring that participants engage in community-based activities. This involvement helps individuals build relationships, explore interests, and develop skills that promote autonomy and active participation in society. For those of working age who are not employed, CDS can focus on prevocational employee development, preparing them for CIE or self-employment. CDS services are designed to enhance, rather than replace, other supports in an individual's life, promoting meaningful engagement and personal development in alignment with their goals and aspirations.

- **DDD Supported Employment Program (DDD SEP):** Long term, HCBS Waiver funded supports that enable individuals with disabilities to maintain competitive employment in integrated settings at an employer identified by the individual through informed choice. DDD SEP services facilitate the maintenance and enhancement of employment which is aligned with an individual's interests, skills, desires and conditions of employment. It may also include self-employment. The expected outcome of DDD SEP services is sustained CIE that is well-matched to the individual's strengths, priorities, and abilities.

Services may include:

- intermittent or periodic job coaching
- systematic instruction
- job analysis
- assistance with obtaining accommodations
- benefits counselling or financial analysis
- assistance with training or retraining
- support in improving productivity
- assistance with scheduling
- support with efforts to obtain benefits
- mobility training
- assistance in fostering advancement opportunities
- facilitation of communication between the employee and business, co-workers, supervisors, or consumers
- other workplace assistance services which enable the individual to sustain CIE or self-employment

In terms of current DDD employment programming, DDD offers SEP (described above). DDD SEP can be offered as group or individual services. DDD SEP Group can be a vehicle to improve skills and explore career choices before moving onto DRS employment supports. In order to access DDD SEP Individual supports, however, it requires successful completion of a DRS vocational rehabilitation closure.

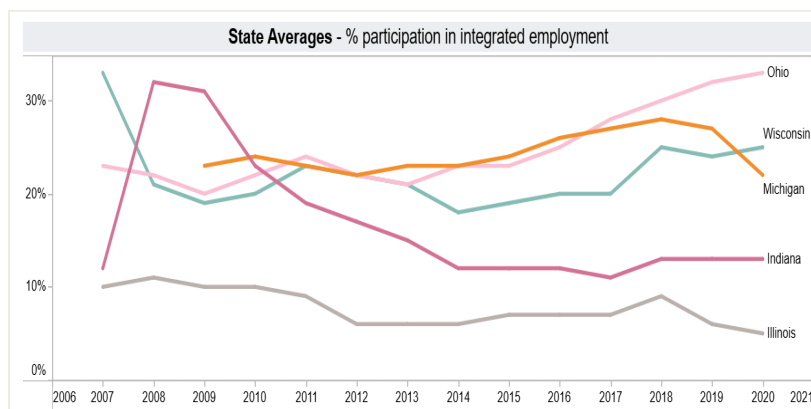
The work of this MYP is to understand and create change to systems related to the quantity and type of programming that can evolve to meet the needs of those transitioning from 14(c) SMW work, including when they need training and education to access employment and when they need to “restart” support for additional attempts to access CIE.

Benchmarking Illinois

When looking at data related to people with IDD accessing employment in Illinois compared to other states, the indicators point to the need for deliberate work to ensure successful transitions for people leaving SMW work in Illinois.

The National Core Indicators – Intellectual and Developmental Disabilities (NCI-IDD) program is a voluntary effort by state developmental disability agencies to track their performance using a standardized set of consumer and family/guardian surveys with nationally validated measures. The effort is coordinated by the National Association of State Directors of Developmental Disabilities Services (NASDDDS) and the Human Services Research Institute (HSRI). The NCI-IDD report from 2023 indicates that 11% of people with IDD in Illinois have a job (including both community- and facility-based settings), compared to the national average of 17%. Thirty-five percent of people with IDD in Illinois report wanting a job, though just 13% have community employment as a goal.¹⁴

Since 2006, the Case for Inclusion has been a leading source for data and policy recommendations regarding the effectiveness of state Medicaid programs in serving people with IDD and their families. Composed of data on 80+ measures sourced from leading researchers and comprehensive policy recommendations for lawmakers at all levels of government, the Case for Inclusion gives legislators, administrators, advocates and other disability champions a sense of the scope of the challenges we face and what we can do to stem the tide of significant systemic challenges. According to the Case for Inclusion, Illinois falls well behind neighboring states related to integrated employment outcomes.



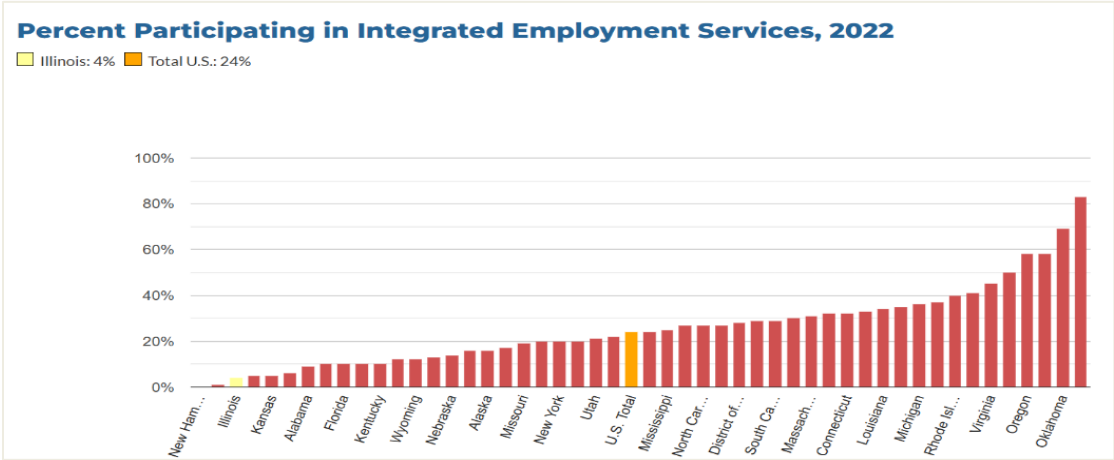
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¹⁴ <https://idd.nationalcoreindicators.org/wp-content/uploads/2024/12/IL-22-23-NCI-IDD-State-Report.pdf>

¹⁵ [Promoting Productivity :: Case for Inclusion](#)

Interestingly, in the Case for Inclusion report, Illinois has the seventh highest number of people with IDD “receiving any employment and day services,” but ranks 3rd from the bottom of all 50 states related to the percentage of people with IDD “participating in integrated employment situations.”¹⁶ This data tells us that many people receive supports and services, but those supports and services are not oriented to CIE.

This result is echoed in the ThinkWork reporting, drawn from the National Core Indicators, from 2022:



	Illinois 2022		Nation 2022	
	Number	Percent	Number	Percent
Total in day and employment services	29,352		598,303	
Total in integrated employment services	1,122	4%	140,521	24%
Total funding for day and employment services	\$197,950,319.00		\$10,727,527,261	
Total funding for integrated employment services	\$3,167,070.00	1.6%	\$1,004,686,749	9.4%

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Illinois has among the highest number of days in the region between eligibility to closure in vocational rehab at 840 days.¹⁸ Neighboring states have on average significantly fewer days to successful closure: Michigan: 531 days; Indiana: 688 days; Missouri: 511 days; Ohio: 515 days; and Wisconsin: 706 days.

The NCI-IDD, the Case for Inclusion, and the State of the State in Intellectual and Developmental Disabilities from Kansas University¹⁹ all provide annual reporting of states against national benchmarks and will be important to review to understand progress in Illinois overall. All of these reports indicate that, despite ongoing progress to improve systems in Illinois to support CIE, there is still work that must be done, and especially as it may relate to people transitioning from 14(c) work environments.

¹⁶ [Promoting Productivity :: Case for Inclusion](#)

¹⁷ [State Snapshots | Think Work](#)

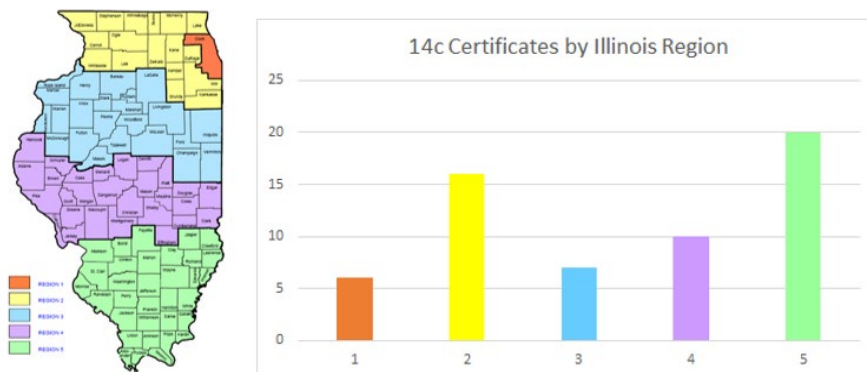
¹⁸ [BB 2024 web F.pdf](#)

¹⁹ <https://stateofthestates.ku.edu/chart-creator> and https://stateofthestates.ku.edu/sites/stateofthestates/files/2025-05/IL_3pg.pdf

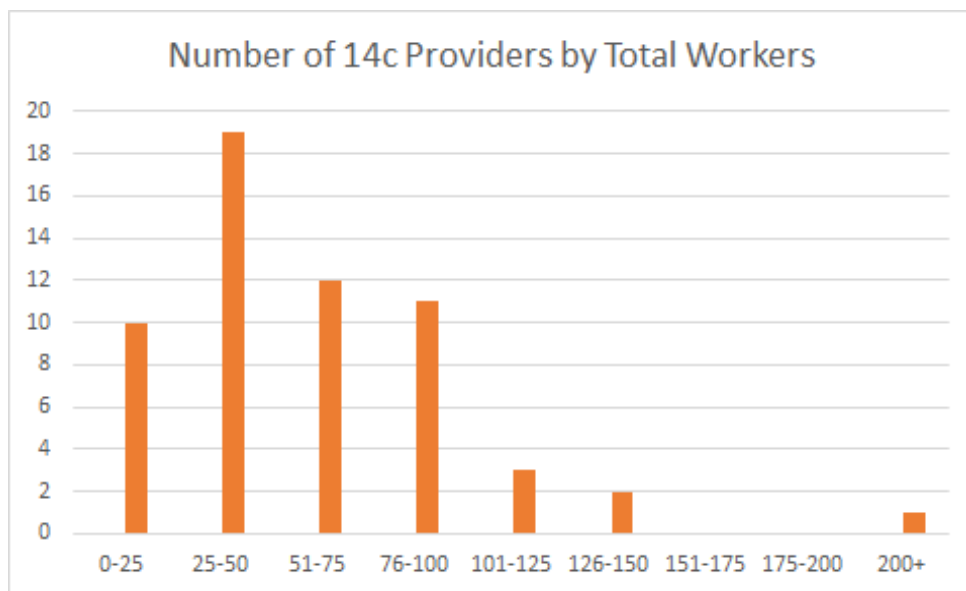
Illinois 14(c) Certificate Holders

As of December 2024, Illinois has 59 active organizations registered as paying SMW as a result of holding federal Department of Labor 14(c) certificates. Across those 59 organizations, nearly 3500 Illinoisans are paid SMW.

The current 14(c) providers are regionally vast:

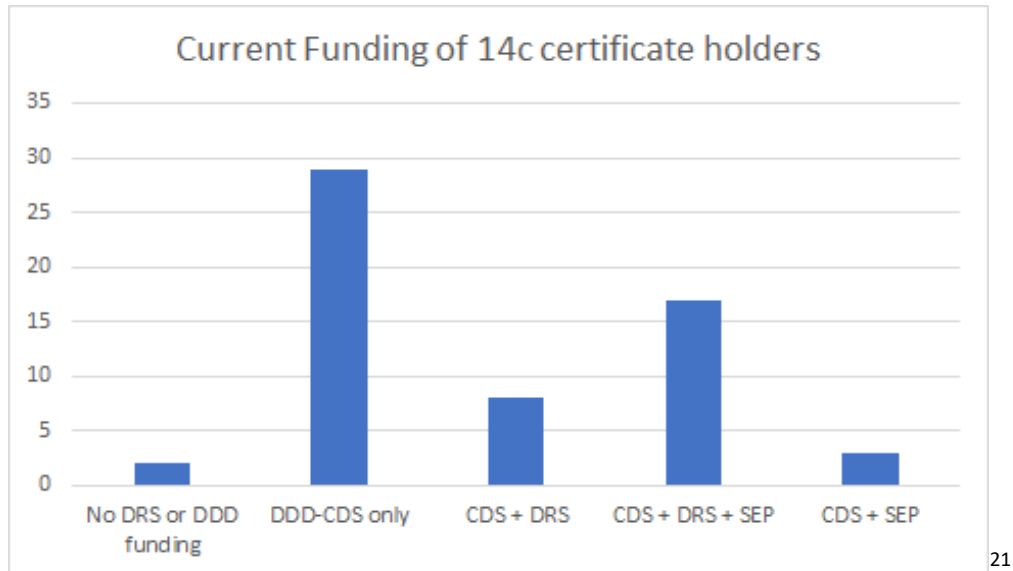


The majority of current 14(c) organizations have fewer than 100 people being paid SMW.²⁰



Of these organizations, it is important to note that they also range in their connectedness to state agency services, specifically from DDD and DRS.

²⁰ Data from DOL December 2024 report: [https://www.dol.gov/agencies/whd/workers-with-disabilities/section-14\(c\)/certificate-holders](https://www.dol.gov/agencies/whd/workers-with-disabilities/section-14(c)/certificate-holders)



Of the 59 organizations that will be transforming from SMW, 31 have **no** expertise or workstreams related to people with disabilities getting jobs in the community (e.g. no funding from DRS or DDD-SEP).²²

There is not a current centralized data collection approach for 14(c) organizations and workers, resulting in limited data from state agencies available to inform DIP planning. To establish data to drive decisions, a survey was conducted in April 2025 of existing Illinois 14(c) providers. With a 48% response rate that represents approximately 49% of people working in 14(c) situations, the following paints a picture of individuals working in current 14(c) situations:

- 8% of 14(c) workers work at a production level that affords them minimum wage or higher;
- 23% of 14(c) workers are 60 years old or older;
- Nearly 70% of organizations identified transportation as the highest/most critical issue for a person accessing work in the community;
- 79% of organizations report administering medicine to 10% of workers during the work day, per Rule 116; and
- 86% of organizations provide personal care support for 28% of workers during the work day.²³

In order to ensure a smooth transition from SMW work, all of this needs to be taken into consideration, and is reflected in the MYP recommendations.

²¹ DDD-CDS= waiver funding for day programming; DRS= state vocational rehabilitation contracts to support employment in the community; SEP=waiver funding for people receiving Supported Employment Programming in the community (which can only be accessed AFTER a successful completion of DRS services)

²² Data from 2024 DDD and DRS funded agency reports provided to DIP Workgroup.

²³ Examples of "Personal Support" provided in the survey were utilizing the restroom and support with meals.

Updates on Other DIP Legislative Requirements

HFS/DDD Supported Employment Rate Increase and Waiver Amendments

As per the DIP legislation, an amendment to the Home and Community-Based Services Waiver Program for Adults with Developmental Disabilities was filed and approved to increase the rates for Supported Employment–Small Group Supports by 40% as of January 2025.

Transition Program Grants

The DIP legislation requires a “Section 14(c) transition program to award transition grants to eligible community agencies with active or pending Section 14(c) certificates to aid in transition away from subminimum wage for workers with disabilities.” A Notice of Funding Opportunity was released in February of 2025, with a deadline of March 21, 2025 for grant submissions. Twenty-eight (28) organizations who currently hold a 14(c) certificate and offer SMW applied for the competitively bid grant. DDD intends to fund 15 organizations through the DIP grant during fiscal years 26 and 27 (7/1/25 through 6/30/27).

As per the law, beginning January 1, 2026, the Department of Human Services will provide an annual status report to the Governor and the General Assembly, incorporating data from each grant recipient, to demonstrate progress toward identified benchmarks.

Personal Needs Allowance

The DIP legislation increased the personal needs allowance from \$60 per month to \$100 per month for people living in waiver funded Community-Integrated Living Arrangements (CILA) as of January 1, 2025, with a requirement that this amount increases annually at the same rate as the Social Security cost-of-living adjustment, to take place January 1 of each year.

Transportation

As mentioned earlier, in a survey of current Illinois 14(c) organizations, 70% indicated transportation being a significant barrier to their workers getting jobs in the community. In the 14(c) model, multiple people can be transported to one place, on a shared schedule. If each of these people gets unique jobs in the community, on varied schedules, the logistics of transportation become complicated, especially in more rural communities where there is limited public transportation or ride services, or the options that exist are cost prohibitive for a person to utilize on a daily basis.

While this MYP includes some specific goals related to transportation, transportation as a barrier to work in the community is broader than just those working in 14(c) organizations. As such, the March 2025 convening of the EEOPD Taskforce created a new Workgroup specific to transportation to develop broad statewide recommendations for improvement in access to transportation as part of a strategy to support people with disabilities gaining access to employment in their communities.

Additionally, as part of the WIOA Unified State Plan (2024-2028), there are multiple overlapping transportation goals that can support efforts to minimize this barrier.

Moving From Promise to Progress: Transformation Away from 14(c) Through Action and Accountability

Over the past six months, more than 50 representatives from across Illinois and the nation came together as part of the EEOPD DIP Workgroup to take on a challenge that reaches far beyond ending SMW. This group, including self-advocates, family members, state agencies, 14(c) providers, and subject matter experts, engaged in deep, candid, and forward-thinking conversations about what it truly takes to transform Illinois' systems to support fair wages, full inclusion, and meaningful opportunities for people with IDD.

This work has been about creating shared vision for what is possible and building the blueprint to get there. Through dozens of meetings, feedback cycles, and collaborative workgroup reviews, one thing became clear: phasing out 14(c) is a vital step, but transformation requires broader, systemic change. The recommendations in the MYP in the following section reflect that bigger picture. They offer measurable actions that will help Illinois remove barriers and build a future where people with IDD are fully supported to pursue CIE and meaningful day services that align to their individual goals.

Some key insights emerged from the Workgroup's conversations:

First, there is a critical need to ensure that CIE is consistently prioritized as the first and preferred outcome for people with IDD, and that earning minimum wage or higher (as the DIP Act requires) is seen as a starting point, not the ceiling. As Illinois transforms its service systems, it is essential to avoid situations where CDS or other meaningful day options unintentionally become the default pathway, rather than a result of informed choice after a full exploration of CIE possibilities.

Second, information about state-funded employment services is currently spread across multiple agency systems and websites. A centralized inventory and, eventually, a user-friendly portal would improve transparency and make it easier for individuals, families, and providers to understand and access available supports.

Third, disability-related data is not always shared or coordinated across agencies. Establishing a cross-agency data infrastructure will improve transparency, strengthen accountability, and ensure that services and investments are guided by accurate, up-to-date information.

Fourth, Discovery, a nationally recognized, person-centered process that helps individuals identify their strengths and employment interests, is not consistently available across the state. Expanding access to Discovery through DRS and DDD will promote equity, increase informed choice, and ensure every person transitioning from SMW employment is prepared for success in the workforce.

Finally, people with IDD are still not consistently represented in workforce development discussions, even though these decisions have direct impact on their lives. Codifying representation on the Illinois Workforce Innovation Board (IWIB) and local workforce committees will ensure that lived experience informs every stage of planning and policy development.

These are just a few of the many areas for transformation efforts to be focused on that the DIP Workgroup identified. The recommendations in this plan do not cover every challenge, but they reflect the urgent priorities, lived experience, and shared hopes of a diverse group deeply committed to real, lasting change. Each recommendation is paired with Related Transformation Measures (RTMs) to track progress, promote accountability, and keep the focus on outcomes that matter.

Together, these recommendations mark a new chapter in Illinois' commitment to equity, access, and opportunity. They represent not only what needs to change, but how we can change it: by listening, acting, and building a better future alongside the people most affected.

DIP MYP Recommendations

The process for developing recommendations was grounded in national expertise and proven work of states that have engaged in this type of effort. The three Subgroups were provided a shared document with recommendations culled from other state plans and national tools that inform sunseting 14(c) certificate employment and increase CIE.

The process was as follows:

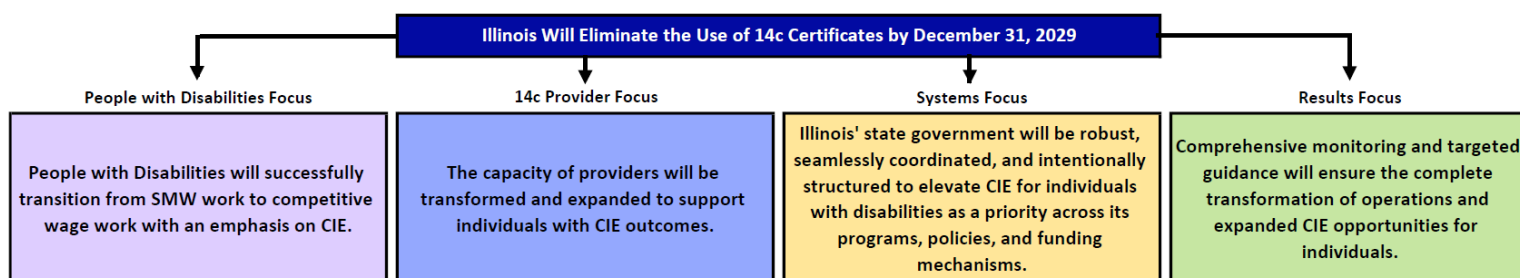
- Each Subgroup was assigned nearly 200 unique recommendations that aligned with their focus area in 9 category areas.
- The Subgroups reviewed each assigned recommendation and classified the recommendation with one of 5 classifications:
 - Adopt Fully
 - Modify and Adopt (with space to suggest revised language)
 - In Progress
 - Not Applicable
 - Need to Discuss
- Subgroups could also create new recommendations in areas they felt were not otherwise covered—both for their Subgroup focus area or assigned to either of the other Subgroups.
- Recommendations indicated as “Adopt Fully” or “Modify and Adopt” were then reviewed by ICDD and organized by thematic areas. For instance, across all three Subgroups, there were multiple recommendations about state agency partners working collaboratively in defined manners. Those recommendations—across Subgroup and category---were organized to be seen as one set of recommendations. This was done so they could be viewed together and not as a multitude of independent recommendations that would then be reviewed multiple times.
- From there, after organizing the Subgroup recommendations, a review was conducted to address any duplication and repetition of recommendations, streamlining a final set of

proposed recommendations for consideration. There was also attention paid to any gaps in recommendations—either based on a review of the national landscape or a requirement of the legislation that was not emergent from the Subgroup recommendations.

- This set of proposed recommendations were then screened against the following criteria:
 - Equity Rubric
 - SMART principles
 - Direct impact on supporting the transition of people currently being paid SMW to competitive wage work of a meaningful day opportunity

Once a complete set of recommendations were developed, they went through an internal review process to ensure clarity of language and overall impact.

In the following pages, the recommendations for the work of the DIP MYP are organized through the lens of a driver diagram model,²⁴ focusing on the main aim of the legislation: to help Illinois successfully eliminate the use of certificates authorized under Section 14(c) of the federal Fair Labor Standards Act of 1938.



There are four primary drivers that organize the recommendations and outcome measures:

1. People with disabilities will successfully transition from SMW work to competitive wage work with an emphasis on CIE. (People with Disabilities Focus)
2. The capacity of providers will be transformed and expanded to support individuals with CIE outcomes. (14(c) Provider Focus)
3. Illinois' state government will be robust, seamlessly coordinated, and intentionally structured to elevate CIE for individuals with disabilities as a priority across its programs, policies, and funding mechanisms. (System Focus)
4. Comprehensive monitoring and targeted guidance will ensure the complete transformation of operations and expanded CIE opportunities for individuals. (Results Focus)

Each recommendation in this MYP is formatted to include four critical components:

²⁴ The Driver Diagram model was introduced by the NEON Core Subject Matter Experts. For more information about Driver Diagrams, please review this: <https://www.edweek.org/leadership/opinion-how-improvement-science-is-leading-to-gains-at-an-urban-high-school/2016/02>

1. **Recommendation Statement:** A clearly defined action written in SMART goal format (Specific, Measurable, Achievable, Relevant, Time-bound) to ensure clarity, accountability, and a direct path to implementation.
2. **Intended Outcome:** A brief description of the expected result or impact the recommendation is designed to achieve, focusing on systems change and improved outcomes for people with disabilities.
3. **Indicators of Success:** Concrete, observable benchmarks that help track progress and determine whether the intended outcome is being realized.
4. **Recommended Entities:** The agencies, organizations, or bodies best positioned to lead or support implementation, based on their roles, responsibilities, and authority.

Using the SMART goal format is a best practice in policy implementation and program design because it promotes actionable, results-oriented planning. According to Doran (1981), SMART goals enhance focus, improve planning efficiency, and establish clear criteria for success. In the context of disability systems transformation, SMART goals support cross-agency alignment, transparent progress tracking, and continuous improvement.

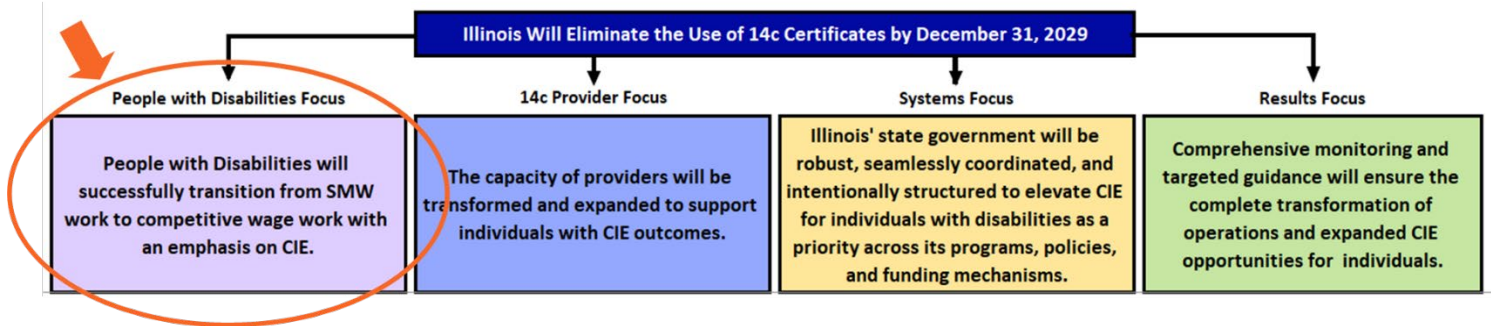
Important Note Regarding Implementation of Recommendations

The Multi-Year Plan outlines a phased, responsible approach to implementing the Dignity in Pay Act. The recommendations are rooted in best practices, community input, and a shared goal of improving employment outcomes for people with disabilities.

While some recommendations are flagged for potential fiscal implications, many can be addressed through improved coordination, strategic planning, and use of existing resources. Several also align with current federally or externally funded efforts, presenting opportunities for collaboration. Importantly, the recommendations in this plan do not signal a requirement for new or additional state spending. Rather, they serve as a blueprint for sustainable systems change, grounded in fiscal responsibility and long-term impact.

Implementation is designed to unfold over five (5) years, allowing for thoughtful planning, steady progress, and intentional system adjustments. These recommendations are intentionally fluid and adaptable. As implementation moves forward, strategies may shift based on lessons learned, course corrections, lived experience, and insights from the field. This plan is meant to guide, not prescribe, transformation, and supports flexibility, continuous learning, and shared accountability across systems.

Recommendations



People with Disabilities Recommendations (15 Total)

Focus: *People with Disabilities will successfully transition from SMW work to competitive wage work with an emphasis on CIE.*

1. Title: Subminimum Wage Transformation Education Effort

By _____, DRS, with support from DDD, will continue to implement a comprehensive communication and engagement campaign to reach every person who is currently receiving subminimum wages and their families (or Guardian) to: 1) educate and address common concerns on a statewide phase-out of subminimum wages 2) affirm options and supports available to help, and 3) provide work and benefits education. Ensure current Career Counseling materials are updated to reference DIP and those presenting the material are trained on Dignity in Pay. Information will be provided in a plain language format and be clear, easy to read, and practical, empowering people to understand and access the state's resources. Data on people reached will be reported to EEOPD DIP Workgroup on monthly basis through the 5-year implementation period. This information will also be made available as a standing webinar training on the DIP Transformation website.

Outcome: 14(c) employees and their families have access to comprehensive information about options for pursuing CIE.

Indicators of Success:

- Number of 14(c) workers, family members, and guardians. contacted: target 100% .
- Number of inquiries made to the website feedback mechanism.
- Number of attendees at regionally offered webinars.
- Number of folks accessing webinar on DIP transformation website.

Recommended Entities Involved:

1) Division of Rehabilitation Services

(2) Division of Developmental Disabilities

(3) Illinois Council on Developmental Disabilities
(4) EEOPD Dignity in Pay Workgroup
(5) Academic Partner
(6) 14(c) Providers

(7) Community Work Incentive Coordinators /
Work Incentive Planning & Assistance Programs
(8) Self-Advocacy and Family-Led Organizations

2. Title: Centering Disability Voice in State Planning

By _____, DRS will implement a structured process to collect, review, and share feedback from people with disabilities with the DIP Workgroup at least annually. This feedback will be used to inform both updates to the Unified State Plan and the DIP MYP annual report. DRS will also report to the DIP Workgroup on adjustments made to the Unified State Plan and DRS service delivery system in response to the feedback received, with a focus on aligning efforts toward CIE.

Outcome:

The lived experiences of people with disabilities are routinely reflected in major workforce policy decisions and service delivery practices, strengthening alignment between the Unified State Plan and the Dignity in Pay Act implementation goals. Service improvements and policy changes based on real-time feedback contribute to more effective CIE outcomes statewide.

Indicators of Success:

- DRS develops and implements an annual feedback collection process that centers the voices of people with disabilities.
- Feedback summaries are shared with the DIP Workgroup by June 1 each year.
- Unified State Plan and/or DRS service delivery adjustments are documented annually and tied directly to feedback themes.
- Annual reports include a section describing how feedback was used to shape services and policy.
- Feedback-driven changes result in increased satisfaction or improved outcomes in employment services, measured through follow-up surveys and case reviews.

Recommended Entities Involved:

(1) Division of Rehabilitation Services
(2) Division of Developmental Disabilities
(3) Illinois Council on Developmental Disabilities

(4) Dignity in Pay Workgroup
(5) Illinois Workforce Innovation Board (IWIB)

3. Title: Disability Representation on State and Local Workforce Boards

By _____, IWIB will ensure formal representation of people with disabilities, disability service providers, community rehabilitation programs, and partners with expertise in Employment First on the Illinois Workforce Development Board and all relevant local workforce development committees. This includes appointing at least one representative from each of these groups to the State Board and

establishing a process to identify and engage appropriate members for local boards, in alignment with the Illinois Workforce Innovation Board Act (20 ILCS 3975/3).

Outcome: Workforce boards across Illinois reflect the diversity and expertise of communities they serve, including the disability community. Representation results in stronger alignment between Illinois' workforce policies, CIE goals, and the Dignity in Pay MYP implementation. Policy decisions and investments are better informed, more equitable, and more responsive to disability-related employment barriers and opportunities.

Indicators of Success:

- At least one person with a disability, one provider representative, and one Employment First-informed partner are formally appointed to the Illinois Workforce Development Board.
- A mechanism for recommending or appointing members to local workforce boards is developed and shared statewide.
- Amendments to 20 ILCS 3975/3 and Chapter 1, Section 4 of the WIOA e-policy manual are adopted.
- Feedback from board members representing the disability community is documented annually and used to guide policy or programmatic recommendations.
- Workforce boards report increased alignment with CIE and DIP MYP priorities.

Recommended Entities Involved:

- | | |
|---|--|
| (1) Division of Rehabilitation Services | (4) Illinois Council on Developmental Disabilities |
| (2) Division of Developmental Disabilities | (5) EEOPD Taskforce |
| (3) Department of Commerce and Economic Opportunity | |

4. Title: Rule 116 Flexibility to Support Medication Access In CIE

By _____, DDD will review and update Rule 116 to allow for flexibility for people to be supported in taking medication while at work in the community. New technology including virtual supports shall be explored to ensure safe medication administration while in the community. As part of the annual MYP, number of people working who require medication during the day will be tracked to ensure that needing medication is not a barrier to CIE.

Outcome:

Increased access to CIE for individuals supported by DDD who require medication during the workday, through revisions to Rule 116 and implementation of technology-enabled supports.

Indicators of Success:

- Rule 116 is revised by (DATE TBD) to allow flexible, community-based medication support for individuals in CIE.
- At least one virtual or remote support model is piloted by DDD by (DATE TBD) and evaluated for effectiveness.
- The annual MYP tracks the number of individuals in CIE receiving medication support during work hours, with year-over-year increases.
- Provider and individual feedback collected through DDD channels indicates reduced employment barriers tied to medication needs.
- Individuals requiring daytime medication report no disruption to CIE access due to support limitations.

Recommended Entities Involved:

- | | |
|--|--|
| (1) Division of Developmental Disabilities | (4) Illinois Council on Developmental Disabilities |
| (2) Division of Rehabilitation Services | (5) Independent Service Coordination Agencies |
| (3) Community Rehabilitation Providers | |

5. Title: Streamlining Services and Shared Tools Across DRS And DDD

By _____, DRS and DDD will conduct a comprehensive review of service processes and requirements from the perspective of individuals transitioning out of subminimum wage employment. The review will identify opportunities to expand pre-employment services, improve access to job coaching and supports for individuals with higher support needs, allow for service "restarts" when initial efforts do not result in CIE or Meaningful Day outcomes, and eliminate unnecessary administrative steps. Recommendations for process updates will be made to allow for a shared use of tools as a person moves from different agency supports. Specifically, if one agency implements a tool (like an interest inventory) for a person, who then moves for support from another agency, the interest inventory does not need to be redone by the new receiving agency.

Outcome:

Increase flexibility, remove barriers, and improve access to pre-employment services, job coaching, and alternative day supports for individuals transitioning from 14(c) employment. These changes will lead to more effective, person-centered transitions to CIE or meaningful alternatives, particularly for individuals with higher support needs or those requiring extended pathways to CIE.

Indicators of Success:

- A formal review plan is initiated by DRS and DDD (TBD DATE), with participation from people with disabilities, service providers, and employment experts.

- A written report of findings and recommendations is developed and submitted to the DIP Workgroup and ICDD.
- At least two policy or procedural changes are proposed by DRS and DDD to expand service flexibility or remove barriers to CIE and meaningful day outcomes.
- Quarterly reports from DRS and DDD document the number of individuals exiting 14(c) work whose outcomes did not result in minimum wage employment or meaningful day services, beginning (TBD DATE).
- Adjustments to service design or delivery are implemented in response to identified gaps, with feedback from individuals and providers informing continuous improvement.

Recommended Entities Involved:

- | | |
|--|--|
| (1) Division of Rehabilitation Services | (4) People with Disabilities and Families or Guardians |
| (2) Division of Developmental Disabilities | (5) DHS IT/Data/Systems Teams |
| (3) Illinois Council on Developmental Disabilities | |

6. Title: Expanding Employment Pathways Through Certified Transition Programs

By _____, DRS and DDD, in collaboration with ICDD, will identify Certified Transition Programs as part of the constellation of options for a person leaving a subminimum wage job, expanding these programs as supports to promote CIE outside of DRS and DDD programming, while also clarifying DRS and DDD knowledge and support of these programs. The EEOPD Transition Workgroup will develop a standard set of information for constituents related to accessing these employment-focused options for support.

Outcome:

Certified Transition Programs will be integrated into Illinois' network of recognized employment supports for individuals exiting 14(c) employment. These programs will be clearly described, supported, and promoted by the State of Illinois as complementary to traditional service lines. Individuals with disabilities and their families or Guardians will have access to clear and consistent information on how to engage with these supports as part of their pathway to CIE under the DIP MYP.

Indicators of Success:

- An environmental scan of Certified Transition Programs is completed by December 2025 in collaboration with ICDD, DDD, and DRS.
- A guidance document is published outlining how these programs align with CIE pathways and how DRS and DDD interface with them.
- Standardized, accessible informational materials are created and disseminated statewide through agencies, providers, and online platforms.

- By December 2026, at least 80% of DRS and DDD regional offices report awareness of and referral processes to Certified Transition Programs and Behavioral Health Clinics.
- Feedback from individuals with disabilities and families reflects increased awareness and understanding of these employment support options.
- At least two examples of programmatic collaboration or formal referral pathways are established between DRS/DDD and identified nontraditional programs by (TBD DATE).

Recommended Entities Involved:

- | | |
|--|--|
| (1) Division of Rehabilitation Services | (5) Certified Transition Program Experts |
| (2) Division of Developmental Disabilities | (6) Family and Self-Advocate Networks |
| (3) Illinois Council on Developmental Disabilities | (7) 14(c) Providers |
| (4) Illinois State Board of Education | (8) EEOPD Transition Workgroup |

7. Title: Innovative CE Payment Model and System Alignment Strategy

By _____, DRS and DDD will jointly design and pilot a performance-based payment and service delivery structure for CE services. This structure will be developed in partnership with high-performing employment providers, including those currently delivering CE, and will utilize innovative funding strategies that allow for sequencing, blending, and braiding of state and federal resources. The payment structure will emphasize both quality and efficiency, be aligned with the Essential Elements of CE, and be tested through a pilot phase before broader implementation. As part of this effort, all related guidance, contract language, and provider requirements will be reviewed for clarity, consistency, and alignment. Opportunities to include day habilitation providers in foundational CE training will also be explored to expand the provider base and support system-wide readiness.

Outcome:

DRS and DDD will implement a unified, performance-based CE payment structure that supports high-quality service delivery, reduces administrative complexity, and enables providers to deliver CE services with fidelity. The structure will be informed by provider input, piloted for effectiveness, and supported through consistent guidance, contract alignment, and targeted training initiatives.

Indicators of Success:

- Joint CE payment model is drafted by DRS and DDD in collaboration with at least five high-performing CE providers.
- Model includes clearly defined service components, outcome metrics, and payment triggers tied to CE progress and outcomes.
- At least one funding strategy is piloted that blends or braids DRS and DDD resources to support CE delivery across systems.

- A statewide review of existing CE-related guidance and contracts is completed, with inconsistencies identified and resolved.
- CE pilot is launched with at least three provider organizations across varied regions and service models.
- Pilot outcomes are documented and used to refine the payment structure prior to broader rollout.

Recommended Entities Involved:

- | | |
|--|--|
| (1) Division of Rehabilitation Services | (4) People with Disabilities and Families or Guardians |
| (2) Division of Developmental Disabilities | (5) 14(c) Providers |
| (3) Illinois Council on Developmental Disabilities | (6) Subject Matter Experts |

8. Title: Earned Income and Asset Protections for HCBS Participants In CIE

By _____, HFS, in coordination with DDD and DRS, will develop and adopt a policy that applies an earned income disregard of up to 100% and removes asset limits for individuals receiving HCBS under a designated waiver who are pursuing CIE. The policy will utilize the federal flexibilities outlined in CMS guidance SMD #21-004 to expand eligibility protections and will include a plan for implementation, interagency coordination, and public communication. Metrics will track the number of individuals benefiting from these protections and any resulting changes in HCBS continuity, employment retention, or re-entry into Medicaid.

Outcome:

Illinois will implement an earned income disregard and remove asset limits for targeted waiver participants pursuing CIE, ensuring that individuals with IDD can retain critical HCBS supports while increasing their earnings, building assets, and achieving greater economic independence. This policy will eliminate a key disincentive to work and expand the reach and impact of CIE under the DIP MYP.

Indicators of Success:

- HFS and DHS develop a policy proposal by (TBD DATE) outlining the earned income disregard and asset protections under CMS SMD #21-004.
- The policy is approved and implemented by HFS for at least one HCBS waiver population, with clear eligibility criteria and guidance to case managers, ISCs, and providers.
- Public-facing materials are distributed to educate families, providers, and individuals on the new protections and how to access them.
- Data shows reduced loss of Medicaid services due to income and asset limits among working-age individuals with IDD.
- Individual and family feedback indicates increased confidence in pursuing employment and saving money due to the policy shift.

Recommended Entities Involved:

- | | |
|---|--|
| (1) Illinois Department of Healthcare and Family Services | (4) Illinois Department of Employment Security |
| (2) Division of Developmental Disabilities | (5) Illinois Workforce Innovation Board |
| (3) Division of Rehabilitation Services | |

9. Title: Rural Transportation Pilots to Support Employment Access

By _____, IDOT will lead a comprehensive review of existing transportation assessments focused on rural areas and the mobility needs of people with disabilities. Based on the findings, a cross-agency workgroup including IDOT, DRS, and DDD will collaboratively design and implement at least two transportation demonstration programs in underserved rural regions that currently house a 14(c) program. These pilots will address access to employment, day services, and medical appointments, with measurable goals related to utilization, cost-effectiveness, and participant satisfaction.

Outcome:

Improved access to reliable, community-based transportation options for people with disabilities in rural areas, resulting in increased participation in employment, day services, and health-related appointments.

Indicators of Success:

- By (DATE TBD), at least 2 transportation demonstration programs will be launched and operational in targeted rural regions.
- People with disabilities utilizing DRS or DDD services will report improved access to transportation.
- Quarterly utilization data will show annual increases in trips related to CIE, day services, or healthcare appointments within pilot regions by (DATE TBD).
- Participant satisfaction surveys administered by DRS and DDD will indicate at least 80% of users rate the service as meeting or exceeding expectations by (DATE TBD).

Recommended Entities Involved:

- | | |
|---|--|
| (1) Illinois Department of Transportation | (5) Illinois Council on Developmental Disabilities |
| (2) Division of Rehabilitation Services | (6) Community Organizations or Advocacy Groups |
| (3) Division of Developmental Disabilities | |
| (4) Regional Transit Authorities or Local Transit Providers | |

10. Title: Employment Services Mapping and Definitions Resource

By _____, DRS, DDD, DCEO, IDES, and IWIB, in partnership with ICDD will publish a cross-agency tool outlining current employment definitions and services.

Outcome:

Individuals with disabilities, families, Guardians, providers, and community partners will have access to a clear, consistent, and user-friendly tool that outlines employment-related definitions and services across state agencies, reducing confusion, improving coordination, and supporting informed decision-making.

Indicators of Success:

- A finalized tool is published and publicly available on state agency websites.
- DRS, DDD, DCEO, IDES, and IWIB formally review and endorse the content for consistency and accuracy.
- Employment-related terms (e.g., Competitive Integrated Employment, Job Coaching, Supported Employment) are defined consistently across agencies.
- Feedback from individuals with disabilities, families, Guardians, and community partners indicates that the tool is accessible, helpful, and easy to understand.
- A mechanism is in place to review and update the tool at least annually to reflect policy or program changes.

Recommended Entities Involved:

- | | |
|---|--|
| (1) Division of Developmental Disabilities | (5) Illinois Department of Labor |
| (2) Illinois Workforce Innovation Board | (6) Illinois Council on Developmental Disabilities |
| (3) Department of Commerce and Economic Opportunity | (7) People with Disabilities and Families or Guardians |
| (4) Illinois Department of Employment Security | (8) Stakeholders |

11. Title: Day Service Rate Redesign for CIE Alignment

By _____, DDD will conduct a review of the current rate structure for day service supports to determine how it can be redesigned to better reflect individual levels of support need, promote the use of flexible and community-based service models, and move away from program-based or facility-dependent structures. This review will include rate modeling, analysis of person-centered outcomes, and recommendations for tiered or individualized rates. The goal is to align funding incentives with individualized, community-focused services that support the goals of the DIP MYP and increase access to CIE for individuals with IDD.

Outcome:

The revised rate structure will give providers more flexibility to support people in diverse ways and will increase opportunities for individuals with IDD to engage in services that truly reflect their preferences and employment goals, consistent with the vision of the DIP MYP.

Indicators of Success:

- A rate study is completed by DDD with analysis of at least three tiered or individualized models from other states by (TBD DATE).
- At least two rate model proposals are developed and shared with the DIP Workgroup and provider network for feedback.
- Proposed changes include rate options for community-based services and individualized supports not tied to traditional program settings.
- New rate structure includes alignment with employment exploration and CIE preparation activities.
- Pilot testing or phased implementation is launched with selected 14(c) providers.

Recommended Entities Involved:

- | | |
|---|--|
| (1) Division of Developmental Disabilities | (4) People with Disabilities and Families or Guardians |
| (2) Illinois Department of Healthcare and Family Services | (5) 14(c) Providers |
| (3) Illinois Council on Developmental Disabilities | (6) Subject Matter Experts |

12. Title: Unlocking Employment Supports Through IL488-2234 Form Submission

By _____, DDD will establish and implement a process to allow Waiver Supported Employment Program (SEP) billing codes to be unlocked upon submission of the IL488-2234 form for individuals participating in CE. The submission of this form will serve as confirmation that the final phase of the CE process has been completed, enabling seamless continuation of employment supports. This change will reduce service gaps and ensure individuals pursuing CIE through CE have uninterrupted access to waiver-funded support.

Outcome:

DDD will implement a policy that links the submission of the IL488-2234 to the automatic activation of SEP codes for individuals who have completed the CE process. This will streamline transitions from job development to employment stabilization and ensure continuous, person-centered support for individuals with IDD pursuing CIE through the waiver.

Indicators of Success:

- A formal policy is issued stating that submission of the IL488-2234 form will trigger unlocking of waiver SEP codes.
- Guidance is disseminated to all ISC agencies and providers outlining the updated process and timeline for SEP code activation.
- SEP codes are unlocked within 5 business days of form submission, as verified through waiver service tracking.
- Provider survey data confirms reduced delays and increased confidence in continuity of service delivery.
- Ongoing monitoring is conducted to ensure compliance and identify any remaining barriers to timely SEP access.

Recommended Entities Involved:

- | | |
|---|--|
| (1) Division of Developmental Disabilities | (4) People with Disabilities and Families or Guardians |
| (2) Illinois Department of Healthcare and Family Services | (5) 14(c) Providers |
| (3) Illinois Council on Developmental Disabilities | (6) Subject Matter Experts |

13. Title: Ensuring Access to Discovery Through DRS, DDD, And Waiver Enhancements

By _____, DRS and DDD will develop and implement a coordinated strategy to ensure Discovery is offered and available to every individual transitioning from subminimum wage employment during the five-year period outlined in the DIP Act. This strategy will ensure that each individual has access to a Discovery process that identifies their strengths, interests, transferable skills, and employment conditions needed for success. The use of Discovery will be tracked and monitored jointly by DRS and DDD to ensure informed choices are being made around CIE transitions, in alignment with the goals of the DIP MYP. This will require amending the waiver to add a Discovery waiver service to ensure access to Discovery for all 14(c) workers.

Outcome:

All individuals transitioning out of 14(c) employment will have access to a structured, high-quality Discovery process that prepares them for informed CIE planning. A shared strategy and the addition of a waiver-funded Discovery service to ensure individuals receive consistent and meaningful support in understanding and pursuing employment options that align with their goals.

Indicators of Success:

- Discovery strategy is finalized and approved by DRS and DDD.

- Number of individuals transitioning from 14(c) employment who are offered and complete Discovery.
- Feedback from individuals confirms that Discovery helped shape their employment planning and choices.
- Discovery waiver service is amended, approved, and implemented.
- Shared tracking and monitoring system is developed and used across agencies to report Discovery use and progress.

Recommended Entities Involved:

- | | |
|--|---|
| (1) Division of Rehabilitation Services | (5) 14(c) Providers |
| (2) Division of Developmental Disabilities | (6) Subject Matter Experts |
| (3) Illinois Council on Developmental Disabilities | (7) Illinois Department of Healthcare and Family Services |
| (4) People with Disabilities and Families or Guardians | |

14. Title: Waiver-Based AT Access for Employment

By _____, DDD, in coordination with DRS and community-based partners, will expand access to AT for individuals receiving DDD waiver services who are seeking employment but are not eligible for DRS services. This will include developing a sustainable mechanism to evaluate and distribute AT through existing programs such as AT Services and Fast Track VR, and exploring braided or innovative funding options. Access and impact will be measured by the number of individuals served, regional availability, and increased capacity to deliver AT evaluations and distribute equipment, in order to reduce service gaps and support successful entry into CIE.

Outcome:

Individuals under DDD waiver services who are pursuing CIE will have access to AT evaluation and equipment, regardless of VR eligibility. This will increase the use of AT across service settings and reduce disparities in employment preparation and retention for people with IDD.

Indicators of Success:

- A cross-agency workgroup is convened by March 2026 to align AT access strategies for non-VR eligible individuals.
- At least two existing programs (e.g., ATS, Fast Track VR) are expanded or leveraged to serve this population by December 2026.
- A funding strategy is identified and implemented to support AT evaluations and equipment distribution for non-VR eligible individuals.

Recommended Entities Involved:

- | | |
|--|--|
| (1) Division of Developmental Disabilities | (5) AT Experts/organizations |
| (2) Division of Rehabilitation Services | (6) Students with Disabilities and Families or Guardians |
| (3) Illinois State Board of Education | |
| (4) Local Education Agencies | |

15. Title: AT Pathways For Non-VR Participants

By _____, DDD in partnership with DCEO, IWIB, and IDES, will ensure individuals not receiving VR employment services can access AT for employment.

Outcome:

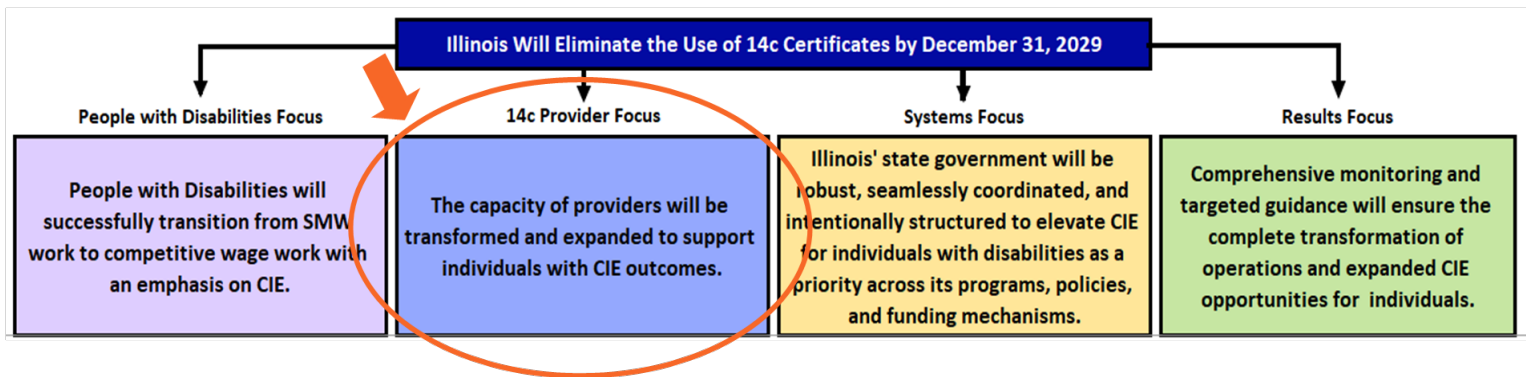
Individuals with disabilities who are not eligible for or do not receive VR services will gain equitable access to employment-focused Assistive Technology. This will reduce disparities in employment preparation and success, expand AT access statewide, and support inclusive workforce participation under the Dignity in Pay MYP.

Indicators of Success:

- A cross-agency workgroup is established by (DATE TBD) to develop strategies for non-VR AT access.
- At least two AT access programs (e.g., ATS, Fast Track VR) are expanded or modified to support individuals not receiving VR.
- A funding strategy (e.g., braided funding or grants) is identified and implemented to support AT acquisition and delivery.
- A clear referral or application process is published for individuals not engaged in VR to request AT.
- Feedback from individuals and providers indicates increased awareness and ease of access to AT services.
- Annual tracking shows an increase in the number of non-VR individuals receiving AT for employment.

Recommended Entities Involved:

- | | |
|---|---|
| (1) Division of Developmental Disabilities | (6) Assistive Technology Providers or Organizations |
| (2) Illinois Workforce Innovation Board | (7) Academic Partner |
| (3) Department of Commerce and Economic Opportunity | (8) People with disabilities, Families or Guardians |
| (4) Illinois Department of Employment Security | |
| (5) Illinois Department of Labor | |



14(c) Provider Recommendations

Focus: *The capacity of providers will be transformed and expanded to support individuals with CIE outcomes.*

1. Title: Coordinated Technical Assistance for 14(c) Provider Transformation

By _____, ICDD, in collaboration with DRS and DDD, will develop and launch a coordinated TA and training initiative for all 14(c) sites, spanning the first three years of the implementation period.

This initiative will include:

- Tracked strategies and tools tailored to each phase of transformation (exploration, implementation, and sustainability)
- TA and training content that builds on existing efforts and is aligned with future needs
- Integration of funding and programmatic resources across state agencies where feasible
- Cross-agency alignment with the Dignity in Pay Act, IDEA, ADA, WIOA, and Employment First principles

TA and training content will include, at minimum:

- Person-centered practices
- Self-determination and dignity of risk
- Public benefits navigation
- Family engagement strategies
- Best practices in employment service delivery for individuals with disabilities

A centralized registration and tracking system will be developed and maintained by ICDD to monitor TA/training access, frequency, and content by each 14(c) site. Agencies that fund or oversee 14(c) providers (DRS and DDD) will review participation data on a quarterly basis and submit summary reports to the EEOPD Taskforce.

The Governor's Office, with guidance from the EEOPD Taskforce, will oversee a cross-agency review process to assess:

- Which providers have accessed TA and to what extent
- Emerging system gaps in provider readiness or engagement
- Recommendations for additional supports or follow-up activities

Rather than requesting written declarations of noncompliance, the review will emphasize agency-supported improvement planning and the removal of systemic barriers, ensuring that all 14(c) providers are given equitable opportunity to participate and progress in alignment with the MYP.

Outcome:

All 14(c) sites in Illinois will have access to structured and equitable technical assistance that reflects their transformation phase, supports high-quality employment service delivery, and builds statewide capacity to fully transition from subminimum wage practices to individualized CIE pathways.

Indicators of Success:

- TA/training curriculum is developed with cross-agency alignment and launched by December 2025.
- At least 95% of 14(c) providers have registered for or participated in at least one TA/training session.
- All TA content includes plain language resources aligned with IDEA, ADA, WIOA, and Employment First.
- Participation and content access is tracked in a centralized system, reviewed quarterly.
- System barriers and low-engagement sites are identified and addressed in quarterly reviews.
- EEOPD Taskforce and the Governor's Office receive quarterly summaries and issue improvement recommendations where needed.

Recommended Entities Involved:

- | | |
|--|--|
| (1) Illinois Council on Developmental Disabilities | (5) EEOPD Taskforce and Dignity in Pay |
| (2) Division of Rehabilitation Services | Workgroup |
| (3) Division of Developmental Disabilities | (6) Academic Partner |
| (4) Governor's Office | (7) 14(c) Providers |

2. Title: Marketing Campaign for Businesses

By _____, Illinois businesses will be targeted by a marketing campaign overseen by the Governor's Office and DHS, using a range of marketing tactics to ensure the campaign is dynamic and impactful. The campaign must target employers of all sizes, employers in different geographic regions, promote business-to-business communication, highlight the impact and business bottom

line benefits, recognize the diversity of challenges and job opportunities in Illinois and highlight the accomplishments of people with IDD and significant disabilities working in CIE. The campaign will utilize direct contact with employers, training done by DRS to chambers of commerce and regional employer networks, and information on state agency websites that are utilized by Illinois businesses. This campaign will be promoted to all relevant State of IL agencies for use with their customer bases.

Year 1 will involve the following:

- Procuring media firm for creation of strategy and content
- Targeting businesses proximate to current 14(c) certificate holders or close to where current 14(c) workers live, and will include an explanation of the transition from sub-minimum wage payment
- Creating an inventory of employment networks (chambers, trade organizations, others to be defined)

Outcome:

The State of Illinois will lead in promoting disability-friendly hiring through an effective front-facing campaign.

Indicators of Success:

- Marketing campaign will be established and implemented.
- 100% of employment networks will receive information about the benefits of disability hiring.
- 100% of state agency websites for business owners, developers, etc. will include information on disability hiring.

Recommended Entities Involved:

- | | |
|--|---------------------------------------|
| (1) Governor's Office | (5) EEOPD Taskforce |
| (2) Division of Rehabilitation Services | (6) Dignity in Pay Workgroup |
| (3) Division of Developmental Disabilities | (7) 14(c) Providers |
| (4) Illinois Council on Developmental Disabilities | (8) Family and Self-Advocate Networks |

3. Title: Provider Training Needs Survey to Support CIE Transitions

By _____, ICDD will design, distribute, and analyze an annual training needs survey targeting staff in community-based provider agencies who support individuals with disabilities. The survey will assess needs in at least eight key content areas: employment and non-employment options, HCBS services, self-advocacy, benefits planning, asset building, AT, certification programs, and mental health services, with at least a 60% response rate across targeted provider organizations. The results will be compiled and used to shape annual training priorities and implementation strategies in the DIP MYP, ensuring targeted capacity-building for staff supporting individuals transitioning from subminimum wage employment to CIE.

Outcome:

Community-based provider agencies across Illinois will have a clearer understanding of their workforce training needs related to supporting people with disabilities in competitive integrated employment and non-employment services. Through annual survey data, ICDD and its partners will identify trends, gaps, and emerging priorities that inform statewide training strategies. This will lead to better-aligned, more responsive training efforts, especially for staff supporting individuals transitioning from subminimum wage work.

Indicators of Success:

- A comprehensive annual training needs survey is developed and disseminated by ICDD with a minimum response rate of 60% from targeted provider agencies.
- Survey responses reflect participation from a diverse range of staff roles, including employment specialists, case managers, DSPs, and transition coordinators.
- Survey results are summarized and included in the annual ICDD MYP implementation report to inform statewide training priorities.
- At least 3–5 high-need training areas are identified each year based on survey results and prioritized for content development or procurement.
- Feedback from provider agencies confirms that training content aligned with survey results is relevant and actionable (as measured by post-training evaluations).
- Data is used to guide future outreach and technical assistance efforts targeting underrepresented regions, populations, or service types.

Recommended Entities Involved:

- | | |
|--|---|
| (1) Illinois Council on Developmental Disabilities | (3) Division of Rehabilitation Services |
| (2) Division of Developmental Disabilities | (4) Advocacy and Family-Led Organizations |

4. Title: Rule 119 Update on Employment-Related Day Services

By _____, DDD will review and revise Rule 119 to include updated language on job exploration activities and employment-related skill building supports funded through the DDD waiver. This revision will incorporate language modeled after provisions used in other states and will be summarized within Rule 119.100(a) under General Purpose. The revised language will emphasize community integration, the development of employment interests and skills, and provide clear definitions for waiver-funded day services that support, but do not constitute, paid employment. These services may include activities such as job exploration, discovery, and skill-building aligned with a person's employment goals but will remain distinct from services that involve paid or CIE. In addition, DDD will issue formal guidance and deliver provider training that outlines allowable activities within day services that support employment goals. These efforts will ensure greater clarity, consistency, and alignment with the goals of the Dignity in Pay MYP to advance access to CIE.

Outcome:

Providers across the state will be equipped to offer consistent, person-centered supports that help individuals with IDD build confidence, interest, and skills related to CIE, ensuring more equitable and effective use of waiver services in alignment with the DIP MYP.

Indicators of Success:

- Revised language is drafted and integrated into Rule 119.100(a) with emphasis on community integration and employment development.
- A comparative summary of at least three other states' waiver language is used to inform Illinois' revisions.
- A formal guidance document is issued by DDD to clarify allowable job exploration and employment prep activities.
- At least two statewide training sessions are offered to providers on the updated rule and implementation guidance.
- Provider survey or feedback tool indicates improved understanding and confidence in offering job exploration supports.
- Increased utilization of employment preparation services is observed in waiver billing data within 12 months of implementation.

Recommended Entities Involved:

- (1) Division of Developmental Disabilities
- (2) Illinois Department of Healthcare and Family Services
- (3) Illinois Council on Developmental Disabilities

- (4) People with Disabilities and Families or Guardians
- (5) 14(c) Providers
- (6) Subject Matter Experts

5. Title: Statewide Cross-Agency Training Hub

By _____, a cross-agency workgroup led by ICDD will establish a centralized set of trainings, with versions of the information customized for multiple relevant constituent groups, in the areas of employment for people with disabilities in the community including, but not limited to:

- Best practices for K12 transition
- DRS/DDD employment programs (customized employment, IPS model, others...)
- Benefits counseling
- AT
- Workplace accommodations for employers
- Disability awareness and hiring benefits for employers

The target audience is:

- People with disabilities
- Families
- Providers
- Employers
- LEAs
- State agency employees

All trainings will include a satisfaction survey to assess participant experience and gather feedback for continuous improvement. A cross-agency CIE IDD Training Committee, composed of experts in CIE, will review all training content twice annually to ensure it remains current, aligned with best practices, and responsive to survey findings.

Trainings will be made available free of charge online through the Dignity in Pay website, owned and operated by ICDD. Additionally, on-site sessions and train-the-trainer models will be offered periodically, depending on available funding and demonstrated demand.

Implementation of trainings will target those directly involved with 14(c) workers and their communities as priority but will be available to all interested.

Outcome:

High Quality, Standardized, Integrated, On-demand Training related to CIE for all constituent groups (businesses, providers, transition, families, state agency employees, and others) will be free and accessible.

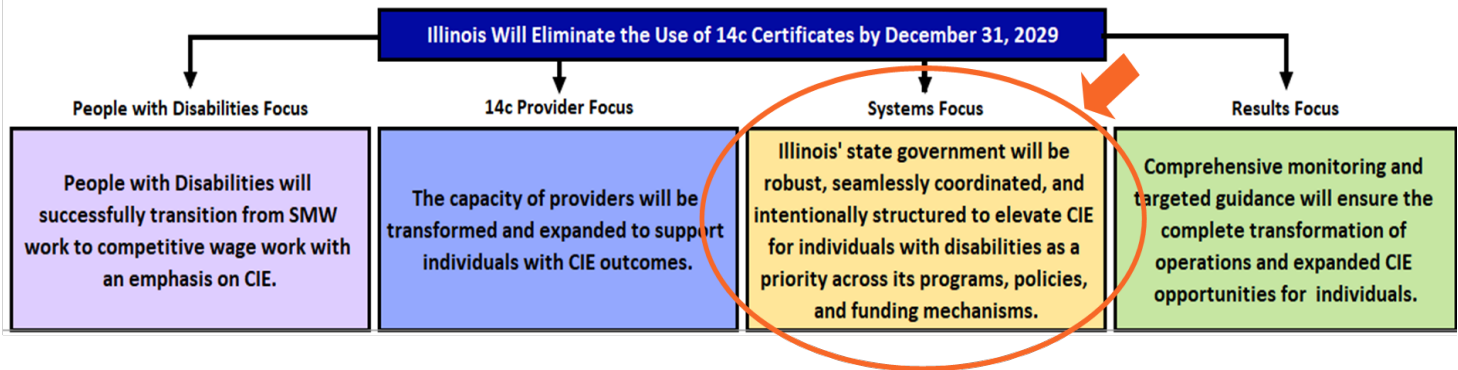
Indicators of Success:

- One set of “sanctioned”/approved trainings utilized across trainers to establish a singular and consistent set of information around CIE for people with IDD and the list of topics above.
- A system for bi-annual training content review will be established and summarized in the report to the annual implementation report.
- Satisfaction survey results will be reported on annually for all trainings and will influence any training updates via the content review process.
- Trainings will be widely accessible to all constituent groups via the DIP webpage, with downloads/views tracked and reported on annually.

Recommended Entities Involved:

- (1) Illinois Council on Developmental Disabilities
- (2) EEOPD Taskforce's Dignity in Pay Workgroup

- (3) People with Disabilities and Families or Guardians



Systems Recommendations

Focus: Illinois' state government will be robust, seamlessly coordinated, and intentionally structured to elevate CIE for individuals with disabilities as a priority across its programs, policies, and funding mechanisms.

1. Title: Unifying State Disability Employment Supports Through Cross-Agency Coordination

By _____, DRS, in partnership with DDD and with support from the Governor's Office, will compile, analyze, and publish a comprehensive, user-facing inventory of all state-administered employment support services for people with disabilities, including individuals with IDD.

This inventory will include:

- All public agency funding streams supporting employment;
- Grants awarded to community-based entities;
- Transition programs for students with disabilities; and
- All adult programs for people with disabilities, including individuals with IDD, focused on job acquisition and retention.

The inventory will detail current program criteria, most recently available program data (including number served, outcome data, and demographic data), and funding allocated versus funding expended. This inventory will be reviewed and updated quarterly and shared with individuals, families (or Guardians), 14(c) providers, LEAs, ISCs, and other community agencies to facilitate informed decision-making and increase access to CIE.

To ensure clarity and accessibility, a system will be established to pull and consolidate data from multiple agency platforms (e.g., OneNet, DDD website). Upon initial completion, the Dignity in Pay Workgroup will determine next steps for building a public-facing navigation portal. If pursued, the portal will be overseen by ICDD, in collaboration with DRS and DDD, and include quarterly data tracking on user access, engagement, and employment outcomes.

Outcome:

People with IDD, families, Guardians, and community partners, including employers, will have easy access to clear, comprehensive, and up-to-date information about employment supports in Illinois. This will support more informed decisions, stronger alignment between systems, and increased access to CIE for people currently receiving subminimum wage or other day services.

Indicators of Success:

- Comprehensive inventory is published and shared statewide by December 2025.
- The inventory is updated quarterly and reflects accurate, disaggregated data.
- At least 75% of surveyed users report the inventory is easy to understand and useful.
- Metrics on access, usage, and employment outcomes are reported quarterly once the portal is launched.
- Recommendations for new funding models or service improvements are developed based on inventory data that tracks access, utilization and outcome for each type of employment support service.

Recommended Entities Involved:

- | | |
|--|---|
| (1) Division of Rehabilitation Services | (6) EEOPD Dignity in Pay Workgroup |
| (2) Division of Developmental Disabilities | (7) Academic Partner |
| (3) Governor's Office | (8) Community Agencies (LEAs, ISCs, 14(c) |
| (4) Illinois Council on Developmental Disabilities | Providers) |
| (5) Illinois State Board of Education | |

2. Title: Employment First Policy and Strategy for CIE Prioritization

By _____, DDD, in collaboration with DRS, ISCs, ICDD, and the Governor's Office, will establish and implement a cross-agency policy and comprehensive implementation strategy to ensure that individualized CIE is prioritized as the first and preferred outcome for people with IDD. This policy will explicitly reflect the language of Illinois' Employment First Act in relation to people with IDD specifically. The implementation strategy shall ensure that all individuals with IDD served by DDD and/or DRS are afforded the opportunity to explore and identify their skills, abilities, capacities, interests and conditions for success as it relates to individualized CIE and options for career pathways. The policy and implementation strategy will set consistent standards for ensuring informed choice and define a consistent "employment informed choice process". Alternatives to employment services (i.e., community day services "CDS") will only be offered if the employment-informed choice process defined in the implementation strategy is being provided to the individual, other employment services are being provided to the individual and the alternative services are functioning as a wraparound support, or the individual has completed the employment informed choice process and decided not to pursue individualized CIE. If declined by the individual, this must be re-evaluated annually at the time of their annual DDD person-centered planning meeting. The implementation strategy shall

specify the requirements for effective annual re-evaluation. This policy does not explicitly prohibit Meaningful Day/CDS from being an outcome if chosen by the individual as part of informed choice and community membership goals, but the involved state agencies and their contracted providers, including ISC's and providers of all waiver services will positively encourage use of employment services, use of Meaningful Day/CDS in combination with employment and Discovery services, rather than community day (non-work) services being used as a default pathway.

Outcome:

People with IDD, especially those transitioning from subminimum wage work, are consistently supported in exploring and pursuing CIE before being referred to non-employment services. CDS is no longer used as a default pathway, and person-centered plans reflect informed, individualized decisions based on meaningful employment planning.

Indicators of Success:

- Increase in the percentage of individuals exiting 14(c) who transition to CIE or employment supports rather than directly to CDS.
- Reduction in CDS enrollments that occur without documented employment exploration or justification.
- Annual audit findings show person-centered plans consistently include CIE-related planning and documentation prior to CDS referrals.
- Provider and ISC feedback reflects improved understanding and use of employment-first protocols, with increased accountability for decision-making.

Recommended Entities Involved:

- | | |
|--|---------------------------------------|
| 1) Governor's Office | (5) EEOPD Taskforce |
| (2) Division of Rehabilitation Services | (6) Dignity in Pay Workgroup |
| (3) Division of Developmental Disabilities | (7) 14(c) Providers |
| (4) Illinois Council on Developmental Disabilities | (8) Family and Self-Advocate Networks |

3. Title: State Policy Alignment For CIE

By _____, the Governor's Office, in coordination with DRS, DDD, DMH, IDHS Olmstead Office, ICCB, ISBE, IDES, and with support from the EEOPD Taskforce and DIP Workgroup, will conduct a comprehensive cross-agency review of all state regulations, policies, and practices to identify and recommend revisions that ensure alignment with the DIP Act. The goal is to confirm that all state agency rules and procedures support person-centered, individualized community participation, and maximize flexibility in service delivery. Recommendations will be documented in a formal report, and agencies will provide written confirmation of compliance or submit action plans to address areas that require alignment to the DIP Workgroup to be included in the annual MYP report and reviewed by the Governor's Office.

Outcome:

A coordinated and person-centered regulatory framework that supports community integration, flexible service delivery, and individualized employment pathways for people with disabilities. Agencies are aligned with federal and state expectations and are better positioned to implement Employment First, DIP, and Olmstead initiatives with consistency and accountability.

Indicators of Success:

- A written report is completed, outlining recommendations for regulatory and policy updates.
- All participating agencies submit documentation confirming compliance or an action plan.
- Regulations and rules are revised to reflect language that promotes flexibility and person-centered approaches.
- Service recipients and providers report fewer barriers related to outdated or rigid regulations.
- Regulatory language across agencies reflects alignment with DIP, WIOA, Employment First, and Olmstead principles.
- Increased coordination across state systems in implementing flexible and community-based service models.

Recommended Entities Involved:

- | | |
|--|--|
| (1) Governor's Office | (6) Illinois State Board of Education |
| (2) Division of Rehabilitation Services | (7) Illinois Department of Employment Services |
| (3) Division of Developmental Disabilities | (8) EEOPD Taskforce |
| (4) IDHS Olmstead Office | (9) Dignity in Pay Workgroup |
| (5) Illinois Community College Board | |

4. Title: Cross-Agency Alignment of Employment Planning Tools

By _____, ICDD, in collaboration with DRS, DDD, ISBE, ISCs, and WIOA partners including the Illinois Workforce Innovation Board, will review all tools currently used across state systems to support individuals pursuing CIE. This includes interest inventories, discovery tools, employment planning forms, and related documents. The goal is to identify redundancies and streamline tools into a unified, cross-agency resource set that reduces duplication and confusion for individuals receiving services. Based on this review, a set of recommendations will be developed to promote tool-sharing across agencies, so that when one agency completes a relevant assessment (e.g., an interest inventory), others can accept and build upon it without requiring repetition. The recommendations will include proposed process changes and policy guidance to support coordinated implementation under the Dignity in Pay MYP.

Outcome:

Illinois will implement a shared set of cross-agency tools to support employment exploration and planning for individuals with disabilities pursuing CIE. These tools will be designed for mutual recognition and use across DRS, DDD, ISBE, and ISCs, reducing duplication and improving continuity of service. Individuals will experience a more coordinated, person-centered approach that honors prior efforts and builds forward momentum across systems.

Indicators of Success:

- A comprehensive inventory of existing employment planning tools used by DRS, DDD, ISBE, and ISCs is completed by (TBD DATE).
- At least three areas of redundancy or confusion across tools are identified and documented.
- A proposed cross-agency toolkit is developed and shared with agency leadership and the DIP Workgroup.
- Formal recommendations for shared use and recognition of tools across agencies are submitted and endorsed by at least three participating agencies.
At least two agencies begin implementation of shared tools and policies allowing for transfer and use of existing assessments (e.g., interest inventories) by (TBD DATE).
- Feedback from individuals with disabilities and providers indicates improved clarity, continuity, and reduced duplication in the planning process.

Recommended Entities Involved:

- | | |
|--|--|
| (1) Illinois Council on Developmental Disabilities | (6) Illinois Workforce Innovation Board |
| (2) Division of Developmental Disabilities | (7) Illinois Department of Employment Security |
| (3) Division of Rehabilitation Services | (8) Local Workforce Innovation Boards |
| (4) Illinois State Board of Education | (9) One-Stop Centers |
| (5) Independent Service Coordination Agencies | |

5. Title: State Policy on Customized Employment (CE) Services and Standards

By _____, DRS and DDD will jointly develop and issue a policy on CE that clearly defines CE service components, outcome expectations, eligibility criteria, and alignment with existing VR and waiver-funded employment supports. The policy will explicitly recognize CE as a valid form of pre-employment service and a pathway to CIE as defined under WIOA. It will also outline how determinations of need are made and how CE services support the transition from subminimum wage employment. Based on the policy framework, DRS and DDD will establish shared professional qualifications and training standards for CE providers and create a plan to grow the statewide CE provider network.

CE will be defined per the Customized Employment for Individuals with Disabilities Act (820 ILCS 97/) as follows: Customized Employment means competitive integrated employment for an individual

with a significant disability that is based on an individualized determination of the strengths, needs, and interests of the individual with a significant disability, designed to meet the specific abilities of the individual with a significant disability and the business needs of the employer, establishes a relationship between the employer and the employee that is negotiated to meet the needs of both parties, and is based on an exchange of specific contributions by the employee for pay by the employer that is at or above the applicable minimum wage.

Outcome:

DRS and DDD will jointly adopt a statewide policy that defines CE service components, outcomes, and processes in alignment with WIOA and the goals of the DIP MYP. This policy will ensure that individuals with IDD have clear access to CE services when appropriate, and that professionals delivering CE receive consistent training and credentialing support across systems.

Indicators of Success:

- A joint CE policy is published by DRS and DDD and shared with provider networks, ISC agencies, and VR offices.
- The policy includes definitions of CE as a pre-employment service and CE outcomes as a valid form of CIE.
- The policy clearly outlines when and how CE is to be offered and the criteria used to determine need.
- DRS and DDD publish a shared set of provider qualifications and training standards for CE professionals.
- At least two statewide trainings are conducted jointly by DRS and DDD within six months of policy release.
- Providers and individuals report increased clarity and access to CE services in follow-up surveys or interviews conducted 6–12 months post-policy implementation.

Recommended Entities Involved:

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|--|---|
| (1) Division of Rehabilitation Services | (4) People with Disabilities and Families (or |
| (2) Division of Developmental Disabilities | Guardians) |
| (3) Illinois Council on Developmental Disabilities | (5) 14(c) Providers |

6. Title: Expanding AT and Training Under the DDD Waiver to Support CIE

By _____, DDD, in collaboration with local community-based providers, will identify and implement AT (AT) solutions and develop training and skill-building opportunities that are available statewide under the DDD waiver. These opportunities will be tailored to support individuals with IDD in pursuing CIE, and offered through regional providers who demonstrate readiness and capacity. At least 10 providers per region will be engaged, and the trainings will be designed and delivered using person-centered practices, with quality and reach measured through participant

evaluations and regional uptake rates, to support long-term employment success and inclusion for people with disabilities.

Outcome:

People with IDD will have greater access to AT and skill-building supports statewide, increasing their opportunities to obtain and maintain CIE. Providers will be better equipped to incorporate AT into person-centered planning and employment services, creating more inclusive and responsive service environments.

Indicators of Success:

- A minimum of 10 regional providers are identified and trained to deliver AT-related services under the DDD waiver.
- Participating providers report increased knowledge and capacity to support AT in employment services.
- A statewide training series is launched, with a minimum of 300 participants completing AT related sessions by June 2027.

Recommended Entities Involved:

- | | |
|--|---|
| (1) Division of Developmental Disabilities | (4) AT Experts/Organizations |
| (2) Division of Rehabilitation Services | (5) Illinois Department of Healthcare and Family Services |
| (3) Illinois Council on Developmental Disabilities | |

7. Title: Modernizing Medicaid Buy-In to Support Employment and Independence

By _____, HFS, in coordination with DDD and DRS, will propose and adopt enhancements to Illinois' Medicaid Buy-In program (Health Benefits for Workers with Disabilities), including the elimination of income limits, resource/asset caps, age restrictions, and premium requirements. These enhancements will align with national best practices and will be implemented through a state plan amendment or other permissible mechanism. Progress will be measured by program enrollment data, utilization rates, and employment retention among enrollees. The policy will be accompanied by a public education campaign to ensure awareness and access.

Outcome:

Illinois will modernize its Medicaid Buy-In program to remove income, asset, age, and premium barriers, ensuring individuals with disabilities can work and earn without risking healthcare coverage. This reform will expand access to Medicaid, incentivize employment, and remove a key structural disincentive to CIE during the subminimum wage phaseout.

Indicators of Success:

- A policy proposal is developed and submitted by HFS, with collaboration from DDD and DRS, detailing the elimination of income, asset, age, and premium restrictions.
- Required federal approval (e.g., state plan amendment) is secured and implemented by the targeted date.
- Program enrollment among working-age individuals with disabilities increases annually.
- Public-facing materials are developed and disseminated statewide to educate individuals, providers, and case managers on eligibility and access.
- Satisfaction surveys indicate high confidence among individuals with disabilities that they can earn income and retain health coverage under the new policy.
- No individual with IDD transitioning from subminimum wage into CIE loses Medicaid coverage due to income or assets post-implementation.

Recommended Entities Involved:

- (1) Illinois Department of Healthcare and Family Services
- (2) Division of Developmental Disabilities
- (3) Division of Rehabilitation Services

- (4) Illinois Council on Developmental Disabilities
- (5) People with Disabilities and Families (or Guardians)
- (6) 14(c) Providers

8. Title: AT and AAC Transition Continuity

By _____, DDD, in collaboration with ISBE and DRS, will establish and implement a statewide process to ensure that students with IDD have timely access to the AT (AT) and augmentative and alternative communication (AAC) devices they used in high school. This will include: (1) creating a formalized mechanism for acquiring devices from local education agencies (LEAs) at the point of transition, and/or (2) amending the DDD waiver to include streamlined access to AT and AAC devices. Success will be measured by implementation of the process in all Illinois regions and tracked via annual reporting on transition-related AT/AAC continuity, with the aim of supporting seamless movement into CIE.

Outcome:

Students with developmental disabilities will experience fewer disruptions in access to the AT and AAC devices they need as they transition from school-based to adult services. This continuity will improve the likelihood of successful outcomes in CIE and reduce the need for re-evaluation and equipment delays post-transition.

Indicators of Success:

- A cross-agency transition process is developed and finalized by DATE TBD, with clear roles and responsibilities identified.

- Formal agreements or guidance issued to LEAs on procedures for transferring or coordinating access to AT/AAC devices at student exit.
- DDD waiver language is updated, if needed, to address timely AT/AAC acquisition for eligible individuals.

Recommended Entities Involved:

- | | |
|--|--|
| (1) Division of Developmental Disabilities | (5) AT Experts/organizations |
| (2) Division of Rehabilitation Services | (6) Students with Disabilities and Families or Guardians |
| (3) Illinois State Board of Education | |
| (4) Local Education Agencies | |

9. Title: BEP Certification Reform for Disability-Owned Businesses

By _____, the Commission on Equity and Inclusion, in partnership with the Department of Central Management Services and representatives from the EEOPD Taskforce, will complete a cross-agency review of Illinois statutes, administrative rules, and certification processes that define and regulate “disability-owned” businesses, including but not limited to 30 ILCS 500/45-35 and Ill. Admin. Code tit. 44, § 1500.4535. Based on this review, the group will draft and recommend revisions to the certification criteria to ensure that only businesses with at least 51% ownership and control by individuals with disabilities qualify for BEP designation.

Outcome:

Illinois will have updated, clearly defined certification criteria for disability-owned businesses, ensuring that Business Enterprise Program (BEP) designations are awarded only to businesses that meet the ownership and control threshold. This change will improve integrity in the BEP program and enhance economic opportunities for people with disabilities.

Indicators of Success:

- A cross-agency workgroup is established by DATE TBD to conduct the legal and procedural review.
- At least three key statutes or rules related to disability-owned business certification are reviewed and analyzed.
- A formal recommendation report, including draft revised criteria, is submitted to CEI and CMS leadership by DATE TBD.
- The proposed revisions include clear definitions of ownership and control by individuals with disabilities and a mechanism for verification.
- The recommendations are integrated into the MYP as part of Illinois’ broader strategy to advance equitable access to CIE and entrepreneurship.

Recommended Entities Involved:

- (1) Governor's Office on Equity
- (2) Department of Central Management Services
- (3) EEOPD Taskforce

- (4) Illinois Department of Commerce and Economic Opportunity
- (5) Disability Advocacy Organizations and Community-Based Business Organizations

10. Title: Tools and Training Resources for Businesses

By _____, DRS, in collaboration with the EEOPD Dignity in Pay Workgroup, its Employer Workgroup, and with support from ICDD, will implement a coordinated strategy to share information, tools, and training resources to assist businesses in preparing to hire people with intellectual and developmental disabilities (IDD), including those with significant disabilities.

This initiative will include the following components:

A mentorship network, developed and facilitated by DRS and the Employer Workgroup, with support from a business association or employment-focused nonprofit, will match businesses that currently employ people with disabilities with employers interested in inclusive hiring. This network will support peer-to-peer learning, ongoing technical assistance, and confidence building among prospective employers.

Employer training, designed and developed by DRS, DDD, and the academic partner, in consultation with the Employer Workgroup and ICDD, will focus on best practices for the recruitment, hiring, and retention of individuals with disabilities. This training will be informed by a comprehensive review of all current state-funded employment-related trainings and result in a unified cross-agency toolkit and messaging strategy.

Foundational human resources materials, created by ICDD in collaboration with DRS, DDD, and HR accessibility experts, will be written in plain language and will include resources such as accessible new hire forms, guardianship permission guidance, and required employment training documents. These tools will be designed to make employer processes more person-centered and accessible and will be distributed to chambers of commerce, trade organizations, and business networks throughout Illinois.

Training content for HR professionals and managers, led by DRS Business Services and state-approved training partners, will cover topics including:

- Workplace accommodations
- Use of AT
- Understanding benefits requirements and available supports
- Employment models (customized, supported, group vs. individual)
- Disability awareness and key characteristics

- **Personal supports, medication, and adult services system navigation**

All tools and training will be designed for wide dissemination and use across state agencies and regional employer networks, promoting a consistent, values-based approach to inclusive employment in Illinois.

Outcome:

Comprehensive training material will be available for free to employers who are prioritizing hiring of people with disabilities.

Indicators of Success:

- Total number of organizations employing people with disabilities increases.
- Mentorship network will be established, advertised, and at least 10 mentor relationships will be established. Every year after that will reflect an increase in mentorships.
- Foundational plain language human resource documents are developed and marketed and downloaded (# of downloads from year to year).
- Employer trainings about aspects of the disability services space will be created, marketed, and downloaded. (# of downloads from year to year).
- Policy is enacted to make IRAs and 401Ks exempt assets for determining Medicaid.

Recommended Entities Involved:

- | | |
|--|---------------------------------------|
| (1) Division of Rehabilitation Services | (5) Dignity in Pay Workgroup |
| (2) Division of Developmental Disabilities | (6) 14(c) Providers |
| (3) Illinois Council on Developmental Disabilities | (7) Family and Self-Advocate Networks |
| (4) EEOPD Taskforce | |

11. Title: Ensuring Equitable BEP Certification

By _____, the Commission on Equity and Inclusion, in partnership with the Department of Central Management Services and representatives from the EEOPD Taskforce, will also develop and disseminate updated guidance and training for relevant state agency staff and community partners to support accurate certification and equitable access to business supports. To prevent misuse of BEP incentives, the group will identify and propose mechanisms to eliminate financial benefits for organizations operating as sheltered workshops that do not meet minimum wage or ownership requirements. Progress will be tracked through documented policy changes, training rollouts, and annual reporting on certification outcomes.

Outcome:

State agency staff and community partners will have clear, actionable guidance on how to certify disability-owned businesses accurately and equitably. The BEP program will better align with the goals of the MYP by disincentivizing subminimum wage business models and prioritizing authentic ownership by people with disabilities.

Indicators of Success:

- Updated certification guidance is issued by CEI and CMS by DATE TBD.
- A training series is launched, reaching relevant agency staff and community partners across Illinois.
- A formal policy proposal is developed and submitted recommending disqualification of organizations that do not meet wage and ownership standards.
- An annual report includes disaggregated data on certification status changes and actions taken as a result of new enforcement measures.

Recommended Entities Involved:

- | | |
|--|---|
| (1) Commission on Equity and Inclusion | (5) Governor's Office on Equity |
| (2) Division of Developmental Disabilities | (6) BEP Advisory Council |
| (3) Illinois Council on Developmental Disabilities | (7) Department of Central Management Services |
| (4) Illinois Department of Labor | |

12. Title: IDOL Phaseout Plan for 14(c) Certificates

By December 31, 2025, IDOL will draft and implement internal procedural updates to phase out the issuance of licenses to pay disabled workers less than the full minimum wage rate (also known as 14(c) certificates under the federal Fair Labor Standards Act). This will include a clear plan to communicate with all current certificate holders by December 2028, notifying them that subminimum wage employment will no longer be allowable after 2029. Beginning in June 2026, IDOL will publish an annual update on the number of active 14(c) certificate holders, which will be incorporated into the MYP report to track statewide progress towards full phaseout.

Outcome:

Illinois will implement a coordinated and transparent process to sunset the use of 14(c) certificates, with clear communication to all providers and an annual data report to track the pace of transition. These actions will reinforce the expectations of the Dignity in Pay Act and support statewide readiness for the full elimination of subminimum wage employment by 2029.

Indicators of Success:

- IDOL finalizes and publishes procedural guidance on ending 14(c) certificate issuance by the target date.
- A statewide communication is issued to all current 14(c) certificate holders by December 2028, outlining the final allowable year for subminimum wage.
- Annual reporting on the number of active 14(c) certificate holders begins by DATE-TBD and is included in the MYP report each year.
- IDOL collaborates with ICDD, DHS-DDD, and DHS-DRS to ensure communication aligns with technical assistance and funding strategies.
- 100% of 14(c) certificate holders receive formal notice and transition timelines at least 12 months prior to the expiration of their subminimum wage authority.

Recommended Entities Involved:

- (1) Illinois Department of Labor
- (2) EEOPD Taskforce's Dignity in Pay Workgroup
- (3) Illinois Council on Developmental Disabilities

13. Title: Statewide Accessible Transportation Strategic Plan

By _____, IDOT, in collaboration with DDD, DRS, ICDD, and representatives from the EEOPD Taskforce, will establish a Statewide Accessible Transportation Taskforce. This Taskforce will be charged with developing a five-year strategic plan that identifies regional transportation gaps and proposes sustainable, accessible transportation solutions to support individuals with disabilities pursuing CIE. The plan will be informed by at least six public listening sessions (two each in rural, suburban, and urban regions) and will result in a published report with actionable recommendations. Progress will be measured by timely formation of the Taskforce, completion of regional input sessions, and submission of a final strategic plan with at least 10 concrete policy, or programmatic proposals aimed at improving transportation equity.

Outcome:

Illinois will have a coordinated, cross-agency plan to improve accessible transportation statewide, designed to address regional gaps and align with broader workforce development and CIE priorities. The plan will provide a clear roadmap for future investments and policy changes that increase mobility, independence, and economic opportunity for people with disabilities.

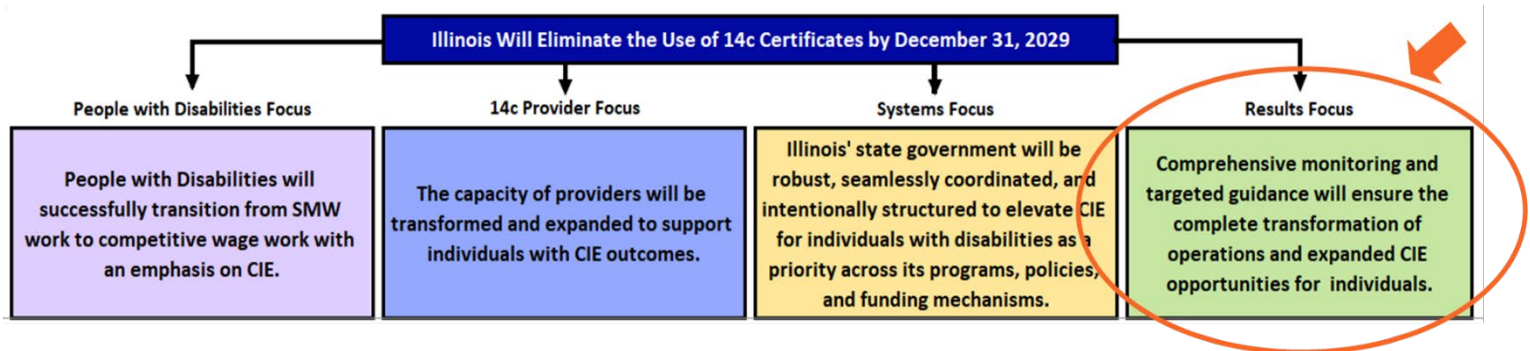
Indicators of Success:

- A cross-agency Accessible Transportation Taskforce is formally established by DATE TBD.
- Six public listening sessions are held by DATE TBD, capturing feedback from diverse geographic areas and disability communities.
- A five-year statewide strategic plan is finalized and published by DATE TBD, including at least 10 actionable policy/program recommendations.

- The plan includes proposed funding strategies, potential pilot projects, and coordination protocols for rural, suburban, and urban transit systems.

Recommended Entities Involved:

- | | |
|---|---|
| <ul style="list-style-type: none"> (1) Illinois Department of Transportation (2) Division of Developmental Disabilities (3) Division of Rehabilitation Services (4) Illinois Council on Developmental Disabilities (5) EEOPD Taskforce | <ul style="list-style-type: none"> (6) Regional Planning Commissions/
Metropolitan Planning Organizations (7) Local Transit Authorities and Paratransit
Providers (8) People with Disabilities and Family
Members (or Guardians) |
|---|---|



Results Recommendations

Focus: Comprehensive monitoring and targeted guidance will ensure the complete transformation of operations and expanded CIE opportunities for individuals.

1. Title: Accessible Resource Hub

By _____, ICDD will publish accessible, user-friendly information on the DIP webpage that outlines comprehensive employment supports available in Illinois. This will include information from the inventory of all state-administered employment support services for people with disabilities, cross-agency approved employment definitions, details on Ticket to Work, Disability Benefits 101, Work Incentive Planning and Assistance programs, Illinois ABLE accounts, and the Health Benefits for Workers with Disabilities program. These resources will be organized and posted in a way that supports individuals with IDD, families, Guardians, and providers in navigating available benefits, maximizing financial independence, and pursuing CIE, in alignment with the goals of the DIP MYP.

Outcome:

ICDD will ensure the DIP website includes a dedicated section on comprehensive employment supports, including Disability Benefits 101, Ticket to Work, WIPA, Illinois ABLE, and HBWD. This will give

individuals with IDD, their families, and support teams centralized access to critical information that can help them confidently pursue CIE while protecting their financial well-being and healthcare access.

Resources will be:

- Organized in a way that supports individuals with IDD, families, and providers in navigating benefits;
- Designed to promote financial wellness and access to CIE; and
- Provided in multiple languages and culturally responsive formats to reflect the diversity of Illinois residents.

All materials will be accessible and developed in plain-language/multiple languages. The site will be maintained with up-to-date content and serve as a centralized hub aligned with the goals of the DIP MYP.

Indicators of Success:

- Web content on Ticket to Work, WIPA, Illinois ABLE, and HBWD is drafted, reviewed by subject matter experts, and posted to the DIP website by (TBD DATE).
- Content is written in plain language and is accessible to people with IDD, with versions available in English and Spanish.
- Site traffic to the employment supports section is tracked and shows a baseline increase in page visits within the first six months.
- Feedback from individuals with IDD and their families confirms that the resources are understandable and helpful in making informed decisions about employment and benefits.

Recommended Entities Involved:

(1) Illinois Council on Developmental Disabilities
(2) People with Disabilities & Family Members or Guardians
(3) Division of Rehabilitation Services
(4) Department of Healthcare and Family Services (to provide HBWD information)

(5) Illinois State Treasurer's Office (to provide IL ABLE information)
(6) Academic Partner
(7) Self-Advocacy and Family Organizations

2. Title: Academic Partner Engaged

By December 31, 2025, the Governor's Office, in collaboration with DHS, will identify and secure an academic partner to support implementation of the DIP MYP. The academic partner or other appropriate entity will be tasked with collecting, analyzing, and reporting on individual 14c worker outcomes and other key data indicators that demonstrate annual progress toward compliance with the DIP plan. Progress will be measured through annual reporting, regular data reviews, and

integration of findings into implementation planning, in order to ensure a transparent, data-driven approach to advancing CIE and transforming 14c systems in Illinois. On at least an annual basis, the academic partner or other appropriate entity will provide an internal report to appropriate staff at DDD and DRS identifying those individual 14(c) workers who remain in 14(c), or are without any employment or day program service, in order for DDD and DRS to support and monitor additional planning with those individuals.

Outcome:

Illinois will have an established academic partner responsible for collecting and analyzing data related to 14c worker transitions and systems progress, resulting in regular, reliable insight into how implementation of the DIP plan is progressing. This will support data-informed decision-making, enable targeted investments in support, ensure monitoring by DDD and DRS of individual 14(c) worker movement into competitive wage employment or other supports and services, and promote transparency in the state's efforts to expand access to CIE.

Indicators of Success:

- An academic partner is formally identified and engaged by the Governor's Office and DDD and DRS by (DATE TBD).
- A scope of work outlining data collection priorities, deliverables, and reporting timelines is developed and approved by all parties.
- Annual reports are produced detailing individual 14c worker outcomes and systems-level progress and are used to inform implementation activities including follow up with providers to monitor planning with individual 14(c) workers.
- Data produced by the academic partner is used to adjust TA, training, and resource deployment to better support provider and system transformation.
- The academic partner's findings are referenced in annual updates to the DIP MYP and publicly shared to reinforce transparency and continuous improvement.

Recommended Entities Involved:

- | | |
|--|--------------------------------------|
| (1) Governor's Office | (4) EEOPD Taskforce & Dignity in Pay |
| (2) Illinois Council on Developmental Disabilities | Workgroup |
| (3) Academic Partner | |

3. Title: Advancing Equity Through Inclusive Outcome Data

By _____, the academic partner will develop and propose a comprehensive methodology for integrating demographic analysis into all outcome tracking under the DIP MYP. The proposed approach will ensure that outcome data is disaggregated by race, gender, primary language, income level, geographic region, disability type, and employment history. This data will be reported annually and reviewed in coordination with ICDD, DRS, DDD, and the DIP Workgroup to assess whether any

disparities exist in outcomes and to inform modifications to training, TA, or resource strategies to promote equity in transitions to CIE.

Outcome:

All 14c providers receiving 14c phase out / transformation funds will consistently report key employment data for individuals served under their certificate. This will result in a reliable, statewide dataset that informs annual planning, supports targeted technical assistance efforts, and tracks year-over-year progress toward the goals outlined in the DIP MYP, especially the transition of individuals from subminimum wage employment to CIE.

Indicators of Success:

- A standardized reporting tool is created, distributed, and supported by ICDD and state agencies by September 2025.
- Annual data submissions from 14c providers are collected, reviewed, and summarized by the DIP Workgroup each year starting in 2026.
- Data from providers is used to guide DIP Workgroup decisions on technical assistance, training, and resource targeting.

Recommended Entities Involved:

- (1) Academic Partner
- (2) Illinois Council on Developmental Disabilities
- (3) EEOPD Taskforce & Dignity in Pay Workgroup

4. Title: 14(c) Transformation Feedback System

By _____, ICDD, DRS, DDD, IDES, ICCB, and the EEOPD Taskforce will develop and implement a cross-agency feedback system specifically targeting individuals with disabilities who are currently employed in 14c settings or who are transitioning out of those settings into minimum wage employment or meaningful day services.

The system will:

- Be autogenerated at key service transition points,
- Be written in plain language, and
- Be used to report quarterly on satisfaction, barriers, and system navigation challenges related to the transition process.

All participating agencies will use the findings to inform service improvements, policy development, and Employment First implementation aligned with the goals of the Dignity in Pay MYP.

Outcome:

Increased clarity and consistency across state agencies regarding employment terminology and available supports, empowering people with disabilities, providers, and state staff to pursue and support a broader range of inclusive employment opportunities.

Indicators of Success:

- Tool is published on a publicly accessible website by June 30, 2026.
- At least five agencies contribute definitions and available supports.
- The tool reflects at least 10 employment types, including traditional and non-traditional options.
- Stakeholder review confirms the tool is clear, accurate, and accessible.
- Agencies report using the tool to guide case planning, training, or service alignment.
- Individuals with disabilities and providers report improved understanding of employment pathways and supports.
- Annual updates are tracked and shared across participating agencies.

Recommended Entities Involved:

- | | |
|--|--------------------------------------|
| (1) Illinois Council on Developmental Disabilities | (5) Illinois Community College Board |
| (2) Division of Rehabilitation Services | (6) EEOPD Taskforce |
| (3) Division of Developmental Disabilities | (7) 14(c) Providers |
| (4) Illinois Department of Employment Security | |

5. Title: Equity Impact Tool for DIP Implementation

By _____, the EEOPD Dignity in Pay Workgroup, in collaboration with the Governor's Office on Equity and relevant state agencies (e.g., DHS, DCEO, ISBE, IDPH), will develop and implement an Equity Impact Assessment Tool to ensure all DIP-related initiatives, especially those affecting 14c phaseout, employment access, and provider transformation, are inclusive of people from communities that have been historically underserved due to race, ethnicity, gender identity, language access, or geography. The tool will be applied at the planning and implementation stages of state-led initiatives, and agencies will be required to submit equity impact summaries annually to the DIP Workgroup.

Outcome:

Ensures equity and intersectionality are built into all Dignity in Pay Act efforts and that underserved populations receive intentional support.

Indicators of Success:

- Equity Tool is developed and piloted by (DATE TBD).
- At least 5 DIP-related agency initiatives use the tool in Year 1.

- Annual equity impact summaries submitted by at least 80% of agencies by (DATE TBD).

Recommended Entities Involved:

- (1) EEOPD Dignity in Pay Workgroup
- (2) Illinois Council on Developmental Disabilities
- (3) Governor's Office on Equity

6. Title: Project Management to Support Cross-Agency Coordination and Implementation

By _____, ICDD, in coordination with IDHS and the Governor's Office, will maintain project management support to oversee implementation of the Dignity in Pay MYP. This includes:

Supporting:

- regular cross-agency planning meetings and tracking progress toward MYP goals;
- agencies align deliverables, timelines, and roles across related transformation initiatives;
- documentation, reporting, and tracking of activities to ensure transparency and follow-through;
- coordination of technical assistance, training, and evaluation activities with external partners;
- logistical and planning support for EEOPD Workgroup operations and DIP implementation;
- liaising between agencies, the Governor's Office, and ICDD to identify and troubleshoot barriers to coordinated action;
- working with state agencies to develop MOUs or IGAs to support agency coordination of 14(c) responsibilities.

Outcome:

Implementation of the Dignity in Pay MYP is effectively coordinated, monitored, and supported through dedicated project management, resulting in aligned cross-agency action, clear timelines and deliverables, and timely reporting. Agencies, partners, and leadership remain engaged, accountable, and responsive throughout all phases of DIP implementation.

Indicators of Success:

- A designated Project Manager is in place and actively supporting coordination and implementation activities across agencies.
- A schedule of cross-agency planning meetings is maintained and shows consistent participation from relevant state agencies.
- A centralized system or tool is used to track and report progress toward MYP goals.
- Deliverables, roles, and timelines are clearly documented and aligned across agencies and updated regularly.

- Technical assistance, training, and evaluation activities are well-coordinated and reported to the EEOPD Dignity in Pay Workgroup.
- Barriers to implementation are identified and resolved in collaboration with the Governor's Office and relevant agencies.
- EEOPD Workgroup meeting operations are successfully planned and executed with timely distribution of agendas, notes, and updates.

Recommended Entities Involved:

- | | |
|----------------------------------|--|
| (1) Governor's Office | (4) Illinois Council on Developmental Disabilities |
| (2) Department of Human Services | (5) EEOPD Taskforce's Dignity in Pay Workgroup |

7. Title: 14(c) Transformation Dashboard and Data Tracking System

By _____, ICDD, in collaboration with DHS (DDD and/or DRS), will develop and maintain a public-facing dashboard on the ICDD-Dignity in Pay Website landing page that showcases progress on the phase-out of subminimum wage across Illinois' 14(c) certificate holders. This dashboard will be included as part of the MYP's annual reporting and will be updated quarterly.

DDD and/or DRS will require 14(c) providers under their oversight to submit standardized data on their transformation progress. 14(c) providers will be required to provide both aggregate data and data about the status of individuals. Aggregated data will be shared with ICDD and reported to the EEOPD Dignity in Pay Workgroup. Individual-specific data will be shared only with the academic partner, project manager, and appropriate state agencies. Development of the dashboard will be coordinated with DoIT or the appropriate IT entity to ensure feasibility and successful implementation.

Required data elements will include, at minimum:

- Number of individuals transitioned from subminimum wage to CIE, including hours worked and wage data
- Status with respect to accessing employment programs and achieving CIE outcomes
- Number of hours in subminimum wage employment versus unpaid or prevocational services
- Participation in other programs and services
- Organizational transformation indicators, such as technical assistance hours completed and business outreach conducted
- Documentation of family and individual outreach efforts

This dashboard will promote transparency, track system-wide progress, and support data-driven decision making around the implementation of the Dignity in Pay Act.

Outcome:

State agencies, 14(c) providers, and community partners have access to a centralized, transparent data tool that tracks individual and organizational progress toward the elimination of subminimum wage, increases in CIE, and overall transformation milestones. This enables informed decision-making, strengthens accountability, and ensures that individuals with disabilities, families, and advocates can monitor progress in real time.

Indicators of Success:

- A public-facing dashboard is launched by July 2026 and updated quarterly.
- All 14(c) providers submit required data to DHS (DDD and/or DRS) for inclusion in the dashboard.
- Dashboard includes individual-level metrics such as number of individuals transitioned to CIE, average hours worked, and wages earned.
- Dashboard includes organizational-level metrics such as number of technical assistance or training hours completed, business engagement activities, and transformation milestones.
- EEOPD Taskforce receives regular updates drawn from dashboard data to support oversight and planning.
- Feedback from providers, advocates, and families indicates increased understanding and usability of transformation data.

Recommended Entities Involved:

- | | |
|---|--|
| (1) Illinois Division of Rehabilitation Services | (4) Illinois Department of Innovation & Technology |
| (2) Illinois Division of Developmental Disabilities | |
| (3) Illinois Council on Developmental Disabilities | (5) 14(c) Providers |

8. Title: Utilizing a Modernized Cross-Agency Disability Employment Data Infrastructure

By December 31, 2029, the Governor's Office (in the lead role), with support from subject matter experts and the EEOPD Dignity in Pay Workgroup, will identify and designate a qualified entity to establish and maintain a cross-agency, centralized data warehouse that serves as the primary repository for employment services and outcome data for people with disabilities. This system will produce quarterly public reports on statewide disability employment-services, expenditures and outcome data and generate required internal reports for state agencies who enter into data sharing agreements with the entity to populate the data into the warehouse. State agencies with contracts with 14(c) certificate holders will further require those certificate holders to enter into data sharing agreements with the entity and submit data at designated intervals to further populate the data warehouse. Annual reporting, benchmarking Illinois against valid data on state and national trends related to employment services, expenditures and outcomes, will be presented to respective state agencies, the Governor's Office and leadership in the state legislature. Additionally, data explaining essential elements contributing to positive employment outcomes will also be analyzed and shared. Reporting will be publicly available and in accessible formats.

At minimum this data reporting system will collect data on:

- **Longitudinal tracking of current 14(c) employees to track their path from 14(c) employment to competitive integrated employment and other meaningful day opportunities.**
- **Provision of benefits counseling and Work Incentives Planning and Assistance for those seeking CIE.**
- **Services received to pursue CIE.**
- **Other related data points detailed in the Dignity in Pay Act as feasible.**

Outcome:

A centralized, cross-agency data system that enables accurate, timely, and transparent reporting on services and outcomes for people with disabilities in Illinois. The system will support informed decision-making, measure progress toward Employment First goals, and improve public accountability by providing consistent statewide data through quarterly public reports.

Indicators of Success:

- MOUs about data sharing across 100% of state agencies that interface with persons with disabilities and employment.
- A singular system, or defined process that merges data from multiple systems via universal client identifiers, that can create reports on data as outlined in the Dignity in Pay Act Legislation.
- An identified “owner” of reporting to manage the cross-agency efforts.
- Demonstrated progress toward CIE outcomes by 14(c) workers.

Recommended Entities Involved:

(1) Governor's Office
(2) Division of Rehabilitation Services
(3) Illinois Department of Labor
(4) Department of Commerce and Economic Opportunity

(5) Illinois State Board of Education
(6) Illinois Department of Employment Security
(7) Academic Partner
(8) Illinois Council on Developmental Disabilities
(9) EEOPD Taskforce (Employment First team)

Data Collection and Sharing

As mentioned earlier, there is not a centralized data collection system related to people with disabilities, who may be supported by various state agencies, related to employment outcomes. Included in this Plan are recommendations about creating a unified data collection and reporting system that showcase the individual and collective outcomes of all the efforts to support people with disabilities to be employed in Illinois.

Some of the requirements of the legislation are not currently reportable due to this. As part of the current data recommendations, we will ensure future reporting on the following legislative requirements:

- The total number of people with disabilities paid SMW who want to transition to CIE with supports (data on choice and supports)
- The total number of people with disabilities paid SMW who do NOT want to transition to CIE and who would benefit from alternative meaningful day opportunities. (data on choice)
- Personal choice of people with disabilities regarding employment goals and planning in person-centered planning processes. (data on choice, goals, and planning)
- The impact of transportation on achieving individual employment goals (data on transportation)
- The activities of youth with disabilities within one year of exiting high school (data on post-school outcomes)
- K12 students involved in DRS services (STEP and Pre-ETS) that transition into adult services
- The number of students ages 14.5 through 22 with individualized education plans (IEPs) indicating a need for community-based adult services

In addition to the legislative data requirements, there will be new data available as a result of tracking progress with specific recommendations. As is outlined in the recommendations, it is expected that new Memorandums of Understanding and Intergovernmental Agreements related to data will be required to provide a comprehensive report. All of this information will be shared annually via the required MYP annual reporting.

Implementation and Monitoring

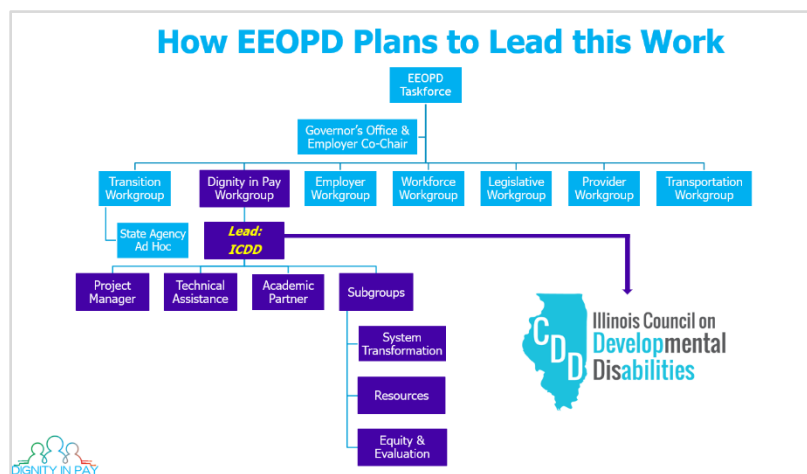
DIP obligates ongoing project planning, communication, coordination, and review of progress that all responsible parties are achieving the outlined benchmarks. The MYP is a living plan and can be expected to need adjustments and refinement as more information, collaboration, and opportunity emerge through the implementation of the plan.

In preparation of this MYP, there has been significant collaboration with state agency departments and connections to existing efforts for potential synergies, like the WIOA Illinois Workforce Innovation Board (IWIB). In the interest of not duplicating work—and weaving the employment journey for people

with disabilities into the conversation of the employment journey for all Illinoisans—these conversations will continue and will likely lead to embedding the long-term aspects of the DIP work into existing employment-focused structures.

Led by ICDD, the first phases of implementation will involve organizing the MYP recommendations into a project plan, ordered based on natural sequencing, priority, and within the context of and to compliment ongoing work of state agencies and other aligned initiatives. As per an MYP recommendation, a dashboard will be developed to track the progress of implementation.

The existing EEPD Taskforce and Workgroup structure allows for implementation and monitoring within current structures. The DIP Workgroup will reconvene starting in July 2025 to reaffirm the membership of the committee, review all recommendations, and inform the project plan. In an ongoing manner, the Workgroup will meet to review progress of each recommendation and, as soon as possible, review the dashboard and data that supports the implementation. The work done by the DIP Workgroup will be reported quarterly to the EEPD Taskforce.



DIP offers an opportunity for Illinois to “walk the walk” of Employment First and ensure all levels of the state funded systems are incentivizing CIE for all people. The cumulative efforts of all who have informed this Plan has been immense. The optimism for the positive outcomes for the transition of people currently earning SMW is unwavering. ICDD looks forward to implementing, supporting, and annually reporting on the progress of this work.

Onward

Illinois is emerging as a national leader in disability employment transformation thanks to the bold vision of the DIP Act and the steadfast leadership of Governor JB Pritzker. Through the coordinated efforts of the Illinois Department of Human Services, the Governor’s Office on Equity, and sibling agencies like ISBE, IDES, ICCB, HFS, and DCEO, the state is driving historic change to ensure that people with IDD are paid fairly and supported in pursuing meaningful, community-based employment. This MYP reflects more than policy. It embodies a bold commitment to purpose, equity, and true inclusion, positioning Illinois as a model for transformative change nationwide.

Glossary of Acronyms

ACRE: Association of Community Rehabilitation Educators

APSE: Association of People Supporting Employment First

ASL: American Sign Language

AT: Assistive Technology

BEP: Business Enterprise Program

CDS: Community Day Services

CE: Customized Employment

CIE: Competitive Integrated Employment

CIL: Centers for Independent Living

CILA: Community Integrated Living Arrangement

CMS: Central Management Services

CWIC: Community Work Incentives Coordinator

DCEO: Department of Commerce and Economic Opportunity

DDD: Division of Developmental Disabilities

DHS: Department of Human Services

DIP: Dignity in Pay

DMH: Department of Mental Health

DOL: Department of Labor

DRS: Division of Rehabilitation Services

EQU: Equity-Level Transformation Measures

e.g.: For example

EEOPD: Employment and Economic Opportunities for People with Disabilities

EVAL: Evaluation-Level Transformation Measures

FLSA: Fair Labor Standards Act

GO: Governor's Office

HBWD: Health Benefits for Workers with Disabilities

HCBS: Home and Community-Based Services

HFS: Healthcare and Family Services (Illinois Department of)

ICDD: Illinois Council on Developmental Disabilities

ICCB: Illinois Community College Board

IDES: Illinois Department of Employment Security

IDOL: Illinois Department of Labor

IDOT: Illinois Department of Transportation

i.e.: that is, or, in other words...

IGA: Intergovernmental Agreement

IL488-2234: Illinois form used to confirm completion of the CE process

ILCS: Illinois Compiled Statutes

IPS: Individual Placement and Support

ISBE: Illinois State Board of Education

ISC: Independent Service Coordination

IT: Information Technology

IWIB: Illinois Workforce Innovation Board

LEA: Local Education Agency

MOU: Memorandum of Understanding

MYP: Multi-Year Plan

PROV: Provider-Level Transformation Measures

PWD: People with Disabilities

SEG: Supported Employment – Group

SEI: Supported Employment – Individual

SME: Subject Matter Expert

SMW: Subminimum Wage

SYS: System-Level Transformation Measures

TBD: To Be Determined

VR: Vocational Rehabilitation

WIOA: Workforce Innovation and Opportunity Act

WIPA: Work Incentives Planning and Assistance

YR: Year

Public Comment Period Information



The **Dignity in Pay Act Multi-Year Plan** is now available for public comment. This Plan outlines how Illinois will phase out the use of 14(c) Subminimum Wage for people with disabilities over the next five years. It was developed with input from people with disabilities, families, providers, community partners, state and national experts, and state agencies.

This work is led by the Employment & Economic Opportunities for People with Disabilities (EEOPD) Taskforce's Dignity in Pay Workgroup, in partnership with the Illinois Council on Developmental Disabilities (ICDD).



Public Comment Period: June 13, 2025 – June 20, 2025



You can review the attached Plan and share your thoughts in one of two ways:

1. **Email** your comments to: DIP.Contact@illinois.gov
2. **Submit your feedback using our online Public Comment Form**, which includes guided prompts to help you share your input. [Check it out!](#)



Feedback Prompts:

1. Was the Multi-Year Plan easy to understand? Why or why not?
2. Are there any parts of the plan you feel are missing or need to be strengthened?
3. Do you agree with the recommendations in the plan? Please explain your answer and note which recommendation(s) you are referring to, if possible.
4. How do you think this plan could impact individuals currently working in 14(c) settings?
5. What supports or resources do you think will be most important to help this plan succeed?
6. Is there anything you or your organization would like to contribute to support the implementation of this plan?

No matter how you choose to share, we're grateful for your input! Once the public comment period ends, we will review and incorporate the feedback received into the final plan, which will be submitted to the EEOPD Taskforce for approval and then to the Governor's Office and General Assembly by July 1, 2025.

Thank you for being part of this important effort to advance equity, opportunity, and dignity in employment for all!