

# 2015-2025

# Nevada's Strategic Plan on Integrated Employment

Developed by the Governor's Taskforce on Integrated Employment

Funded and supported by:



# Nevada Plan for Competitive, Integrated Employment

# Contents

ACKNOWLEDGEMENTS	ii
TERMS AND DEFINITIONS	1
INTRODUCTION	4
CURRENT SITUATION	6
Results in Response to the Executive Order	9
MISSION, VALUES AND GUIDING PRINCIPLES	13
Mission	13
Values	13
Guiding Principles	13
Philosophy	13
CRITICAL ISSUES	14
GOALS	16
2015-18	16
2015-20	16
2015-25	17
STRATEGIC PLAN	18

### **ACKNOWLEDGEMENTS**

This plan was developed through the efforts of the Taskforce on Integrated Employment. Members were appointed by Governor Brian Sandoval.

# Jane Coorough-Gruner, Taskforce Chair

Nevada Aging and Disability Services Division

# LaVonne Brooks, Taskforce Vice Chair

High Sierra Industries, Inc.

# **Taskforce Members**

Joshua Baker, University of Nevada, Las Vegas

Edward Guthrie, Opportunity Village, Inc.

Shelley Hendren, Nevada Department of Employment, Training and Rehabilitation

David Jickling, Regional Transportation Commission

Sherry Manning, Nevada Governor's Council on Developmental Disabilities

Jack Mayes, Nevada Disability Advocacy and Law Center

Kristine Minnich, Clark County School District

Mechelle Merrill, Nevada Bureau of Vocational Rehabilitation

Mark L. Olson, Member of the Public

Brian Patchett, Easter Seals Nevada

Louis Renshaw, Nevada Governor's Council on Developmental Disabilities

Ken Rodriguez, Regional Transportation Commission

Stephen Schumacher, Nevada Governor's Council on Developmental Disabilities

Kelly Wales, Washoe County School District

Lenn White, Member of the Public

The Governor's Taskforce on Integrated Employment would like to thank and acknowledge the hundreds of key stakeholders, including people with intellectual/developmental disabilities, their families, providers, key informants, care givers, businesses, and advocates who provided their valuable time and perspective through participation in key informant interviews, focus groups, and survey completion. Taskforce members and key informants completed state scorecards. Key informants represented business, public and private agencies, providers, consumers and family members. Their support helped craft strategies to create a more diversified, inclusive, and integrated workforce. We also thank the hundreds of Nevadans who completed surveys and provided input.

### **Contributors**

Maria Albarran Steve Behm Alex Britz Cathy Britz **Bob Brown** Mary Bryant Matt Burak Otilia Camargo Tosha L.Carey William Carey Ellie Carter **Scott Carter** Daniel C. Citapin Arlene Comella Stephen Comella Stacey Conner Pedro Correa Diana Crites **Todd Crowe** Reggie Daniel Regina D. Daniel Monica Dell Orto Harold Despain Cherryl Dinnell Erin Dinnell

Kristy Doraro Olivia Nicole Espinoza Alice Goldberg Melvin Goldberg Aide Gonzalez Luz Gonzalez Christine Gregory Brianna Hammon Deidre Hammon Scott Harrington Ariel Hoagland Jamie Johnson Jason Johnson Jennifer Kane Jeff Kaul Kailin Kelderman Dan Kemple Katherine Kemple Rie Kennedy-Lizotte Keenan Knight Martha Knight Gay Kurashige James T. Kurashige Ian Laetkehans Roberta Langley

Naomi Leahy
Bertha Lopez
Jonas Martin
Kathy Martin
Jacque Matteoni
Joe Mattes
Lisa McVeigh
Rosie Melarkey
Mechelle Merrill
Travis Mills
Angelica Montenegro

Angelica Montene Anne Moody Kay Moore Mary Nevin Nicholas (no last name)

name)
Blanca Ocana Perez
Santa Perez
Sarah Quinn
Rosa M. Reza
Brandi Richmond
Judith Roller
Scott Ruggles
James Ruggles
Sylvia Ruiz

Ralph Sacrison Rebecca Samples Gabriela Sanchez Michelle Sanchez-Bickley

Rosie Scott

Grace Shaw Bernice Southuwk Stephanie Simmons **Rob Stuart** Dañelle Sundell Diana Sundell Sue Suran Lvnda Tache Maxine Taylor **Terry Taylor** Maria Trejo Nikki Van Orman Kelly Wales Korri Ward Abigail M. Wheeler Carolyn Young

Jacita Young

John Young



This plan was developed by Social Entrepreneurs, Inc., whose mission is to improve people's lives by strengthening organizations.

For information about this plan, contact Kelly Marschall at kmarschall@socialent.com

# **TERMS AND DEFINITIONS**

The following terms and definitions are used throughout the strategic plan:

ADSD—Aging and Disability Services Division

Community Training Center—A non-profit organization authorized to provide care and training for persons with intellectual disabilities and persons with related conditions. Current law requires Aging and Disability Services Division of the Department of Health and Human Services to adopt regulations governing the provision of Jobs and Day Training Services, including to people with disabilities served at CTCs.

**Competitive, Integrated Employment**—Work in the competitive labor market that is performed on a full-time or part-time basis in an integrated setting and for which the person is compensated at or above minimum wage, but not less than the customary wage and levels of benefits paid by the employer for the same or similar work performed by persons who are not people with I/DD.

- Competitive: work resulting in minimum wage or higher
- Integrated: working with employees who are not people with I/DD

**Day Habilitation**— Provision of regularly scheduled activities in a non-residential setting, separate from the participant's private residence, that improve self-help, socialization and adaptive skills to enhance social development and performance of activities of daily living and community living. Activities and environment are designed to foster the not only the acquisition of skills, but for greater independence and personal choice. Services are furnished consistent with the participant's person-centered service plan.

Developmental Disability—The definition used by the Nevada Governor's Council on Developmental Disability, means a severe, chronic disability of an individual that—is attributable to mental or physical impairments or a combination of mental and physical impairments; is manifested before age 22; is likely to continue indefinitely. This disability must result in substantial functional limitations in 3 or more of the following areas of major life activity: self-care; receptive and expressive language; learning; mobility; self-direction; capacity for independent living; economic self- sufficiency. In addition reflect the individual's need for a combination and sequence of special, interdisciplinary, or generic services. Individual supports or other forms of assistance that are life-long or extended duration and are individually planned and coordinated.

**DETR**—Department of Employment, Training and Rehabilitation

**DSPs**—Direct Service Professionals

**ESs**—Employment Specialists

**EDAWN**—Economic Development Authority of Western Nevada. EDAWN is a private/public partnership committed to recruiting and expanding quality companies that have a positive economic impact on the quality of life in the Greater Reno-Sparks-Tahoe region.

**GOED**—Nevada Governor's Office of Economic Development, established in 1983, the state agency is tasked with promoting and encouraging vital economic interests of Nevada, except for travel and tourism.

Individuals with Disabilities Education Act (IDEA)—IDEA was originally enacted by Congress in 1975 to ensure that children with disabilities have the opportunity to receive a free appropriate public education, just like other children. The law has been revised many times over the years. The most recent amendments were passed by Congress in December 2004, with final regulations published in August 2006 (Part B for school-aged children) and in September 2011 (Part C, for babies and toddlers).

I/DD—Intellectual/Developmental Disability

Intellectual Disability—The following excerpt from the Nevada Administrative Code (NAC) defines Mental Retardation; however, the NAC has been revised to Intellectual Disability. School districts across the State of Nevada are required to follow this statute when initially determining eligibility for special education. NAC 388.055 "Mental retardation" defined. (NRS 385.080) "Mental retardation" means a condition that:

1. Is characterized by intellectual functioning at a level that is significantly below average, and which exists concurrently with related limitations in two or more of the following adaptive skill areas:

- (a) Communication skills;
- (b) Self-care;
- (c) Home living;
- (d) Social skills;
- (e) Use of the community;
- (f) Self-direction;
- (g) Health and safety;
- (h) Functional academics;
- (i) Leisure; and
- (j) Work;
- 2. Manifests before the age of 18 years; and



3. Adversely affects the educational performance of a pupil.

(Added to NAC by Bd. of Education, eff. 7-14-88; A 11-23-93; R085-99, 2-16-2000)

**Informed Choice**—Informed choice is the process of choosing from options based on accurate information and knowledge. These options are developed by a partnership consisting of the consumer and the counselor that will empower the consumer to make decisions resulting in a successful vocational rehabilitation outcome.

**NGCDD**—Nevada Governor's Council on Developmental Disabilities.

**NEIS**—Nevada Early Intervention Services.

**RTC**—Regional Transportation Commission. Regional Transportation Commissions exist for Washoe County and Southern Nevada. The RTC, created by the State of Nevada in 1979, provides public transportation services, street and highway construction, and transportation planning.

**Sheltered Workshop**—The term refers to an organization or environment that employs people with disabilities separately from others. In the U.S., both the term "sheltered workshop" and its replacement term "work center," are used by the Wage and Hour Division of the U.S. Department of Labor to refer to entities that are authorized to employ workers with disabilities at sub-minimum wage. U.S. public policy at the Federal level has shifted away from sheltered workshops in favor of administering services, programs, and activities in the most integrated setting appropriate to the needs of individuals with disabilities.

**SSI**—Social Security Insurance.

**WIA**—Workforce Investment Act, The federal Workforce Investment Act, which superseded the Job Training Partnership Act, offers a comprehensive range of workforce development activities through statewide and local organizations. Available workforce development activities provided in local communities can benefit job seekers, laid off workers, youth, incumbent workers, new entrants to the workforce, veterans, persons with disabilities, and employers.

**WIOA**—Workforce Innovation and Opportunity Act was signed into law by President Obama on July 22, 2014 to help job seekers — including those with disabilities — access the services they need to succeed in employment and match employers with skilled workers.

### INTRODUCTION

On July 21, 2014, through Executive Order 2014-16, the Governor's Taskforce on Integrated

Employment (herein referred as "Taskforce") was established by Brian Sandoval, Governor of Nevada. The Taskforce is responsible for examining and evaluating current employment programs, resources, funding, available training, and employment opportunities for people with intellectual/developmental disabilities (referred to throughout as I/DD), and for providing a report to the Governor, on or before July 1, 2015.

The Taskforce is also responsible for developing a three, five, and ten-year strategic plan (2015-2025) that will result in "creating a more integrated workforce and expanding competitive employment opportunities for individuals with intellectual/developmental disabilities."

A review of state and national literature identified a number of key opportunities that Nevada could address in its plan. More information on the research related to these findings are detailed in the 2015 <a href="Integrated Employment Research Report">Integrated Employment Research Report</a>. The Research Report was presented to the Taskforce and used to develop this strategic plan. Opportunities include:

### Government as a model employer

Government represents a significant opportunity to advance employment opportunities for people with disabilities. Government can assume a leader's role, act as a model employer for people with I/DD, and set the path for the business community in integrated employment. Creating a fast-track hiring process for people with I/DD, focusing on retention of these employees, and setting hiring goals are examples of actions that government can adopt to cultivate an environment that encourages employment for people with I/DD.

# Business as an employer and partner

The business community is critical to improving employment outcomes for people with I/DD. Many businesses are willing to hire people with I/DD, but they need support from schools and government to address the barriers that people with I/DD face. Encouraging the business community to play a stronger role as a

partner in integrated employment requires understanding the business perspective. Government should not rely solely on the business community but instead act as a long-term support agent and resource, working with business as a partner.

# Promoting Competitive, Integrated Employment

People with disabilities face unique barriers such as low expectations for their future and lack of work-based experience. Students with disabilities may not expect to get a job after they leave high school, and many of them do not receive the same kind of work-based experiences as their non-disabled peers. It is important to improve employment outcomes by offering individuals the support they need to successfully enter the workforce.

(The National Governors Association Center for Best Practices (NGA Center), 2012) It is essential that government change its approach with businesses regarding employing people with I/DD. Government should not appeal to businesses' corporate responsibility, but should instead show businesses how hiring people with disabilities will meet businesses' needs (The National Governors Association Center for Best Practices (NGA Center), 2012).

# Early and timely school assessment and planning for transitions

Transition and career-readiness services for youth with I/DD should be provided from middle school on to begin shifting expectations toward work and a career. Commonly these services start at high school, but research suggests that starting earlier leads to better outcomes. Strategies include incorporating career-readiness content into the educational curriculum, linking state college and university disability services with career services, and providing students with specific knowledge and skills to be successful. In addition, hands-on work experience during high school, whether it is paid or not, increases the chances of youth with I/DD finding employment with higher wages after they graduate.

### A cultural shift

It is critical to address the traditional paradigm of "prepping young people with I/DD for a life of benefits" and change it to "prepping young people with I/DD to a life of work." State policies and strategies should promote the inclusion of people with I/DD to the workforce by making competitive, integrated employment a priority, and implementing the same strategies used with the broader workforce.

# Coordinated schools and economic development authorities

Close coordination between schools and economic development authorities is beneficial for young people with I/DD. This allows schools to help students with I/DD develop the skills they need to enter the workforce. Employers benefit from a broader pool of skilled applicants.

### Sustainable funding

Leveraging limited resources and utilizing multiple funding streams is very important to improve competitive, integrated employment for people with I/DD. This includes ensuring that Nevada is fully matching the federal funding for Vocational Rehabilitation. Other strategies include capitalizing on the numerous federal programs, connecting with private-sector and philanthropic resources, and maximizing the efforts of disability experts.

### **Orientation to results**

It is also important to set and measure progress toward employment goals and the return on investment of disability employment programs. Information on progress can be used to improve programs and encourage others to participate in them.

# **CURRENT SITUATION**

In 2013, the Nevada Governor's Council on Developmental Disabilities (NGCDD) published a position paper on integrated employment. The paper stated, "The benefits of integrated employment for individuals with I/DD are well established in nationwide literature; however, movement from segregated settings has been slow and the percentage working in integrated employment has been flat since the 1990s (Butterworth et al., 2013). In Nevada, the percentage of individuals with I/DD in community



based programs has increased since the 1990s."

The paper went on to make recommendations that informed the later Executive Order. The Executive Order established the Taskforce and charged it with examining a number of issues, with the goal that:

"The administration intends to improve cooperation and collaboration among state agencies, community leaders, non-profit organizations and businesses to enhance and strengthen supported employment systems, education, training, and services for individuals with intellectual/developmental disabilities, thereby encouraging their success, expanding their ability to make informed choices, and promoting a more integrated workforce." --Executive Order 2014-16

From December 2014 to March 2015, the Taskforce on Integrated Employment guided a number of activities to understand the current situation in Nevada related to competitive, integrated employment for persons with intellectual and developmental disabilities (I/DD). This included research and outreach across the state to explore areas of strengths and weaknesses within the existing system as well as opportunities to strengthen service outcomes.

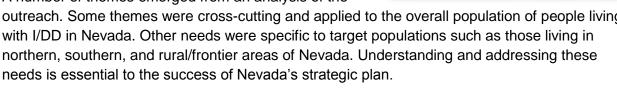
### Outreach included:

- The Alliance for Full Participation State Team Scorecard, which was used by the Taskforce and key informants to evaluate state policies, practices and strategies that impact opportunities for competitive, integrated employment.
- Ratings of Recommendations in the Nevada Governor's Council on Developmental Disabilities (NGCDD Position Paper by Taskforce members.
- Key Informant Interviews with 13 experts to assess the various systems providing people with I/DD with employment training, opportunities and supports.

- Focus groups with 93 people with I/DD and/or their parents/caregivers were facilitated to identify opportunities and challenges within the existing system.
- Consumer Surveys from 356 people with I/DD or family members, were used by the Taskforce to help describe the current situation and make recommendations for systems improvements.

The 2015 Integrated Employment Outreach Summary Report is a companion document to this strategic plan and provides detailed analysis of the outreach results and recommendations that were considered by the Taskforce in response to Executive Order 2014-16 and which informed the development of the strategic plan.

A number of themes emerged from an analysis of the outreach. Some themes were cross-cutting and applied to the overall population of people living with I/DD in Nevada. Other needs were specific to target populations such as those living in northern, southern, and rural/frontier areas of Nevada. Understanding and addressing these



**Shared Definition and Vision:** There is a lack of a shared definition of what competitive, integrated employment is, what should be measured, and what it means to provide choice or options. Consumer surveys clearly identify three areas that are priorities for people with I/DD. They include: working in a job they like, having access to job training resources, and

having the opportunity to earn a wage that is fair for the work they perform.

### Government as a Model and

**Leader:** Key informants and focus group participants both identified the critical role the state can play in implementing competitive, integrated employment. The state could play a tremendous leadership role by employing people with I/DD and using accepted approaches such as job carving and job sharing. This would also afford the state the vocabulary to speak with employers knowledgably about what works and how best to integrate people with I/DD into their workforce. Key informants noted that the bureaucracy and risk management constraints at the state

"IT'S NOT OUR KIDS WITH I/DD THAT ARE THE BARRIER. IT'S THE WHOLE **COMMUNITY OF PEOPLE RAISED HERE** THAT HAVE HAD LITTLE TO NO EXPOSURE TO PEOPLE WITH I/DD AND THEIR FEARS, INTOLERANCE, AND POOR UNDERSTANDING. EXPOSE THE **NEXT GENERATION OF "TYPICALS" TO** THOSE WITH I/DD AT A VERY YOUNG AGE AND IN 20 YEARS YOU WILL HAVE A GREATER ACCEPTANCE IN THE **WORK FORCE.**"

**Survey Respondent** 

often are barriers to the state's ability to employ people with I/DD.

**Community Awareness:** More community awareness and understanding of resources, needs, and the service delivery system is essential for individuals, families, providers, employers, and community members to create an environment where competitive, integrated employment can be successful.

**Collaboration and Coordination:** Collaboration and coordination is needed between schools and the state agencies serving people with I/DD in terms of resources, data sharing, eligibility processes, and transition planning and implementation. Collaboration is occurring at the state level but needs to be pushed down to the local level. In addition, transportation is a key factor in success and must be seen as a partner and collaborator. Finally, no collaboration will work if it doesn't include people with I/DD and their family members at every level of the discussion.

**Employer Engagement:** A lack of sufficient opportunities for meaningful work was identified repeatedly by key informants, focus group participants, and in stakeholder surveys.

More large, small, and entrepreneurial business engagement is needed across the state. The state could play a tremendous leadership role by modeling approaches to achieving the goals of employing people with I/DD, and engaging employers in conversations about how the state overcomes barriers that employers are also likely to face.

Resource Development and

**Sustainability:** A lack of adequate resources and the need for sustainable funding strategies threatens the success of any plan or system developed by Nevada. Funding, coupled with the

WE NEED WORK. WHEN WE
WORK WE FEEL BETTER, WHEN
WE FEEL LIKE PRODUCTIVE
MEMBERS OF SOCIETY WE HAVE
LESS HEALTH ISSUES. GET
COMPANIES TO HIRE US.

**SURVEY COMMENT** 

need to overhaul the rate setting process for Medicaid and other services for people with I/DD is essential to the success of competitive, integrated employment in Nevada. Sufficient resources or the lack thereof was mentioned in every focus group and by every key informant in some context. Therefore, ensuring adequate resources for the services that promote competitive, integrated employment is a critical issue to many stakeholders.

**Changing Landscape:** The Workforce Innovation and Opportunity Act (WIOA) has been adopted but final rules have not been published. Ongoing coordination and identification of the implications of WIOA is essential during planning and implementation of any system changes. In addition, Nevada's education system is currently undergoing substantive changes with the likelihood of more to follow. Ensuring that people with I/DD don't get further lost or left behind while schools implement changes within WIOA, the Common Core or adjust to other

changes enacted by the 2015 legislature will be critical. Ensuring schools are actively at the table in all implementation discussions is essential.

# **Results in Response to the Executive Order**

Key informant interviews, focus group discussions, surveys, results from a State Scorecard rating and Taskforce input provided information on issues to be examined per the Executive Order. Key assessment results include:

**STUDENT SERVICES:** Students with I/DD are most often identified prior to kindergarten entry, frequently through parent initiated assessments, and in coordination with ChildFind and/or Nevada Early Intervention Services (NEIS). While school districts do identify students with I/DD, there are no consistent assessment tools utilized across school districts, and resources (including transitional supports) available post-identification are insufficient to meet students' needs.

Existing methods for identifying students with I/DD, the implementation of vocational assessments, and the delivery of employment-related planning and training services are not consistent or sufficient across the state. Proactive engagement of individuals to identify interests and match their interests to training opportunities is needed. Earlier intervention, access to more options, and opportunities and better transitions through collaboration, coordination, and shared resources are needed.

# **WAGE SETTING PRACTICES:**

The current practice of paying people with I/DD less than a living wage was identified as a barrier to achieving meaningful employment. The impact of wages earned on an individual's SSI benefits exacerbates the challenge as those that acquire employment fear losing access to necessary supports which cannot be acquired on the wages typically earned. Achieving competitive wages, and implementing strategies to address and achieve placements that are in the highest and best interest of the individual requires a shared

I WANT MY CHILD TO HAVE OPTIONS AND A CHANCE TO MAKE MINIMUM WAGE. | WANT A FUTURE FOR MY CHILD. I WILL NOT ENCOURAGE MY CHILD TO EXPERIENCE SERVITUDE **ENVIRONMENTS THAT DO NOT ALLOW** FOR HER TO GAIN NEW SKILLS OR EXPERIENCE GROWTH. WE NEED TO **CHANGE THE ATTITUDE OF MANY** SERVICE PROVIDERS AND TEACH THEM ABOUT HIGH EXPECTATIONS FOR PERSONS WITH DISABILITIES. PERSONS WITH DISABILITIES HAVE A TREMENDOUS AMOUNT TO SHARE WITH THE COMMUNITY. THEY SHOULD **NOT BE HIDDEN AWAY IN** INSTITUTIONAL TYPE SETTINGS.

**Survey Comment** 

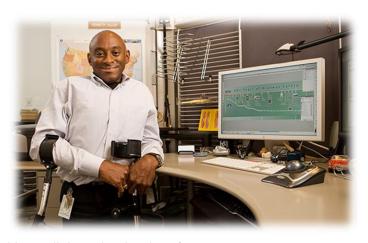
definition of competitive, integrated employment. It also requires education and supports for individuals, families, schools, providers and employers. Finally, a pool of employers is needed to provide choices for jobs and work experiences/workplace training.

Proactive engagement of businesses is critical for competitive, integrated employment. Job carving and job sharing are two approaches that can achieve placements in the highest and best interest, but in all cases, the focus must fit with individuals' interests and skills, as well as employers' needs.

Current rates for Medicaid funded providers of employment services are based on an outdated formula, using ratios that can act as a disincentive to promoting employment and achieving the outcomes sought in the Executive Order. The rate setting process as it currently exists is not adequate and needs to be overhauled.

# **COLLABORATIVE EFFORTS:**

Collaboration at the state level was noted as a strength by a majority of key informants. However, focus groups indicated that these collaborations often don't exist at the local level. Focus group participants felt that parents, educational institutions, state agencies and community partners do not work in partnership for the benefit of consumers. More opportunities for shared assessments, communications, and resources are needed and could be addressed through effective



collaboration. Nevada has many examples of positive collaboration but has few resources to take those collaborations or resulting pilot projects to scale in a way that would have a statewide impact.

Key informants also stated that employers and people with I/DD need to be at the table consistently. Memorandums of Understanding (MOUs) are needed between school systems (districts and higher education), Vocational Rehabilitation, the Regional Centers, transportation, and providers to outline roles, responsibilities and agreements.

**FUNDING MECHANISMS:** Nevada doesn't have sufficient resources to implement competitive, integrated employment, and many are concerned that state and federal funds are not being utilized to their fullest potential. In addition, many key informants agreed there is a tremendous need to develop alternative funding options. A minority of key informants were very concerned that the competitive, integrated employment plan would result in a loss of resources for those most vulnerable, and in their opinion, unable to work.

Sustainability was a recurring theme when key informants discussed goals, policies or programs. There is a need to support additional services and individualized supports within the educational system, and this is even more pronounced within the adult service systems. While

at least one school district is leveraging federal matching funds to support employment and transitional supports, this strategy is not being utilized throughout the state.

Access to Information: Information is not widely available to families in their search for services and supports. School districts, community-based providers, and state agencies' staff are not fully aware of resources themselves, leaving parents and consumers with the responsibility of finding out what is available, and how to access care. There was consensus that neither people with I/DD, nor their families, are provided sufficient information to make informed decisions concerning training, services, and employment opportunities. Access to information was identified as a key concern at every level of the system, from individuals and families, to communities and statewide systems.

I think it's very important to open many doors available to individuals with I/DD in our community.

Education is definitely key for community businesses. I also think it's extremely important to find jobs that focus on individual interest and abilities which is not always the case. If we did more of this it would promote longevity with jobs.

**Survey Comment** 

**DAY HABILITATION SERVICES:** There was considerable concern from many key informants about the effectiveness, demand, and long-term need for "day habilitation" and sheltered workshops in community training centers. At the same time, parents in focus groups and on surveys expressed concern about the need for day habilitation services and more

funding for them, particularly in rural areas. Key informants felt that day habilitation should be included in options for people with I/DD but voiced concern that they are sometimes provided as the only viable option, rather than competitive, integrated employment being the first option offered. Day habilitation settings were often not seen as a resource that supports employment preparedness due to a perceived lack of opportunities for skill development.

Day habilitation settings can offer ways for people to contribute to their community, and add value. Others noted that they are often staffed by a low skilled workforce. Key informants felt the structure of these settings could be enhanced or reconfigured to support



temporary placement based on individualized and progressive skill development for consumers. Truly promoting these services as training centers for assessment and skill acquisition was

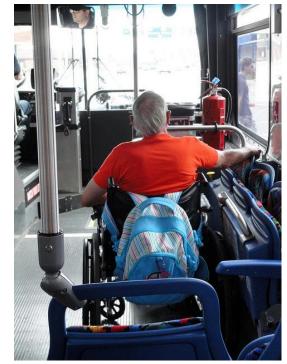
identified by multiple key informants as a way to enhance the service delivery system. Focus group members and key informants felt this will only be possible if these services are supported by highly qualified, skilled, and consistent staffing levels.

**TRANSITIONAL SUPPORTS:** Transitional supports for individuals are often insufficient to prepare people with I/DD beyond their high school experience. Within the educational system, transitional plans are often established too late and include only rudimentary goals. Additionally, staffing, such as transitional officers, are not always available to families. Within the adult serving system (Vocational Rehabilitation and Regional Centers), services are not often initiated prior to the age of 18, and when they are, few resources exist for students. Current approaches and opportunities to allow families to plan for transition services in the K-12 setting are not consistent across the state, and are seen as insufficient by the majority of key informants. This issue was frequently cross-referenced with the lack of access to information, particularly about programs and options. Providing transition supports earlier in a person's life was mentioned by a majority of key informants.

**TRANSPORTATION:** Transportation to and from work, school, and doctor's appointments is not widely available to people with I/DD, or is difficult to navigate due to their disabilities. Issues included a lack of sufficient routes, hours of operation, bus driver consistency, and timeliness of the service. Alternative transportation options and training supports are needed, especially in the rural areas of the state. A number of barriers and the needed improvements to address

them were identified to support transportation for people with I/DD. They included the lack of reliability to be at work on time and general concerns about treatment and safety. Transportation to attend appointments for services and general transportation were identified by surveys from the rural counties as the top services needed.

Nevada's plan for competitive, integrated employment addresses these key issues, drawing on best practice research and reports and incorporating recommendations from stakeholders across Nevada, while strategically prioritizing goals into three, five and ten year goals.



# MISSION, VALUES AND GUIDING PRINCIPLES

### **Mission**

The Taskforce mission is to develop and implement a sustainable system for individuals with intellectual and developmental disabilities (I/DD) to achieve competitive, integrated employment in the setting of their choice.

### **Values**

We believe:

- 1. Our job is to increase opportunities and decrease barriers.
- 2. All individuals, schools, families, and businesses must raise their expectations.
- 3. People will be hired because of their ability not because they have a disability.
- 4. Employment is a win/win for everybody.
- 5. People are healthier, safer and happiest with meaningful work of their choosing.

# **Guiding Principles**

Nevada is making competitive, integrated employment happen by:

**Changing Expectations:** Everyone can contribute and participate in meaningful and competitive employment.

**Strengthening Partnerships:** Agencies and programs work toward the same outcome and work effectively with each other.

**Promoting Choice:** Individuals have the right to informed choice through community experience.

**Embracing Diversity:** Respect and support people of all color, gender, and disability.

**Valuing Efficiency:** Strive to meet the needs of our community, economy, employers, and workers.

**Ensuring Quality:** Continually monitor the education, training, employment services, and consumer satisfaction.

# **Philosophy**

The prevailing philosophy that guides all aspects of this plan is that Nevada will be strengthened by promoting competitive, integrated employment where people with I/DD are employed at or above the state minimum wage.

# **CRITICAL ISSUES**

Following a review of research and outreach results and recommendations, the following critical issues were defined and prioritized by the Taskforce for a successful plan for competitive, integrated employment in Nevada.

**Government as a Leader and Model Employer:** Government can assume a leader's role, act as a model employer for people with I/DD and set the path for the business community in competitive, integrated employment.

**Outcomes Measurement and Review Process:** It is important to set and measure progress toward employment goals and the return on investment of disability employment programs. Information on progress can be used to improve programs and encourage others to participate in them.

# Employer Engagement,

**Development and Support:** More large, small, and entrepreneurial business engagement is needed across the state. The state could play a leadership role by modeling approaches to setting goals and employing people with I/DD, and engaging employers in conversations about how the state overcomes barriers that employers are also likely to face.



**Sustainability:** Nevada doesn't have sufficient resources to implement competitive, integrated employment, and many are concerned that state and federal funds are not being utilized to their fullest potential. A lack of sufficient resources and the need for sustainable funding strategies threatens the success of any plan or system developed by Nevada. Funding, coupled with the need to overhaul the rate setting process is essential to the success of competitive, integrated employment in Nevada. Ensuring sufficient resources for the services that promote competitive, integrated employment is critical.

Collaboration and Coordination: Collaboration and coordination is needed between schools and the state agencies serving people with I/DD in terms of resources, data sharing, eligibility processes, transition planning and implementation. Nevada has many examples of positive collaborations but has few resources to take those collaborations or resulting pilot projects to scale in a way that would have a statewide impact. Memorandums of Understanding (MOUs are needed between school systems (districts and higher education), Vocational Rehabilitation, Regional Centers, transportation, and providers to outline roles, responsibilities and agreements.

**Professional Development:** Appropriate assistance is needed for both Direct Service Professionals (DSPs) and Employment Specialists (ESs) to improve outcomes for job seekers with I/DD. DSPs and ESs can benefit from consistent use of best and promising practices. Professional development focused on more training would help DSPs and ESs address the needs of people with I/DD by finding job openings, engaging employers to hire, and negotiating job responsibilities with an employer. Promoting best practices for person-centered career planning, customized employment, job creation, and self-employment is needed.

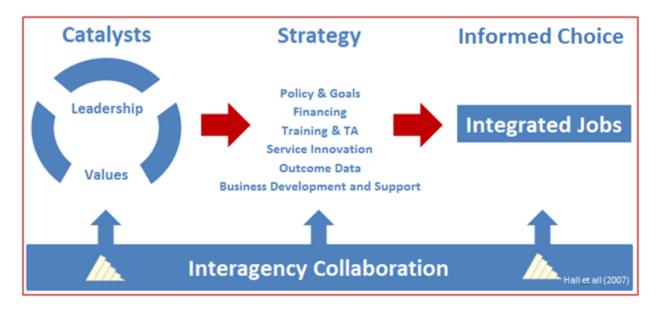
# Early and Timely School Assessment and Planning for

**Transitions:** Transition and career-readiness services for youth with I/DD should be provided from middle school on to begin shifting expectations toward work and a career. Commonly these services start at high school, but research suggests that starting earlier leads to better outcomes.

**Transportation:** Transportation to and from work, school, and doctor's appointments is not widely available to people with I/DD, or is difficult to navigate. Alternative transportation options and training supports are needed, especially in the rural areas of the state. Barriers that must be addressed include the cost, areas served, hours of operation, treatment of consumers, and general concerns about reliability, treatment and safety.

# **Nevada's Proposed High Performance Model**

In examining efforts across the nation, Nevada reviewed best practices and developed a revised version of a national model for competitive, integrated employment. Nevada's model is:



Nevada's plan addresses the key components of the model and sets goals to achieve competitive, integrated employment.

# **GOALS**

To achieve competitive, integrated employment in Nevada, and address the aforementioned critical issues, goals were identified and prioritized by the Taskforce. Goals include:

# 2015-18

# Resource Development and Sustainability

- 1. Education, employment and other related systems within Nevada have and maintain sufficient resources and funding for competitive, integrated employment.
- 2. Systems within Nevada implement a reimbursement structure for service providers that increases competitive, integrated employment of people with I/DD.

# Collaboration and Coordination

3. Nevada develops effective partnerships that include all stakeholders to implement competitive, integrated employment.

# 2015-20

# **Professional Development**

4. Nevada has well-trained, competent professionals that educate and prepare people with I/DD to achieve competitive, integrated employment.

# **Transportation**

5. People with I/DD have affordable and reliable transportation options across all regions of Nevada to participate in all aspects of life.

# Employer Engagement, Development and Support

- 6. Nevada provides ongoing training and support for employers and their employees with I/DD.
- 7. Nevada companies have enough information about and access to people with I/DD seeking employment to make informed business decisions to hire them.

# 2015-25

# Government as a Leader and Model Employer

- 8. There are measurable increases in employment of Nevadans with I/DD within the State of Nevada, including local governments and the publicly-funded university system.
- 9. The State of Nevada, including the publicly-funded university system, is a model employer who supports policies, procedures, regulations and practices to increase opportunities, foster innovation, reduce barriers, facilitate accommodations and informed choice for competitive, integrated employment of people with I/DD consistently across the state.
- 10. Information is gathered and reported annually on key indicators for competitive, integrated employment across education, employment and other related systems.

# Early and Timely School Assessment and Planning for Transitions

- 11. Young people with I/DD have work experiences that are typical of their peers.
- 12. Every individual with I/DD in Nevada transitions to adulthood with vocational experiences and the education that will enable them to obtain competitive, integrated employment.



# STRATEGIC PLAN

The goals for competitive, integrated employment in Nevada, to address the critical issues identified in this plan, were prioritized by the Taskforce, with timing established based on priorities but also on the estimated time needed to implement strategies.

There are a number of other entities within the state that are working to address aspects of this plan and issues related to competitive, integrated employment for people with I/DD. Whether the Taskforce will remain in existence is unknown, but regardless, a lead entity will need to be identified to achieve the goals in this plan. To implement the plan, support from key private and public leaders will be necessary.

The Taskforce recommended establishing workgroups that will include Taskforce members, businesses, people with I/DD, and others to establish action steps necessary to implement the strategies identified for each goal. Workgroups could report to a designated entity quarterly, allowing the entity to review and revise strategies and action steps to account for changing conditions, such as the establishment of WIOA rules and regulations, or following policy changes that may impact the implementation plan. The entity could evaluate progress toward achieving goals on an annual basis and issue a report to the Governor outlining progress to date, successes and challenges, with recommendations for revisions to the plan as needed.

The three, five and ten year strategic plan is outlined on the following pages, based on the timing established by the Taskforce to achieve the goals of the plan, as follows:

2015-2018

- Resource Development and Sustainability
- Collaboration and Coordination

2015-2020

- Professional Development
- Transportation
- Employer Engagement, Development and Support

2015-2025

- Government as a Leader and Model Employer
- Early and Timely School Assessment and Planning for Transitions

# 2015-2018 Integrated Employment Strategic Plan

### CRITICAL ISSUE: RESOURCE DEVELOPMENT AND SUSTAINABILITY

Nevada doesn't have sufficient resources to implement competitive, integrated employment, and many are concerned that state and federal funds are not being utilized to their fullest potential. A lack of sufficient resources and the need for sustainable funding strategies threatens the success of any plan or system developed by Nevada. Funding, coupled with the need to overhaul the rate setting process is essential to the success of competitive, integrated employment in Nevada. Ensuring sufficient resources for the services that promote competitive, integrated employment is critical.

Goal 1. Education, employment and other related systems within Nevada have and maintain sufficient resources and funding for competitive, integrated employment.

# **Strategies**

- A. Collaborate to access and leverage all available resources for programs and services for people with I/DD and ensure all funding is maximized and sufficient for long-term employment success. (Includes Plans for Achieving Self-Support (PASS), Impairment Related Work Expenses (IRWE) benefits, and all Medicaid/WIOA and SSI/SSDI resources).
- B. Engage the Governor and the Legislature to add the resources to the system that are needed to achieve the outcomes of competitive, integrated employment.
- C. Develop new and strengthen existing partnerships and collaborations charged with supporting people with I/DD.
- D. Pursue alternative/complementary funding through private foundations and grants and link grant writing staff across agencies to leverage information and increase grant success.
- E. Develop third party cooperative arrangements between state agencies and education systems.

Goal 2. Systems within Nevada implement a reimbursement structure for service providers that increases competitive, integrated employment of people with I/DD.

# **Strategies**

- A. Establish a funding and rate plan for sustainability that includes braided and blended funding across agencies, and re-balances funding and staff.
- B. Maximize available state and federal resources through improved rate and payment systems to increase competitive, integrated employment.
- C. Educate legislators to understand the importance of increased State funding to draw down increased Federal funds.
- D. Develop sustainability plans to respond to funding changes, including in the Workforce Innovation and Opportunity Act (WIOA).
- E. Require competitive, integrated employment to be addressed in all applicable state plans that are part of the Nevada system of care for people with I/DD.

STRATEGIC PLAN 20 | P a g e

# 2015-2018 Integrated Employment Strategic Plan

# **CRITICAL ISSUE: COLLABORATION AND COORDINATION**

Collaboration and coordination is needed between schools and the state agencies serving people with I/DD in terms of resources, data sharing, eligibility processes, transition planning and implementation. Nevada has many examples of positive collaborations but has few resources to take those collaborations or resulting pilot projects to scale in a way that would have a statewide impact. MOUs are needed between school systems (districts and higher education), Vocational Rehabilitation, Regional Centers, transportation, and providers to outline roles, responsibilities and agreements.

Goal 3. Nevada develops effective partnerships that include all stakeholders to implement competitive, integrated employment.

# **Strategies**

- A. Expand innovative partnerships and collaborations and promote communication with all partners to leverage resources, reduce duplication of efforts and expand opportunities for employment.
- B. Establish memorandums of understanding (MOUs)/interlocal agreements with key state and local agency partners, to define roles and responsibilities, remove barriers to employment supports as people transition from one funding stream to another, and secure grant funding, including braided or blended funding to implement innovative projects statewide.
- C. Implement data sharing policies, practices and systems with state agencies, school districts and providers of competitive, integrated employment services.
- D. Research and employ evidence-based best practices, including person-centered planning.

STRATEGIC PLAN 21 | P a g e

# 2015-2020 Integrated Employment Strategic Plan

### CRITICAL ISSUE: PROFESSIONAL DEVELOPMENT

Appropriate assistance is needed for both Direct Service Professionals (DSPs) and Employment Specialists (ESs) to improve outcomes for job seekers with I/DD. DSPs and ESs can benefit from consistent use of best and promising practices. Professional development focused on more training would help DSPs and ESs address the needs of people with I/DD by finding job openings, engaging employers to hire, and negotiating job responsibilities with an employer. Promoting best practices for person-centered career planning, customized employment, job creation, and self-employment is needed.

Goal 4. Nevada has well-trained, competent professionals that educate and prepare people with I/DD to achieve competitive, integrated employment.

# **Strategies**

- A. Invest in building the skills of Employment Specialists, supervisors, and key paraprofessional staff who work with people with I/DD to improve competitive, integrated employment outcomes.
- B. Provide evidence-based curriculum, career readiness professional development and training to teachers and classified support staff who directly work with students with I/DD.
- C. Link state colleges' and universities' disability services with career services.
- D. Change the rate structure to raise salaries for Direct Service Professionals and Employment Specialists to levels commensurate with careers in the field.
- E. Promote and support Direct Service Professionals and Employment Specialists positions as meaningful, competitively-compensated human services and economic development careers rather than administrative positions.
- F. Ensure that all teachers and Vocational Rehabilitation counselors have knowledge on competitive, integrated employment strategies, and adopt transition competencies.
- G. Work with the higher education systems to create a minor in I/DD employment services.

STRATEGIC PLAN 22 | P a g e

# 2015-2020 Integrated Employment Strategic Plan

### **CRITICAL ISSUE: TRANSPORTATION**

Transportation to and from work, school, and doctor's appointments is not widely available to people with I/DD, or is difficult to navigate. Alternative transportation options and training supports are needed, especially in the rural areas of the state. Barriers that must be addressed include the cost, areas served, hours of operation, treatment of consumers, and general concerns about reliability, treatment and safety.

Goal 5. People with I/DD have affordable and reliable transportation options across all regions of Nevada to participate in all aspects of life.

# **Strategies**

- A. Develop and expand transportation service options.
- B. Expand and promote the use of voucher programs for transportation services.
- C. Promote and expand travel training services to high schools and for adult users.
- D. Work with transportation companies and employers to create a system for paid/reimbursed ride sharing.
- E. Provide driver's license support for high-functioning people with I/DD.
- F. Adopt policies that allow for more flexibility for pick-ups and drop-offs of people with I/DD.
- G. Maximize efforts for sustainable grants and alternate funding sources in order to expand transportation services.
- H. Partner with employers on ride-sharing options for their employees with I/DD.
- I. Develop transportation systems to promote pick-ups and drop-offs at high schools to encourage access to worksites after school.

STRATEGIC PLAN 23 | P a g e

# 2015-2020 Integrated Employment Strategic Plan

# CRITICAL ISSUE: EMPLOYER ENGAGEMENT, DEVELOPMENT AND SUPPORT

More large, small, and entrepreneurial business engagement is needed across the state. The state could play a tremendous leadership role by modeling approaches to setting goals and employing people with I/DD, and engaging employers in conversations about how the state overcomes barriers that employers are also likely to face.

Goal 6. Nevada provides ongoing training and support for employers and their employees with I/DD.

# **Strategies**

- A. Develop continued employment support for people with I/DD who have achieved more than 90 days of successful employment; i.e. 180 days, 360 days.
- B. Pursue creative partnerships with employers to include job carving and job sharing and to provide on the job training, career-readiness and self-advocacy training for people with I/DD on their worksites.
- C. Utilize business owners and managers in Nevada and other states who have effectively hired and retained people with I/DD to relate their stories, demonstrate the benefits, and share their knowledge and best practices on how to create competitive, integrated employment opportunities.
- D. Provide proactive benefits planning to people with I/DD and their families to navigate the impact of work on benefits and supports.

Goal. 7 All Nevada companies have enough information about and access to people with I/DD seeking employment to make informed business decisions to hire them.

# **Strategies**

A. Identify business leaders with expertise with people with I/DD in each region of the state who can effectively serve as the outreach leader to businesses, and liaison between agencies and schools ("entrepreneur-in-residence").

STRATEGIC PLAN 24 | P a g e

# Nevada Plan for Competitive, Integrated Employment

- B. Provide outreach, training and support to employers and human resource groups to dispel myths and fears, and to educate them about hiring people with I/DD, the benefits to doing so, and the job supports available to sustain these employees.
- C. Develop a structure to support local coalitions that link providers, businesses, schools and families with people with I/DD.
- D. Create and implement marketing strategies and share success stories with employers. Promote business opportunities through social media.
- E. Utilize teams of business professionals from industry sectors to work with schools and Vocational Rehabilitation to develop transition and skills development certificate programs that mirror the most likely jobs in those sectors.
- F. Support partnerships and resources for employers to help them manage legal, tax, and employment requirements. Engage a number of industries, including small businesses and entrepreneurial ventures to participate in competitive, integrated employment.
- G. Facilitate partnerships with local and state economic development authorities including GOED and EDAWN, businesses and nonprofits to mentor and support people with I/DD to start up and develop entrepreneurial ventures.
- H. Pursue public/private partnerships with businesses, nonprofits, and people with I/DD and their families to work with DETR, school districts, ADSD, RTC and other relevant agencies to provide technical assistance and resources to be used in education and training of people with I/DD for real world competitive, integrated employment positions.
- I. Add a tab on the Secretary of State's webpage to share information on resources and linkages to hiring people with disabilities for new businesses in Nevada.
- J. Include an Employer Forum at the Chamber of Commerce level, SHRM, Sector Council and WIA/WIOA programs to create employer linkages to facilitate the hiring of people with disabilities.

STRATEGIC PLAN 25 | Page

# 2015-2025 Integrated Employment Strategic Plan

### CRITICAL ISSUE: GOVERNMENT AS A LEADER AND MODEL EMPLOYER

Government can assume a leader's role, act as a model employer for people with I/DD and set the path for the business community in competitive, integrated employment.

Goal 8. There are measurable increases in employment of Nevadans with I/DD within the State of Nevada, including local governments and the publicly-funded university system.

# **Strategies**

- A. Implement accepted hiring approaches such as job carving, job sharing and part time/non-traditional shift offerings.
- B. Align the statewide infrastructure (policies, procedures, regulations and practices) to promote competitive, integrated employment, implement Nevada's plan with a fast-track (or preferential) hiring process for people with I/DD and create more under-fill, intern and trainee positions in the state system. Bring all aspects of hiring people with I/DD, including candidate sourcing, evaluation, and interviewing, consistent with best practices through a thorough review of all policies, procedures, regulations and practices.
- C. Ensure the State has a centralized fund source for accommodations and assistive technology for employees.
- D. Develop communications and marketing, including social media, career fairs and job announcements that encourage qualified applicants with disabilities to apply.
- E. Ensure information on diversity awareness and employment supports is readily distributed and taught at employee orientation.
- F. Use the contracting system to incentivize the hiring, retention and promotion of people with I/DD by state contractors, much like the federal Section 503 of the Rehabilitation Act.
- G. Ensure all the State's internal and external web sites are accessible.
- H. Create a state team that shares experiences with other organizations regarding the advantages of hiring people with I/DD.

STRATEGIC PLAN 26 | P a g e

Goal 9. The State of Nevada, including the publicly-funded university system, is a model employer who supports policies, procedures, regulations, and practices to increase opportunities, foster innovation, reduce barriers, facilitate accommodations, and informed choice for competitive, integrated employment of people with I/DD consistently across the state.

# **Strategies**

- A. Develop and implement a policy for day habilitation programs that will work with people with I/DD to be self-identified as either 1) a long-term placement due to their likely inability to acquire long-term and stable employment, or 2) a temporary placement with a specific plan in place to establish employable skills and independence.
- B. Promote policies to protect SSI and other benefits against income earned to provide access to needed supports that contribute to an adequate quality of life.
- C. Encourage government employees and leaders to publically champion and educate others about hiring people with I/DD, including sharing success stories and publically praising employers who are leaders of inclusion.
- D. Educate local and statewide workforce development boards so they fully support integrated employment for people with I/DD as a winning strategy for workforce development.
- E. Make available funding to support summer, weekend, and after-school employment experiences.

Goal 10. Information is gathered and reported annually on key indicators for competitive, integrated employment across education, employment, and other related systems.

# **Strategies**

- A. Use the WIOA mandated Combined State Plan, Performance and Accountability team's recommendation to establish outcomes tied to length of time to achieve employment, longevity of employment, wages, benefits and satisfaction in the workplace.
- B. Develop and adopt statewide universal data elements to capture data related to key indicators across the lifespan.

STRATEGIC PLAN 27 | Page

# Nevada Plan for Competitive, Integrated Employment

- C. Collect data beginning in school to track, follow and measure key data elements including assessment, placement, retention, wages and satisfaction.
- D. Monitor, track and share performance measurements, trends and other data at the individual and program/system level. Utilize the data annually to review and refine statewide strategies.
- E. Develop and implement a confidential process within the state system for employees to self-identify as a person with a disability.
- F. Use longitudinal studies to measure qualitative as well as quantitative person-centered parameters such as: a) satisfaction with their job as structured and as appropriate to their skills and desires; b) actual interaction with co-workers; c) actual support from agencies, providers and employers; and, d) ability to change jobs as skill levels and interests change.

STRATEGIC PLAN 28 | P a g e

# 2015-2025 Integrated Employment Strategic Plan

### CRITICAL ISSUE: EARLY AND TIMELY SCHOOL ASSESSMENT AND PLANNING FOR TRANSITION

Transition and career-readiness services for youth with I/DD should be provided from middle school on to begin shifting expectations toward work and a career. Commonly these services start at high school, but research suggests that starting earlier leads to better outcomes.

# Goal 11. Young people with I/DD have work experiences that are typical of their peers.

# **Strategies**

- A. Incorporate career-readiness content into the educational curriculum, linking state college and university disability services with career services.
- B. Provides classes in career readiness and hands-on work experience onsite at businesses to students I/DD.
- C. Provide opportunities for paid or unpaid, hands-on work experiences including in the form of career-based assessments, internships, job shadowing, mentorships, volunteer work, and summer jobs.
- D. Require community based career exploration and career training for all high school students with I/DD across all regions of Nevada.
- E. Work with school districts to create an internal expectation that Vocational Rehabilitation will be included in all junior and senior IEP meetings when appropriate, to facilitate best practice transition planning.
- F. Create advisory panels of typical high school and college young people to provide technical assistance and mentorship to young people with I/DD on where to find, and how to have work experiences typical of their peers.
- G. Increase options for students in in-demand careers.

STRATEGIC PLAN 29 | P a g e

Goal 12. Every person with I/DD in Nevada transitions to adulthood with vocational experiences and the education that will enable them to obtain competitive, integrated employment.

# **Strategies**

- A. Develop a customized approach to serving people with I/DD in their employment needs. Use assistive technology wherever possible and promote tele-services.
- B. Make resources/services available to help youth with I/DD transition including: early planning beginning at age 14, field trips to new school campuses, job shadowing opportunities, summer work experiences, and life skills training.
- C. Implement services to promote competitive, integrated employment in day habilitation settings including staff training, personcentered supports, exposure to volunteer opportunities, development of soft skills, more ways to be out in the community in a variety of settings, and transportation so people can get to places in the community.
- D. Increase communication between Vocational Rehabilitation, Special Education Teachers and Paraprofessionals and Section 504 Coordinators.
- E. Promote peer to peer networks and mentoring.
- F. Provide opportunities for paid or unpaid, hands-on work experiences, career-based assessments, internships, job shadowing, mentorships, volunteer work, and summer jobs.
- G. Increase the number of third party cooperative arrangements with school districts across all regions of Nevada which support competitive, integrated employment.
- H. Create the expectation for people with I/DD that they should have a full and enriching day comprised of competitive/integrated work, supplemented with volunteering, classes at the community college and activities for personal entertainment/enrichment.
- I. Develop options to allow a student transitioning into work or postsecondary setting, to seamlessly maintain their assistive technology devices after high school.

STRATEGIC PLAN 30 | Page