

OASIS · AT A GLANCE

Employment First is failing Level 3 adults

Thirty-one states passed Employment First legislation. The national competitive integrated employment rate for people served by state disability agencies is 16%. The other 84% are a policy category nobody named.

PILLAR: WHY | COMPANION TO BLOG POST B147 | 2-PAGE BRIEF

16%

IN INTEGRATED JOBS

Of people receiving state IDD agency services, as of 2024.

How the gap opened

POLICY, CLOSURE, STALL

STAGE 1

The policy arrived

31 states passed Employment First legislation, 16 issued executive orders, and 32 have agency policy. Integrated employment became the presumed goal.

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STAGE 2

The settings closed

Workers paid under 14(c) certificates fell from 124,066 in 2018 to 38,524 in 2024, a 68% decline. Certificates fell from 1,459 to 700.

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STAGE 3

The rate did not move

16% of people served by state IDD agencies work in an integrated community job. Auditors found large shares of former workers simply left the data.

What the policy promised against what it produced

APSE, STATEDATA, GAO, DOL

Employment First, promise and documented result

The left column is not a straw man. It is the stated intent of the policy, which was correct. The right column is what the federal and national data show happened.

MEASURE	THE PROMISE	THE DOCUMENTED RESULT
Adoption	Universal state policy	31 legislating, 16 executive, 32 agency policy
Segregated work	Phase out 14(c)	Down 68%, 124,066 to 38,524
Integrated jobs	Rate rises with policy	Stuck at 16% in 2024
Where people went	Into community jobs	Oregon: 18% working, 54% untracked
Wages	Above subminimum	Rose from \$4.01 to \$13.93 in Oregon
Hours	Comparable or better	Average weekly hours fell in both states

54%

No longer in the state data

Oregon's cohort of 1,875, tracked to September 2023. Nobody can say where they went.

68%

Decline in 14(c) workers

From 124,066 in 2018 to 38,524 in 2024. The settings closed on schedule.

84%

Not in an integrated job

The residual. There is no national indicator for whether they have a funded day.

AN EMPLOYMENT GOAL AND AN EMPTY TUESDAY

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Sam is 27, needs one-to-one support, and has had competitive integrated employment as the top goal on his plan for five years. No job coach has been assigned in three of them. His mother Denise asked what he does instead. The plan said community integration, twelve hours a month. Sam is awake about 480 hours a month.

A GOAL IS NOT A SERVICE. ASK WHAT FILLS THE REST.

THE TAKEAWAY

Employment First does not require employment. It requires employment to be explored, documented, and then either pursued or ruled out in writing, with a funded alternative named. A plan with only a goal leaves an aspiration where a service should be.

TURN THE PAGE

How to audit your adult child's plan, the questions that expose an empty one, and the second measure to demand from your state.

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Auditing a plan that has a goal and no day

ASK FOR BOTH

EXPLORE

Was employment actually tried?

☐ Ask whether employment was explored and documented

☐ Ask what specifically was tried and what happened

☐ Ask when the last documented attempt occurred

☐ Ask who the assigned job coach is, by name

☐ A goal with no assigned staff is not being pursued

DECIDE

If employment is not the goal

☐ Get that determination in writing, in the plan

☐ Require a named alternative service, not a category

☐ Require authorized hours attached to it

☐ Require a named provider with current capacity

☐ Ask what happens if that provider cannot staff it

MICHIGAN

What the HSW actually offers

☐ Individual Supported Employment targets integrated work

☐ Small Group Employment covers two to six workers

☐ The state states plainly that Small Group is not CIE

☐ Skill Building is a 1915(i) State Plan service

☐ Out-of-Home Non-Vocational Habilitation covers the day

COUNT

The numbers to demand

☐ Authorized non-work day hours per week

☐ Hours actually delivered last month

☐ The gap between those two numbers, in writing

☐ How many adults in your region have a funded day

☐ Ask your state to publish that figure annually

BRING ONE PAGE, NOT A BINDER

The meaningful day one-pager

01

The goal

What the plan says the employment goal is, and its date.

02

The activity

What actually happens, hour by hour, on a typical week.

03

The gap

Authorized hours against delivered hours, last month.

04

The ask

The specific service and hours you want added, named.

YOUR MOVE

When the plan has a goal and your adult child has an empty week

1

Ask what was tried

Specifically, with dates and outcomes.

2

Get the ruling

Employment pursued or ruled out, in writing.

3

Name the alternative

A service, not a category, with hours.

4

Track delivery

Authorized against delivered, every month.

5

Demand a measure

Ask your state to publish the funded-day count.

Do not argue against Employment First. Argue for a second measure. What gets counted gets budgeted, and nobody counts the other 84%.

SOURCES

Institute for Community Inclusion, University of Massachusetts Boston. StateData: national and state employment outcomes for people with IDD, 2024.

Association of People Supporting Employment First. Employment First state policy map: 31 states with legislation, 16 with executive orders, 32 with agency policy.

U.S. Government Accountability Office. Subminimum Wage Program: Employment Outcomes and Views of Former Workers in Two States. GAO-25-106471. April 29, 2025.

U.S. Department of Labor, Wage and Hour Division. Section 14(c) certificate holder data, 2018 and 2024; APSE 14(c) trends update, July 2024.

ABOUT THE AUTHOR

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