POLICY BRIEF

Stepping Away From the Benefits Cliff

Policy Strategies to Support Employment for People with Disabilities in New York State
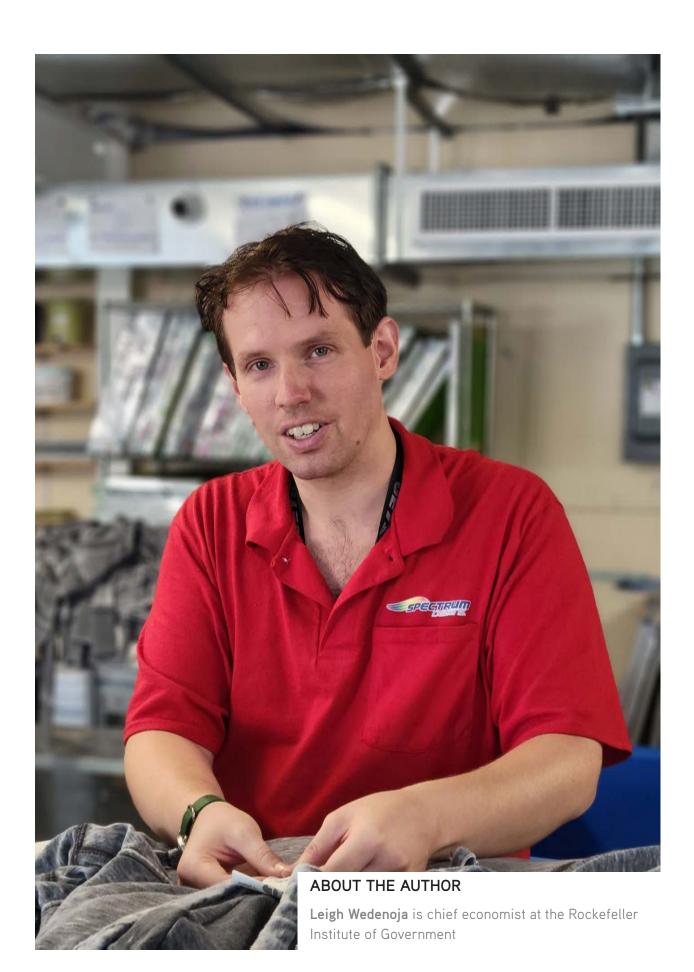
Prepared for:

NYSID
Purchasing That Powers Employment

NEW YORK
ALLIANCE FOR INCLUSION & INNOVATION

Leigh Wedenoja

August 2024

Rockefeller
Institute of Government

ABOUT THE AUTHOR

Leigh Wedenoja is chief economist at the Rockefeller Institute of Government

STEPPING AWAY FROM THE BENEFITS CLIFF

Executive Summary

People with disabilities are significantly less likely to be employed than their peers, and when they are employed work fewer hours for lower wages. There are many different obstacles to employment that confront people with disabilities and one understudied barrier is the employment disincentive created through eligibility rules for public benefits programs. The Rockefeller Institute's earlier report, *Navigating the Benefits Cliff: The Role of Benefit Eligibility in the Decision to Work and More for People With Disabilities in New York State*,[1] documented how benefits eligibility rules work for people with disabilities and how benefit receipt changes as people choose to work or to increase their employment earnings. The goal of this report is to build on that research and take a deeper dive into existing New York State policies and programs intended to lower employment barriers for people with disabilities, as well as suggest additional policy solutions to further promote and facilitate employment.

Through discussions with New York stakeholders, an extensive academic literature review, a series of webinars, and an in-person forum, the Rockefeller Institute identified three primary informal barriers to employment that result from benefits eligibility rules. These three barriers include:

1. **The prevalence of missing information and misinformation:** As discussed in the previous brief, eligibility requirements for Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI), other benefits, and employment programs are complicated. In part, due to these complications, many people lack adequate information on how to navigate them and rely on outdated or incorrect information when making employment decisions.

2. **Administrative burden:** These are the costs associated with applying for and maintaining access to government services for the person receiving services. Administrative burden encompasses not only the time and effort of applying for and maintaining benefits but also adds to the stress and fear of losing those benefits.

3. **Risk aversion:** The combination of misinformation, partial information, and administrative burden contributes to risk aversion—or the unwillingness to take risks even when the expected outcome of the risk is significantly better than the expected outcome without the risk—among people with disabilities who rely on public benefits. Risk aversion is most associated with the fear of losing health insurance.

These three barriers cannot be viewed independently as they feed into and magnify each other. In response to the barriers identified, this report recommends five principles to guide existing and new policies to assure that all New Yorkers with disabilities who want to work have the opportunity to do so and receive the best available services to support them as they make employment and life decisions. These recommended guiding policy principles are as follows:

1. The effect of benefits on work should not be viewed in a vacuum, rather people with disabilities and their families should be equipped with complete information and services to make holistic decisions about all aspects of life including housing, transportation, work, and benefits.

2. The discussion of the benefits-employment tradeoff should center support for the individual employment goals of people with disabilities rather than the potential negative effects of benefits loss. This concept of "employment first" should guide New York State hiring and conversations with private employers.

3. New York State agencies, benefits counselors, and Independent Living Centers could directly address administrative burden and risk aversion in the employment choices of people with disabilities by providing accurate information on health insurance and overpayment risk.

4. Disability professionals need training and access to up-to-date and accurate information on the relationship between benefits and work and information on how to refer clients to trained benefits counselors in order to prevent the proliferation of inaccurate or out-of-date information through informal pathways.

5. Advances in technology should be utilized both behind the scenes to improve service provision and targeting, as well as in customer-facing spaces to improve access to accurate and easily digestible information on benefits and employment.

This report first summarizes and discusses findings from the previous report on *Navigating the Benefits Cliff*. This includes the primary finding that for the majority of individuals who rely on SSI and SSDI, there is no benefits cliff based on eligibility rules alone, due to the fade-out structure built into SSI and many other benefits programs where each additional dollar of earnings results in a decrease of less than one dollar

in benefits. Despite this fact, the informal barriers discussed above prevent many people with disabilities from fully seeking employment. The report then discusses the webinar and seminar series the Rockefeller Institute conducted and outlines the three identified informal barriers referenced above.

Finally, the report discusses the five policy principles identified and how they can be operationalized to improve and expand both existing policy tools and guide new policy levers for reducing employment barriers. Key areas for policy expansion discussed include:

1. Viewing employment as part of whole-life planning through:

    a. Leveraging and coordinating existing sources of support for people with disabilities including Independent Living Centers (ILCs) and Adult Career and Continuing Education Services-Vocational Rehabilitation (ACCES-VR).

    b. Providing financial literacy and planning services to people with disabilities and their families.

    c. Improving transportation services to improve both access to employment and access to community life and services for people with disabilities.

2. Reframing the conversation about employment for people with disabilities to both public and private employers through:

    a. Expanding the scope of both New York's Employment First policy and the Office of the Chief Disability Officer.

    b. Leveraging existing public and public-private partnership employment programs including the Preferred Source Program and Civil Service's 55-b/c program.

    c. Promoting employment for people with disabilities through advocacy to private employers.

3. Managing risk aversion and administrative burden associated with employment for people with disabilities through:

    a. Assisting individuals in applying for and managing federal employment incentive programs including Ticket to Work.

    b. Reducing the potential for SSI/SSDI overpayments and subsequent repayments through education and assistance with wage reporting.

    c. Directly addressing the fear of losing health insurance through promoting the Medicaid Buy-in Program for Working People with Disabilities and Medicaid Expansion in New York.

4. Supporting and training the disability support professionals who promote employment for people with disabilities through:

    a. Training and funding additional benefits counselors.

b. Providing basic and intermediate benefits and employment training through existing and new programs for other disability professionals including employment specialists, disability resource coordinators (DRCs), SUNY microcredentialed direct support professionals, and certified employment support professionals.

5. Improving technology for service provision and customer interaction through:

a. Improving the ability of New York State agencies and service providers to share data and information through an integrated data system.

b. Improving customer service technology through the use of "one-stop-shops" like the New York Employment Services System (NYESS) Front Door program and potentially embracing newer technology like artificial intelligence (AI) chatbots.

Background: The Myth and Reality of the Benefits Cliff

The Rockefeller Institute report, *Navigating the Benefits Cliff: The Role of Benefit Eligibility in the Decision to Work and More for People With Disabilities in New York State*, considers the relationship between social safety net programs and employment for people with disabilities in New York.[2] In the US, many public benefits programs, including the ones discussed in the report, are means-tested and the amount of benefit that a person or family receives is directly tied to their income. As someone's income increases, their benefit amount decreases. A "benefits cliff" occurs when a family's increased income causes a loss of benefits whose value is greater than the income increase.[3] A benefits cliff can create a disincentive to work when families would have more resources working less rather than working more.

The earlier report details the eligibility requirements and enrollment processes for the primary sources of public benefits for people with disabilities in New York. These include cash benefits: Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI) both of which are administered by the Social Security Administration (SSA) and the public health insurance programs Medicare and Medicaid. It also included other commonly used benefits programs including the Earned Income Tax Credit (EITC), Supplemental Nutritional Assistance Program (SNAP), Section 8 Housing Choice Vouchers (HCV), the Home Energy Assistance Program (HEAP), and the Weatherization Assistance Program (WAP). These programs are administered by various federal and state agencies and often have overlapping and complex eligibility requirements based on disability status, prior work history, employment income, assets, and local cost of living.

Using the eligibility rules for these programs, the report walks through three simplified examples of what happens to employment income, benefits income, and total resources as people with disabilities receiving either SSI or SSDI choose to begin work or increase their employment earnings. The examples and background eligibility data show that, on paper, there is no cash benefits cliff for individuals who qualify

for SSI and no benefits cliff for most individuals who qualify for SSDI and work. In other words, due to the less than one-to-one fade-out structure of SSI, EITC, SNAP, HCV, HEAP, and WAP, more earned income always results in more total resources. In addition to the lack of a cash cliff, there is also no health insurance cliff. In New York, SSI recipients stay eligible for either traditional Medicaid or the Medicaid Buy-in for working people with disabilities (MBI-WPD) for income up to $75,385[4] and that limit will significantly increase in 2025. Once SSDI payments end, the individual is still eligible for Medicare for up to 93 additional months.[5]

Beyond the simple program eligibility standards there are several income exemptions and asset protection programs for people receiving SSI or SSDI that mitigate the impact of additional employment earnings on cash benefits. There are also employment incentive programs including the Plan to Achieve Self-Support (PASS) program and the Ticket to Work program, which shelter benefits while an individual is beginning a work plan with the support of the state's appropriate agency. These programs are discussed in detail in the previous report.

Despite the absence of a benefits cliff on paper, employment for people with disabilities in New York remains low. In 2019 (the last year of data before the pandemic had a disproportionate impact on employment for people with disabilities), there were 1.1 million working-age adults who reported a disability.[6] New Yorkers with a disability are less than half as likely to participate in the workforce as their peers. For those in the labor market, the rate of unemployment among New Yorkers with a disability was nearly three times higher at 11.6 percent compared to 4.1 percent. Employed workers with a disability were 13 percentage points less likely to hold a full-time job, earned three dollars less per hour, worked three fewer hours per week, and were twice as likely to have a very limited schedule of 15 hours per week or fewer compared to their peers without disabilities. People with disabilities are nearly three times more likely to live in group quarters, rely on SNAP benefits, and significantly less likely to have access to a phone, computer, smartphone, cellular data, and broadband. They are also three times more likely to have not graduated from high school.[7]

Although there is no benefits cliff on paper, the cliff is very real in practice. There are significant indirect barriers created by benefits eligibility rules and the benefits application process that can prevent or disincentivize people with disabilities from seeking employment or seeking to earn more. Subsequent discussions with stakeholders and the forum series "Navigating the Benefits Cliff" found that the administrative burden that results from the complexity of the benefits application process and different employment incentives, the fear of losing necessary services through loss of eligibility for cash supports, and a substantial amount of missing information and misinformation around employment and benefits eligibility rules can prevent individuals from pursuing career opportunities even when working will result in higher total resources.

The true barriers to employment that result from the use of public benefits are more complicated than the eligibility rules themselves. An individual's personal experience, the stories they hear from friends and family, and the advice they receive from disability professionals all affect how a person thinks about employment and how they navigate

all the factors involved in deciding to work or deciding to work more. Although each individual's exact experience is unique, discussions with professionals, researchers, policymakers, and employees with disabilities themselves identified three themes in indirect barriers that can prevent people with disabilities from fully pursuing employment. These indirect barriers include the prevalence of missing information and misinformation, administrative burden, and risk aversion.

The Prevalence of Missing Information and Misinformation

As discussed in the report, *Navigating the Benefits Cliff*, the rules surrounding benefits eligibility, benefits application, eligibility recertification, and employment incentives like Ticket to Work and PASS are all extremely complex. Individuals may be eligible for different programs and supports depending on their experiences as outlined in the Social Security Administration's *Red Book*.[8] Beyond those directly applicable benefits rules, there is the added complication of managing transportation, housing, medical care, and savings when a person is deciding whether or how much to work. Highly trained benefits advisors can help people with disabilities and their families navigate these overlapping eligibility criteria and make resource-maximizing forward-looking decisions about employment, but many of the disability professionals, friends, and family members that individuals with disabilities interact with on a daily basis are not benefits counselors and have only limited insight into how all of these pieces fit together when making an employment decision. They may also have out-of-date information on program eligibility.

Some of the most common pieces of misinformation were discussed during the webinar series. Workers with disabilities, employers, and disability professionals reported routinely hearing that individuals believed they would lose their SSI cash benefits and their Medicaid by working more than 15 hours per week. There are no hours limit for SSI benefits, rather the SSI cash benefit an individual receives is based on their monthly earnings. People with disabilities also do not lose their Medicaid upon losing SSI cash benefits and can participate in the Medicaid Buy-In for Working People with Disabilities program when earnings are less than $75,385 per year. There is also significant missing and incomplete information on the value and type of assets people with disabilities can maintain while receiving benefits.

Administrative Burden

Administrative burden, in this context, refers to the costs associated with applying for and maintaining access to government services for the person receiving services. This is in comparison to the concept of "red tape," which refers to added layers of bureaucracy that require compliance but do not necessarily help achieve institutional or stakeholder goals.[9] People with disabilities who rely on SSI or SSDI face higher than average levels of administrative burden as both programs have complex application processes and require significant effort to maintain access to the programs with wage reporting and ongoing medical disability review. This administrative burden increases when an individual chooses to enter the workforce or chooses to earn enough to

no longer qualify for SSI or SSDI cash benefits. When working, individuals on SSI or SSDI must report their wages to SSA monthly and they need to vigilantly watch their benefits as SSA does not adjust payments in real-time, which means as income increases, an individual may receive an overpayment from SSA and will have to pay that back. Working individuals also need to pay attention to the length of the trial work period, which is the number of months they can work while still qualifying for full benefits, the rules of their individual work incentive program, and any anomalies in earnings including three paycheck months and bonuses.

Risk Aversion

The combination of misinformation, partial information, and administrative burden contributes to risk aversion—or the unwillingness to take risks even when the expected outcome of the risk is significantly better than the expected outcome without the risk—among people with disabilities who rely on public benefits. SSI and SSDI are predictable, stable sources of income whereas earned income—especially for hourly employees—may be unstable and depend on variations in available hours, seasonality, and minimum wage rules. One of the main reported fears in losing SSI and SSDI cash benefits is that an individual will also lose access to Medicaid or Medicare despite continued eligibility for both after the cessation of cash benefits. Additionally, when deciding to work or to work enough to lose cash benefits an individual needs to decide not only if they can earn enough to give up cash benefits now but also whether they will be able to maintain those higher earnings in the future. As discussed above in

the misinformation section, the lack of knowledge and complicated rules around the expedited reinstatement period, the trial work period, and Medicaid eligibility mean that an individual may believe it is just as hard to return to SSI cash benefits as it was to apply originally. Further, some programs like Section 8 HCVs have long wait-lists so an individual who ceases to qualify may have difficulty regaining those benefits in the future if they are needed.

Policy Solutions: A Holistic View of Lowering Barriers to Employment for People with Disabilities

The choice to work or to earn more will nearly always result in more income and higher total resources for people with disabilities who receive SSI or SSDI. This is primarily due to the gradual fade-out structure of SSI, SNAP, Section 8 HCVs, HEAP, and the Earned Income Tax Credit (EITC). Despite the absence of a benefits cliff in the eligibility rules themselves, there are still significant indirect barriers that result from the benefits application and maintenance process that can prevent people with disabilities from fully pursuing employment. These barriers are primarily driven by missing information and misinformation, administrative burden, and risk aversion. It is difficult to distinguish these three factors because they magnify each other. The complexity of the application process and its hefty administrative burden make it easier for misinformation and incomplete "rules of thumb" pertaining to hours restrictions or savings to proliferate. Further, the lack of available and accurate information on how work affects Medicaid and Medicare eligibility contributes to the unwillingness to risk losing health insurance through working too much.

Combating these indirect barriers requires a holistic policy approach that focuses on all the factors a person with disabilities and their families consider when making employment decisions. There are five principles that New York State can embrace in designing, implementing, and expanding policies that promote and support employment for people with disabilities and assist in managing the employment benefits trade-off.

1. The effect of benefits on work should not be viewed in a vacuum, rather people with disabilities and their families should be equipped with all the necessary information and services to make holistic decisions about all aspects of life including housing, transportation, work, and benefits.

2. The discussion of the benefits-employment trade-off should center support for the individual employment goals of people with disabilities rather than the potential negative effects of benefits loss. This concept of "employment first" should guide New York State hiring and conversations with private employers.

3. New York State agencies, benefits counselors, and Independent Living Centers need to directly address the administrative burden and aversion in the employment choices of people with disabilities by providing accurate information on health insurance and overpayment risk.

10

4. Disability professionals need training and access to up-to-date and accurate information on the relationship between benefits and work and information on how to refer clients to trained benefits counselors in order to prevent the proliferation of inaccurate or out-of-date information through informal pathways.

5. Advances in technology should be utilized both behind the scenes to improve service provision and targeting, as well as in customer-facing spaces to improve access to accurate and easily digestible information on benefits and employment.

The Effect of Benefits on Work Should Not Be Viewed In a Vacuum

Employment is only one aspect of life and the decision of whether and how much to work is inherently intertwined with other important life decisions including education, financial planning, housing, and transportation. For people with disabilities, many of the same programs and supports that facilitate employment are also those that contribute to independent living and future planning. When executed well, these whole-life services can decrease administrative burden and increase access to up-to-date and accurate information on all available benefits including employment incentives.

Independent Living Centers (ILCs) are one of the primary access points to services and life planning for people with disabilities. These centers are nonprofit organizations, funded in part by state and federal grants,[10] which assist people with disabilities in all aspects of their lives including financial planning, education, and employment. Adult Career and Continuing Education Services-Vocational Rehabilitation (ACCES-VR) administers base funding for 41 ILCs in New York State.[11] ILCs are designed to meet the needs of the community they serve and are governed by a board consisting of at least half people with disabilities; they seek to employ people with disabilities and encourage the participation of volunteers with disabilities. They provide services including peer counseling, independent living skills training, referral to additional services, financial planning, housing assistance, and benefits counseling among others.

Many of the administrative requirements and core services provided by Independent Living Centers (also called Centers for Independent Living (CILs)) are determined by Title VII, Chapter I, Part C of the Rehabilitation Act of 1973, as amended (the Rehab Act). Oversight over the Act's provisions at the federal level is provided by The Administration for Community Living's (ACL's) Office of Independent Living Programs. The most recent annual report from ACL focuses on the impact of the pandemic in which ACL found that ILCs were able to flexibly adapt their services during the 2020 and 2021 program years to respond to the disproportionate impact of COVID-19 on people with disabilities. ILCs changed their service provision model to increase access to remote services including personal assistance services, peer mentoring and social services, and employment and education services.[12]

Many of the service changes necessitated by the pandemic can and should be maintained to improve service provision and employment opportunities. Remote services and

remote employment are especially valuable to people with certain types of disabilities. Workers with disabilities were more likely to telework before the pandemic than workers without disabilities. During the pandemic, workers with disabilities who were employed in person were conversely less likely to transition to remote work due to the in-person-only nature of their job type.[13] Despite the demonstrated success of remote work during the pandemic, many employers are still resistant to using telework as a disability accommodation even when it is not necessary for work to be done in person.[14] The experience of ILCs moving many services to remote during the pandemic makes them uniquely poised both to offer training and referrals for training in remote work careers as well as to advocate for remote work accommodations with employers. ILCs can also continue to provide their other services remotely to increase accessibility to people with transportation difficulties or compromised immune systems.

Financial Literacy and Planning

One of the specific services offered by many ILCs and other organizations is financial planning. Financial literacy and planning services are associated with positive outcomes for all Americans. Despite the value of financial literacy and planning, there is little evidence that traditional one-off financial literacy classes impact either knowledge or behavior in the long term.[15] Even studies that show a positive impact of financial literacy classes on knowledge generally do not measure whether individuals actually practice positive savings and planning behaviors.[16] While general education interventions may not be effective, targeted informational interventions aimed at important decisions generally are. A field experiment found that employees who received an educational intervention specifically aimed at their retirement savings options contributed more to their retirement plan and were more likely to have emergency savings and report using a budget.[17] A similar education intervention aimed at first-time home buyers had similar results. The authors noted that education at that step was crucial because many of the participants were overconfident in their ability to maintain their mortgages and had not begun saving for retirement.[18]

The juxtaposition of these two types of studies—general financial education and targeted education aimed at specific financial decision points—highlights the importance of continued and targeted financial planning services and education for all New Yorkers, including those with disabilities. Beyond the general financial planning concerns everyone has, people with disabilities face other limitations on their savings and planning behaviors that result from asset limitations on certain kinds of savings, vehicles, and misinformation about those limitations. A study of the financial health of people with disabilities and their families during the COVID-19 pandemic found that nearly one-third of the people with disabilities and their families surveyed had no financial literacy education nor any training in special needs planning.[19]

Financial planning services are integral in an individual's decision to work. One of the fears associated with employment for people on SSI is the possibility of exceeding the asset limit of $2,000 and therefore losing SSI cash benefits. Appropriate financial planning can prevent that outcome. Since the 2014 federal Achieving a Better Life Experience (ABLE) Act, the tax-advantaged savings accounts, called ABLE accounts,

allow individuals with disabilities and their families to save money to be used for qualified disability expenses without losing eligibility for SSI.[20] In addition to ABLE accounts, special needs trusts and qualified retirement savings programs can also be used to allow working people with disabilities to save for their future, work, and maintain SSI benefits and Medicaid eligibility.[21] Access to financial planning services while making employment decisions is crucial to prevent misinformation and risk aversion from becoming a barrier to employment.

Transportation

Access to reliable and safe transportation is necessary for people with in-person employment, but it is also broadly important for other aspects of life in any community including shopping, socializing, and medical care. Despite the importance of transportation, people with disabilities face significant barriers to access. A 2019 national survey of people with disabilities found that most respondents reported difficulties in accessing public transportation and access was even more difficult when trying to attend community events or appointments that did not occur on a regular schedule.[22] Lack of reliable and flexible transportation limits both the amount and type of work a person can engage in. Even when transportation expenses are deducted from qualified earnings as an impairment-related work expense (IRWE),[23] a person with a disability can still be limited in terms of employment opportunities if available transportation is limited.

Assuring that people with disabilities have access to reliable and flexible transportation needs to go beyond traditional ideas of accessibility, which have focused primarily on mobility impairments. Cognitive and intellectual disabilities also have effects on people's ability to travel.[24] A recent study in *Transport Policy* discusses the factors that limit transportation access for people with disabilities. People with disabilities make fewer and shorter trips than their peers and are less likely to walk or drive as primary modes of transportation. This means that they are more reliant on public transportation. The authors highlight the lack of research on the needs of people with disabilities in public transportation, specifically how to support the needs of people with disabilities other than mobility impairments including executive function disorders and certain cognitive disabilities.[25] People with disabilities are also more likely to live in poverty than their peers, which compounds the effect of inaccessible public transportation.[26]

Although substantial gains have been made in accessible transportation because of the Americans with Disabilities Act (ADA), compliance is far from perfect in New York public transportation. Many MTA stations in New York City remain inaccessible by ADA standards[27] but there is an effort to add accessibility accommodations to 70 additional stations.[28] Despite improvements, the reality of transportation remains limiting even in New York City.[29] The overlapping roles of various state and local agencies and authorities can make it difficult to navigate who is responsible for which transportation system and where to go to find resources.[30]

Reframing the Conversation for Employers

New York State and Employment First

In 2014, Governor Andrew Cuomo signed an executive order to create a commission for Employment First policy. The commission made several recommendations, many of which have been implemented since the publication of the commission's March 2015 report. Despite the implementation of some of these recommendations, many of the barriers to employment detailed in the 2015 report are the same ones identified here nearly a decade later. The report found that many people with disabilities and their families lacked information about important employment support programs like Ticket to Work and the Medicaid Buy-In for Working People with Disabilities and that there was a need for better education and a network of information for employers to enable and encourage the hiring of more people with disabilities.[31] Employment First provisions are not unique to New York but rather a nationwide effort to reframe the conversation around employment for people with disabilities to center work.

One of the more innovative recommendations of the report is the creation of an outcome measurement system to assess whether the recommended programs and expansions are successful and determine if New York is meeting its goal of a 5 percent increase in employment for people with disabilities and a 5 percent reduction in poverty among people with disabilities. The commission recommended linking state employment and Medicaid data in addition to more traditional outcome measures like unemployment rates generated from American Community Survey data. The potential impact of linked administrative data for facilitating employment for people with disabilities is discussed in the technology section below.

Office of the Chief Disability Officer

The Office of the Chief Disability Officer (CDO) was established in 2022[32] with a mission to advocate on behalf of people with disabilities and the issues that they face. The office's stated intent is to "break down silos between state agencies that provide services to people with disabilities, improve diversity, equity, and inclusion for people with disabilities, [push] for progress on state-wide accessibility issues, [provide] a disability perspective on policy proposals, legislation, state agency operations, and diligently [connect] with communities and advocates on a wide spectrum of disability issues." Despite the newness of the office, it has the potential to provide both leadership and to help coordinate access to the complex web of disability services generally and employment services specifically. Current CDO, Kimberly Hill Ridley, gave the keynote address at the Rockefeller Institute's in-person forum "Policy Solutions at the Local, State, and Federal Level" and highlighted many of her office's ongoing initiatives discussed below.

Since its inception, the CDO has engaged in both educational and advocacy campaigns including the disability rights and employment month symposiums (2022 and 2023). These symposiums included employment supports for people with disabilities like job fairs, resume and interview preparation technique sessions, information on inclusive internships, and information on the state's Civil Service 55-b/c program.[33] These symposiums are an important first step in explaining and promoting the myriad of employment services and opportunities for people with disabilities in New York State, but they occur only once per year. Recordings of the workshops are available, but there is significant potential for expanded community engagement from the office both to people with disabilities and potential employers. The nascent office has a unique opportunity to leverage existing programs across different state agencies, expand their educational resources, and directly assist people with disabilities, their families, and their employers to navigate all available resources.

New York State Industries for the Disabled, Inc. and the Preferred Source Program

NYSID has facilitated the Preferred Source Program for individuals with disabilities for 50 years. NYSID's network of 140 member agencies and corporate partners create thousands of jobs annually with significant local economic impact.[34] In response to the Employment First Commission and OPWDD's Workshop Transformation Program, NYSID implemented a five-year strategic plan in 2018 to update the enabling legislation, create greater relationships with private corporations, and ensure that all jobs created through the program were public-facing and competitively integrated employment opportunities. In 2022, the New York State legislature unanimously approved and Governor Hochul signed into law the Preferred Source Program Modernization Bill. The bill codified the first significant updates in New York's Preferred Source Program since the closure of Willow Brook, a state-funded institution for children with intellectual disabilities, and the program's inception in 1975.[35]

Provisions of the new law sunset on October 4, 2025. Legislative action is necessary if the program and its benefits are to continue. In 2023, 6,350 individuals worked on NYSID contracts at an average hourly wage of $21.78. For every hour an individual with a disability is working there is a $108.00 economic output. In 2023, the economic impact was $360 million.[36]

Civil Service 55-b/c

The New York State Civil Service Law authorizes the New York State Civil Service Commission to fill positions normally available only through competitive examination with the appointment of qualified persons with disabilities (55-b) and qualified veterans with disabilities (55-c). The 55-b program, in particular, has appointed individuals with diverse disabilities to many different state agencies and civil service titles. The Department of Tax and Finance, Office of General Services, Department of Education, and Department of Labor are the largest 55-b/c employers. The most common job title groups are office assistant and taxpayer service. Common reported disabilities among 55-b/c users include mental-emotional illness (34 percent), orthopedic impairment (19 percent), development-mental disability (9 percent), and learning disabilities (10 percent).

It is important to note that the 55-b/c program allows individuals to be appointed to positions usually allotted through open-competitive exams, but these are not exclusively "entry-level" positions. Of the 1,380 appointees included in the 2022 report, more than 10 percent (166 appointments) were at a job grade 18 or higher corresponding to a salary of $77,912 to $120,156. Employees hired through the 55-b/c program are also able to pursue promotional examinations to continue to advance within the state government.[37] The total number of available 55-b/c positions was expanded in 2023 and it is important to regularly evaluate utilization of the program and expand the available slots as demand from agencies and people with disabilities increases.

Increasing Employment for People with Disabilities by Private Employers

Missing information and misinformation about employment for people with disabilities also affect employers and can contribute to their willingness to recruit and hire people with disabilities. A 2018 study of the academic literature and trade publications on national employer perceptions of people with disabilities identified a pervasive disconnect between the perception employers have of people with disabilities and the actual demonstrated skills of workers with disabilities. This disconnect affects the willingness of employers to hire people with disabilities.[38] Employers may be particularly reluctant to hire employees with intellectual or mental health disabilities.[39]

One initiative from the Employment First Commission is the EmployAbility toolkit for employers.[40] This document seeks to provide factual information to help overcome the reluctance some employers have in employing people with disabilities. The document includes information on the requirements of the Americans with Disabilities Act (ADA), the average costs of accommodations, available tax credits, try-out programs,

and on-the-job training. Beyond information interventions, New York State has a preferred source program that allows government entities to purchase commodities and services without a competitive bid process if that good or service is available from a provider on the preferred source list.[41] Two of the three preferred source organizations directly support the employment of people with disabilities: the New York State Industries for the Disabled (NYSID) and the New York State Preferred Source Program For New Yorkers Who Are Blind (NYSPSP).[42] The EmployAbility tool kit and Preferred Source Program both work to facilitate private companies in hiring people with disabilities by reducing informational barriers and providing financial incentives to potential state agency customers. Private companies that receive tax credits and grants from New York State could be incentivized or encouraged to do business with the Preferred Source Program. NYSID has already provided goods and services to private companies in addition to their provision of goods and services to New York State.

Employment First initiatives and Preferred Source Programs generally only impact employers in specific industries or who seek out disability hiring information. As the academic literature discussed above shows, many employers are still wary of hiring people with disabilities. One potential tool for changing employer attitudes is amplifying the voices of employers who have hired significant numbers of people with disabilities and have experienced the business advantages of doing so. These peer-to-peer connections are likely to have a greater impact than government-facilitated informational brochures alone. Anecdotal evidence from employers who took part in the webinar series backs up this assertion. One of the employers found that he often has to explain why he seeks to hire people with disabilities to other members of his industry and dispel myths about benefits and work rules. The Office of the Chief Disability Officer, NYSID, and NYSPSP could play a role in facilitating peer-to-peer connections for employers in addition to their current educational outreach. State agencies that hire extensively through the 55-b/c program could also serve as important peer navigators for private businesses that engage in similar work.

Managing Risk Aversion and Administrative Burden Associated with Employment for People with Disabilities

Managing Administrative Burden

In this report, the administrative burden has been primarily discussed in terms of the amount of paperwork required to apply for and maintain benefits. However, there are additional reporting requirements for people who both receive benefits and work, so choosing to work or choosing to earn more can actually increase the administrative burden of benefits rather than decrease it. Employment incentive programs themselves can increase administrative burden, especially during the initial stages and transition period between only receiving benefits and working without receiving cash benefits like SSI or SSDI. Working people with disabilities may still qualify for other noncash benefits including Medicaid, Medicare, and transportation subsidies.

The number and complexity of employment services for people with disabilities can make it difficult to know where and how to begin or continue a career path. There are, however, evidence-based policies to simplify communication of that information. Direct, clear, and targeted information results in greater uptake of services. An early study of the Ticket to Work program found that young people receiving SSDI (age 18–39) who received mailings from the program during the initial enrollment period were more likely to enroll in associated services.[43] This suggests that direct targeting of program-specific information to a population with a higher probability of program take-up is more valuable than general promotion of the program.

The documentation of impairment-related work expenses (IRWE) contributes an additional layer to the administrative burden of employed people with disabilities. IRWE are costs for items or services that a person needs to work because of their disability. SSA deducts those costs from a person's countable income when determining their SSI benefit or whether they earn above SGA for an SSDI benefit. IRWE documentation can be complicated because an employee must show that the item or service is necessary for work, that they paid for the item or service, and that it is not eligible for reimbursement through other sources like Medicaid or Medicare. While some IRWEs are one-time or infrequent expenditures like prostheses or adaptive technology, others may be routine and require frequent documentation like transportation expenses and service animal care.[44]

Fear of Overpayments

One of the primary drivers of risk aversion in employment is the fear of overpayments. An overpayment occurs when the Social Security Administration (SSA) pays out benefits beyond what the beneficiary is entitled to. This can occur when an individual does not report changes in their earnings to SSA or when there is a lag in processing at SSA. SSDI overpayments can be particularly high because SSDI does not have the fade-out structure of SSI. An audit study by the SSA Office of the Inspector General found that in a sample of 200 beneficiaries, 77 were overpaid for a total of $1.3 million, and 63 percent of that overpayment was driven by incorrect reporting by the beneficiaries themselves and the remainder from lagged processing at SSA.[45] There are strategies that can reduce the potential for overpayment and limit the associated fear and risk aversion. One problem is the infrequency of communication from SSA, the timing of that communication, and the lack of urgency conveyed.[46] These factors together contribute to inaccurate or incomplete wage reporting by SSDI and SSI recipients. While the SSA's communications are outside New York State's control, existing state programs that support employment for people with disabilities could build in reminders and guidance to improve wage reporting to prevent overpayments.

Preventing overpayments is crucial to keeping individuals with disabilities employed. Individuals on SSDI who experience overpayment and receive a notice to repay the funds are less likely to work enough to earn above substantial gainful activity (SGA), which is the earnings limit for cash benefits[47] in the months following the overpayment notification. The decrease in earnings is highest among individuals with lower levels of education (below a high school diploma) and those who also receive

SSI.[48] Interviews with workers who have received overpayment notices provide insight into the mechanisms through which overpayments affect employment decisions. A 2018 Mathematica study interviewed 84 SSDI recipients of overpayment notices and found that 51 percent immediately quit their jobs upon the notice and most reported confusion as to how the overpayment happened as they believed they were correctly following SSA reporting requirements.[49] This immediate effect on work suggests that policies designed to prevent overpayments and overpayment notifications either through education of employees or changes to the way SSA notifies employees of overpayment would have a positive effect on employment.

Fear of Loss of Health Insurance

The fear of losing health insurance is the result of a history of limited health insurance options for people with disabilities in the US. Prior to the passage of the Affordable Care Act (ACA), there were few health insurance options for working people with disabilities other than traditional Medicaid, which required individuals to live in poverty to qualify. As such, many people with disabilities were forced to limit their employment earnings to maintain access to Medicaid as they could not afford private insurance even when working or were excluded from private insurance for having a preexisting condition. Following the ACA's Medicaid expansion, people with disabilities living in states that expanded Medicaid were able to earn more while maintaining Medicaid and as a result were significantly more likely to be employed than people with disabilities in states that did not expand Medicaid.[50, 51] Studies across multiple states have shown that Medicaid Buy-In Programs for working people with disabilities increase the likelihood of employment, increase earnings, and decrease reliance on SNAP.[52]

The Medicaid Buy-In program for Working People with Disabilities is particularly robust in New York State. In 2024, a working person with a disability can earn up to $59,826 before losing traditional Medicaid coverage due to the Medicaid expansion,[53] and working individuals with qualified disabilities (those that would qualify for SSI or SSDI) can have a gross income up to $75,385 and participate in the Medicaid Buy-In program for Working People with Disabilities.[54] The program is set to increase both asset limits and income limits in 2025. Despite the Medicaid Buy-In coverage, many people with disabilities, their families, and disability professionals are still acting on outdated information from before the ACA. The fear of losing health insurance from working too much is based on historic reality and both the Medicaid expansion and Buy-In programs are relatively new. Making sure that disability professionals, people with disabilities, and their families have up-to-date information on their Medicaid options is a necessary first step for many when considering employment. People will not seek employment if that means losing the health support they need to live happy and independent lives.

The Role of Disability Support Professionals in Promoting Employment

Benefits Counselors

Benefits counselors are trained professionals whose job is to advise people with disabilities who use SSI and SSDI benefits through their options for employment and help them understand how employment will affect eligibility for Social Security Administration benefits, other in-kind and cash supports, and eligibility for Medicaid and Medicare public health insurance. Benefits counseling services are largely funded through federal grants through the Ticket to Work and Work Incentives Planning and Assistance (WIPA) programs. Ticket to Work counselors are located in state vocational rehabilitation (VR) agencies and public or private employment networks (ENs). WIPA-funded benefits counselors are funded by SSA to provide free benefits counseling to all Social Security recipients including those that do not use the Ticket to Work program. WIPA-funded community work incentive coordinators (CWICs) provide counseling about working, increasing earnings, and how those choices affect public benefits.[55]

One of the most prominent benefits counselor training programs is the Work Incentive Practitioner Credential (WIP-C) program at Cornell's online Yang-Tann Institute (YTIOnline).[56] This credentialing program is fully online and consists of 17 sessions and an exam. YTIOnline also provides continuing education classes that deal with more advanced benefits situations and an audit option. The individual WIP-C courses can also be applied to rehabilitation counselor recertification with the Commission on Rehabilitation certification (CRCC).[57] The full WIP-C certification course is fairly

expensive at $1,575, however individual webinars on specific topics including "Overpayments: As Certain as Death and Taxes" and "Update on VA Benefits for Working Veterans with Disabilities" are priced at $20. The Virginia Commonwealth University Rehabilitation Research and Training Center (VCU RRTC) has a similar program.[58] Individuals who want to pursue a career in benefits counseling can either fund the course themselves or receive funding through their employer to do so.

Trained benefits counselors are in short supply. The courses are difficult and there is an initial investment in tuition required to train a counselor. There are currently only two training programs that have limits on space and course offerings. Additionally, there is sparse funding for these counselors as discussed above. Because this is a small and specialized field, there is limited information and data on the labor market for benefits counselors specifically. The O*NET occupation classification system does not include a separate category for benefits counselors and workers in that field are likely to be categorized under "Rehabilitation Counselor," "Educational, Guidance, and Career Counselors and Advisors," "Healthcare Social Workers," "Social and Human Service Assistants," or "Eligibility Interviewers, Government Programs" depending on an individual's specific training and job tasks.[59]

A study of work incentives benefits counseling services by Michigan Rehabilitation Services (MRS) found that Vocational Rehabilitation (VR) customers receiving SSA benefits who received benefits counseling services correctly answered more questions about SSA benefit eligibility and work than those who did not receive counseling. Benefits counseling recipients also reported better knowledge of work incentive programs and those with accurate knowledge of the programs were more likely to report an intent to use them.[60] A nationally representative study focusing on transition-age young adults (18–35) with intellectual disabilities who receive SSI benefits found that the young adults who received work incentive benefits counseling services were more likely to be employed and had higher hourly wages compared to similar young adults on SSI who did not receive the counseling services.[61]

Assuring that people with disabilities who want to work have access to trained benefits counselors to guide them through the different employment incentive programs, their effect on benefits eligibility, and mitigating the possibility of overpayments requires a two-fold effort. The first piece is recruiting, training, and retaining individuals in the benefits counselor profession. This includes engaging in standard employment recruiting efforts but also vetting and identifying current disability professionals who can be successful in the benefits training courses and potentially supporting those employees financially through the course. The second piece is information dissemination. Benefits counselors can only provide effective advice if they are sought out. Benefits counseling is routinely advertised as part of the services provided by VR agencies, ENs, Independent Living Centers (ILCs), and WIPA projects but nontraditional pathways of information sharing, including advertising benefits counseling to self-advocacy groups, family networks, and other disability professionals, can assure that people with disabilities interested in employment are aware of the service. Further, making sure VR agencies, ENs, ILCs, and WIPA projects communicate with each other assures that even if a person approaches one of these entities for benefits counseling and is not eligible either because they don't live in the service area or do not use

Ticket to Work, that person can be referred to another entity where they are eligible to receive benefits counseling.

Other Disability Professionals

Benefits counseling is the gold standard for supporting employment but an individual with a disability who wants to work may never make it to a meeting with a benefits counselor if they hear misinformation about work incentives and benefits from other disability professionals along the way. Creating structures and training to prevent professionals, people with disabilities themselves, and their families from perpetuating myths, outdated information, or inaccurate information is just as critical as assuring access to highly trained professional benefits counselors.

One piece of out-of-date information that is regularly perpetuated is the idea that people with mental health disorders are unable to work or can only do so in specific sheltered environments. To combat this, the New York State Office of Mental Health (OMH) developed *A Guide for Employment Specialists*[62] aimed at people working directly with individuals with mental health disorders who are seeking employment. The goal is to make sure that all professionals who work with this population have some knowledge of current best practices for promoting employment and knowledge of both state and federal employment incentives and training programs. The brief document debunks common myths about how employment affects benefits receipt. Rather than train all professionals in benefits counseling or the intricacies of employment incentives, it provides just enough information to encourage disability professionals who are not trained benefits counselors or employment experts to know where to go to get more information and where to refer their clients if those clients are seeking employment opportunities.

Similarly, the New York State Department of Labor is committed to making sure that its career center activities are accessible to people with disabilities through the employment of disability resource coordinators (DRC).[63] These DRCs have a hybrid role within career centers. They not only provide information and benefits advising on federal work incentives programs like Ticket to Work but also provide more general employment services. The latter includes ensuring career centers and workforce systems are accessible to job seekers with disabilities, promoting career pathways through career centers and online resources, and coordinating job-seeking support across different New York State agencies and external service providers.

Targeting basic information on the relationship between benefits and work to all disability professionals could have a profound effect on limiting the transmission of inaccurate and outdated information. Simple documents like OMH's toolkit or short webinars and seminars held during work hours for disability professionals across job types are not intended to make those professionals experts, but rather to help them guide the people they work with to experts and prevent inaccurate information from stopping an individual's employment journey before it begins.

One promising avenue for exposing more disability professionals to basic information on benefits and employment incentives is through the newly created SUNY Microcredentials for New York State Direct Support Professionals.[64] Microcredentials

are short, flexible, skill-based certifications intended to demonstrate a specific skill with value on the labor market. These credentials can stand alone or be "stacked" to earn college credits or more intensive credentials and certifications.[65] The microcredential program is in partnership with the New York State Office for People With Developmental Disabilities (OPWDD) and allows participants to earn national certification from the National Alliance for Direct Support Professionals (NADSP) in a three-tiered credential program that is currently free to participants. There are 19 SUNY campuses across the state participating in the program to some extent. Governor Hochul has announced a $32 million investment in expanding the program to additional campuses through 2030 and training 6,000 additional professionals.[66]

The specificity of microcredentials makes them ideal for training disability professionals in the basics of benefits rules and employment incentives without the intensity and price tag of a full benefits counseling certification program. Relevant benefits information could be included in the curricula of the existing DSP-I, DSP-II, or DSP-III microcredentials or developed into its own standalone microcredential. The microcredential program is new and still in the process of expansion, which means now is the ideal time to assess and shape the curriculum to ensure the education is as valuable as it can be. The goal of adding basic benefits information to DSP curriculums is not to replace benefits counselors, but rather to reduce misinformation transmission.

Another promising certification program is the certified employment support professional (CESP) certification developed by The Association of People Supporting Employment First (APSE). APSE's stated goal is to promote employment opportunities for all people with disabilities. The CESP is an exam-based credential intended for employment support professionals (ESP). It allows them to demonstrate that they have the requisite knowledge, experience, and ethics to work as job coaches, employment specialists, and job placement personnel among other positions. The credential is not stagnant and requires continuing education to maintain certification, which ensures certified professionals have up-to-date knowledge on employment support and incentive programs.[67]

Improving Technology for Service Provision and Customer Interaction

One potential solution to improve both the ability of people with disabilities and their families to navigate benefits eligibility rules and remedy staffing shortages is the use of technology. There are three main avenues through which technological advances can decrease barriers to work for people with disabilities. First, adaptive technology can directly facilitate work for people with disabilities through physical supports like adaptive office furniture and mobility aids but also through advances in computer technology including remote work, accessible websites, and screen readers among others. Second, state administrative data systems can be employed to reduce the administrative burden associated with applying for and maintaining access to public benefits. These systems can be used to simplify wage reporting and eligibility

recertification, they can also be used to connect individuals to additional services for which they are likely to be eligible. Finally, technology can be used to improve the customer experience when interacting with public benefits programs. Because eligibility for programs is often complicated and instructions are written in technical language, it may be difficult or impossible for a person with a disability or their family to navigate that system without professional guidance. The shortage of trained benefits counselors magnifies that problem. Creating more streamlined ways to engage with government services through artificial intelligence (AI) programs or traditional step-by-step guidance could encourage more people to engage in employment incentive programs.

As the focus of this report is the relationship between public benefits and employment, this section will focus on the second two types of technology policy: reducing administrative burden by improving and linking data systems within state agencies and leveraging technology to improve customer experience.

Getting the Most out of Existing Survey and Administrative Data

There has been a push since the early 2000s to increase the ability of government data systems to "talk" to each other across different agencies and different types of data. A key motivation at that time was to improve research and causal evaluation of program effectiveness by linking information from individuals' program receipts to the outcomes those programs were intended to influence. One of the earliest efforts at the federal level is the Longitudinal Employer-Household Dynamics (LEHD) dataset, which combines administrative data from the Internal Revenue Service (IRS) on both enterprises and individuals with household survey data to study changes in employment and earnings dynamics over time.[68]

Most studies on the effects of benefits provision on health, poverty, and employment are, however, conducted using survey data. Commonly used surveys include the American Community Survey (ACS),[69] administered by the US Census Bureau; the Current Population Survey (CPS),[70] which is jointly administered by the US Census Bureau and the Bureau of Labor Statistics; and the Survey of Income and Program Participation (SIPP),[71] administered by the US Census Bureau. All three surveys ask extensive questions about people's use of social safety net programs, their incomes, occupations, health, and disability status. Unlike the ACS and CPS, the SIPP is a longitudinal study rather than a repeated cross-section meaning that the same individuals are surveyed over multiple years and months to track the dynamics of how their lives change rather than having a different group of individuals surveyed each year.[72] These three surveys are often used to measure employment outcomes for people with disabilities.

These comprehensive survey data sources have allowed scholars to do research into the effects of social safety net programs and the effect of eligibility rules on important life outcomes including health, food security, earnings, and savings, as a good deal of what is known about the effectiveness of benefits programs for people with disabilities originates from these surveys. Much of the research discussed in this report uses these surveys. A limitation, however, is that these surveys do not cover the entire

population of people receiving services and rely on the respondents' recollection of program participation as well as all their personal information. The survey is also not timely with a multiple-year lag between survey responses and data publication. The results are not immediately available to the public, researchers, or policymakers.

An increasingly important alternative to survey data, both for research and policy, is linked administrative data. Unlike survey data, which is collected for the express purpose of research and demography, administrative data is the data that governments develop in order to run their own programs. Administrative data includes school records, medical records, SSI and SSDI applications and payments, SNAP application and payment records, tax records, unemployment insurance contributions, and many other sources. Traditionally, administrative data was only available to and used by the agency that owned the data. In other words, the SSA held all information on SSI applications and payments, whereas state and federal Medicaid offices held all information related to an eligible individual's medical care and payouts, and a state's department of labor and the federal IRS held all information on an individual's income and tax payments. This siloing of information is particularly detrimental to individuals with disabilities who often interact with many different government agencies at once.

Integrated data systems (IDS) are an alternative to fully siloed records that have become popular as data management, data analysis, and privacy tools have improved.[73] IDS vary in terms of the type of data included, the governance structure, the inclusion of partners outside of the government (most often universities), and the level of cooperation with systems existing at state, local, and federal levels. Most IDS records are deidentified meaning that although they are linked at the individual record level, the actual personally identifiable information (PII) of the individual is masked. This allows researchers to provide valuable insight into program overlap, program outcomes, and program structure that can aid policymakers in improving outcomes. In cases where government agencies are the owners and administrators of an IDS, records may retain full PII allowing frontline staff to view a full picture of their clients' lives including employment, benefit receipt, and sometimes even health and education records.

An internal IDS that includes PII may be particularly valuable for improving services for people with disabilities and reducing barriers to employment related to benefits eligibility rules. People with disabilities tend to interact with multiple different government agencies over the course of their lifetimes and careers with much of the information on those programs not automatically shared across agencies. The most effective IDS for service provision and targeting are those that have existed for many years or those that have integrated many years of data so that there are enough individuals observed to make conclusions about program effectiveness or to accurately identify high-needs individuals and target programs towards them.

IDS at the Local Level

One of the earliest IDS is the Allegheny (Pennsylvania) County Data Warehouse.[74] The warehouse was founded in 1999 with a grant from the Human Services Integration Fund[75] with the explicit intent to "develop a common client management technology system across the disparate programs that were consolidated into a single

Department of Human Services (DHS) in 1997." The success of the program required the political will and leadership to invest resources into the necessary technology and require that all targeted data sources and agencies use a common data management system. The current system includes data from 27 different major sources and topics including aging, substance use, mental health, child welfare and independent living, public benefits, intellectual disability, Medicaid, school records, courts and justice involvement, health services, and labor information.

An important aspect of the Allegheny system is not just its breadth and complexity but also its accessibility to clients, providers, and the agencies themselves. It has multiple tools that use this data including a public tool called QuickCount,[76] which allows the public to find aggregate information on service provision, and use AccessMyInfo,[77] which allows clients to access their personal service provision information including current services, past services, and changes over time, and Provider Connect,[78] which allows DHS providers and partners easier access to information from all county providers who may be working with an individual.

While Allegheny County has one of the most extensive, long-running, and integrated systems, New York City (NYC) also boasts an IDS called the Center for Innovation through Data Intelligence (CIDI), which was founded in 2011 and is housed within the NYC Mayor's office. The stated goal is "to conduct inter-agency research to identify areas of service need in the City of New York."[79] CIDI is more focused on research rather than case management compared to Allegheny County and their research has primarily focused on homelessness and housing, children and youth services, and certain health services. One key focus of CIDI is the comprehensive well-being of New Yorkers, which moves beyond base measures of poverty to document health outcomes, education, housing burden, safety, infrastructure access, and community vitality across both geographic areas and demographic groups.[80]

IDS at the State Level

Washington State's Integrated Client Databases (ICDB) was founded in 1995 and is housed in the Research and Data Analysis (RDA) Division of the Department of Social and Health Services. The stated goal of the ICDB is to conduct "program evaluation, performance measurement, predictive modeling, forecasting, geographical analysis, and policy analysis to support the design, operation, and evaluation of health and human services programs."[81] The ICDB includes information from 30 state agencies with the majority of data originating from healthcare authorities, the Department of Social and Health Services (DSHS), and the Department of Youth and Families. DSHS includes many traditional disability services such as developmental disability services, vocational rehabilitation (VR), and behavioral health services. Sixty-seven percent of DSHS clients also use healthcare authority services, which makes linking this data incredibly valuable for service provision.

Washington has directly applied their ICDB to benefits provision for people with disabilities. Recognizing that many people who receive SSI benefits have overlapping needs that are provided by other agencies such as support for functional limitations, adaptive technology, or intensive mental and physical healthcare, they created a

system of reports and simple tables to give a holistic overview of the individual, the services they receive, and the services they may be eligible for.[82]

New York's neighbors—Massachusetts, Connecticut, and New Jersey—all have some form of an IDS although the scope of those systems is more limited than the one in Washington. Connecticut's P20 WIN system was integrated in 2021 and focuses primarily on school and workforce data, although it includes some data from the Department of Social Services.[83] The New Jersey[84] and Massachusetts[85] systems both focus on health data and are still in the early stages of development. California is also in the process of developing an IDS.[86]

Potential for an IDS in New York to Support Employment for People with Disabilities

Beginning an IDS program can seem daunting but there are existing best practice strategies and supports. Discussions of implementation in the literature cited above have stressed the importance of leadership and funding in the initial stages to make data matching and governance possible. There is already significant data sharing and some linked data systems in New York State at the local level. The NYC CIDI system discussed above falls into that category as does the Research Alliance for New York City Schools (RANYCS), which focuses exclusively on education.[87] New York also has a history of supporting public-facing agency data including through the Open NY data portal.[88] There are also existing data-sharing practices within New York State government including the sharing of unemployment insurance (UI) data through the UI Data Sharing Bill enacted in 2013 (Chapter 456).[89] Beyond these larger-scale endeavors, there are also a number of one-off data-sharing agreements between different agencies within New York State, between state and local agencies, and between state agencies and external researchers intended to answer specific research questions. This existing backbone of data openness is promising for the development of an IDS.

A system equivalent to Washington State or Allegheny County will likely take years to grow and develop but there are short-term benefits to integration and established best practices for building IDS. Actionable Intelligence for Social Policy (AISP) at the University of Pennsylvania supports state and local governments in the formation of IDS and has a large network of state and local IDS including Washington and Allegheny. New York would not need to create a comprehensive IDS all at once, rather existing data-sharing agreements could be leveraged through a subset of agencies with specific service-oriented goals. In the case of supporting employment for people with disabilities, the Office of the Chief Disability Officer could expand its current efforts to improve cooperation within New York State government by leading a data-sharing effort between the main service provision agencies. As discussed above, the UI data sharing law makes it particularly straightforward for wage information to be shared across agencies, which could assist in helping disability service providers and benefits counselors advise people on how to avoid overpayments, how to engage in the trial work period, and when to expect changes in SSI and SSDI payments based on earned wages.

Improving Customer Service Interactions with New York State Through Technology

State IDS are generally background entities that help governments identify service needs in their communities and better target those services. Some IDS, including the Allegheny system, also create client portals so that individuals have a full view of their service use and benefits in one easy-to-understand place. That improved customer interface would be a meaningful policy goal even in states that do not have an IDS like New York State. In the webinar and seminar series "Navigating the Benefits Cliff," a common refrain from both people with disabilities themselves and professionals who work with them is that the relationship between benefits and employment is complicated and that the complication is further magnified by other services people with disabilities may use including housing and transportation.

The process of applying for public benefits and transitioning to work is incredibly complicated on paper[90] but even more difficult in practice. The language of benefits eligibility rules is difficult to understand and not written for the average person, which can create confusion and incorrect applications. It can be difficult to find accurate information on which program best suits an individual or a benefits advisor who serves that individual due to how federal grant funding works. Even identifying which state office or nonprofit service provider is the best place to start navigation or navigate those agencies' changes in care management and care coordination including the 2018 transition from Medicaid service coordination to care coordination.[91]

Improved customer-facing technology, including "one-stop shop" websites and artificial intelligence (AI) chatbots is a potential aid to individuals in navigating the complex landscape of overlapping services, benefits, and employment incentives. The gold standard of these customer options would also involve the backbone data sharing of an IDS but current customer-facing technology can be improved even without improving the underlying data.

New York's Current Efforts

New York State currently has two programs aimed to serve in some sense as "one-stop shops" or "first steps" in identifying and accessing services, benefits, and employment supports. The Office for People with Developmental Disabilities (OPWDD) uses the Front Door program as a first step in connecting eligible people with disabilities and their families with appropriate services using person-centered planning. The website itself is direct, states in plain language the goal of the program, and walks individuals through the process including eligibility, who to contact, and the types of services offered. The website also includes various service booklets and brochures as well as video modules, which walk through the same information.[92]

The New York Employment Services System (NYESS)[93] also functions as an initial contact point but its goal is supporting employment for people with disabilities rather than other forms of service provision. NYESS is a partnership between the Office of Mental Health (OMH) and the Department of Labor (DOL); once again highlighting the importance of cross-agency collaboration in promoting the employment of people with disabilities. NYESS additionally coordinates with several other state agencies. In addition to the customer resources NYESS provides, they also have employer services and provider education, which are discussed above. The customer resources are clear and include how to find an agency, the basics of the Ticket to Work program, public benefits resources, and information on other work incentives and DOL programs. NYESS allows users to search by detailed geography including zip code to find local benefits counselors and other professionals and services.

Front Door and NYESS are not the only two agency starting points for a person with disabilities who wants to explore their public benefits and employment options. Many people first encounter employment programs through ACCESS-VR[94] or Independent Living Centers (ILCs).[95] People with disabilities who require educational accommodations when they are in school may also initially access benefits advisement and employment services through the New York State Education Department Office of Special Education[96] or the New York State Educational Partnership[97] and both organizations' district and regional offices.

Assuring that all people with disabilities who want to work have that opportunity means leveraging all of these potential first stops and making sure they provide clear information about all available programs both at their agency and at other agencies within New York State. Further, there need to be clear referral channels for when a person contacts an agency for whose services they are not eligible to make sure they are connected with the correct agency and are able to continue their employment journey rather than become stymied by red tape. Coordination across agencies is

especially valuable for young people with disabilities who are making the initial transition between school and work or living with family and living independently. These youth are particularly vulnerable to losing services as they move out of eligibility for youth services through state education and into eligibility for adult services like Ticket to Work.

Embracing New Technology

Front Door, NYESS, and ACCESS-VR are all effective organizations with incredibly important resources. The crucial factor is making sure that people who need them are able to find those resources and learn enough from initial contact to move forward to achieve their employment and living goals. Traditional tools, including search engine optimization,[98] plain language, ADA-compliant websites, increased visibility online through targeted advertisements and posts, and increased visibility in the community through physical ads and maintaining a presence at community events and hubs like festivals and libraries, are all strategies that have magnified and will continue to magnify the effectiveness of customer-facing one-stop shops. In addition to these traditional outreach methods, modern developments in customer support technology, including artificial intelligence (AI) chatbots, could further expand the reach and support services of these agencies and improve the productivity of their limited staff.

AI chatbots are online interactive discussion tools designed to simulate the type of conversation a person would have with another person. Artificial intelligence (AI) is a broad term that encompasses different types of computer programming all of which rely on "learning." In the broadest sense, AI is computer software that mimics the way humans think and process information in order to perform complex tasks. The complex tasks most relevant to a chatbot are interpreting human communication (natural language processing) and performing complex reasoning based on information provided to the chatbot by the customer and other information that the program has "learned" from in the past.[99] Various versions of AI are already being implemented in the healthcare space including administrative functions like appointment scheduling and reminders, billing, and fraud detection, but also more technical applications like diagnosis, imaging interpretation, and public health tracing.[100] Chatbots are mainly used in administrative functions and mental healthcare for people with low to moderate needs.[101]

Expanding the use of AI chatbots and AI generally to service provision and employment promotion for people with disabilities is promising but not without potential pitfalls. There is very little research on the effectiveness of AI chatbots in delivering government services. The most famous AI chatbot, ChatGPT, has only been available to the public since 2022[102] and although it has been employed effectively for many uses including customer service,[103] it has also been plagued by inaccuracies[104] and those inaccuracies may be increasing over time.[105] The recent and rapid deployment of these technologies has necessitated two different types of research relevant to implementation for government services: first, can these chatbots improve citizens' interactions with their government and the job performance of government employees? And second, will citizens be willing to trust chatbots?

Hila Mehr at the Ash Center for Democratic Governance and Innovation at the Harvard Kennedy School of Government takes a deep dive into the necessary considerations of government use of chatbots. Mehr highlights the potential benefits of using AI for citizen services, specifically, for answering questions, filling out and searching documents, routing requests, translating, and drafting documents. AI chatbots could reduce the administrative burden of applying for and maintaining public benefits programs and employment incentive programs by walking users through the application process and filling out appropriate forms based on an individual's responses. These chatbots can also learn over time to recognize common application errors and troubleshoot them in real-time before an application is rejected for those errors. With the high demand for benefits counselors, limitations on those counselors' funding and time, and incomplete information held by other disability professionals, AI chatbots could also be used to accurately answer basic questions about benefits eligibility and work incentives rather than relying on incomplete information, outdated information, or misinformation.

AI technology has already been extensively implemented in government administration. Handwriting recognition software, a form of machine learning, has been employed for decades by the US Postal Service[106] and that software has been continuously improved for automatic mail sorting since the 1960s. Other government agencies use similar AI-powered handwriting recognition software, including the US Census Bureau in their digitalization and public release of the handwritten 1950 census.[107] New York City has worked with IBM's Watson software to improve responses to their 311 city information system.[108] AI has the ability to automate many of the paperwork tasks or "red tape" faced by government officials and free up their time to better engage with customers and deal with complex issues beyond filling out simple forms or answering routine questions. More than half of local government officials report they do not have enough time in the week to complete their required tasks.[109]

Using AI chatbots for disability services and employment programs may result in additional complications beyond using AI chatbots in public service provision more generally. AI has already been implemented with real-time closed captioning to varying results.[110] A major potential pitfall in using AI to interact with people with disabilities is that the AI software may not be trained on information generated from that population. Recognition of facial features, handwriting, and behavior by AI is learned and when people with disabilities have deviations in those attributes compared to the general population, AI systems will only be able to correctly interpret those deviations if it has been trained on a population in which they are common. Chatbots would need to be trained on a wide variety of atypical spelling and phrasing in order to serve people with developmental, learning, intellectual, and cognitive disabilities.[111] There is a dearth of research on the quality of interaction of people with disabilities and chatbots and very few studies of chatbot effectiveness, validity, and interaction quality that include people with disabilities.[112] Prioritizing and funding AI studies that involve people with a wide variety of disabilities and identities will be necessary before implementing AI chatbots aimed at this population to ensure that the chatbot can correctly process the information it needs to process.

Conclusion

New York has significant resources to promote and support work for people with disabilities, but challenges remain that require additional investment in innovative policy and expansion of existing successful programs. The three main barriers to employment discussed in this report—missing information and misinformation, administrative burden, and risk aversion—are three of the same barriers that were identified by the Employment First Commission in 2015. While these barriers persist, there have been successful efforts to mitigate them and promote employment. The foundation of existing programs can be expanded and adjusted to be even more successful. Many of the program descriptions and recommendations above focus on information transmission to help people with disabilities navigate the complexity of public benefits, employment incentive programs, and all other disability services that are necessary for employment and living. Even the most well-designed program can only be successful if it is utilized by the people who would benefit from it.

While New York State has made progress, federal action would be needed to address one of the most significant contributors to the work disincentive created by the existing benefits cliffs of public programs. Many of the earnings and asset limitations that pertain to benefits are not indexed to inflation, wages, or cost of living. When SSI was established in 1972, most benefits and exemption amounts were not indexed to inflation, as a result, the income disregard and earned income disregard (analogous to the standard deduction for taxable income) remain low at $20 and $65 respectively but would be $128 and $416 if they had been indexed to inflation.[113] Similarly, the
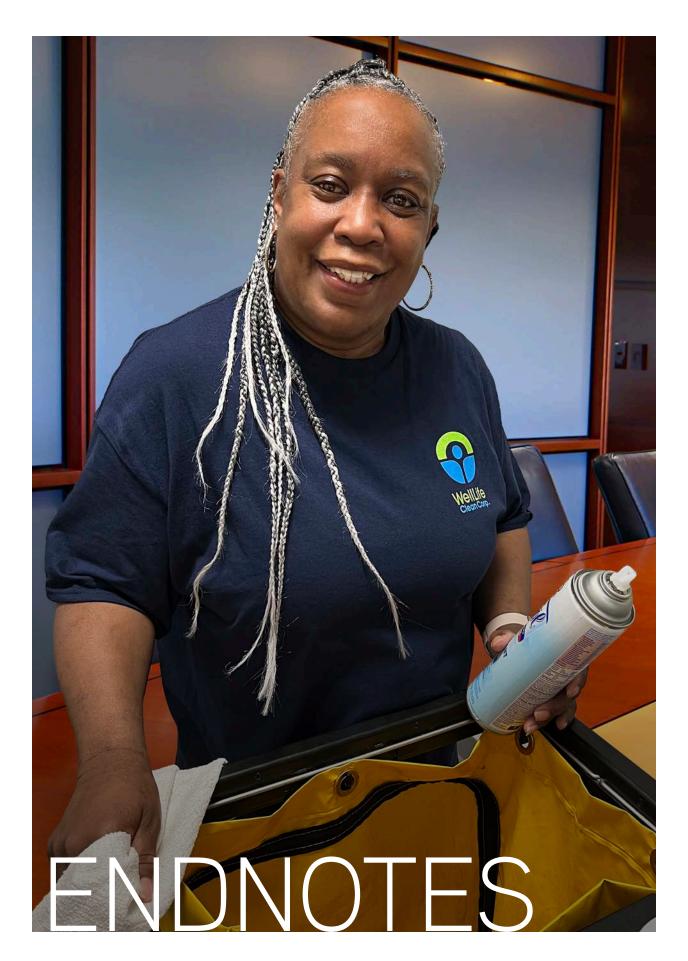
asset limit was raised from $1,500 for an individual and $2,250 for a couple in 1985 to $2,000 for an individual or $3,000 for a couple in 1989 but that limit has remained unchanged since.[114] If that increase had been indexed to inflation, the current individual asset exclusion would be $4,915.86.[115] The New York minimum wage is also more than double the federal minimum wage (last updated in 2009), which means that a minimum wage worker in New York can work only half as many hours and stay below SGA as a worker in Mississippi.

This report has discussed many of the policy tools New York State has to work around the limitations created by federal eligibility rules for SSI and SSDI. Most notably, New York has taken advantage of both the general Medicaid expansion and the Medicaid Buy-In Program for Working People with Disabilities. The expansion of these programs goes far in reducing the main informal barrier to employment for people with disabilities, which is the fear of losing health insurance. New York also provides significant resources to navigate complex benefits and employment programs, most of which are discussed above. There are many small changes to those existing programs that can make them more effective and increase their reach into the community of people with disabilities.

The place where New York could make more significant gains through new policy is in its technology use. Improving data sharing for agencies that support people with disabilities through an Integrated Data System (IDS) and improving customer service through traditional technology and AI systems are advances that could benefit not only people with disabilities but all New Yorkers who engage with government services and public benefits. Many lower-income New York families rely on social services and benefits programs and those programs can be both challenging to apply for and require a substantial commitment to maintain especially for workers who have unpredictable schedules and incomes and those who are self-employed or have multiple employers. As of 2020, in New York, only 78 percent of families eligible for the Earned Income Tax Credit (EITC) received it, which means more than one in five eligible families did not. New York's take-up rate is higher than the national average of 76 percent.[116] Estimates from the US Department of Agriculture (USDA) for Supplemental Nutritional Assistance Program (SNAP) take-up in New York are similar at 81 percent of eligible families.[117] An IDS with a focus on benefits would allow New York to target these eligible families who do not currently receive benefits. Receipt of benefits is associated with significant welfare gains including higher test scores,[118] improved maternal health,[119] more high school graduation, and higher young adult employment among others.[120] One group likely to benefit from increased access to and knowledge of benefits are members of the care workforce especially direct support professionals (DSPs), home health aides, and nursing aides. These individuals have low wages and are more likely to be women and to support children than their peers.[121] Forty-six percent of direct care workers rely on some form of public benefits including Medicaid, SNAP, the EITC, and other forms of food and cash assistance.[122]

Additional research is needed to identify the full costs and benefits of technological improvements to New York's social services systems and data-sharing infrastructure. The costs are easier to identify and many of those costs are up-front, while the benefits and long-term cost savings are harder to identify and define. The immediate costs of an IDS would include payment for data storage and maintenance, building user interface

systems for agencies and individuals to navigate, and most importantly employing experts to build and maintain these systems. Many of the benefits will occur further in the future. Increasing employment for people with disabilities will reduce the amount of benefits paid out through the SSI and SSDI programs, it would also increase tax revenue due to the increase in earned income. There are larger benefits beyond employment for people with disabilities as well. As noted above, children who receive benefits have higher earnings as young adults, are less likely to receive benefits as adults, and are more likely to graduate from high school—all of which would be expected to increase tax revenue. There are also likely to be significant savings from decreasing employee time for processing applications and recertifications for benefits applicants.

ENDNOTES

1   Leigh Wedenoja, Laura Schultz, and Ryan Wilcox, *Navigating the Benefits Cliff: The Role of Benefit Eligibility in the Decision to Work and More for People With Disabilities in New York State* (Albany, NY: Rockefeller Institute of Government, November 2023), https://rockinst.org/wp-content/uploads/2023/11/Navigating-the-Benefits-Cliff.pdf.

2   Ibid.

3   *Moving On Up: Helping Families Climb the Economic Ladder by Addressing Benefits Cliffs* (Washington, DC: National Conference of State Legislators, July 2019), https://search.issuelab.org/resource/moving-on-up-helping-families-climb-the-economic-ladder-by-addressing-benefits-cliffs.html.

4   "Medicaid Buy-In Program for Working People with Disabilities," New York State Department of Health, updated April 2024, https://www.health.ny.gov/health_care/medicaid/program/buy_in/.

5   "SSDI only Employment Supports," US Social Security Administration, accessed October 18, 2023, https://www.ssa.gov/redbook/eng/ssdi-only-employment-supports.htm?tl=3.

6   In this section we document the population of people with disabilities and their employment in New York State using data from the 2015–20 American Community Surveys (ACS) as harmonized by IPUMS. Our sample includes working-age adults (18–64).

7   Steven Ruggles, et al., IPUMS USA: Version 12.0 [dataset] (Minneapolis, MN: IPUMS, 2022), https://www.ipums.org/projects/ipums-usa/d010.v12.0.

8   *The Red Book – A Guide to Work Incentives and Employment Supports*, SSA Publication No. 64-030, (Washington, DC: US Social Security Administration, August 2023), https://www.ssa.gov/redbook/.

9   Sanjay K. Pandey and Patrick G. Scott, "Red Tape: A Review and Assessment of Concepts and Measures," *Journal of Public Administration Research and Theory* 12, no. 4 (2002): 553–80, https://www.jstor.org/stable/3525860.

10 "Centers for Independent Living," Administration for Community Living (ACL), updated July 2024, https://acl.gov/programs/aging-and-disability-networks/centers-independent-living.

11 "Independent Living Centers," Adult Career & Continuing Ed Services, New York State Education Department, accessed July 22, 2024, https://www.acces.nysed.gov/vr/independent-living-centers.

12 *Annual Report on Centers for Independent Living: Program Years 2020 and 2021* (Washington, DC: Administration for Community Living, April 2024), https://acl.gov/sites/default/files/2024-03/CIL_AnnualReport_PY2020-2021_508.pdf.

13 Douglas Kruse, et al., "Disability and remote work during the pandemic with implications for cancer survivors," *Journal of Cancer Survivorship* 16, no. 1 (2022): 183–99, https://doi.org/10.1007/s11764-021-01146-z.

14 Stacy A. Hickox and Chenwei Liao, "Remote Work as an Accommodation for Employees with Disabilities," *Hofstra Labor & Employment Law Journal* 38, no. 1 (2020): 25–68, https://scholarlycommons.law.hofstra.edu/hlelj/vol38/iss1/3.

15 Lewis Mandell and Linda Schmid Klein, "The Impact of Financial Literacy Education on Subsequent Financial Behavior," *Journal of Financial Counseling and Planning* 20, no. 1 (2009): 15–24, https://files.eric.ed.gov/fulltext/EJ859556.pdf.

16 Aisa Amagir, et al., "A review of financial-literacy education programs for children and adolescents," *Citizenship, Social and Economics Education* 17, no. 1 (2017): 56–80, https://doi.org/10.1177/2047173417719555.

17 J. Michael Collins and Carly Urban, "The Role of Information on Retirement Planning: Evidence from a Field Study," *Economic Inquiry* 54, no. 4 (2016): 1860–72, https://doi.org/10.1111/ecin.12349.

18 Stephanie Moulton, et al., *Field Experiments on the Impacts of Financial Planning Interventions for Recent Homebuyers*, Center for Financial Security Working Paper 2011-CFS.5 (University of Wisconsin-Madison, October 2011), https://cfs.wisc.edu/2011/10/09/field-experiments-on-the-impacts-of-financial-planning-interventions-for-recent-homebuyers/.

19   Annemarie M. Kelly, et al., "Financial Health Assessments by People with Disabilities and Their Families during the COVID-19 Pandemic: Opportunities and Obstacles for Financial Planners," *Journal of Financial Service Professionals* 76 (2022): 46–55, https://www.emich.edu/cob/documents/hersheysept22.pdf.

20   "ABLE Accounts," National Disability Institute, accessed July 22, 2024, https://www.nationaldisabilityinstitute.org/financial-wellness/able-accounts/.

21   David A. Rephan and Joelle Groshek, "ABLE Act Accounts: Achieving a Better Life Experience for Individuals with Disabilities with Tax-Preferred Savings (and the old reliable special and supplemental needs trust)," *Mitchell Hamline Law Review* 42, no. 3 (2016): 963, https://open.mitchellhamline.edu/mhlr/vol42/iss3/6/.

22   Jill Louise Bezyak, et al., "Community participation and public transportation barriers experienced by people with disabilities," *Disability and Rehabilitation* 42, no. 23 (2018), 3275–83, https://doi.org/10.1080/09638288.2019.1590469.

23   "Impairment-Related Work Expenses," in *The Red Book – A Guide to Work Incentives and Employment Supports*, SSA Publication No. 64-030 (Washington: DC: US Social Security Administration, August 2023): 13, https://www.ssa.gov/redbook/index.html.

24   Mike Prescott, et al., "Factors that affect the ability of people with disabilities to walk or wheel to destinations in their community: a scoping review," *Transport Reviews* 40, no. 5 (2019): 646–69, https://doi.org/10.1080/01441647.2020.1748139.

25   Kaylyn Levine and Alex Karner, "Approaching accessibility: Four opportunities to address the needs of disabled people in transportation planning in the United States," *Transport Policy* 131 (February 2023): 66–74, https://doi.org/10.1016/j.tranpol.2022.12.012.

26   Julian Hine and Margaret Grieco, "Scatters and clusters in time and space: implications for delivering integrated and inclusive transport," *Transport Policy* 10, no. 4(2003): 299–306, https://doi.org/10.1016/S0967-070X(03)00055-6.

27   "MTA Accessible Stations," Metropolitan Transit Authority, updated April 2024, https://new.mta.info/accessibility/stations.

28   "Station accessibility projects," Metropolitan Transit Authority, updated April 2024, https://new.mta.info/project/station-accessibility-upgrades,

29   Annie McDonough, "How accessible is transit in New York?" *City & State New York*, June 27, 2021, https://www.cityandstateny.com/policy/2021/06/how-accessible-is-transit-in-new-york/182725/.

30   "Transportation," New York State Justice Center for the Protection of People with Special Needs, accessed July 22, 2024, https://www.justicecenter.ny.gov/transportation.

31   *New York State Employment First Commission Report and Recommendations* (Albany: New York State Employment First Commission, March ,1, 2015), https://nyess.ny.gov/system/files/documents/2023/07/employment_first_march2015_final.pdf.

32   N.Y. Comp. Codes R. & Regs. tit. 9 § 8.136, https://casetext.com/regulation/new-york-codes-rules-and-regulations/title-9-executive-department/subtitle-a-governors-office/chapter-i-executive-orders/part-8-executive-orders-andrew-m-cuomo/section-8136-executive-order-no-136-establishing-the-new-york-employment-first-initiative-to-increase-employment-of-new-yorkers-with-disabilities.

33   "Disability Rights & Employment Awareness Month (DREAM) Symposium," October 3, 2023, https://www.ny.gov/events/disability-rights-employment-awareness-month-dream-symposium.

34   Laura Schultz and Michelle Cummings, "NYSID's Economic Impact on New York: Estimation of the Social and Fiscal Return on Investment of New York State Industries for the Disabled on New York State and Its Taxpayers," Rockefeller Institute of Government, September 4, 2019, https://rockinst.org/issue-area/nysids-economic-impact-on-new-york/.

35   New York State Office of General Services, "Preferred Source Program Announcements, CL-624-2023-02," news release, February 7, 2022, https://ogs.ny.gov/news/cl-624-2023-02-preferred-source-program-announcement.

36   Laura Schultz, "The Role of Disability Service Providers in the New York State Economy," Rockefeller Institute of Government, December 13, 2021, https://rockinst.org/issue-area/the-role-of-disability-service-providers-in-the-new-york-state-economy/.

37   Laura Schultz and Leigh Wedenoja, *Effectiveness of Sections 55-b and 55-c of the Civil Service Law* (Albany, NY: Rockefeller Institute of Government, December 2022), https://www.cs.ny.gov/extdocs/pdf/2022%20DCS%2055-b-c_Report.pdf.

38   Paul M. Baker, et al., "Barriers to Employment Participation of Individuals With Disabilities: Addressing the Impact of Employer (Mis)Perception and Policy," *American Behavioral Scientist* 62, no. 5(2020): 657–75, https://cacp.gatech.edu/sites/default/files/2020-02/Barriers%20to%20Employment.pdf.

39   Nene Ernest Khalema and Janki Shankar, "Perspectives on Employment Integration, Mental Illness and Disability, and Workplace Health," *Advances in Public Health* (2014), https://doi.org/10.1155/2014/258614.

40   *EmployAbility: A Toolkit for Employers* (Albany: New York Employment First Commission, 2023), https://cms5.revize.com/revize/niagaracounty/Document_center/Department/S-Z/WorkSourceOne/employ-ability%20a%20Toolkit%20for%20Employers.pdf.

41   "Preferred Sources," New York State Office of General Services, accessed July 22, 2024, https://ogs.ny.gov/procurement/preferred-sources.

42   New York State Preferred Source Program For New Yorkers Who Are Blind, https://www.nyspsp.org/.

43   David Stapleton, Arif Mamun, and Jeremy Page, "Initial impacts of the Ticket to Work program: estimates based on exogenous variation in Ticket mail months," *IZA Journal of Labor Policy* 3 (2014): 1–24, https://doi.org/10.1186/2193-9004-3-6.

44   Impairment-Related Work Expenses.

45   *Incorrect Payments to Disabled Beneficiaries Who Return to Work*, Audit Report A-07-17-50131 (Washington, DC: Office of the Inspector General, US Social Security Administration, May 2018), https://oig-files.ssa.gov/audits/full/A-07-17-50131.pdf.

46   Denise Hoffman, Jonah Deutsch, and Britta Seifert, "A behavioral economics assessment of social security disability insurance earnings reporting documents," *Disability and Health Journal* 16, no. 3 (2023): 101449, https://doi.org/10.1016/j.dhjo.2023.101449.

47   "Substantial Gainful Activity," US Social Security Administration, 2024, https://www.ssa.gov/oact/cola/sga.html.

48   Denise Hoffman, Priyanka Anand, and John Jones, *How Do Work-Related Overpayments Affect the Earnings of Social Security Disability Insurance Beneficiaries?* DRC Working Paper (Washington, DC: Mathematica, 2020), https://www.mathematica.org/publications/how-do-work-related-overpayments-affect-the-earnings-of-overpaid-social-security-disability.

49   John Kregel, *A Qualitative Study of Employment Experiences of DI Beneficiaries after Receipt of an Overpayment*, DRC Working Paper No. 2018-06 (Washington, DC: Mathematica Policy Research, December 2018), https://www.mathematica.org/publications/a-qualitative-study-of-employment-experiences-of-di-beneficiaries-after-receipt-of-an-overpayment.

50   Jean P. Hall, et al., "Effect of Medicaid Expansion on Workforce Participation for People With Disabilities," *American Journal of Public Health* 107, no. 2 (2017): 262–4, https://doi.org/10.2105%2FAJPH.2016.303543.

51   Jean P. Hall, et al., "Medicaid Expansion as an Employment Incentive Program for People With Disabilities," *American Journal of Public Health* 108, no. 9 (2018): 1235–7, https://doi.org/10.2105%2FAJPH.2018.304536,

52   Melissa Ford Shah, et al., "Evaluation of the Medicaid Buy-in Program in Washington State: Outcomes for Workers With Disabilities Who purchase Medicaid Coverage," *Journal of Disability Policy Studies* 22, no. 4 (2012): 220–9, https://doi.org/10.1177/1044207311427162.

53   "Medicaid Buy-In Program for Working People with Disabilities," New York State Department of Health, updated April 2024, https://www.health.ny.gov/health_care/medicaid/program/buy_in/.

54   *Welcome to the Medicaid Buy-In program for Working People with Disabilities Toolkit* (Albany: New York State Department of Health, https://www.health.ny.gov/health_care/medicaid/program/buy_in/docs/working_people_with_disabilities.pdf.

55   "Benefits Counseling and the Path to Employment," US Social Security Administration, Ticket to Work, June 2020, https://choosework.ssa.gov/Assets/cw/files/Library/2020/Fact-Sheet-Benefits-Counseling.pdf.

56   YTIOnline, accessed July 22, 2024, https://www.ytionline.org/.

57   "About YTI Online," YTIOnline, accessed July 22, 2024, https://www.ytionline.org/about.

58   "Online Courses," VCU RRTC VCU Rehabilitation Research and Training Center, Virginia Commonwealth University, accessed July 22, 2024, https://vcurrtc.org/training/courses.cfm.

59   O*NET Online, accessed July 22, 2024, https://www.onetonline.org/.

60   Claudia Pettit, "The Effect of Benefits Counseling on Increasing Knowledge of Social Security Work Rules and Work Incentives," *Rehabilitation Counselors and Educators Journal* 10, no. 2 (2021), https://doi.org/10.52017/001c.28184.

61   Kanako Iwanaga, et al., "Evaluating the Effect of Work Incentives Benefits Counseling on Employment Outcomes of Transition-Age and Young Adult Supplemental Security Income Recipients with Intellectual Disabilities: A Case Control Study," *Journal of Occupational Rehabilitation* (2021): 1–11, https://doi.org/10.1007/s10926-020-09950-7.

62   *A Guide for Employment Specialists With OMH Provider Agencies* (Albany: New York State Office of Mental Health, 2018), https://nyess.ny.gov/system/files/documents/2023/07/2018-omh-guide-for-employment-specialists.pdf.

63   "Disability Resource Coordinators," Career Services for Persons with Disabilities, New York State Department of Labor, accessed July 22, 2024, https://dol.ny.gov/career-services/career-services-for-persons-with-disabilities.

64   "SUNY Microcredentials for NYS DSPs," State University of New York, accessed July 22, 2024, https://www.suny.edu/microcredentials/dsp/.

65   "Gain New Skills, Knowledge, and Experience with Microcredentials at SUNY," State University of New York, accessed July 22, 2024, https://www.suny.edu/microcredentials/.

66   Office of Governor Kathy Hochul, "Governor Hochul Announces $32 Million to Grow Workforce to Support New Yorkers with Developmental Disabilities," news release, March 20, 2024, https://www.suny.edu/suny-news/press-releases/3-24/3-20-24-dsp/.

67   "CESP Certification Is Far More Than Certificate of Completion," APSE, 2022, https://apse.org/cesp-central/.

68   *LED New Data from the States and the U.S. Census Bureau Local Employment Dynamics* (Washington, DC: US Census Bureau), https://lehd.ces.census.gov/doc/LEDonepager.pdf.

69   "American Community Survey (ACS)," US Census Bureau, updated June 10, 2024, https://www.census.gov/programs-surveys/acs.

70   "Current Population Survey (CPS)," US Census Bureau, updated October 20, 2023, https://www.census.gov/programs-surveys/cps.html,

71   "Survey of Income and Program Participation (SIPP)," US Census Bureau, updated July 1, 2024, https://www.census.gov/programs-surveys/sipp.html.

72   *2022 Survey of Income and Program Participation Users' Guide* (Washington, DC: US Census Bureau. June 2023), https://www2.census.gov/programs-surveys/sipp/tech-documentation/methodology/2022_SIPP_Users_Guide_SEP23.pdf.

73   "Integrated Data Systems Map," Actionable Intelligence for Social Policy, University of Pennsylvania, accessed July 22, 2024, https://aisp.upenn.edu/integrated-data-systems-map/.

74   *Allegheny County Data Warehouse* (Philadelphia, PA: Allegheny County Analytics, February 2024), https://analytics.alleghenycounty.us/wp-content/uploads/2024/02/24-ACDHS-03-Datawarehouse.pdf.

75   *Human Services Integration Fund (HSIF)* (Philadelphia, PA: Allegheny County Department of Human Services, December 2013), https://www.alleghenycounty.us/files/assets/county/v/1/services/dhs/documents/dhs-funding/hsif_2017.pdf.

76   "QuickCount Data Tool," Allegheny County Analytics, accessed July 22, 2024, https://analytics.alleghenycounty.us/quickcount-data-tool/.

77   AccessMyInfo, accessed July 22, 2024, https://accessmyinfo.alleghenycounty.us/.

78   Allegheny County OKTA, accessed July 22, 2024, https://alleghenycounty.okta.com/.

79   Center for Innovation through Data Intelligence, New York City Mayor's Office, accessed July 22, 2024, https://www.nyc.gov/site/cidi/index.page.

80   *Well-Being Index 2022 Update* (NYC Center for Innovation through Data Intelligence, October 2022), https://www.nyc.gov/assets/cidi/downloads/pdfs/2022-NYC-Well-Being-Index-Final.pdf.

81   *Integrated Client Databases* (Olympia: Washinton State Health and Human Services, December 2021), https://www.dshs.wa.gov/sites/default/files/rda/reports/research-11-205.pdf.

82   Erika M. Kitzmiller, *IDS CASE STUDY: Washington State* (Philadelphia, PA: Actionable Intelligence for Social Policy, April 2014), https://aisp.upenn.edu/wp-content/uploads/2015/08/WAState_CaseStudy.pdf.

83   "What is P20 WIN?" State of Connecticut Office of Policy and Management, accessed July 22, 2024, https://portal.ct.gov/opm/p20win/.

84   "Integrated Population Health Data Project," Rutgers Center of State Health Policy, accessed July 22, 2024, https://iphd.rutgers.edu/.

85   "Public Health Data Warehouse (PHD)," Massachusetts Office of Population Health, accessed July 22, 2024, https://www.mass.gov/public-health-data-warehouse-phd.

86   "AISP Network: CalHHS Record Reconciliation and Agency Data Hub," AISP, accessed July 22, 2024, https://aisp.upenn.edu/network-site/california/.

87   The Research Alliance for New York City Schools, New York University Steinhardt School of Culture, Education, and Human Development, accessed July 22, 2024, https://steinhardt.nyu.edu/research-alliance.

88   New York State Open Data, accessed July 20, 2024, https://data.ny.gov/.

89   "Unemployment Insurance (UI) Data Sharing," New York State Department of Labor, accessed July 22, 2024, https://dol.ny.gov/unemployment-insurance-ui-data-sharing.

90   Wedenoja, Schultz, and Wilcox, *Navigating the Benefits Cliff: The Role of Benefit Eligibility in the Decision to Work and More for People With Disabilities in New York State*.

91   "Care Management," New York State Office for People with Developmental Disabilities, accessed July 22, 2024, https://opwdd.ny.gov/providers/care-management.

92   "Front Door," New York State Office for People with Developmental Disabilities, accessed July 22, 2024, https://opwdd.ny.gov/get-started/front-door.

93   "About NYESS," New York Employment Services System, accessed July 22, 2024, https://nyess.ny.gov/about-nyess.

94   "Access-VR (Vocational Rehabilitation)," New York State Education Department, Adult Career & Continuing Ed Services, accessed July 22, 2024, https://www.acces.nysed.gov/vr.

95   "Independent Living Centers," New York State Education Department, Adult Career & Continuing Ed Services, accessed July 22, 2024, https://www.acces.nysed.gov/vr/independent-living-centers.

96   "Special Education," New York State Education Department, accessed July 22, 2024, https://www.nysed.gov/special-education.

97   "About the Educational Partnership," New York State Education Department, Office of Special Education, accessed July 22, 2024, https://osepartnership.org/about.

98   "Search Engine Optimization," US Department of Commerce International Trade Administration, accessed July 22, 2024, https://www.trade.gov/ecommerce-seo.

99   "Machine Learning vs. AI: Differences, Uses, and Benefits," Coursera, March 19, 2024, https://www.coursera.org/articles/machine-learning-vs-ai.

100   Courtney Burke, "Artificial Intelligence in Healthcare: Considerations for Policymakers," Rockefeller Institute of Government, November 28, 2023, https://rockinst.org/blog/artificial-intelligence-in-healthcare-considerations-for-policymakers/.

101   Gabriel Perna, "Virtua Health is bringing on AI therapists amid provider shortage," *Modern Healthcare*, November 7, 2023, https://www.modernhealthcare.com/digital-health/virtua-health-adopts-ai-chatbots-mental-health.

102   Samantha Lock, "What is AI chatbot phenomenon ChatGPT and could it replace humans?" *The Guardian*, December 5, 2022, https://www.theguardian.com/technology/2022/dec/05/what-is-ai-chatbot-phenomenon-chatgpt-and-could-it-replace-humans.

103   Bernard Marr, "A Short History Of ChatGPT: How We Got To Where We Are Today," *Forbes*, May 19, 2023, https://www.forbes.com/sites/bernardmarr/2023/05/19/a-short-history-of-chatgpt-how-we-got-to-where-we-are-today/?sh=5be228ed674f.

104   Ian Bogost, "ChatGPT Is Dumber Than You Think," *The Atlantic*, December 7, 2022, https://www.theatlantic.com/technology/archive/2022/12/chatgpt-openai-artificial-intelligence-writing-ethics/672386/.

105   Lingjiao Chen, Matei Zaharia, and James Zou, "How Is ChatGPT's Behavior Changing over Time?" *arXiv preprint arXiv:2307.09009* (2023), https://arxiv.org/pdf/2307.09009.

106   "75 Years of Innovation: Advanced postal address recognition," SRI, November 2021, https://www.sri.com/press/story/75-years-of-innovation-advanced-postal-address-recognition/.

107   Victoria Macchi, "1950 Census Release Will Offer Enhanced Digital Access, Public Collaboration Opportunity," National Archives News, December 14, 2021, https://www.archives.gov/news/articles/1950-census-access.

108   Kristan Conley, "City enlists IBM's Watson to fix outdated 311 system," *New York Post*, February 15, 2017, https://nypost.com/2017/02/12/city-enlists-ibms-watson-to-fix-outdated-311-system/.

109   Caroline Cournoyer, "Is a 40-Hour Workweek Enough in Government?" *Governing*, July 20, 2016, https://www.governing.com/archive/gov-time-usage-survey-government.html.

110   Chase DiBenedetto, "For captioning, humans are still the key to accessible, AI-driven tech," *Mashable*, August 4, 2023, https://mashable.com/article/ai-captions-transcription-accessibility-concerns-report.

111   Anhong Guo, et al., "Toward fairness in AI for people with disabilities SBG@a research roadmap," *ACM SIGACCESS Accessibility and Computing* 125 (2020): 1, https://doi.org/10.1145/3386296.3386298.

112   Stefano Federici, et al., "Inside pandora's box: a systematic review of the assessment of the perceived quality of chatbots for people with disabilities or special needs," *Disability and Rehabilitation: Assistive Technology* 15, no. 7 (2020): 832–37, https://doi.org/10.1080/17483107.2020.1775313.

113   Jack Smalligan and Chantel Boyens, *Encouraging Work in the Supplemental Security Income Program* (Washington, DC: Urban Institute, March 31, 2022), https://www.urban.org/research/publication/encouraging-work-supplemental-security-income-program.

114   "Disability Programs in the 21 Century: Need for Review of the Supplemental Security Income Programs Benefit Levels, Asset Limits and Income Exclusion," Social Security Advisory Board 1, No. 2 (March 2009), https://s3-us-gov-west-1.amazonaws.com/cg-778536a2-e58c-44f1-9173-29749804ec54/uploads/2021/03/2009-Disability-Brief-Series-2-SSI-Benefits-Assets-and-Income_2009.pdf.

115   Calculation made using the Federal Reserve Bank of Minneapolis Inflation Calculator for years 1989 and 2023: https://www.minneapolisfed.org/about-us/monetary-policy/inflation-calculator.

116 "EITC Participation Rate by States Tax Years 2013 through 2020," Internal Revenue Service, updated January 26, 2024, https://www.eitc.irs.gov/eitc-central/participation-rate-by-state/eitc-participation-rate-by-states.

117 Karen Cunnyngham, *Reaching Those in Need: Estimates of State Supplemental Nutrition Assistance Program Participation Rates in 2020* (Mathematica and US Department of Agriculture, August 2023), https://www.mathematica.org/publications/estimates-of-state-supplemental-nutrition-assistance-program-participation-rates-in-2020.

118 Gordan B. Dahl and Lance Lochner, "The Impact of Family Income on Child Achievement: Evidence from the Earned Income Tax Credit," *American Economic Review* 102, no. 5 (2012): 1927–56, https://www.aeaweb.org/articles?id=10.1257/aer.102.5.1927.

119 William N. Evans and Craig L. Garthwaite, "Giving Mom a Break: The Impact of Higher EITC Payments on Maternal Health," *American Economic Journal: Economic Policy* 6, no. 2 (2014): 258–90, https://www.aeaweb.org/articles?id=10.1257/pol.6.2.258.

120 Jacob Bastian and Katherine Michelmore, "The Long-Term Impact of the Earned Income Tax Credit on Children's Education and Employment Outcomes," *Journal of Labor Economics* 36, no. 4 (2018): 1127–63, https://doi.org/10.1086/697477.

121 Leigh Wedenoja, "Defining the Care Workforce: A New Way to Think about Employment in Healthcare, Education, and Social Services," Rockefeller Institute of Government, November 2022, https://rockinst.org/issue-area/defining-the-care-workforce-a-new-way-to-think-about-employment-in-healthcare-education-and-social-services/.

122 *Direct Care Workers in the United States: Key Facts* (New York, NY: PHI, 2023), https://www.phinational.org/resource/direct-care-workers-in-the-united-states-key-facts-2023/.

ABOUT THE ROCKEFELLER INSTITUTE

Created in 1981, the Rockefeller Institute of Government is a public policy think tank that conducts cutting-edge, nonpartisan research and policy analysis. Our mission is to improve the capacities of communities, state and local governments, and the federal system to work toward genuine solutions to the nation's problems. Through rigorous, objective, and accessible analysis and outreach, the Institute gives citizens and governments facts and tools relevant to public decisions.

Learn more at www.rockinst.org.

LEARN MORE

----

www.rockinst.org

@rockefellerinst

Rockefeller
Institute of Government