AN ABSTRACT OF THE DISSERTATION OF

Leanne S. Giordono for the degree of Doctor of Philosophy in Public Policy presented on November 15, 2018.

Title: Advocacy Coalitions, Shifting Priorities and Disability Services: An Integrative and Iterative Approach to Explaining Policy Change

Abstract approved: ________________________________________________

Edward P. Weber

Under the label “Supported Employment,” services that promote competitive, integrated employment (CIE) for working-age adult with intellectual and developmental disabilities have been federally funded since the 1980s, alongside other more traditional day habilitation and segregated or sub-minimum wage employment services. However, since the early 2000s, over 30 states have adopted “Employment First” policy, prioritizing competitive, integrated employment (CIE) as the preferred outcome, and in some states, restricting alternative service options. And while researchers have made a considerable effort to understand system-level determinants of participation in CIE-focused services, little attention has been paid to the political factors driving these major changes in the overall policy mix. Moreover, the Employment First changes, which have attracted little public attention or controversy, vary considerably across states in timing, form and content.

What do these policy changes look like, and how can we explain both the occurrence of major policy changes and the variations in timing? Using a three-manuscript format, the study applies a mixed method approach to two cases, Washington and Pennsylvania. The study uses the Advocacy Coalition Framework (ACF) as the primary theoretical framework, informed by the practitioner-oriented Systems Change framework,
and extended by concepts from the Theory of Gradual Institutional Change. The overall results suggest that in both Washington and Pennsylvania, a process of policy “layering” that began in the 1980s with the expansion of the status quo service mix, was followed by a subsequent period of “displacement,” in which major policy changes prioritized CIE-focused services while restricting non-CIE services. These major policy changes stemmed from the activities of two competing advocacy coalitions, “Choice” and “Employment First.” While the Choice coalition sought to maintain the status quo, or a full menu of service options, the reform-oriented Employment First coalition pursued prioritization of CIE-focused services.

These shifts in the policy mix were associated with similar combinations of subsystem attention and coalition-based activity, including stakeholder mobilization and strategic use of framing and narrative, as well as heightened political attention and bureaucrat advocacy. Washington’s major policy changes began in the 2000s, while in Pennsylvania, no major policy changes occurred until the 2010s. Despite the similar conditions for overall policy change, differences in the timing of major policy changes were associated with service provider coalition membership and antecedent service levels. In Washington, which experienced high levels of CIE service participation by the late 1990s, the defection of most service providers from the Choice coalition in the early 2000s was a key condition related to major policy change, even though a small contingent of service providers continued to pursue a Choice-oriented policy mix. By comparison, in Pennsylvania, where CIE service participation remained low through the 2010s, there was no public mass defection of service providers from the Choice coalition, and major policy changes were only achieved in the context of federal guidance. The evidence additionally suggests that minor policy changes in Washington during a period of policy layering in the 1980s and 1990s contributed to the service provider defection from Choice to Employment First.

This study takes an iterative and integrative approach to explaining major policy change. In addition to offering a rich explanation for the major policy changes experienced in both states, the study offers a contextualized ACF application to a low salience issue
area, thus extending the framework’s range beyond its usual application in high salience and contentious policy settings. Relatedly, the study substantiates key ACF propositions related to the role of coalition-based activity and pathways to major policy change. Moreover, the study highlights key complementarities between the ACF and the Systems Change model, providing a future pathway for integrating the findings with practitioner-oriented change models. Finally, the study illustrates the benefits of extending the ACF with concepts from the Theory of Gradual Institutional Change, thus illuminating the transition from one policy process period to the next.
Advocacy Coalitions, Shifting Priorities and Disability Services: An Integrative and Iterative Approach to Explaining Policy Change

by

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A DISSERTATION

submitted to

Oregon State University

in partial fulfillment of the requirements for the degree of

Doctor of Philosophy

Presented November 15, 2018
Commencement June 2019

APPROVED:

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Leanne S. Giordono, Author
ACKNOWLEDGEMENTS

The past four-plus years have been a luxury. What an opportunity to read, write and think about issues I care about, in a supportive environment and surrounded by thoughtful and interesting people!

Many thanks to my committee for contributing the parts that formed the whole. Thanks especially to Dr. Ed Weber for seeing the forest for the trees, Dr. Mike Jones for keeping an open door, Dr. Hilary Boudet for guiding me through “qualitative-land”, Dr. Gloria Krahn for your endless enthusiasm and commitment to disability policy, and Dr. David Rothwell for your confidence in social policy to alleviate burdens and improve lives. Thanks also to my committee and other faculty members, including Dr. Todd Pugatch, Dr. Mark Edwards and Dr. Brent Steel, for offering multiple “on-the-job” learning and publication opportunities, as well as Dr. Adam Haley who provided valuable guidance throughout the last months of the writing process. I am grateful for the National Science Foundation Graduate Research Fellowship Program (No. 1314109-DGE) for its generous support of my graduate school experience and dissertation research. Finally, thanks to the many interview respondents who generously shared their time and thoughts with me.

Finally, endless thanks to my family. To my parents – Susan, Larry and Rosie – you prepared me well and rarely receive the gratitude you deserve. Thanks to my beautiful children – Gabe, Sabina and Phoebe – for being who you are. Most of all, thanks to Mark – your loving support and encouragement have made it possible for me to pursue my dreams.
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1. **INTRODUCTION**

In 2015, over 600,000 individuals with intellectual and developmental disabilities in the United States received Day Habilitation and Employment (DH&E) services from state I/DD agencies (Butterworth et al. 2016). The number served by I/DD agencies has doubled since 1988, and recent estimates suggest that only 20% of all individuals with I/DD are known and served by I/DD state agencies (Institute on Community Integration n.d.). State DH&E systems, which are nested in the broader federal system of Medicaid Home- and Community-based Services (HCBS) waivers, have a history of offering some combination of day habilitation and employment services, reaching back to at least the mid-1980s (Agranoff 2011; Gettings 2011; McGaughey and Mank 2001a). Strong federal government support for competitive, integrated employment services reaches back to the mid-1980s under the label “supported employment” (McGaughey and Mank 2001a; Wehman et al. 1989) and was reiterated by several federal changes during the 2000s and 2010s, including Olmstead litigation and the HCBS “final rule” (US Department of Justice n.d.). Moreover, disability researchers have long held that competitive, integrated employment (CIE), given appropriate services and supports, is an achievable and worthy objective for most, if not all, working-age adults with intellectual and developmental disabilities (Wehman et al. 2018). Historically, however, CIE-focused policy at the state level has been only one part of the overall DH&E policy mix, often secondary to other well-established services, such as day habilitation and other facility-based services and supports (Butterworth et al. 2016). Furthermore, participation in segregated work services and nonwork day services has grown at a faster rate than CIE programming and nationwide participation in publicly CIE-focused services (Wehman 2018).

However, since the early 2000s there has been a shift in state-level policy, with over 30 states adopting “Employment First” policies that prioritize competitive, integrated employment (CIE) for individuals with Intellectual and Developmental Disability who
receive publicly-funded services (Nord 2014, Nord and Hoff 2018). The widespread adoption of state-level policy pronouncing CIE as the priority outcome, accompanied in some cases by policies that bolster CIE-focused services and restrict non-CIE services, is a major change. Moreover, the timing and scale of the recent policy changes, after two to three decades of offering both CIE and non-CIE services, suggests an important turn in state I/DD systems. Finally, the adoption by states of Employment First policy exhibits considerable variation in the timing, form and content, and while such variation is not unexpected, we understand little about the conditions and causal mechanisms that result in state-level policy change in the context of a federal system (Thompson and Burke 2007).

While disability researchers have made a considerable effort to understand system-level determinants of participation in CIE-focused services, including development of a Systems Change framework that includes policy change as a key element (Hall et al. 2007), far less attention has been paid to the political factors driving Employment First policy change. Furthermore, while policy process frameworks have only rarely been applied to disability-related policy, those few applications suggest that disability-related policy change is frequently characterized by interest group and coalition-based activity, as well as the use of political strategies including agenda-setting (Pettinicchio 2013), problem definition (Itkonen 2009; Jeon and Haider-Markel 2001), venue-shopping (Nagel 2006), and framing/narrative (Shapiro 1994).

What do these policy changes look like, and how can we explain both the occurrence of major policy changes and the variation in timing? The study uses a mixed methods study to address these questions and a three-manuscript format to address these

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1 For this study, CIE-focused services refer to a variety of services provided to support individuals in paid work (i.e., at least minimum wage) that occurs in an integrated setting (i.e., with individuals without disabilities). Such services include supported employment and customized employment. Non-CIE services include those services that do not yield such outcomes, such as day habilitation, respite, community access, sub-minimum wage employment, and sheltered workshop participation. Selected traditional supported employment services, including group supported employment (e.g., work crews and enclaves) are considered by some to be outside the realm of CIE.
questions. A secondary objective of the study is to advance the development of both scholarly and practitioner-oriented theoretical frameworks. For all three manuscripts, the Advocacy Coalition Framework (ACF) serves as the main theoretical foundation. Each manuscript takes a slightly different perspective on the ACF, with the intent of refining, extending or connecting to existing theoretical- and practitioner-oriented frameworks.

This introduction is followed by three manuscript-style chapters, before offering a conclusion with a broader discussion of the results and prospective research opportunities. As a manuscript-style dissertation, each of Chapters 2-4 include a unique rationale, research question(s), description of the theoretical framework(s) and findings. Furthermore, each manuscript is tailored to reflect a slightly different audience, while contributing to the overall objectives of the study. The remainder of this introduction provides an overview of the research questions addressed by the study, a description and rationale for the primary theoretical frameworks and related developments, the overall methodological approach and underlying epistemology, and a summary of the main findings.

1.1 Study Objective and Research Questions

The study’s main objective is to explain how and why states shifted toward prioritization of CIE outcomes via changes to the service mix. However, each manuscript is associated with specific research questions that reflect iterative stages in the research process and related lines of inquiry.

1.1.1 Manuscript 1

When confronting questions related to policy change, a researcher can select from among a long menu of potential frameworks, each offering a unique lens on the policy process. The frameworks differ by level of analysis, vocabulary and concepts, relationships among key variables, and model of the individual (Heikkila and Cairney 2017). While there are no definitive guidelines on framework selection and application, researchers are advised to consider the research question(s), design and context (Weible 2014).

After careful consideration, the Advocacy Coalition Framework emerged as the best candidate for addressing the main objective of this study. The ACF, a longstanding
policy process framework developed by Sabatier and Jenkins-Smith (1993) posits that major policy change results from competition between advocacy coalitions with opposing policy core beliefs. A primary motivation to use the ACF was its focus on the main research question, namely the determinants of policy change. The selection was also predicated on an initial scan of national activities related to recent policy changes, which suggest strategic attempts by stakeholders to collectively influence policy, as well as an expectation of encountering coordinated resistance along the way, which points to the potential presence of advocacy coalitions. The ACF is also built around conceptual elements that are aligned with previous findings about policy change in a disability-focused policy context, as well as selected elements of a systems-level framework used to explain individual outcomes. Finally, the ACF’s level of analysis (i.e., subsystem) is conducive to state-level policy change in a low salience issue area that is likely to be constrained to a broad group of subsystem-level policy actors.

However, there is little empirical evidence of a coalitional presence in existing literature, possibly due to the lack of attention to politically-oriented factors. Moreover, the ACF is typically applied to high salience and contentious policy issues (Sabatier and Weible 2007), leaving uncertainty about the viability of the framework in historically low salience and historically collaborative subsystems, such as Day Habilitation and Employment subsystems. The first manuscript therefore poses the questions: 1) Is there evidence of advocacy coalitions within these policy subsystems, particularly in relation to the policy changes of interest? and 2) If so, does the character of identified advocacy coalitions and other subsystem characteristics warrant the use of the ACF to explain observed policy changes? Addressing these research questions as a distinct manuscript follows recent recommendations to conduct studies of coalition identification and characterization separately from analyses of policy change (Pierce et al. 2017).

From a practical perspective, this descriptive study is primarily intended to validate (or invalidate) the use of the ACF. However, the manuscript also contributes to the policy process literature by extending theoretical viability of the ACF to relatively low salience and historically collaborative settings. Finally, the manuscript offers insights into the nature of the values and beliefs of key stakeholders with divergent policy preferences,
which may prove useful to advocates and policymakers as they consider the potential consequences of policy decisions.

1.12 Manuscript 2

The second manuscript is more squarely focused on characterizing the observed policy changes and identifying the conditions that led to state-level policy change. While Employment First policy changes have been counted and characterized with respect to form, including directive, executive order, and legislation (Nord 2014; LEAD Center, n.d.), there has been little effort to systematically characterize recent policy changes. Moreover, disability researchers have focused considerable effort on explaining participation in CIE-related services, including the development of a Systems Change model that incorporates a variety of systems-level factors, which are expected to yield positive changes to individual outcomes (Butterworth et al. 2017; Hall et al. 2007). Despite highlighting policy change as a key factor, however, the model does not identify the conditions that are expected to lead to policy change, and disregards political factors that have been shown to matter in extant literature on policy change. As such, the second manuscript poses the following research questions: 1) What does state-level CIE-focused policy change look like? 2) Why and how did CIE-focused policy change occur? and 3) Why did states vary in the timing of policy change?

The second manuscript contributes to our understanding of Employment First policy adoption identifying key conditions leading to policy change, as well as conditions that yield variation in the timing of change. The manuscript also Lijtition Framework, leveraging conceptual insights from both frameworks to contextualize the empirical application. Finally, the application contributes a contextualized distinction between major and minor policy change that builds on fundamental ACF guidelines, providing traction for understanding the sequential nature of policy changes in both subsystems.

1.13 Manuscript 3

One of the findings derived from the second manuscript relates to the role of coalition defection for timing of the observed changes. The defection of most service providers from one coalition to the opposing coalition was associated with early, but not
later, policy change. Instead, later policy change, which was enabled by federal guidance, was tempered by continued service provider commitment to the status quo and opposition to reform. This finding is aligned with ACF hypotheses, but not fully explained by it, offering an opportunity for ACF refinement. ACF scholars hypothesize that shifts in coalition defection are a causal mechanism for policy change (Nohrstedt 2011), especially in response to external or internal system events. However, case data and extant literature pointed to an earlier process of incremental policy change leading to the important shift in coalition membership, and ultimately the major changes that were the focused of the second manuscript. Importantly, the ACF hypothesizes that major policy change will most likely be associated with nonincremental events. In contrast, the Theory of Gradual, Institutional Change (GIC) is a recently developed framework that offers a typology associated with gradual (incremental) and transformative (major) change, as well as an underlying theory to account for such changes.

The focus of the third manuscript, therefore, is on proposing an extension of the ACF that provides a richer description of the process leading to major policy change, specifically: 1) to identify strategies for using concepts from the GIC in the context of the ACF; and 2) to illustrate the added value of an extended framework. The third manuscript provides rationale for the need to extend the ACF with the GIC, strategies for incorporating GIC conceptual elements, and an illustration of the proposed extension that draws on one of the cases in the second manuscript, supplemented with data from extant literature.

The manuscript offers a richer explanation for the observed policy changes that builds on the ACF-related findings without negating them. The extension articulates the relevance of historical (incremental) policy changes in one period to subsequent subsystem conditions and policy changes in the next. Furthermore, it yields insights into the causal mechanism (in this case, coalition membership shifts) that resulted in transition from one period to another. Finally, the proposed extension is likely to expand the scope and relevance of the ACF to subsystems facing similar conditions, including other social policy and service-oriented subsystems, especially those that can accommodate dual-tracked and conflicting policy options.
1.2 Overall Approach and Methods

This study takes an iterative and integrative approach to meeting the main objective. All three of the manuscripts rely on a common theoretical foundation and data sources, although each uses slightly different theoretical refinements and methodological approaches to address the specific research questions of interest. As described earlier, the ACF, which explains policy change as resulting from competition between advocacy coalitions, serves as the main theoretical framework that guides this study’s data collection and analysis efforts. With at least 240 ACF applications between 1987 and 2017, the ACF is a well-developed and oft-tested framework (Pierce et al. 2017; Weible et al. 2009). As such, data collection and analysis efforts were tailored to reflect ACF conceptual elements and methodological standards. That said, scholars are still grappling with ways to refine the theory, innovate and standardize methods and apply to new settings (Jenkins-Smith et al. 2017), offering an opportunity for new applications to yield a meaningful contribution to the literature.

Ontologically and epistemologically, this study conforms to a postpositivist perspective, wherein “reality” is knowable, but only imperfectly, and inference is broadly based on the capacity to falsify findings (Guba and Lincoln 1994). The overall research design is a case-based, mixed methods approach (Creswell 2007) wherein each manuscript relies on a common data pool while using a unique analytic strategy to address the specific research question(s) of interest. Two “diverse” cases (Seawright and Gerring 2008), Day Habilitation and Employment subsystems in Washington and Pennsylvania, are the unit of analysis for the first two studies, while the third study uses data from Washington alone. The study relies on multiple data sources, both primary and secondary, including stakeholder telephone interviews, policy documents, media, advocacy materials and extant databases. Extant literature produced by disability researchers also serves as an important source of information, as the policy changes of interest have received considerable attention in the disability literature, both peer-reviewed and “grey” literature. While the reliance on two cases limits the generalizability to the broader population, the research design offers analytic generalizability, clearing a path for future research.
Each manuscript serves a unique purpose and is oriented toward a different audience, even while all three manuscripts contribute to the greater objective. As such, the manuscripts emphasize slightly different gaps and opportunities, conceptual elements, and methodological or theoretical details. The overall result, however, advances toward the main objective, strengthened by the iterative approach and unique contribution of each individual manuscript. While this study does not provide evidence that these pathways to change apply to other states, it identifies at least two such pathways, and highlights the potential for a given outcome to result from different combinations of conditions, known as equifinality (Ragin 1987/2014). Additional research is necessary, however, to assess the frequency of the identified and alternative pathways to policy change.

1.3 Findings and Expected Contributions

While the findings all contribute to the overall objective, there are several manuscript-specific findings that are expected to contribute to both policy and theory.

The first manuscript provides evidence of competing advocacy coalitions, Choice and Employment First, in both states. The Choice coalition is associated with a preference for the status quo, a dual-tracked system that permits both day habilitation and/or CIE-focused services. In contrast, the Employment First coalition pursues policy reforms that prioritize CIE-focused services, including limits on non-CIE services, such as sheltered workshops, sub-minimum wage and day habilitation activities. The second manuscript builds on these findings, identifying multiple conditions under which “major” policy change occurred in both states, including coalition-motivated stakeholder mobilization and strategic use of information, heightened political attention, and bureaucratic advocacy.\(^2\)

Furthermore, service provider coalition defection is associated with the early timing of

\(^2\) For the purposes of this study, “major” policy change includes changes associated with each coalition’s policy core beliefs, namely changes that limit non-CIE services. Minor changes include those that maintain the status quo of a dual-tracked service system, including those that incentivize CIE-focused services. This definition, which is aligned with the ACF categorization of policy change, contextualizes the definition for the subsystem of interest.
policy change in one of the cases, and raising questions about the antecedents to change that are not easily explained by the ACF. The manuscript articulates an approach for characterizing major policy changes and identifying explanatory factors, as intended. However, the manuscript also demonstrates the alignment between the Systems Change model and the Advocacy Coalition Framework, leveraging conceptual insights from both frameworks to contextualize the empirical application. Finally, the application contributes a contextualized distinction between major and minor policy change that builds on fundamental ACF guidelines, but also offers traction for understanding the sequential nature of policy changes in both subsystems. The third manuscript picks up with that last observation, extending the ACF with insights from the Theory of Gradual, Institutional Change and illustrating that a much earlier, incremental process of policy “layering” transitioned to more dramatic policy “displacement,” namely via shifts in coalition membership.

From a theoretical perspective, the findings contribute to the development of the Systems Change Framework and the Advocacy Coalition Framework. The study’s findings are aligned with elements in the Systems Change model and echo some of the findings associated with that model. However, this study offers additional insight into the political factors at play, especially the specific combinations of causal conditions and mechanisms that contribute to the occurrence and timing of major policy change. While the study does not explicitly combine the two frameworks, the findings associated with this study contribute to our understanding of the patterns of change observed in the two cases and could be used to refine the Systems Change framework for understanding the patterns of policy change in other states. The study makes more explicit contributions to the ACF by demonstrating the potential for: 1) application of the ACF to a context outside its typical scope, namely a low salience subsystem; and 2) explicit extension of the ACF via the GIC, which offers new insights into the process of change. These efforts forge a way forward for scholars who are interested in examining policy change in similar contexts and leave open the possibility of additional refinements.

From a policy perspective, advocates representing both coalitions are undoubtedly aware, and regularly leverage, the opportunities presented by the conjunction of conditions
in various states. However, this study provides more explicit insights into the signals associated with policy change, which may be useful for policymakers who are not as closely connected with subsystem issues, given the low levels of public attention accorded to the subsystem. At a national level, advocates and policymakers have supported a variety of Employment First efforts. The findings, especially those in the third manuscript, highlight the implications of early policy change for subsequent policy developments, suggesting that state-level convergence may require a substantially higher level of support in states on the “late” policy change pathway.

Perhaps more importantly, state-level variation and policy change are more than an abstract concept to the individuals who receive services. Over 600,000 working-age adults in the United States receive Day Habilitation and Employment Services from state-level I/DD agencies (Butterworth et al. 2016). With the ongoing shift from facility-based to community-based services (Lulinski et al. 2018) and the broad decentralization of social safety net services (Bruch et al. 2016), state governments will likely continue to play an important role in the lives of individuals with I/DD who have long-term support needs. The number of individuals served by I/DD systems has grown significantly, doubling from around 300,000 individuals in 1988 to over 600,000 in 2013 (Butterworth et al. 2016). Moreover, recent estimates suggest that among 7.4 million individuals with I/DD in the United States, only 20% were known to and served by states agencies in 2016 (University of Minnesota n.d.), suggesting that the need for services and supports may be much higher. While the federal government plays an important policy influence, especially via funding and guidance, state policy decisions ultimately affect the everyday experience of individuals served by I/DD agencies. As such, an enhanced understanding about how, why and when key state-level policy changes occur is essential to ensuring equitable, efficient and effective public services.
2. ADVOCACY COALITIONS IN LOW SALIENCE POLICY SUBSYSTEMS: STRUGGLES UNDER A SMOOTH SURFACE

2.1 Introduction

The Advocacy Coalition Framework (ACF) is a well-established framework that has been used to understand policy change at the policy subsystem level for over a quarter-century (Sabatier and Jenkins-Smith 1993; Weible et al. 2011). The ACF is predicated on the idea that competing coalitions within policy subsystems contend to influence decisions made by government authorities, ultimately affecting institutional rules, policy outputs and impacts (Sabatier and Jenkins-Smith 1993). Competing advocacy coalitions can be identified by their distinct belief systems and level of coordination (Sabatier and Jenkins-Smith 1993). As Weible and Sabatier (2006) note, however, the ACF may not be as applicable to subsystems lacking clear coalitions, including subsystems involving low salience issues or new and technical policy issues that “operate outside the public’s eye” (132). Indeed, much of the existing literature has focused on relatively high salience issues, such as water rights (e.g., Crow 2008), hydraulic fracturing (e.g., Heikkila et al. 2014) and charter school expansion (e.g., DeBray et al. 2014).

Due in part to this tradition, the ACF offers little direct guidance about its applicability to low salience settings, treating issue salience only indirectly via the concepts of public opinion (Jones and Jenkins-Smith 2009) and conflict (Sabatier, Hunter and McLaughlin 1987; Weible 2008; Weible and Heikkila 2017). Jenkins-Smith et al. (2018) urge policy process scholars to explore the applicability of ACF in “nontraditional settings” (158). This paper responds to that challenge by testing for evidence of competing coalitions in state-level systems of publicly-funded Day Habilitation and Employment services for working-age adults with intellectual and developmental disabilities (I/DD). Since the early 2000s, over 30 states have adopted policies prioritizing competitive, integrated employment (CIE) opportunities for individuals with I/DD who receive publicly-funded services and supports (Butterworth et al. 2014; Butterworth et al. 2017; Nord 2014; Winsor et al. 2017).

This study follows the recent recommendation from Pierce et al. (2017a) to conduct ACF studies of coalition identification and characterization separately from analyses of policy change and learning. Specifically, this paper addresses the following research questions: 1) Is there evidence of advocacy coalitions within these policy subsystems, particularly in relation to the policy changes of interest? and 2) If so, does the character of identified advocacy coalitions and
other subsystem characteristics warrant the use of the ACF to explain observed policy changes? The paper uses a mixed methods approach (Creswell 2014) with data from two states, Washington and Pennsylvania, to address these questions.

Except for the work of a handful of scholars (e.g., Jeon and Haider-Markel 2001; Itkonen 2007/2009; Schneider and Ingram 1993; Schriner 2005), policy process frameworks have rarely been applied to disability-related policy. Moreover, there appears to have been no scholarly attempt to explain the changes experienced since 2000 in the Day Habilitation and Employment subsystems in the context of the ACF. Erkulwater (2006) notes that disability-related policy has received such little attention because “political scientists are generally interested in explaining controversy, and they see very little of it in disability programs” (14). Disability researchers have extensively studied policy-related issues, including Day Habilitation and Employment Services (e.g., Hall et al. 2007; Niemiec et al. 2009; Rogan and Rinne 2011; Winsor et al. 2006). These inquiries, however, rely on goal-oriented frameworks that minimize attention to opposition, coalition-based activity and other political factors. This study fills those gaps with a preliminary exploration of the Day Habilitation and Employment system through the lens of the Advocacy Coalition Framework.3

Using a mixed methods approach, the study yields evidence of at least two advocacy coalitions (Employment First and Choice) in the policy subsystems that provide Day Habilitation and Employment services to individuals with I/DD in both Washington State and Pennsylvania. These coalitions fulfill ACF expectations of divergent policy core beliefs and policy preferences, as well as evidence of coordination. However, the overall subsystem is more collaborative than adversarial, the coalitions are not easily delineated by stakeholder type or organizational affiliation and coordination of opposition activities tends to be episodic and reactive. These observations suggest that the ACF is an appropriate framework for exploring the conditions that have led to state-level prioritization of CIE-focused policy since 2000, but also that its application may require theoretical refinements, such as clarification of policy conditions that are likely to lead to coalition activity. Importantly, the results indicate that low salience subsystems

3 This study intentionally precedes a comparative application of the ACF to examine policy changes.
may appear smooth on the surface, but undergo struggles and competition for policy gains, similar to more salient and contentious subsystems.

The results of this study are relevant for theory development, as well as practical policy application and learning. The ACF tradition of examining coalitions and policy change in high salience settings is analogous to selecting cases on the dependent variable; by expanding the range of cases to “least likely” settings (Brady and Collier 2010; Gerring 2007), we learn more about the applicability of the ACF. Second, while the findings cannot be generalized to a broader set of cases, analysts may glean methodological insights about whether and how to apply the ACF 1) in other subsystems or issue areas, or 2) as counterfactual cases in high salience subsystems or issues. Third, the study makes observations about types of policy change that are likely to yield coalition-based activity and conflict in otherwise collaborative subsystems. Finally, this study illuminates CIE-related policy decisions in the selected states and may inspire innovation in the theories of change used by policymakers and advocates to inform decision-making.

2.2 Theoretical Framework

The Advocacy Coalition Framework (ACF) posits that within policy subsystems, competing coalitions take advantage of resources and strategies to influence subsystem-related decisions made by government authorities, ultimately affecting institutional rules, policy outputs and impacts (Sabatier and Jenkins-Smith 1999). The primary analytic unit in the ACF is the policy subsystem, which can be identified by content area, geographic boundaries and/or engaged stakeholders. The subsystem is assumed to include a broad set of subsystem actors inclusive of government staff, politicians, interest groups, consultants, scientists and others (Sabatier 1988; Sabatier and Jenkins-Smith 1993).

The ACF describes policy actors’ belief systems as three distinct tiers: 1) deep core beliefs; 2) policy core beliefs; and 3) secondary beliefs (Sabatier and Jenkins-Smith 1993). Core beliefs include fundamental beliefs about norms and the way the world works, and they are unlikely to change over time. Policy core beliefs are subsystem- or policy-specific beliefs about

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4 This analogy applies the term “case” loosely, as in generic cases of coalition formation and policy change.
problems, priorities and values and can be either normative or empirical. Secondary beliefs include more instrumental beliefs about the means required for goal achievement; they tend to be narrower in scope and more empirically-based.

Advocacy coalitions are one of the defining features of the ACF, which conceptualizes them as the subset(s) of policy subsystem actors “who share policy core beliefs and who coordinate their actions in a nontrivial manner to influence a policy subsystem” (Jenkins-Smith et al. 2018, 148). Accordingly, policies and programs (and policy/program preferences) can be thought of as translations of belief systems (Sabatier and Jenkins-Smith 1999; Weible et al. 2009). The theory’s dependence on belief systems to characterize and motivate policy decisions stems from the assumption that boundedly rational individuals primarily use belief systems to filter information and simplify the world in response to uncertainty and limited cognitive abilities (Jenkins-Smith et al. 2018). Policy change and policy learning are presumed to be subject to coalition beliefs, resources and strategies, political opportunity structures and other resources and constraints (Sabatier and Weible 2007).

The ACF proposes multiple hypotheses about coalition formation, maintenance and characteristics. First, the ACF expects that “the lineup of allies and opponents will tend to be rather stable over periods of a decade or so” (Sabatier 1988, 141), which has been largely substantiated by the ACF literature (Jenkins-Smith et al. 2018). Policy actors are expected to show consensus on policy core issues even when they differ on secondary aspects and thus to surrender secondary aspects before giving up on policy core beliefs, although these propositions have yielded mixed support (Jenkins-Smith et al. 2018). Lastly, the ACF anticipates variation by stakeholder role and organization type, with administrative agencies expected to advocate more moderate positions than their interest group allies, and actors from material groups expected to be less constrained in their articulation of beliefs and policy preferences than purposive groups, although these last two propositions have rarely been tested (Jenkins-Smith et al. 2018).

While the ACF does not explicitly address either salience or conflict, several scholars have explored these concepts through an ACF-informed lens. Jones and Jenkins-Smith (2009), for example, posit that public opinion interacts with policy subsystems exogenously via “salience disruption” and endogenously via “policy dimension-shift” (48). They further hypothesize that greater/lesser issue salience (relative to other subsystems) will increase/decrease the role of public opinion as both a constraint and a resource (Jones and Jenkins-Smith 2009), suggesting
that the dynamics of policy change might look different in a low salience setting. The concept of conflict is introduced by Weible (2008) through a typology that characterizes subsystems as unitary (low conflict), collaborative (intermediate conflict) and adversarial (high conflict), positing conditions under which 1) expert-based learning is likely to occur and 2) subsystem shifts are likely to occur. Weible and Heikkila (2017) leverage key ACF elements to explore the dynamics of conflict in the Policy Conflict Framework, proposing a “conflict intensity spectrum” ranging from no conflict to high conflict based on position divergence, threat from policy positions and willingness to compromise (Weible and Heikkila 2017, 30). While these developments underscore the relevance of salience and conflict to the ACF, they do not preclude coalitional activity or related policy change in low salience settings. Furthermore, they may provide opportunities for theoretical refinement in such settings. This paper explores those possibilities through an examination of two low salience subsystems.

2.3 Subsystem Context

Jenkins-Smith et al. (2014) highlight the opportunity for the ACF to contextualize methods, concepts and findings. Accordingly, this section delineates the policy subsystems in each state, describes the nature of Day Habilitation and Employment subsystems and related policy change more broadly, and provides the rationale for expecting issues related to these subsystems to be low salience.

2.31 Delineating the Policy Subsystems

For this study, the policy subsystems of interest are those that provide Day Habilitation and Employment services and supports to working-age adults with intellectual and developmental disabilities. These subsystems, which are present in all US states but vary substantially, often offer supported employment, training and pre-vocational services and day habilitation/recreation activities (Agranoff 2011; Gettings 2011). Long-term services and supports, including Day Habilitation and Employment services, are predominantly funded by federal Medicaid Home- and Community-Based Services (HCBS) waivers, which are managed by state-level I/DD units (Agranoff 2011; Gettings 2011; Hemp et al. 2016). Related services and supports (e.g., short-term services and high school transition services) are funded by vocational rehabilitation and education agencies.
The Day Habilitation and Employment subsystems in Washington State and Pennsylvania have been selected for this application. Based on Sabatier and Jenkins-Smith’s (1993, 1999) guidelines, the policy subsystems in the selected states are delineated to include stakeholders that are responsible for policy, service provision, advocacy and research related to the Day Habilitation and Employment subsystem. Stakeholders include core government stakeholders, including representatives from departments of Intellectual and Developmental Disability (often housed in departments of human services). Members of publicly-funded partnerships, including federally-mandated and federally-funded Development Disability Councils (DD Councils) and Protection and Advocacy Services (P&As), are also key state-level stakeholders, as are members of national and state-level non-profit interest groups (e.g., The Arc, Goodwill Industries). Professional associations representing national or regional rehabilitation professionals (e.g., ASPE/Association of People for Supported Employment, ACCSES, ANCOR) and researchers (e.g., Association of University Centers on Disability) may also be important stakeholders in the subsystem. Finally, peripheral stakeholders in the subsystem may include other government stakeholders, including representatives from departments of vocational rehabilitation, education and/or workforce development.

2.32 Policy Changes

The state-level policy changes observed since the early 2000s, frequently labeled “Employment First” policy, typically pronounce competitive, integrated employment (CIE) as the priority outcome for services and supports for individuals with I/DD (Butterworth et al. 2016; Nord 2014; Wehman 2018), although there is wide variation in timing, form and content (Winsor et al. 2017; Nord 2014). Policy changes include expansion of CIE-focused services and/or restriction of non-CIE services and supports, often relying on changes to resource allocation, service provider contracts, interagency collaboration, and service options or restrictions (Niemiec et al. 2009; U.S. Department of Labor n.d.; Winsor et al. 2017; Wehman 2018).

The interest in providing access to employment-related services for individuals with I/DD is not new. While sub-minimum wage work has been available since 1938 via the Fair Labor Standards Act (FLSA), the development of sheltered workshops (i.e., segregated, sub-minimum wage work) during the 1970s and 1980s provided publicly-funded access to training and employment opportunities for adults with disability outside of the formal education system.
In the mid-1980s, “supported employment” services initially became available via Medicaid waivers; such services included job coaching, specialized job training and customized supervision, intended to support individuals with disability in competitive employment positions. These services have been offered and promoted by both the federal and state governments since the 1980s, especially via Home- and Community-Based Services (HCBS) waivers for long-term services and supports (Agranoff 2011; Friedman 2016; Friedman and Rizzolo 2016; Gettings 2011; LeBlanc et al. 2000).

Alongside employment services, most states also offer a variety of Day Habilitation and Employment services, including non-employment services (i.e., day habilitation or respite), as well as non-competitive employment-related supports (i.e., sub-minimum wage) and/or services in non-integrated settings (i.e., facility-based/sheltered workshop services) (Friedman 2016; Friedman and Rizzolo 2016). Medicaid long-term services waivers, which are the result of negotiations between the state and federal government, are the primary source of funds for day habilitation and employment services (Gettings 2011).

2.33 Subsystem Salience

Several observations suggest that issues related to Day Habilitation and Employment services are likely to be low salience. First, individuals with disability have long been identified within the social construction literature as a “deserving” target population (Schneider and Ingram 1993; Schriner 2005), suggesting little broad opposition to the provision of publicly-funded supports for that population. A recent Harris Poll survey (2015) indicates that most people from both political parties support the provisions of the 1990 Americans with Disability Act, as well as Social Security Disability Insurance. Similarly, employment is typically considered a positive policy outcome, despite longstanding political struggles over the balance between the roles of the state and the market (Weir 1992). Furthermore, the subsystems target a small and narrowly defined target population, with approximately 610,000 served across the United States in 2015 (Butterworth 2016), and most long-term service and supports are funded by the Medicaid system. In Wilson’s (1991) typology, the subsystems are likely to be characterized by client politics, with concentrated benefits and diffused costs. As such, we might expect public attention and subsystem conflict to be low. However, an initial scan of national activities related to recent policy changes suggests strategic attempts by stakeholders to collectively influence policy.
“Employment First” has been described as a “grassroots movement with progressive rehabilitation professionals as its core” (Racino 2015, 160), in addition to being the namesake for formal policy changes. Employment First has also served as an organizing principle for professional association activities (e.g., Association of People for Supported Employment First) and related communities of practice (e.g., State Employment Leadership Network). Finally, several federal government initiatives specifically support and promote Employment First policy change (e.g., U.S. Department of Labor Office of Disability Employment Policy Employment First State Leadership and Mentoring Program (EFSLMP) grants; U.S. Department of Health and Human Services Association of Intellectual and Developmental Disabilities Partnerships in Employment Systems Change (PIE) grants). These observations suggest the presence of policy change advocates who expect to encounter resistance along the way, potentially in the form of coordinated opposition.

Contextualization is a common feature of ACF applications (Jenkins-Smith et al. 2014). In seeking evidence of advocacy coalitions, this study considers the implications of the nature of these subsystems and related policy changes for coalition activities.

2.4 Methods

The study uses a mixed methods analysis of the Day Habilitation and Employment subsystems in two states, Washington and Pennsylvania. The methods were inspired by calls to use common ACF approaches and strike “the right balance in fitting the framework to answer questions in a particular context” (Jenkins-Smith et al. 2014, 207), as well as recent recommendations to use transparent and compelling analytic approaches (Pierce et al. 2017b).

2.41 Data Sources

The study uses both respondent interview data and newspaper coverage from the two states as its primary data sources. The two states in this study, Washington and Pennsylvania, were purposively selected as “diverse” cases (Gerring 2007; Seawright and Gerring 2008) in

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5 Interview data proved to be the best source of coalition presence due to the lack of media attention. Coalition-specific materials were also collected as a secondary data source, but were insufficient as primary source material.
order to maximize variation in the timing of policy adoption, as well as initial policy outcomes and changes in policy outputs from 1999-2014. They were selected from among the 50 U.S. states on the basis of CIE-focused policy adoption (“Employment First” legislation or executive order) and CIE policy outputs (1999 levels and 1999-2014 changes in integrated employment). In qualitative terms, Washington represents early CIE-focused policy change (2007) and Pennsylvania represents late change (2016-17). The sampling frame is shown in Appendix A1.

2.42 Data Collection and Analysis

Pierce et al. (2017b) find that the most compelling ACF applications demonstrate multiple policy core beliefs, describe coordination and apply network or cluster analysis to study coalition structures. The analytic approach in this study is based on these findings, as well as a review of selected applications that use related techniques (e.g., Nohrstedt 2008; Pierce 2011; Weible & Sabatier 2009). The study relies on a combination of telephone interviews (n=36) and newspaper items (n=148) as its primary data sources. Policy documents were also collected systematically and consulted to corroborate interview findings. The study uses data transformation (qualitative to quantitative), a variant of mixed methods triangulation design that facilitates the use of both qualitative and quantitative data to inform the findings (Creswell 2007).

The paper follows the recommendation of Epstein and Segal (2000) to measure issue salience via “contemporaneous” media coverage (i.e., how the issue was viewed at the time that it occurred). A LexisNexis search of state-specific newspapers in Washington and Pennsylvania was conducted to gauge media coverage of the subsystem and issue-specific policy changes between 2000 and 2017. Irrelevant articles (e.g., award announcements) were omitted from the

6 At the time of case selection, relevant policy outcomes data were only available through 2014.
7 LexisNexis search terms included: (("disabled" OR "intellectual disabilit*" OR "cognitive disabilit*" OR "developmental disabilit*" OR "mental* retard*" OR "special needs") AND ("employment services" OR "sheltered workshop" OR "enclave" OR "sub-minimum wage" OR "vocational rehabilitation" OR "supported employment" OR "integrated employment" OR "wage certificates" OR "employment first")). The LexisNexis search was supplemented by a Gale PowerSearch of The Seattle Times using the same search terms.
8 The LexisNexis database does not include full coverage of The Seattle Times, which has the largest distribution in Washington State. As such, I supplemented the LexisNexis search with a search of Seattle Times articles.
set, yielding a total of 47 items from 8 Washington newspapers and 101 items from 27 Pennsylvania newspapers. Newspaper items, including articles, editorials and letters to the editor, were manually coded as high-, medium- or low-relevance. High-relevance articles included those relating to the target population and service type and to public policy, as well as those with direct relevance to CIE-related policy decisions. Medium-relevance articles included those relating to the target population and service type and to broad public policy issues (e.g., budget), but with no direct relevance to specific CIE-related decisions. Low-relevance articles included those relating to the target population but without any policy-related issues; most of these articles were program descriptions and/or human-interest stories.

To identify interview respondents, a systematic Google search was first conducted in each state to identify subsystem policy and advocacy documents. Documents were reviewed for relevance, with relevant documents then coded for stakeholder name, title, organization and stakeholder type (e.g., government agency or partnership, service provider, interest group, professional association, media, research/think tank, other). Stakeholders with the highest document citation frequencies within each stakeholder category were selected for initial contact. The search-based sample was supplemented with snowball sampling; most respondents included additional stakeholder names within their interview responses and in response to a request to identify high-priority stakeholders in the subsystem. Stakeholders identified multiple times during the interview process and stakeholders described as representing an alternative viewpoint were also contacted for interview. All interview respondents were assured anonymity in order to promote candid responses.

In total, thirty-six semi-guided telephone interviews in the two states (20 in Washington; 16 in Pennsylvania) were conducted. The response rates among those sent initial e-mail invitations were 47 percent and 24 percent in Washington and Pennsylvania, respectively.

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9 While the LexisNexis search was useful for measuring salience, Google searches were far more fruitful for identifying a broad array of specific organizations and individuals in the policy subsystem, primarily due to the low return of high-relevance newspaper items.

10 An additional 21 national-level respondents were identified and interviewed using similar respondent selection processes. Those responses were not included directly in this study, although data from those interviews were used for context and to interpret responses to questions about collaboration.
However, the completion rate among individuals who responded to the initial e-mail invitation was higher: 80 percent in Washington and 67 percent in Pennsylvania. Most of the non-responses in Pennsylvania reflect non-response to both the initial e-mail invitation and follow up telephone call(s). All interviews included a series of questions about the respondent’s background, current policy context, policy changes over time, policy process conditions and events and collaboration and collaboration avoidance. These questions were designed to elicit broad information about policy changes and the policy actor’s role. See Appendices A2 and A3 for the interview guide and number of responses by stakeholder type. All interviews were recorded and transcribed. The average interview time was 50 minutes.

The respondents represented stakeholders in each state’s subsystem of Day Habilitation and Employment services for individuals with I/DD from a variety of stakeholder groups, including government agencies, interest/advocacy groups, service providers and professional associations. Many respondents described having engaged in the policy subsystem for over a decade, some for as long as forty years. Several stakeholders had held positions with multiple stakeholder groups during their careers. Many respondents described a personal connection with the policy subsystem, such as having a close family member who experiences I/DD.

Qualitative coding and analysis were conducted on all state-level interviews, using a multi-stage approach, including: 1) a preliminary scan for evidence of subsystem controversy and/or opposition to policy changes; 2) an initial coding strategy (Lofland et al. 2006); and 3) a focused coding strategy (Lofland et al. 2006). All coding efforts were informed by the ACF belief system typology and instrument developed by Sabatier and Jenkins-Smith (1993), as well as more recent ACF applications (e.g., DeBray-Pelot et al. 2007; Hirschi and Widmer 2010; Pierce 2011). As shown in Table 2.1, the coding scheme included tags within the three ACF belief tiers, including 13 interview-informed categories that align with ACF guidance and applications.

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11 The vast majority of non-responses in both cases reflect potential respondents who simply did not respond to initial e-mail and telephone requests.
Table 2.1: Subsystem Belief System

<table>
<thead>
<tr>
<th>Core beliefs</th>
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<tbody>
<tr>
<td>Value of providing services and supports [to individuals with I/DD]</td>
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<tr>
<td>Value of individualizing services [for individuals with I/DD]</td>
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<tr>
<td>Role of the government [regarding authority to select or limit service options for individuals with I/DD]</td>
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<tr>
<td>Stakeholder motivations [for supporting or opposing CIE prioritization]</td>
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<tr>
<td>Capacity [of individuals with I/DD] to work [in competitive, integrated jobs]</td>
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<tr>
<th>Policy core beliefs</th>
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<tbody>
<tr>
<td>Nature of the policy problem</td>
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<tr>
<td>Cause of the policy problem</td>
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<tr>
<td>Priority policy outcome</td>
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<tr>
<td>Target sub-populations</td>
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<table>
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<tr>
<th>Secondary policy beliefs</th>
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<tr>
<td>Evidence basis of CIE effectiveness</td>
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<tr>
<td>Policy Preference</td>
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Conceptually, the ACF makes a clear distinction between core beliefs and policy core beliefs. However, the nature of the interview data, which intentionally focused the conversation on the policy subsystem, makes it challenging to distinguish between policy-relevant beliefs and generic beliefs about the nature of the world. For example, respondent statements about the value of services and supports typically related to Day Habilitation and Employment services for individuals with I/DD, rather than more generic statements about the value of human services.

For each category, coding tags were developed to characterize the respondent’s belief system (e.g., “Nature of problem: Un/underemployment”; “Government Authority: Government cannot/should not prescribe choices”) and respondent statements were then tagged accordingly. A binary coding scheme, presence/absence, was used to classify evidence of each respondent’s beliefs for each coding tag. See Appendix A4 for detailed coding tags. Ultimately, the data were recoded quantitatively, with “1” and “0” indicating presence and absence of the coding tag, respectively, such that a “0” potentially represented both item non-belief and non-attention.

While the coding scheme may have the effect of under- or overestimating the degree to which selected respondents align with specific belief systems, there is no a priori reason to believe that respondents differ in their tendency to articulate specific beliefs based on their policy position or coalition membership. Preliminary results from the coding process were used to identify specific beliefs and belief systems that are qualitatively distinct. All coding was conducted using Dedoose 7.6.
Next, the preliminary results from the qualitative analysis were subjected to hierarchical cluster analysis to validate and refine the preliminary qualitative conclusions using SPSS Statistics 24. The between-groups method for binary data (Ochiai measure)\(^\text{12}\) was used to produce 2-, 3- and 4- cluster solutions and a related dendogram. The cluster analysis was conducted separately for each state, and equality of means and goodness of fit tests were performed on both models using discriminant analysis. Finally, cross-tabulations and Fisher’s exact test of statistical significance (2-sided) were used as supplementary measures of association to inform interpretation of the results. The evidence from qualitative and quantitative analyses was triangulated to address the research questions. While the quantitative results provided the basis for identifying key findings, qualitative data were used to supplement all findings.

2.5 Findings

2.5.1 Evidence of Salience

State-specific newspaper coverage in Washington and Pennsylvania suggests that CIE-related policy issues in both states receive low levels of public attention. Between 2000 and 2017, 8 Washington newspapers published a total of 47 items with some subsystem relevance, including 10 (20%) high-relevance items, 16 (34%) medium-relevance items, and 21 (45%) low-relevance items. During the same timeframe, 27 Pennsylvania newspapers published a total of 101 items with some relevance, including 24 (24%) high-relevance, 32 (32%) medium-relevance, and 45 (45%) low-relevance items. Editorials, op-eds and letters to the editor represented approximately one-quarter of all high- and medium-relevance items. In all, newspaper coverage amounts to fewer than two high-relevance items per year on average, suggesting that CIE-related issues were indeed low salience during the study period in both states’ Day Habilitation and Employment subsystems. The annual number of high-relevance items totaled five and twelve in Washington and Pennsylvania, respectively.

\(^{12}\) The Ochiai measure treats “0” values as neither similar nor dissimilar, which is appropriate given the data coding method (IBM Knowledge Center, n.d.a.).
As shown in Figure 2.1, the two states both show evidence of small increases in media coverage occurring just after the adoption of CIE-focused policy changes in 2007 (Washington) and proposed changes in 2016-17 (Pennsylvania), suggesting that media attention in both subsystems increased in response to issue-related conditions and changes, despite remaining generally low throughout the study period.

![Figure 2.1: High-relevance newspaper coverage, 2000-2017](image)

Despite the low levels of public attention, there is some evidence of conflict related to the prioritization of CIE at the subsystem level. At least 80% of interview respondents in both Washington and Pennsylvania associate the issue of CIE-focused policy changes with conflict. Washington respondents describe longstanding differences related to CIE issues since at least the early 2000s, including several attempts to repeal CIE-related rules and legislation, most recently in 2017. One respondent characterizes the differences as follows:

*There are people on each side of the issue. If you don’t give people employment, you’re a bad guy, and if you don’t give people access to something to do during the day, you’re a bad guy. If you can’t reliably deliver employment as something to do during the day, then that's a problem."* (WA_ind39, telephone interview, July 2017).

In Pennsylvania, respondents similarly describe a longstanding divergence in policy positions, but they also describe subsystem policy as having been stable and dominated by the status quo policy position until 2016-17, when CIE-focused rule changes were proposed by the Office of Developmental Programs. The response to that decision, which culminated in a protest
at the state Capitol and a partial retreat by the state agency, was described by one respondent as “a critical mass that evolved pretty quickly around ‘workshops are closing, we can't have this’” (PA_ind45, interview, September 2017) and by another respondent as being “as intense as I've ever seen it in the 40 years I've been here” (PA_ind65, interview, September 2017).

The interview responses suggest that both subsystems have experienced conflict and that the underlying divergence in policy positions is not new. However, more extreme conflict-related activity tends to be described in episodic terms, occurring primarily in response to policy change.

2.52 Evidence of Divergent Belief Systems

Hierarchical cluster analysis yielded two distinct clusters of policy-related beliefs in each state, as suggested by the dendograms presented in Figure 2.2. In this paper, the two clusters are labeled “Employment First” and “Choice,” reflecting both the colloquial use of those terms by respondents and the more formal use of the terms in advocacy materials, policy settings and peer-reviewed literature.
Figure 2.2: Dendograms of Coalition Membership, Washington (n=20) and Pennsylvania (n=16)
The discriminant function analyses associated with these clusters yielded canonical correlation statistics of 0.96 and 0.99 in Washington and Pennsylvania, respectively, indicating that the clustering solution is a good fit in both subsystems, with over 92 percent of the variation in the dependent variable (coalition membership) explained by each model. See Appendix A5 for the technical results of the equality of group means tests and cross-tabulations. There is substantial overlap between the variables that define the clusters in each state, as shown in Table 2.2 and described in more detail below.
<table>
<thead>
<tr>
<th></th>
<th>Washington</th>
<th>Pennsylvania</th>
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<tbody>
<tr>
<td>Core beliefs</td>
<td></td>
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<tr>
<td>Role of the government</td>
<td>Government should guide choices</td>
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</tr>
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<td>Value of services and supports</td>
<td>Value emphasized</td>
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</tr>
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<td>Value of individualized services</td>
<td>Value emphasized</td>
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</tr>
<tr>
<td>Stakeholder motivations (self-interest, values, fear)</td>
<td>Motivations vary</td>
<td>Yes</td>
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<td>Individual capacity to work</td>
<td>Everyone can work</td>
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<td>Individuals are un/underemployed</td>
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<td>Cause of the problem</td>
<td>Lack of exposure and low expectations</td>
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<td>Priority outcome</td>
<td>Employment</td>
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<td>Secondary policy beliefs</td>
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<td>Data-based evidence</td>
<td>Data supports CIE-focused policy</td>
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<td>Policy Preferences</td>
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<td>CIE-focused services</td>
<td>Preserve or expand CIE services</td>
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<td>Evidence of coordination</td>
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### Washington

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<td>Activities to oppose CIE prioritization</td>
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<td>Collaborate with Choice stakeholders</td>
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<td>Yes</td>
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</table>
Value of Services

In both states, respondents from both coalitions converge with respect to the value of ensuring that individuals with I/DD have access to publicly-funded services and supports. Additionally, among those sampled, there is no evidence of any respondents with an interest in broadly reducing access to services for this target population.

Stakeholder Motivations

There is little evidence of variation between the coalitions with respect to their likelihood of ascribing specific motivations to stakeholders. Multiple stakeholders attribute actions to self-interest, typically in the context of the incentives that tend to motivate families (convenience), service providers (contracts and rates) and government staff (career). For example, one respondent describes changes in the incentives faced by service providers:

*Again, it's what you incentivize. So, there was a time when that was incentivized, when people grew a big workshop operation. If you were running a workshop of any size, you don't have a billing code for that anymore.* (PA_ind45, telephone interview, September 2017)

Respondents from both coalitions also characterize a variety of stakeholders -- including government agencies, service providers and employers -- as being motivated by values, described by one respondent as the prospect of doing “the right thing” (PA_ind02, telephone interview, September 2017). In contrast, families’ motivation is more frequently attributed to concerns about potential loss of services and supports in the context of CIE-focused policy. One Employment First stakeholder describes her perceptions about CIE opposition from families:

*Because I think a lot of it, the push back is usually about fear. Families are afraid... and they want a safety net.* (WA_ind28, telephone interview, June 2017).

Furthermore, respondents in both subsystems tend to describe opposition stakeholders as being motivated by virtuous intentions, even when their decisions yield negative outcomes, which are described as resulting from (inadvertently) poor decisions.
Role of the Government

In both states, a defining Choice coalition belief is related to the idea that individuals and families are the best judges of their own interests and have the right to choose from among a wide selection of (existing) services and supports. Some Choice respondents even describe Day Habilitation and Employment services and supports in terms of entitlement, suggesting that the government transgresses individuals’ rights when service offerings are restricted or eliminated. For example, one Choice respondent indicates:

*That's the cornerstone of absolutely everything we talk about. I don't care about what program you come up with, what opportunities you identify. Choice is the key word we use 1,000 times and then another 1,000 times... We all are entitled to pursue those things that are of interest to us and having the choice to do that. (PA_ind44, telephone interview, September 2017).*

In contrast, Employment First respondents tend not to contest the responsibility of the government to guide choices in the interest of achieving positive outcomes. Some respondents even assert that the government should limit options, because individuals and families (especially families) do not always make choices that will lead to optimal outcomes for individuals with I/DD. To be sure, Employment First stakeholders express a strong belief in investment in the value of an individualized or “person-centered” approach to services, a belief in self-determination, and an appreciation for families’ role as primary caregivers. However, they assert the government’s responsibility to guide (and/or limit) the available menu of service options in the interest of ensuring positive outcomes for individuals with I/DD.

Nature and Cause of the Problem

Choice respondents are more likely to describe the problem in terms of service access, availability and appropriateness and related under-engagement experienced by individuals with I/DD. In both states, Choice respondents are more likely than Employment First respondents to ascribe the problem to the risk to services posed by observed or hypothetical/predicted policy changes. In Washington, Choice respondents
focus on contexts where economic opportunities are lacking or in decline, describing the
dearth of services and employment prospects in selected geographic areas. Multiple Choice
respondents describe the projected or realized outcome for individuals with I/DD who
cannot access an array of appropriate services and supports as a “sitting at home on the
couch” problem, as in one respondent’s statement:

In Washington state, the DDA or the Developmental Disabilities
Administration has made a choice to close down pre-vocational
programs. And in doing so, in our area anyway, there's a lot of people
that are now going home to couches. (WA_ind37, telephone interview, July
2017)

While Employment First members voluntarily acknowledge that services and
opportunities are limited in some areas, they are less likely to focus on service availability
as the cause of the problem. Instead, Employment First respondents tend to characterize
the primary problem in terms of the prioritized individual outcome (employment),
describing unemployment and underemployment of individuals with I/DD as the primary
problem. They cite a variety of causes for this problem, especially the lack of exposure to
employment opportunities. For example, one Employment First respondent contests the
Choice argument that individuals with I/DD should be allowed to “choose” the service
setting:

Well, it's... a pretty limited choice if all you have is a sheltered workshop. I
said, ‘If you've only experienced one thing it's not a choice in my opinion’.
(WA_ind26, telephone interview, June 2017)

The nature and cause of the problem may be related to the current status quo and
prospective changes. In both states, the status quo includes both CIE and non-CIE
opportunities, and prospective CIE-focused policy change likely threatens the service
balance. Even in Washington, where CIE has been prioritized since 2007 and non-CIE
opportunities are close to being phased out, Choice respondents express deep concerns
about the loss of appropriate services.

Attributes of the Target Population
A major divergence in policy core beliefs relates to assertions about the capacity of all individuals to work competitively with supports. The evidence suggests that members of the Choice coalition tend to express more doubt about the capacity of individuals with I/DD to work competitively, suggesting that some high-acuity individuals are unlikely to ever succeed in a competitive, integrated environment. One Choice respondent describes the population that he serves in the following terms:

*If the stars would all align, I would say out of the 150 [people we serve], in a perfect world... [eliminating] transportation and every other road... I could count on one hand, not quite two hands, somebody that might have a percentage of a chance to work in the community competitively. We recognize the level and the amount of supervision that our folks require.* (PA_ind65, telephone interview, August 2017)

Members of the Employment First coalition tend to articulate the belief that anyone can work competitively with appropriate supports, and some even assert that all individuals have a responsibility to work, even while acknowledging that finding and retaining work can be extremely challenging for individuals with severe disabilities. For example, one Employment First respondent describes the controversy as centering around values and the belief that everyone can work:

*While we're a Work-First state, we still have some people, some legislators, who believe that they can look at an individual and tell whether they can work or not. It's difficult because it's embracing... I believe everybody can work, so it really goes against my values.* (WA_ind24, telephone interview, July 2017)

However, the discriminant analysis did not yield significant results for the all-can-work belief in either state, suggesting that believing ‘some individuals can’t work’ (i.e., there are exceptions to the rule) is important for Choice membership, but believing ‘all individuals can work’ (i.e., no exceptions are necessary) is less important for Employment First membership.

**Priority Outcomes**

Both coalitions cite a variety of important outcomes related to Day Habilitation and Employment services for individuals, including engagement, being in community and
making choices. However, members from the Employment First coalition are far more focused on employment, with over 80% in both states citing employment as the primary outcome of interest. For example, one Employment First respondent states:

*I think that it's important also to note that one, we developed our program with the big, you know, sticky papers on the wall that were blank because [crosstalk 46:06] to work from. We went ‘Okay, what are the outcomes that we want for the people that come into these programs?’ And employment was number one. (PA_ind58, telephone interview, September 2017)*

Choice respondents do not belittle employment as a positive outcome and indeed many express that employment is a valuable outcome for some members of the target population. However, Choice respondents are more likely to articulate alternative outcomes as the priority, including family respite (in Washington) and safety (in Pennsylvania). For example, one Choice respondent describes her role as a guardian for her adult child as being focused on health and safety:

*I'm her legal guardian. I have to keep her safe... If she's not in a place to learn correct etiquette and yet understand that some people aren't safe, we have a problem. (WA_ind37, telephone interview, July 2017)*

While Employment First respondents cite concern for family outcomes, especially in relation to their role as primary caregivers, they are less likely to focus on family outcomes as the priority for policy choices. Finally, several Choice respondents voice the view that minimum wage (or higher) is specifically not a priority outcome either among families or among some individuals with I/DD.

**Policy Preferences**

At the risk of simplifying a complex policy landscape, Employment First respondents are typically most interested in preserving or expanding CIE-focused services and supports, while restricting selected non-CIE activities, especially facility-based and sub-minimum wage services. In contrast, Choice respondents prefer to preserve or expand non-CIE services and supports, including facility-based services. Choice respondents do not express any preference for restricting CIE-focused services and supports; on the contrary, they express full support for making such services readily available.
Specific policy preferences vary somewhat by state. In Washington, an early adopter of CIE-focused policy, the Employment First coalition is focused on preserving those changes and eliminating remaining facility-based service options. However, Employment First coalition members also acknowledge that the state experiences a gap in community-based (non-CIE) alternatives, which they attribute to insufficient resources and political will; the Employment First coalition would like to see such alternatives expanded, but not at the expense of CIE-focused services and supports. The Washington Choice coalition is interested in eliminating restrictions on and expanding access to non-CIE services, as well as preserving access to facility-based options, especially in rural areas. Both coalitions have actively campaigned on behalf of legislation to support their policy goals.

In Pennsylvania, a more recent CIE-focused policy adopter, the Employment First coalition maintains an interest in promoting CIE-focused services as a long-term goal, but intermediate efforts are focused on expanding access to community-based services and restricting facility-based services. The Choice coalition is interested in preserving the status quo, which includes reliance on facility-based and sub-minimum wage services, and thus resists strong CIE-focused mandates.

Sub-Populations of Concern

Both coalitions articulate apprehensions about the overall prospects of employment for specific sub-populations, especially high-acuity individuals and individuals from rural areas, although the degree to which coalitions focus on the problem for specific target populations varies by state. Choice respondents in Pennsylvania are more likely to focus on the challenges faced by high-acuity individuals than Employment First respondents. In Washington, members of both coalitions are equally likely to articulate concern about challenges faced by high-acuity populations, especially in terms of observed outcomes related to the implementation of policy changes. For example, one Employment First respondent acknowledges:

*It isn't as easy for people with really significant autism ... How long is it going to take? Is it going to be possible? Maybe yes. Maybe it's going to*
take a way long time for someone with high level of classic autism.
(WA_ind43, August 2017)

Employment First respondents are more likely to describe the challenges associated with those sub-populations in terms of the changes required to address the problem. Choice respondents, on the other hand, tend to frame their concerns in terms of the negative impacts CIE-focused policy changes have yielded (or will yield) among individuals from those groups.

**Attention to the Evidence Base**

Results suggest that attention to the evidence base varies by state. In Pennsylvania, few individuals from either coalition mention data-based evidence, in either support of or opposition to CIE-related policy. In contrast, attention to the evidence base is a key predictor of coalition membership in Washington. In that state, Employment First respondents typically argue that data show employment gains after initial policy changes, whereas Choice respondents contend that CIE-focused policies have yielded downward trends in employment, especially with respect to hours and wages. The difference between states may be associated with the timing of the CIE-focused policy changes, which in Washington occurred over a decade prior to the interviews, yielding time for observations about policy impacts to be collected and disseminated. Furthermore, Washington state has historically placed a strong emphasis on data collection and review (Hall et al., 2007).

### 2.53 Coalition Coordination

**Coordinated Activities**

Activity on behalf of or in opposition to CIE is an important predictor of membership in the Employment First or Choice coalitions, respectively, in both state subsystems. Respondents from both coalitions cite specific examples of organized coalition activity, including lobbying and other legislative advocacy, social media campaigns and organized rally/protest. In addition, there is considerable evidence of intra-coalitional collaboration.
For example, Employment First participants describe coordinating activities with other Employment First stakeholders in support of CIE-focused legislation, executive orders and other policy action, as well as memberships in professional associations with a strong Employment First focus. Choice respondents do not appear to be as well-coordinated with respect to policy-oriented activities but do cite specific activities and identify Choice stakeholders and organizations as sources of strategic information.

There is little evidence of systematic collaboration avoidance, although a small number of respondents from both coalitions described avoiding collaboration with individuals, organizations or policy positions from the opposite viewpoint.

Inter-coalition Collaboration

Despite evidence of coalition-based activity, there is also substantial evidence of inter-coalition collaboration. Multiple individuals, particularly from the Employment First coalition, state that they collaborate with everyone and do not avoid collaboration with anyone. For example, one Employment First stakeholder indicates:

So, I think my primary word while working in the field was partnership. ... You have to listen to people who don't agree with you because they often make really good points. You have to figure out how to involve and then incorporate those ideas into your agenda so that people feel heard and feel like they can participate in the project. That doesn't mean that you vow or change what you don't really believe, but it does mean that if they make a good point you really listen to it and you try and figure out how to address that issue. (WA_ind39, telephone interview, July 2017)

Both states show evidence of cross-coalition working groups, as well as informal networking, even among members of opposition coalitions.

2.54 Coalition Emergence and Membership

In both state subsystems, Choice and Employment First coalitions both emerged as distinctly active coalitions in the last two decades. However, the policy positions they represent date to at least the early 1990s, when the Choice policy preference (i.e., a wide array of services, including non-CIE services) represented the status quo. The focus on competitive employment gained traction when both states formally committed to
employment as a desired outcome for individuals with I/DD and began to serve increasing numbers of individuals in integrated employment services. Employment First coalition members tend to describe the Choice coalition as a small but vocal minority. Since approximately 2000, both coalitions have emerged as distinct, coordinated efforts, though they have followed slightly different paths in the two states.

In Washington, Employment First has been contending for dominance since at least the early 2000s. At that time, the Employment First coalition included government leadership, advocacy organizations and parent advocates and successfully coordinated efforts to revise state rules, resulting in prioritization of CIE services beginning in 2007, known as the Working Age Adult policy (Hall et al, 2007). One organization, known as the Washington Initiative for Supported Employment (WISE), has been especially involved in advocating for and providing technical assistance related to CIE-focused policy since the 1990s. Furthermore, in the early 2000s, most service providers joined the Employment First coalition as part of the consolidation of two major professional associations; the resulting organization, the Community Employment Alliance, formally stated support for the Employment First policy position. Shortly thereafter, remaining parent advocates, advocacy organizations and service providers undertook multiple attempts to retract CIE policy changes via counter-legislation. However, the Choice coalition did not formally organize until the mid-2010s, when a small number of service providers and selected family member advocates coalesced around a single membership organization, the Coalition of Developmental Disabilities Voices (CCDV). Based on the available evidence, Washington state government agency leadership has consistently been active in the Employment First coalition during the study timeframe.

In Pennsylvania, the policy status quo represented the Choice coalition’s preferences until recently, although Choice interests have not historically been formally organized under a distinct organization. There is evidence of Employment First activity throughout the study period, although most Employment First activity began in earnest in the mid-2010s with social media campaigns, a 2016 Executive Order and proposed rule changes. In 2017, a small, loosely organized Choice coalition emerged to protest the proposed rule changes. The Employment First coalition represents the reform coalition,
with well-organized policy-oriented activity and support from a variety of stakeholders, including interest groups, family members, self-advocates and government stakeholders. Unlike Washington, the Pennsylvania Employment First coalition does not have clear support from the bulk of the service provider community. Some service providers are Employment First supporters, while others are aligned with the Choice coalition, particularly those that continue to offer non-CIE services. Service providers’ professional associations express cautious support for maintaining access to CIE-focused services, but some continue to represent a large contingent of providers that rely on facility-based settings for day habilitation and employment services. The current Pennsylvania government agency leadership actively supports the Employment First coalition.

Coalition membership is not fully dichotomous or stable for all policy actors in either state. Some actors are constrained in their ability to stray from their organization’s official stance and others have reservations about taking strong policy positions, leading to policy actors that seem to straddle both coalitions. Other policy actors have more publicly defected from coalitions (in both directions) at various points in time. There is little evidence of systematic variation along other professional or personal dimensions. Most respondents from both coalitions have been working in the I/DD subsystem for over five years (some as long as forty), and most respondents indicated that they have a personal connection to the subsystem, typically a family member who experiences I/DD.

Respondents in both subsystems report receiving support from national organizations with similarly aligned policy preferences. Washington and Pennsylvania are both members of the State Employment Leadership Network (SELN), an active proponent of Employment First policy positions. In contrast, Choice coalition members have turned to national networks with similar policy positions, such as the A-Team, a grassroots effort

\[13\] SELN is a national community of practice supported by the National Association of State Directors of Developmental Disabilities Services (NASDDDS) and the Institute of Community Inclusion at the University of Massachusetts Boston (ICI)
to “ensure service choices are protected and sustained” (A-Team Wisconsin n.d.), as well as ACCSES, a national service provider professional association.

### 2.6 Study Limitations

Before proceeding with the discussion, the limitations of this study should be acknowledged. First, the respondent sample is not representative, which may bias estimates about the presence and character of the subsystems and related coalitions. A combination of document analysis and snowball sampling was used to ensure inclusion of key policy actors and viewpoints. Second, the data were collected systematically but not uniformly; the qualitative data from the interviews represent the underlying concepts of interest, but only where attention to the concept is expressed by the respondent. The use of the Ochiai measure, which treats “0” values (i.e., inattention) as neither similar or dissimilar, decreases any bias associated with inconsistent levels of attention. Relatedly, the small sample limits the applicability of standard regression methods and related inference. However, the study uses hierarchical cluster analysis as the primary analytic method, which is non-parametric and therefore does not violate assumptions associated with other quantitative strategies. Finally, the study includes only two cases, both purposively selected, clearly limiting the generalizability of the study findings to other cases. Even though the cases are diverse with respect to policy change timing, they are likely to be comparable to the Day Habilitation and Employment subsystems in other states, especially given the nested nature of the states in a broader structure of cooperative federalism (Gettings, 2011), which subjects them to similar federal regulations and political conditions.

### 2.7 Discussion and Conclusion

This study finds evidence of at least two advocacy coalitions in both state-level subsystems, the Employment First coalition and Choice coalition, based on the two conditions specified by the ACF: divergent policy core beliefs and coordination. In both subsystems, respondents are unified across coalitions by selected core policy beliefs, particularly those related to the value of services and the motivations ascribed to stakeholders. Furthermore, respondents’ equanimity about the motivations ascribed to
stakeholders suggests that the “devil shift” (Fischer 2016; Sabatier et al. 1987) is not broadly experienced in either subsystem. However, respondents do cleave along multiple dimensions, including the government’s role in service-related decisions, the nature and cause(s) of the problem, key attributes of the target population, priority outcome(s), policy preferences and policy-related activities. The presence of coalitions suggests that the ACF may be an appropriate framework for exploring the conditions that have led to variation in state-level prioritization of CIE-focused policy since 2000. Furthermore, differences between the two states in the temporality of coalitional activity suggest that they may be appropriate comparison cases for future study of policy change.

Despite substantial evidence of coordinated efforts by policy actors to influence policy, there is also some evidence that these subsystems do not reflect “ideal” ACF-style coalitions. First, coalitions are not easily identifiable by stakeholder type or organizational affiliation. Both coalitions include respondents from both advocacy organizations and service providers, suggesting that the distinction between purposive and material groups, highlighted by the ACF (Sabatier and Jenkins-Smith 1993; Sabatier and Weible 2007), may not be as appropriate in these subsystems. Similarly, current state government agency leaders represent some of the strongest proponents of Employment First policies and policy change, belying the ACF hypothesis that “within a coalition, administrative agencies will usually advocate more moderate positions than their interest group allies” (Sabatier and Jenkins-Smith 1999, 129).

Relatedly, formal coalition presence and related activity are unbalanced and have changed over time. In both subsystems, the reform coalition (Employment First) is more proactive and formally organized, while the status quo coalition (Choice) is more loosely organized and reactive. In Washington, where the status quo was heavily retrenched in the early 2000s, the Choice coalition is more formally organized than in Pennsylvania, which faced the first major threat to the status quo in 2017. In both subsystems, Choice coalitional presence is associated with threat to the status quo policy, which accords with Weible and Heikkila’s (2017) observation that “one policy conflict might last for extended periods of time at the policy subsystem level, with multiple interdependent short-term policy conflicts intermittently emerging and subsiding at the level of policy action
situations over the formulation and adoption of public policies” (28). This observation highlights the potential utility of using a conflict lens to characterize the shifting policy landscape and related coalitional activity. Moreover, these observations suggest that in these conditions, alternative coalition descriptors, such as “status quo” and “reform,” may be more meaningful than the traditional ACF concepts of “dominant” and “minority.”

Finally, the nature of the policy positions and related changes is worth noting. During the 1990s, provision of CIE-focused services (e.g., supported employment) was increasingly made available by state government agencies alongside non-CIE services (e.g., facility-based employment) as the status quo policy position. In contrast, the Employment First efforts to prioritize CIE tend to involve some restriction to non-CIE services. These reform efforts evoke the concepts of “layering” and “displacement” introduced by Streeck and Thelen (2005), who note that changes brought about by “layering” involve the introduction of new institutions that “do not directly undermine existing institutions, [and] typically do not provoke countermobilization by defenders of the status quo” (19). In contrast, “displacement,” which involves a shift from one institution to another, may be brought about by defection, invasion and/or cultivation by policy actors (Streeck and Thelen 2005). These concepts may help to clarify the rise of coalition-based activity in an otherwise low salience setting, especially if used in tandem with the existing ACF typology of major/minor change.

What might we expect to see in the way of coalition dynamics and policy change in these subsystems through the ACF lens? First, we might expect coalitions to exhibit unique patterns of strategic resource use, such as focusing efforts on subsystem-level recruitment of political actors and mobilizable troops, rather than on public support, reflecting Jones and Jenkins-Smith’s (2009) hypothesis of a positive association between salience and the role of public opinion as a resource. We might also expect policy brokers to play more of a critical role when conflict grows to the point of a “hurting stalemate,” as posited by Ingold (2011, 439), but to be unnecessary if policy changes continue to broadly reflect the status quo. Finally, we might expect these subsystems to exhibit some amount of policy-oriented learning if the subsystem remains sufficiently collaborative (Weible 2008). Indeed, disability researchers highlight collaboration as a key element in the systems change
frameworks that advocate for “a seamless transition to individual, competitive jobs” (Butterworth et al. 2017, 274).

This study concludes that the presence of coalitions can be detected in low salience subsystems, which may introduce possibilities for applying the ACF to other “nontraditional settings,” including other subsystems that exhibit various forms of gradual, transformative change not typically addressed by the ACF. Furthermore, ACF scholars may find it useful to identify low salience cases as a counterfactual to more high salience cases. Perhaps more importantly, the lack of public attention or apparent conflict in such subsystems may disguise coalition-based competition that provides a precursor (or inhibitor) to meaningful policy change. Advocates and policymakers may find, for example, that coalition-based competition is a more predictive driver of policy change, and ultimately of outcomes, than previously imagined. The low salience nature of the Day Habilitation and Employment subsystems is unlikely to be unique in the social policy realm; other subsystems may exhibit similar coalition-based struggles for policy influence beneath a smooth surface.
2.8 References


Friedman, Carli, and Mary C. Rizzolo. 2016. “‘Get Us Real Jobs:’ Supported Employment Services for People with Intellectual and Developmental Disabilities in Medicaid Home and Community Based Services Waivers.”


3. FROM EMPLOYMENT OPTIONAL TO “EMPLOYMENT FIRST”: EXPLAINING TWO CASES OF STATE-LEVEL DISABILITY POLICY CHANGE

3.1 Introduction

State-level Day Habilitation and Employment (DH&E) subsystems provide services and supports to adult, working-age individuals with intellectual and developmental disability (I/DD). In 2015, DH&E services were provided to over 610,000 individuals with I/DD nationwide, of whom 18% received integrated employment services (Butterworth et al. 2016). In 2016, I/DD agencies spent $865 million on integrated employment services, representing a 44% inflation-adjusted increase since 1999 (University of Massachusetts n.d.). That said, nationwide spending on integrated employment as a proportion of total expenditures has decreased slightly during the same period, by about 2 percentage points, due to a relative increase in spending on community-based day habilitation services (Butterworth et al. 2017; Friedman 2016). Similarly, the proportion of individuals nationwide who received supported employment services (out of all individuals receiving day/employment services) decreased from 1999 to 2014 from 24% to 19%.

Since 2000, over 30 states have adopted policy prioritizing competitive, integrated employment (CIE) outcomes among the I/DD population, typically under the label “Employment First” (Nord 2014; Racino 2015). These legislative, executive and administrative directives include a combination of symbolic language, improved access to employment supports and/or incentivization of employment services and restrictions on facility-based and day activity services (Butterworth et al. 2016; Nord 2014). The form of

\[\text{CIE-focused services and supports include supported employment, integrated employment and customized employment, which typically prioritize work in integrated settings (i.e., alongside individuals without I/DD) and earning competitive wages. Other (non-CIE) services and supports typically include day habilitation, facility-based employment (i.e., sheltered workshops), and sub-minimum wage jobs.}\]
policy adoption also varies, with states passing new legislation, executive orders and/or administrative directives (Nord 2014; LEAD Center, n.d.), as shown in Figure 3.1.

![Figure 3.1: CIE-focused policy adoption (adapted from Nord, 2014 and expanded using LEAD Center data)](image)

State DH&E systems are nested in the broader system of cooperative federalism via the system of Medicaid Home- and Community-Based Services (HCBS) waivers, which provide the majority of funding for DH&E systems (Agranoff 2011; Gettings 2011). While state-level variation is not unexpected, we understand little about the conditions and causal mechanisms that result in state-level policy change in a federal context (Thompson and Burke 2007). Furthermore, while the policy adoption distribution curves resemble a standard S-shaped curve typically associated with a national interaction model (Rogers 1995; Berry and Berry 2017), the variation in both the content and form of the changes and evidence of coalition activity (Giordono 2018b) suggests more than a simple policy diffusion process. These observations give rise to the primary research questions: 1) What does state-level CIE-focused policy change look like? 2) Why and how did CIE-focused policy change occur? and 3) Why did states vary in the timing of policy change?
Disability researchers point to a variety of systems-level factors, including policy change, that are expected to yield changes to individual employment outcomes (Butterworth et al. 2017; Hall et al. 2007). However, while the “systems change” model highlights policy change, it does not explicitly identify conditions that lead to policy change and tends to disregard political factors emphasized by the policy process literature. The policy process literature, in turn, finds evidence that traditional political factors, such as strategic action by organized interests (e.g., Itkonen 2007; Itkonen 2009), often influence disability-related policy. However, to date, policy process scholars rarely attend to disability policy and have not applied policy process frameworks to the CIE-focused changes observed in the DH&E subsystem.

This study theoretically leverages the Advocacy Coalition Framework (ACF) in a comparative research design to examine policy changes observed in two states’ DH&E subsystems, Washington and Pennsylvania. The two “diverse” cases were purposively selected because they reflect early and late policy change during the eighteen-year window from 1999-2017, providing a counterfactual to assess the conditions that lead to policy change (Gerring 2007; Seawright and Gerr 2008). Moreover, they are similar with respect to key characteristics, such as citizen ideology, welfare generosity and the presence of a rural/urban divide. The findings suggest that in both states, common factors leading to policy change include heightened subsystem attention and coalition-based use of stakeholder mobilization, strategic framing and narrative, as well as heightened political attention, and bureaucratic advocacy. The timing difference, however, is associated with the early defection of Washington service providers from the status quo coalition.

The study offers important implications for both disability policy and policy process research. From a disability policy perspective, the study highlights conditions under which major policy change is likely to occur, as well as the type of policy change (minor) that is more likely to be associated with policy-oriented learning. Federal agencies and disability researchers interested in supporting state-level policy change are likely to find these results relevant to their efforts. From a policy process perspective, the study offers a “non-traditional” application of the ACF to low salience conditions, which is more typically applied to high salience, contentious policy issues (Jenkins-Smith et al. 2017).
The study also yields considerations for theory development, including potential refinements to our understanding of policy change.

3.2 Leveraging Two Literatures to Understand CIE-focused Changes

Two distinct, but complementary, literatures offer important insights into the observed CIE-focused policy changes: 1) disability research; 2) policy process research.

3.2.1 Disability Research

Disability scholars have devoted substantial attention both to recent CIE-focused changes and to disability policy more broadly. Prior to 1985, most individuals with I/DD receiving waiver-funded services were served in segregated, unpaid day habilitation settings (McGaughey and Mank, 2001a). In the 1970s and early 1980s, new knowledge and successful demonstrations yielded growing nationwide interest in supported employment as an option for individuals with severe disabilities (McGaughey and Mank 2001a). Between 1985 and 1996, federal grants had been provided to all but 2 states to support innovation and systems change in supported employment services and supports (McGaughey and Mank 2001a; McGaughey and Mank 2001b). Pennsylvania and Washington were among the first two cohorts of state-level grantees (Wehman 1989). These efforts dovetailed with the establishment of Medicaid waivers that enabled states to shift services from facility-based settings to home and community-based settings, as well as the first decade of Individuals with Disabilities Education Act implementation (Agranoff 2011; Gettings 2011; McGaughey and Mank 2001a).

Despite initial growth in the availability and participation in supported employment, researchers noted widespread variation among states (McGaughey and Mank 2001a; McGaughey and Mank 2001b) and a broad slowdown in state-level supported employment outcomes (Braddock et al. 2004; Butterworth et al. 1999; McGaughey and Mank 2001a; McGaughey and Mank 2001b; Rusch and Braddock 2004). Early efforts to explain these trends are inconclusive and ultimately suggest that “systems change is complex” (McGaughey and Mank 2001a, 221). Ultimately, disability researchers developed a new actor-driven, implementation-focused and goal-oriented Systems Change
The Systems Change model reflects researchers’ observations about early adopters of CIE-focused policy (e.g., Hall et al. 2003; Hall et al. 2007). Since the development of that model, disability researchers have steadily engaged in evaluative research, yielding targeted lessons about system-level conditions, facilitators and barriers associated with goal achievement, continuing to emphasize the importance of leadership (Winsor et al. 2006); “a backbone organization” (Butterworth et al. 2017), relationships (Butterworth et al. 2017; Tucker et al. 2017), funding mechanisms (Butterworth et al. 2008; Hall et al. 2011), and service provider transformation (Inge et al. 2009; Rogan and Rinne 2011;)

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15 The model was initially called the “Conceptual Model for High Performance Variables” but has since been referred to more commonly as a Systems Change model. I adopt similar terminology in this paper.
Sulewski 2017). They have also devoted considerable efforts to clarifying and promoting the model, often under the label “Employment First”. For example, multiple researchers (e.g., Niemiec et al. 2009; Kiernan et al. 2011; Martinez 2013; Nord et al. 2013) describe the principles embodied by the Systems Change model, as well as specific strategies (including policy changes) for achieving change, suggesting that disability researchers have reached a ‘scientific consensus’ around the value and feasibility of prioritizing CIE outcomes. The Systems Change model, however, lacks specification around the drivers, conditions or nature of expected policy changes. The model turns the lens on employment outcomes for individuals with disability, rather than the policy process itself, omitting reference to most of the political factors highlighted by the policy process literature, which are described below.

3.22 Policy Process Research

The policy process literature, which is the study of “how public policy is made” (Smith and Larimer 2016, 93), frequently includes a focus on how and why policy changes. There have been relatively few applications of policy process theory to disability-related policy systems during the last two decades. However, existing applications suggest that a politically-oriented approach to understanding the disability policy system may yield fruitful insights for understanding the recent state-level changes. In particular, these studies suggest that disability policy change is frequently characterized by 1) activity by interest groups or coalitions with opposing policy preferences (Itkonen 2007); and 2) use of standard political strategies to achieve policy change, including agenda-setting (Pettinicchio 2013), problem definition (Itkonen 2009; Jeon and Haider-Markel 2001), venue-shopping (Nagel 2006), framing and narrative (Itkonen 2007; Jeon and Haider-Markel 2001) and interest group mobilization (Shapiro 1994). Most recently, in a study with direct relevance to this research, Giordono (2018a) finds evidence of at least two competing advocacy coalitions, “Employment First” and “Choice,” in the Day Habilitation and Employment Services subsystem in Washington and Pennsylvania during the 2000-2017 study period.
This paper contends that the complementarities between the two literatures offer an opportunity to understand the process of state-level policy change in the context of the DH&E systems. Specifically, the Advocacy Coalition Framework (ACF) accommodates most of the key elements of the Systems Change model, while placing the spotlight on CIE-focused policy change.

The ACF was developed by Sabatier and Jenkins-Smith in the early 1990s to explain policy change and learning (Sabatier 1988; Sabatier and Jenkins-Smith 1993; Weible et al. 2011) and has subsequently been applied in at least 240 publications (Pierce et al. 2017; Weible et al. 2009). The ACF posits that policy change and learning results from competition by advocacy coalitions to achieve policy preferences (Sabatier and Jenkins-Smith 1999). Advocacy coalitions are composed of individuals who “share policy core beliefs and who coordinate their actions in a nontrivial manner to influence a policy subsystem” (Jenkins-Smith et al. 2017, 148). The policy subsystem can include a wide range of subsystem actors, including government staff, politicians, interest groups, consultants, scientists and others (Sabatier 1988; Sabatier and Jenkins-Smith 1993). Policy actors’ beliefs are described in the context of a 3-tiered system: 1) deep core beliefs; 2) policy core beliefs; and 3) secondary core beliefs (Sabatier and Jenkins-Smith 1993).

In the context of the ACF, policy change includes revisions in policy core components of governmental programs, termination of programs, or launching of new programs. The ACF hypothesizes that several sources of policy change: 1) external perturbations; 2) internal events; 3) policy-oriented learning; and 4) negotiated agreement (Jenkins-Smith et al. 2017). Events can include changes to socioeconomic conditions, public opinion, systemic governing coalition(s), policies in other subsystems, or even changes to more stable parameters and long-term opportunity structures. The ACF also hypothesizes that major policy change is unlikely to occur while the advocacy coalition responsible for the original policy remains in power, except under conditions of hierarchical imposition (Jenkins-Smith et al. 2017). Other conditions expected to influence policy change include the overall context, coalition-specific resource use and political opportunity structures. See Figure 3.3 for an adapted version of the traditional ACF visual,
which explicitly articulates coalition resources and related strategies. For simplicity, it eliminates the separation between short- and long-term coalition opportunity structures. Long-term opportunity structures are traditionally used by the ACF to accommodate variation in international political systems, whereas a comparison between two US states is unlikely to exhibit substantial differences in long-term political structures.

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16 This visual explicitly articulates coalition resources and related strategies. For clarity, it eliminates the role of long-term coalition opportunity structures, which are traditionally used to accommodate variation in international political systems. A comparison between two US states is unlikely to yield substantial differences to long-term opportunity structures.
3.3 Alignment between the ACF and the Systems Change Model

The ACF’s approach is aligned with the Systems Change model’s actor-driven model, which emphasizes the importance of values, “key players” and relationships (Hall et al. 2007) as key contextual and facilitating factors. The ACF also accommodates important strategies highlighted by the Systems Change model, including information diffusion and other communication efforts. Moreover, the ACF accommodates many of the concepts identified by previous disability-focused policy research, including strategic behavior by organized interests and the use of framing and narrative strategies to achieve policy goals. Finally, the ACF explicitly acknowledges both the role and intentions of
researchers in the process of policy change (Sabatier and Weible 2007), making the framework particularly appropriate, given the advocacy orientation of the Systems Change model.

### 3.31 Sources of Change

External or internal events are expected to increase the likelihood of policy change (Sabatier and Jenkins-Smith 1993; Jenkins-Smith et al. 2017). External shocks, such as a socio-economic change, a shift in public opinion, change to the governing coalition or change in another policy subsystem can function as such an event via heightened public and political attention, agenda change, redistribution of coalition resources and/or change to venue availability (Heikkila et al. 2014; Jenkins-Smith et al. 2017). Similarly, internal perturbations, such as a system failure or crisis, can also heighten attention to program deficiencies and reform opportunities (Jenkins-Smith et al. 2017). Finally, policy-oriented learning and negotiated agreement are alternative pathways to policy change (Jenkins-Smith et al. 2017). The Systems Change model, in contrast, places a strong emphasis on policy-oriented learning, but places little emphasis on the other pathways of change hypothesized by the ACF.

### 3.32 Context

The ACF also expects that “relatively stable parameters” (Sabatier and Jenkins-Smith 1993; Jenkins-Smith et al. 2017), including basic attributes, sociocultural values, and constitutional structure may enhance (or detract) from the subsystem’s conduciveness to policy change. The disability literature offers insight into subsystem attributes, as well as values and goals. For example, early research by McGaughey and Mank (2001a) shows that state-level ideology and economic conditions are predictors of integrated employment implementation. We might also expect overall welfare commitment to indicate a state’s willingness and ability to support targeted services (Dilger and Boyd 2014). There is also evidence that prior service investments and participation levels may influence the likelihood of change. McGaughey and Mank (2001a) find that a greater investment in supported employment are more likely to show higher levels of employment-related outcomes, which they attribute to state implementation “commitment.”
The overall level of subsystem collaboration is also expected to influence the use of expert-based information and learning, with collaborative subsystems less likely to use expert-based information for political purposes than more adversarial subsystems (Weible 2008). Collaboration and partnership have been key elements in the Systems Change model since its development (Hall et al. 2007), and Butterworth et al. (2017) identify interagency collaboration as a key predictor of positive change in employment outcomes.

### 3.33 Political Opportunity

Long-term political opportunity structures are more typically associated with variation in macro-political structures, more often observed at the international level. In this subsystem, we do not expect to see major differences in the opportunity structures typically highlighted by the ACF. However, variation in the decentralization of authority between state and local control may be expected to make a difference (Kübler 2001). Indeed, the Systems Change model proposes that local control of service contracts (often at the county level) is more likely to yield positive changes to employment outcomes (Hall et al. 2007), suggesting that local authority increases political opportunities for policy change. On the other hand, low service provider capacity and competition, especially in rural areas (Van Slyke 2007), might reduce the local policymakers’ willingness and capacity to influence policy change.

### 3.34 Resource Availability and Use

The ACF further suggests that coalitions strategically use available resources and related strategies to influence decisions by government authorities, institutional rules, and ultimately, policy outputs and outcomes. Resources and related strategies can include formal legal authority, public opinion, information, mobilizable troops, financial resources and skilled leadership (Sabatier and Weible 2007). The causal mechanisms by which an event leads to policy change include heightened public and political attention, agenda change, redistribution of resources and opening/closing of policy venues (Jenkins-Smith et al. 2018, 145; Nohrstedt 2011).

Sabatier and Weible (2007) note that formal legal authority is a particularly effective coalition resource, and that coalitions often pursue related strategies, such as
lobbying government officials and placing allies into positions of power, to increase the likelihood of achieving their policy preferences. Public opinion can serve to help sway decisions by officials in positions of authority, and coalitions typically invest heavily in efforts to gain the support of the public (Sabatier and Weible 2007). However, in low salience policy subsystems like the DH&E subsystems, we might expect public opinion to play a less important resource role (Jones and Jenkins-Smith 2009).

Relatedly, information is a key resource that can take multiple forms, including relatively neutral forms of information- and data-sharing, as well as more politicized use of framing and narrative strategies for persuasion purposes (Sabatier and Weible 2007). Indeed, goal communication and training are both key methods of information-sharing in the Systems Change model (Hall et al. 2007). Researchers are included as potential policy actors by the ACF because of the potential role that researchers play in the information production and dissemination process (Sabatier and Weible 2007). Given the goal-oriented nature of disability-focused research, we might expect disability researchers to play an important role in policy change.

Sabatier and Weible (2007) describe ‘mobilizable troops’ as an inexpensive resource often used by coalitions with few financial resources. Relatedly, Hall et al. (2007) highlight the importance of ‘relationships’ between policy actors to promote and support systems change. Moreover, Butterworth et al. (2017) acknowledges the importance of family members in key service-related decisions, which places them in the category of mobilizable troops. The federally-financed Protection and Advocacy (P&A) system establishes a formal state-level network of advocacy channels.

Finally, ‘skillful leadership’ (Sabatier and Weible 2007) by ‘key players’ (Hall et al. 2007) is a key coalition resource for developing a vision, attracting resources, and using resources strategically. Relatedly, federal “anchoring” agencies can be an important source of leadership and belief system maintenance (Ellison and Neumark 2010). A number of recent federal actions suggest renewed federal prioritization of CIE-focused services. For example, the 1999 Olmstead vs. L.C. U.S. Supreme Court decision and related Department of Justice litigation in two states (U.S. Department of Justice n.d.), the 2014 Medicaid “settings rule,” (Centers for Medicare and Medicaid Services 2016) and multiple federal
agency initiatives (e.g., U.S. Department of Labor n.d.a; U.S. Administration on Intellectual and Developmental Disabilities n.d.) all point to a shift in federal priorities. And yet, some federal regulations that are arguably contrary to CIE priorities remain in place, such as the 1938 Fair Labor Standards Act that allows sub-minimum wage payments for individuals with disability (U.S. Department of Labor n.d.b.). As such, we might expect to see national partners serving as a coalition resource.  

3.4 Methods

This study takes a qualitative approach to addressing the research questions of interest, including: 1) What does state-level CIE-focused policy change look like? 2) Why and how did CIE-focused policy change occur? and 3) Why did states vary in the timing of policy change? The study uses multiple sources of data from two states (Washington and Pennsylvania) and a comparative analytic approach in the context of the ACF. This section describes the approach to ACF operationalization, as well as the case selection, data collection, coding and analysis methods.

3.41 ACF Operationalization

As Jenkins-Smith et al. (2014) acknowledge, the ACF offers an opportunity for contextualization and adaptation. This study uses three distinctive elements of ACF application, including subsystem delineation, definition of policy change, and identification and characterization of advocacy coalitions, to achieve a context-specific ACF operationalization. Sabatier (1988) defines the policy subsystem as the interaction between “non-trivial” policy actors who maintain an interest in a specific policy area. In this study, the subsystem is delineated as the DH&E system in each state, from which relevant policy actors are expected to include (at a minimum) representatives from

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17 The ACF acknowledges the possibility of nested subsystems (Weible and Sabatier 2014) but offers few examples or a prescription for treatment. This study recognizes that states are subject to federal government changes, influence from other national actors and that states learn from other states. However, the study also assumes that states have independent authority to plan, negotiate and make decisions according to state-level conditions.
government agencies, politicians, advocacy organizations, service providers and professional associations.

Major policy changes include “significant shifts in the direction or goals of the subsystem” (Jenkins-Smith et al. 2017, 145), while minor policy changes primarily reflect a change in the means of achieving acknowledged goals (Jenkins-Smith et al. 2017, 145; Sabatier and Jenkins-Smith 1999). However, the study contextualizes that classification for this subsystem, such that major policy changes include those that impose restrictions on the status quo. Policies that supplement the status quo are categorized as minor change because the policies function predominantly as a means of achieving a previously stated goal.

Evidence for subsystem advocacy coalitions relies on findings from Giordono (2018a), who uses a mixed method approach to identify the presence of two advocacy coalitions in each subsystem, called “Employment First” and “Choice,” which exhibit distinct policy core beliefs and policy preferences. The Employment First coalition would like to prioritize CIE-focused services and supports and minimize reliance on non-CIE services and supports. In contrast, the Choice coalition prefers to maintain a full range of options and allow individuals (and their families) to select the services and supports that best meet their needs. The Choice coalition tends to be loosely organized and reactive and has formally emerged in the early- to mid-2010s, even though it represents the status quo, while the Employment First coalition is well organized and pro-active.

Four main conceptual elements in the ACF include 1) event(s); 2) context; 3) political opportunity; and 4) coalition resource availability and use. As shown in Table 3.1, each conceptual element includes multiple conditions and sources of evidence, which were used to inform data collection, coding and analysis methods.

Table 3.1: Concepts, conditions and evidence

<table>
<thead>
<tr>
<th>Conceptual Element</th>
<th>Condition</th>
<th>Source of Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sources</td>
<td>Change in socio-economic conditions</td>
<td>Overall unemployment</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Overall labor force participation</td>
</tr>
<tr>
<td></td>
<td>Change in target population attributes</td>
<td>Target population acuity</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Target population diagnoses</td>
</tr>
<tr>
<td></td>
<td>Change in public opinion</td>
<td>Media attention</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Survey results</td>
</tr>
</tbody>
</table>
| Change in systematic governing control | Administrative leadership  
Ideological/political divisions |
| Change in venue availability | Lawsuit decision(s)  
Legislation introduced  
Administrative rule changes |
| Subsystem breakdown | Hurting stalemate  
Subsystem scandal(s) or crises |
| Change in overlapping subsystem | Education policy  
Vocational rehabilitation policy |
| Change in parallel subsystem | Other state policy |
| Hierarchical change | Federal rules  
Federal legislation  
Federal judicial decision(s) |
| State political conditions | Social welfare generosity  
Citizen ideology  
Government ideology |
| State economic conditions | Overall unemployment  
Overall labor force participation |
| Subsystem target population | Individuals with I/DD |
| Subsystem service history | Prior CIE participation  
HCBS access to services  
County-based services |
| Subsystem service structures | Use of managed care  
Unionization of HCBS services  
Service fragmentation |
| Degree of consensus required | Consensual decision rules (macro) |
| System openness – Venue structure | Number of decision-making venues  
Access to decision-making venues |
| System openness – Access to input and feedback opportunities | Advocacy channels and networks  
Public comment opportunities |
| System openness – Centralization of authority | Decentralized authority |
| Overlapping cleavages | Rural/urban and ideological divides |
| Formal legal authority | Appointments  
Lobbying campaigns |
| Public and political opinion | Public and political attention  
Public and political attitudes |
| Information | Access to administrative data  
Access to anecdotes/stories  
Framing/narrative |
| Mobilizable troops | Dedicated members/followers  
Supply of and access to new recruits |
| Financial resources | Private and public funding  
Dedicated organization |
| Skilled leadership | Experience and credibility  
Skills and stability  
Federal partnerships |
Case Selection and Data Collection

The study uses a combination of telephone interview data and publicly available documents as the primary data sources. The two cases were selected purposively to maximize variation in the timing of policy adoption\(^{18}\) and policy-related outcomes\(^ {19}\) during the study period (Gerring 2007; Seawright and Gerring 2008). In qualitative terms, Washington represents early adoption of CIE-focused policy (before 2014), while Pennsylvania is a late adopter (2014 or later). The semi-longitudinal nature of the study mitigates the threat to inference through “selection on the dependent variable” (King, Keohane and Verba 1994). Because both states ultimately experience major policy change, the design allows for a counterfactual based on the distinct timing of policy change. The sampling frame is provided in Appendix A1.

Using subsystem delineation parameters, an iterative search strategy was used to identify “non-trivial” policy actors. For each state, systematic a systematic Google search provided an initial source of policy-relevant sources, including organization websites, policy documents and news articles.\(^ {20}\) The top 100 returns from each search were downloaded and screened for relevance. Databases for organizations and documents were produced from the search results. Organizational websites were screened for relevant

\(^ {18}\) For sampling purposes, policy adoption was limited to Executive Order and/or Legislation.

\(^ {19}\) Policy-related outcomes included the 1999 proportion of participants receiving supported employment services and the percentage change in that proportion from 1999-2014.

\(^ {20}\) The Google search included two iterations, including 1) an advanced Google search; and 2) a Google news search. The basic Google search used the following search terms: “[state name]” AND (“disability” OR "disabled" OR "intellectual disability" OR "intellectually disabled" OR "developmental disability" OR "developmentally disabled" OR "mentally retarded" OR "special needs") AND ("employment services" OR "sheltered workshop" OR "subminimum wage" OR "vocational rehabilitation" OR "supported employment" OR "integrated employment" OR "wage certificates" OR "employment first"); and 2) two Google News search using three combinations of search terms: a) [state name] AND "developmental disability" AND employment; b) [state name] AND "developmental disability" AND employment. Google searches were supplemented with documents provided by national telephone interview respondents. The Google news search used the following search terms in multiple iterations: [state name] AND ("developmental disability" OR "mental retardation") AND (employment OR sheltered workshop).
documents and added to the document database, which was coded for stakeholder names, organizations and stakeholder type. All relevant results were entered into a respondent database. Policy actors with the highest citation frequencies from each stakeholder type were selected for initial contact. During the interview process, the respondent sample was supplemented by snowball sampling based on references provided by stakeholders (Lofland et al. 2006). A total of thirty-four semi-guided telephone interviews were conducted in the two states (20 in Washington; 16 in Pennsylvania). The completion rate among individuals who responded to the initial e-mail invitation was 80 percent in Washington and 61 percent in Pennsylvania. Interview respondents were assured anonymity to promote candid responses. The average interview duration was 50 minutes. See Appendices A2 and A3 for the interview guide and number of responses by stakeholder type. All interviews were recorded and transcribed.

Supporting data were retrieved from a variety of publicly available secondary sources. Selected documents from the initial Google search were catalogued for analytic use. In addition, LexisNexis searches were conducted to retrieve relevant items from state newspapers, yielding a total of 47 relevant items from 8 Washington newspaper and 101 items from 27 Pennsylvania newspapers. Targeted searches of state websites yielded official policy documentation, including legislation, executive orders and policy directives/memos. Documents relating to “Olmstead” cases were retrieved from the University of Michigan’s Civil Rights Litigation Clearinghouse (University of Michigan, n.d.). Supporting documents transmitted by interview respondents were catalogued and reviewed. Extant state-level data related to demographics, socio-economic status, service participation and federal grant participation were gathered from a variety of sources, including the American Community Survey (U.S. Census Bureau n.d.), StateData.info (Institute on Community Inclusion at the University of Massachusetts n.d.), State of the

21 An additional 21 national-level respondents were identified and interviewed using similar respondent selection processes. Those responses were not included directly in this study, although data from those interviews for context and to interpret responses.
States in Intellectual and Developmental Disabilities (Coleman Institute for Cognitive Disabilities at the University of Colorado n.d.), State Fact Sheets (Center on Budget and Policy Priorities n.d.) and federal government websites. Supplemental data were used as evidence for selected ACF conceptual elements, including 1) sources of change; 2) context; and 2) political opportunity.

### 3.43 Coding

All interview transcripts were coded in Dedoose 7 using ACF conceptual categories and a multi-staged coding strategy involving initial (open) coding on a sample of the interviews, followed by theoretically-grounded focused coding on all interviews (Lofland et al. 2006). The initial coding strategy was used to become familiar with the data and assess the relevance of ACF conceptual elements for the context and research questions of interest. A focused coding strategy was used to code each interview for the presence of selected ACF conceptual elements, including 1) external and system events; 2) coalition resource availability and use; 3) policy changes; and 4) beliefs and coalitions. See Appendix A6 for a detailed codebook, including primary codes and subcodes.

### 3.44 Analytic Approach

The coded and catalogued data were triangulated and used to inform within-case and cross-case comparative analyses. The within-case approach involved preparation of an in-depth case study for each case using theoretically-oriented process tracing methods to identify likely causal paths between one or more conditions and the outcome(s) of interest (George and Bennett 2005). The results from the within-case analyses were then used comparatively, taking advantage of the longitudinal nature of the research design to yield inferences about the contributors to variation in policy change timing and pathways (George and Bennett 2005).

### 3.5 Case Summaries: Pennsylvania and Washington

This section provides a brief overview of the events relating to CIE-focused policy change in Pennsylvania and Washington. Figure 4 shows a side-by-side visual of key
events and policy changes in the two states between 1999 and 2017. See also Appendix A7 for detailed case summaries and visual presentation of the causal process.

Figure 3.4: Timeline of Key Events and Policy Changes

3.51 Washington

In 2006, in the wake of a subsystem breakdown involving a legislated mandate to review system goals (Washington Legislature 1998), Washington became one of the first adopters of a CIE-focused policy directive, the Working Age Adults Policy (Washington Department of Social and Health Services 2004), which established employment supports as the first use of subsystem program funds for working-age adults (21 through 61 years)
(Hall et al., 2007). The policy effectively displaced day habilitation (“community access”) services with CIE-focused services for the first nine months of service participation and was subsequently codified in 2012 legislation (Washington Legislature 2012). These efforts were followed by a 2015 commitment to eliminate new admissions to sheltered workshops as part of a HCBS transition plan (Washington State Department of Social and Health Services 2015). The state also adopted several minor changes during the study period, including a comprehensive needs assessment strategy and outcomes-based service provider rates.

The Washington DH&E has a strong history of employment-related service provision and stakeholder collaboration, but coalitions have become more active on both sides of the CIE policy issue, and the Choice coalition has repeatedly mobilized in response to Employment First policy changes and related activities. Respondents from both coalitions describe ongoing tension. One Choice respondent states:

\textit{If the jobs were available now, then Washington would already be an Employment First state. It’s our position that Washington wants to become an ‘Employment Only’ state under the guise of ‘Employment First’.}

(WA\_ind30 telephone interview)

Similarly, an Employment First respondent describes ongoing discontent with the Employment First approach:

\textit{We’ve got some legislators who continue to oppose it. [Who] say, ‘Why would we force people to try our most expensive service.’ And we live that every year in legislation, and again, this year. So, even though we put Employment First in policy, now that policy is continually threatened...}

(WA\_ind04 telephone interview)

### 3.52 Pennsylvania

Pennsylvania was slow to prioritize CIE-focused policy. Since 1990, Pennsylvania has had a written policy supporting access to employment opportunities for individuals with intellectual disability (Pennsylvania Department of Public Welfare 1990), but service provision records suggest a low level of attention to integrated employment services. In 1999, only 19% of Pennsylvania participants received integrated employment services, substantially lower than the average of 29% among all states (University of Massachusetts
Moreover, no major policy changes occurred until after the 2014 HCBS Final Rule and related guidance, despite early attempts to renew the state’s commitment to employment policies via policy directive in the 2000s. Increased attention to CIE-focused policies began in the early 2010s, with minor changes related to centralization of contracting authority and a related service provider rate restructuring process. After the federal “settings” rule was finalized, however, multiple changes occurred, including an Executive Order and new HCBS waiver rules that added new employment-focused service definitions and restricted facility-based participation.

Similar to Washington, Employment First coalition activity preceded major policy changes, beginning in the early 2010s with a stakeholder social media campaign and gubernatorial involvement in the “A Better Bottom Line” CIE-focused national campaign. The Choice coalition did not emerge until the new HCBS rules were announced in 2016. In response to the more restrictive rules, service providers, families and their legislators mobilized at a protest in Harrisburg, which led the state to reduce the restrictions. Employment First advocates have organized to promote Employment First legislation, which was introduced as HB 2130 in the 2015 session (Pennsylvania House of Representatives 2015), introduced again as HB 1641 in the 2017 session (Pennsylvania House of Representatives 2017). Respondents note that the legislation is intended to codify preceding policy changes, and that organizers have deliberately avoided including dramatic changes to sheltered workshop rules in the legislation. One Employment First supporter states:

*I’ll be absolutely frank in saying that we did not want to get into the middle of the sheltered workshop fight. We didn’t think that was a fight that we could win… As much as we would like it to go further, we think there's only so much appetite politically that we can manage right now.* (PA_ind51)

The legislation was ultimately signed into law by Governor Wolf in June 2018, with provisions for state agencies to prioritize supported employment services, establish a Governor’s Cabinet for People with Disabilities and a goal for at least 7% of the state agency work force to comprised of individuals with disability (Pennsylvania Legislature 2018).
3.6 Findings

Results from the study are organized around the three main research questions, including: 1) What does state-level CIE-focused policy change look like? 2) Why and how did CIE-focused policy change occur? and 3) Why did states vary in the timing of policy change?

3.6.1 The Character of Policy Change

In the context of the ACF policy changes include “significant shifts in the direction or goals of the subsystem” (Jenkins-Smith et al. 2017, 145), while minor policy changes include those that change only the means of achieving acknowledged goals (Jenkins-Smith et al. 2017, 145; Sabatier and Jenkins-Smith 1999). This study further refines the distinction, classifying “major” policy changes as those that impose restrictions on the status quo, and “minor” policy changes that simply provide continued support for the provision of CIE services without any accompanying change to non-CIE services. Washington and Pennsylvania both experienced major and minor policy changes over the course of the study period, but differed in the degree, timing and sequence, as shown in Table 3.2.

22 In contrast, the Systems Change model does not distinguish between minor and major change.
23 This distinction is derived from contextualization of the ACF. As such, the labels “major” and “minor” do not necessarily correlate with other assessments of policy change or importance (e.g., efficiency, effectiveness).
Table 3.2: Comparison of Policy Changes

<table>
<thead>
<tr>
<th>Type of Change(s)</th>
<th>Washington</th>
<th>Pennsylvania</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major changes:</td>
<td>1) Working Age Adults Policy and subsequent legislation</td>
<td>Major changes:</td>
</tr>
<tr>
<td></td>
<td>2) Limits to sheltered workshop entry</td>
<td>1) Executive Order</td>
</tr>
<tr>
<td>Minor changes:</td>
<td>1) Outcome-based rate structure</td>
<td>2) Community settings requirement</td>
</tr>
<tr>
<td></td>
<td>2) Comprehensive needs assessment</td>
<td>3) Elimination of sub-minimum wage for small group employment</td>
</tr>
<tr>
<td>Timing</td>
<td>Early (before 2014) and Late (2014 or later)</td>
<td>Late (2014 or later)</td>
</tr>
<tr>
<td>Sequence</td>
<td>Institutional rule-making FOLLOWED BY Decision by government authority AND Additional institutional rule-making</td>
<td>Decision by government authority FOLLOWED BY Institutional rule-making</td>
</tr>
</tbody>
</table>

Types of Change

Washington and Pennsylvania both made major policy changes during the study period. The Working Age Adults Policy in Washington clearly favors participation in employment services by placing limitations on participation in day habilitation services and stated limits to sheltered workshop entry forecloses on such services. In Pennsylvania, new waiver-related rules requiring at least 25% participation in a community setting also limits the use of segregated employment services. However, Washington changes are more restrictive to status quo service options and place a greater emphasis on employment.

These major policy changes might otherwise be described as incremental, in the sense of introducing marginal changes to existing rules. However, they clearly reflect a shift in the policy core beliefs, namely related to the importance and availability of traditional non-CIE services, and are described as meaningful by respondents. While the ACF does not preclude incremental change, major change is not typically described by ACF scholars in those terms.

Both states also made a variety of minor policy changes throughout the study period, such as new service definitions (Pennsylvania) and an outcomes-based rate structures (Washington and Pennsylvania), both of which reflect a shift in the means of...
encouraging participation in employment services. The Systems Change model explicitly anticipates these types of changes (e.g., flexible funding, incentive structures), but does not as clearly articulate the types of major changes observed in these subsystems.

**Timing and Sequence**

There are clear differences in the timing and sequence of policy changes. As expected, Washington experienced early major policy change (before 2014), while Pennsylvania did not experience major policy change until after 2014. In both states, the major policy changes are associated with a combination of decisions by government authorities and changes to institutional rules. The sequence of events differs in the two states, with policy directives and institutional rulemaking unexpectedly preceding decisions by government authorities in Washington state.

Furthermore, most of the changes might be best described as incremental, in the sense of introducing marginal changes to existing rules, despite being categorized as “major” changes and described as meaningful by respondents. While the ACF does not preclude incremental change, major change is not typically described by ACF scholars in those terms.

**3.62 Why and How Did Policy Change Occur?**

As shown in [Error! Not a valid bookmark self-reference.], and described in the remainder of this section, the evidence suggests that in both cases, initial events and other conditions yielded opportunities for Employment First supporters to proactively use coalition resources in pursuit of policy change. Choice supporters tended to act more reactively in response to the adoption and/or proposal of restrictive CIE-focused policies.
<table>
<thead>
<tr>
<th></th>
<th>Washington</th>
<th>Pennsylvania</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Pre-2014</strong></td>
<td>Source(s) of change:</td>
<td>Source(s) of change:</td>
</tr>
<tr>
<td></td>
<td>High degree of subsystem breakdown</td>
<td>Low degree of subsystem breakdown</td>
</tr>
<tr>
<td></td>
<td>High degree of subsystem attention</td>
<td>Low degree of subsystem attention</td>
</tr>
<tr>
<td></td>
<td>Political opportunity:</td>
<td>Political opportunity:</td>
</tr>
<tr>
<td></td>
<td>High bureaucratic advocacy</td>
<td>Low bureaucratic advocacy</td>
</tr>
<tr>
<td></td>
<td>High national support</td>
<td>Moderate national support</td>
</tr>
<tr>
<td><strong>Context:</strong></td>
<td>High antecedent levels of CIE services</td>
<td>Low antecedent levels of CIE services</td>
</tr>
<tr>
<td><strong>EF Resources/strategies:</strong></td>
<td>Strong connection to allies in authority</td>
<td>Weak connection to allies in authority</td>
</tr>
<tr>
<td></td>
<td>High degree of mobilizable troops</td>
<td>Low degree of mobilizable troops</td>
</tr>
<tr>
<td></td>
<td>Strong strategic use of information</td>
<td>Weak strategic use of information</td>
</tr>
<tr>
<td></td>
<td>Strong national support</td>
<td>Moderate national support</td>
</tr>
<tr>
<td></td>
<td>Strong service provider support</td>
<td>Weak service provider support</td>
</tr>
<tr>
<td></td>
<td>High coalition membership</td>
<td>Low coalition membership</td>
</tr>
<tr>
<td><strong>Choice Resources/strategies:</strong></td>
<td>Moderate connection to allies in authority</td>
<td>Moderate connection to allies in authority</td>
</tr>
<tr>
<td></td>
<td>Low degree of mobilizable troops</td>
<td>High degree of mobilizable troops</td>
</tr>
<tr>
<td></td>
<td>Strong strategic use of information</td>
<td>Weak strategic use of information</td>
</tr>
<tr>
<td></td>
<td>Moderate national support</td>
<td>Moderate national support</td>
</tr>
<tr>
<td></td>
<td>Low coalition membership</td>
<td>High coalition membership</td>
</tr>
<tr>
<td><strong>2014 and later</strong></td>
<td>Source(s) of change:</td>
<td>Source(s) of change:</td>
</tr>
<tr>
<td></td>
<td>High degree of hierarchical guidance</td>
<td>High degree of hierarchical guidance</td>
</tr>
<tr>
<td></td>
<td>High degree of subsystem attention</td>
<td>High degree of subsystem attention</td>
</tr>
<tr>
<td><strong>Political opportunity:</strong></td>
<td>High degree of bureaucratic advocacy</td>
<td>Low degree of bureaucratic advocacy</td>
</tr>
<tr>
<td><strong>Context:</strong></td>
<td>High antecedent levels of CIE services</td>
<td>Low antecedent levels of CIE services</td>
</tr>
<tr>
<td><strong>EF Resources/strategies:</strong></td>
<td>Strong connection to allies in authority</td>
<td>Strong connection to allies in authority</td>
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<td>High degree of mobilizable troops</td>
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<td>Strong strategic use of information</td>
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<td></td>
<td>Strong national support</td>
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<tr>
<td></td>
<td>High coalition membership</td>
<td>High coalition membership</td>
</tr>
<tr>
<td><strong>Choice Resources/strategies:</strong></td>
<td>Moderate connection to allies in authority</td>
<td>Moderate connection to allies in authority</td>
</tr>
<tr>
<td></td>
<td>Moderate degree of mobilizable troops</td>
<td>Strong degree of mobilizable troops</td>
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<td></td>
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<tr>
<td></td>
<td>Moderate national support</td>
<td>Moderate national support</td>
</tr>
<tr>
<td></td>
<td>Low coalition membership</td>
<td>Moderate coalition membership</td>
</tr>
</tbody>
</table>
Sources of Change

The ACF posits that multiple conditions can act as necessary, but not sufficient, sources of policy change. In both states, subsystem conditions provided the spark for subsequent coalition-based activity and policy change. In Washington, the late 1990s subsystem breakdown heightened political and subsystem attention to CIE-related issues and was closely followed by the (mandated) 2002 Stakeholder Workgroup report that articulated support for a Pathway to Employment, as well as the 2003 dismissal of the Arc of Washington vs. Quasim lawsuit that argued for a full range of services (University of Michigan n.d.). The later events represented a negotiated agreement and a judicial venue closure, respectively, offering an opportunity for administrative leadership to formulate and implement the initial Working-Age Adult Policy. Pennsylvania also experienced subsystem breakdowns in the 2000s, but the resulting subsystem and political attention targeted waitlist issues and problems with the county-based contracting, rather than the service mix. However, the 2014 federal HCBS “settings” rule served as a primary motivator for major policy changes in both states. In Pennsylvania, observations of Olmstead-related litigation in other states also provided an impetus for change. These observations suggest that Washington experienced an internal pathway to policy change, while Pennsylvania experienced a quasi-external pathway.

However, there is also evidence that policy-oriented learning contributed to minor policy changes in both Pennsylvania and Washington. The process of developing a comprehensive needs assessment process (WA) and setting outcomes-based rate structures (both PA and WA) were both accompanied by substantial reference to research and extant data. There is less evidence of policy-oriented learning before the major changes, as indicated by technical analysis and related analytic debate. However, selected service

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24 In Washington, issues related to the waitlist were resolved in the judicial venue.
providers in Washington refer to survey data (showing that individuals would prefer to work) as an instigator for subsequent efforts to transform their service structures.

**Context, Political Opportunity and Coalition Resources/Strategies**

Relatively stable state and subsystem contextual attributes can also influence the favorability of the environment to policy change. The two states experience only slight differences in political climate and key economic conditions. Washington’s government is historically more liberal, although the two states are equivalent with respect to citizen ideology (Fording 2018). Economic conditions, including unemployment and labor force participation responses to the Great Recession, were similar during the study period (US Census Bureau n.d.). Moreover, subsystem service structures were similar – both states relied on fee-for-service models (i.e., not managed care) and HCBS services were not unionized in either state. Finally, despite differences in government ideology, the states’ overall welfare commitment, including TANF participation and support and Medicaid expansion, has followed similar trends over time.

However, the two states’ portfolio of CIE-focused service provision prior to the study period was dramatically different. In Washington, the proportion of participants receiving integrated employment services in 1999 was 58%, compared with only 19% of Pennsylvania participants. Furthermore, the proportion grew to 85% in Washington, while Pennsylvania’s proportion remained consistently low. It is challenging to disentangle the influence of service levels from other conditions. However, there is little evidence that service levels alone influence policy; instead, they interact with coalition resources and strategies to yield a pathway to policy change. The evidence in this study suggests that service levels matter, in these cases, at least in part because of the influence on coalition membership, especially among service providers.

Service providers advocate for policy change on their own behalf and can also act as mobilizers of families and individuals. In the late 1990s, major Washington service providers formed an advocacy network (P2000, subsequently renamed P2020) separate from the traditional service provider association Rehabilitation Enterprises of Washington (REW). In the 2000s, P2020 and REW merged to form the Community Employment
Alliance and issued a statement declaring CIE as its preferred policy and yielding an important source of support for proposed policy changes. In contrast, service providers in Pennsylvania played an active role in mobilizing individuals and families against proposed rule changes, suggesting that service provider coalition membership plays an important causal link between service levels and policy change.

Since the finalization of the 2014 federal HCBS rule, however, most service providers (and their professional associations) in both states anticipate eventual implementation of federal regulations, and articulate some combination of support, neutrality, or resignation toward Employment First policy positions. One representative from a Pennsylvania professional association states “*The state's really careful to say they're not mandating closure of these workshops or adult training facilities, but the landscape is really changing*” (PA_ind45 telephone interview). That said, in both states, a contingent of service providers have mobilized against CIE-focused policy in the form of Choice coalitions, and in Pennsylvania there is little of a mass coalition defection by service providers similar to that experienced in Washington in the 2000s.

Political opportunity refers to the influence of long-term opportunity structures and political environment on the resources and behaviors of subsystem actors and coalitions (Sabatier and Weible 2007). In these cases, bureaucratic advocacy stands out as a key contributing factor related to policy change in both states. Major CIE-focused policy change in both states was initially achieved via policy directive (in Washington) and rulemaking (in Pennsylvania) by administrative leaders widely recognized as vocal and skilled Employment First champions. These findings are aligned with both ACF suggestions that formal legal authority is one of the most powerful coalition resources (Sabatier and Weible 2007), as well as with literature acknowledging the active role of bureaucrats in the policymaking process (Krause 1999; Workman 2015). That said, an attempted CIE-focused change via policy directive in Pennsylvania during the late 2000s failed, suggesting that bureaucratic advocacy alone is not sufficient for policy change, but also requires strong and committed administrative leadership.

The contribution of decentralized authority (to the county level) is unclear, although multiple respondents attributed Washington policy changes to county authority.
However, authority in Pennsylvania was similarly decentralized during the same period, and no change occurred there, even under the leadership of a sympathetic state administrator. Moreover, by the time that Pennsylvania began to explore policy change, authority had been centralized at the state level, in response to federal concerns about inconsistent county contracting practices. These findings suggest that goal alignment between state and county administrations offered the opportunity and support for change, rather than the structure itself.

There is little evidence that macro-level long-term opportunity structures influenced policy change. As US states, both subsystems are pluralist subsystems with concomitant high consensus requirements and formal system openness. Moreover, both states are subject to overlapping rural/urban and ideological divides, suggesting that such cleavages do not explain observed differences in the policy process, although there is some evidence that such cleavages may contribute to coalitional divergence in policy preferences. However, it would be ill-considered to deny the influence of the national stage on state-level choices, even though national events, support and guidance are broadly applicable to all states. National events and support offered opportunities for policy actors, especially those from the Employment First coalitions, to raise the profile of CIE-focused policy change on the subsystem agenda and to provide a coalition-based interpretation. Furthermore, stakeholders in both states have access to the formal, federally-supported Protection and Advocacy system, and there is evidence that the P&A-supported organizations (e.g., DD Council, Disability Rights Network, UCEDD) are active in both states. Similarly, there is strong evidence of both formal channels of communication and advocacy (e.g., public comment periods) in both states, as well as informal networks. However, there is some evidence that the Employment First coalition in Washington had closer ties with national supporters in the 2000s, while Pennsylvania ties with national supporters were relatively weak until the mid-2010s.

In both states, the Employment First coalition was more proactive in its pursuit of major policy change, while the Choice coalition tended to mobilize more reactively in response to proposed or actual policy changes. The character of mobilization in both states suggests that the Employment First coalition has access to more resources than the Choice
coalition, especially during the period(s) prior to policy change. However, both coalitions attempted to influence policy via heightened political and subsystem attention, especially through the strategic connections to allies in positions of authority, information, and mobilizable troops.

The Employment First coalition maintained a strong connection in the form of an ally in agency leadership in both states. In Washington, for example, while respondents noted the important contributions of skilled advocacy leadership, a dedicated organization (WISE) and county-based support, they attributed the initial policy directive to the Director of Developmental Disabilities Division Linda Rolfe, who held that position until 2013. Similarly, Deputy Secretary Nancy Thaler in Pennsylvania has been given much of the credit for recent changes in Pennsylvania, although respondents also noted the contributions of her predecessor Steve Suroviec and other advocacy leaders. In contrast, the Choice coalition does not appear to have had formal support among state agency leadership, instead focusing on establishing connections with legislative allies, often relying on existing advocacy channels and frequent in-person contact. The Employment First coalition also invested in establishing and maintaining relationships with state legislators to influence CIE-focused policy change.

Relatedly, both coalitions strategically used information and mobilizable troops in tandem in both states. For example, the Pennsylvania Choice coalition relied heavily on these strategies, mobilizing sheltered workshop participants and their families to protest proposed rule changes at the Capitol, providing insight into the path dependent nature of subsystem policy change and stasis. Similarly, the Employment First coalition in Pennsylvania mobilized individuals with I/DD to develop a social media campaign (#iwanttowork) that respondents attribute with focusing political attention on CIE-focused policy. The coalitions typically rely on civil rights framing (employment as a right, choice as a right) and narrative (stories of hope, stories of decline), targeting subsystem stakeholders and selected government authorities, to influence major policy change. In Washington, administrative data has also been used by both coalitions since the initial policy change, both politically and instrumentally. Thus far, Pennsylvania coalitions show little evidence of using administrative data to influence major policy change, relying more
heavily on framing to convey information. In contrast, administrative data and expert-based opinion were used in both states to influence minor changes, as anticipated by the ACF. Interestingly, neither coalition in either state focused its resources on influencing broader public opinion.

3.63 Why did states vary in the timing of policy change?

Two distinguishing subsystem conditions stand out as having an influence on the timing of major policy change. First, the mass defection of service providers from the Choice coalition in Washington, as indicated by reform of the main professional association, signaled support for major policy change from that stakeholder group. While service providers in Pennsylvania are cognizant of the federal changes, they have not publicly announced a preference for Employment First policy en masse. While they are not necessarily opposed to all Employment First policy, they are protective of traditional services and mobilize as necessary to resist reform.

Second, the waiting list issue emerged as a major issue in both states in the early 2000s. In Pennsylvania, advocates formulated a major mobilization campaign to address the issue with direct advocacy. In contrast, Washington waiting list issues were addressed by the judicial system, freeing up stakeholders to pursue CIE-related issues. These observations suggest that in a system with limited resources, competing subsystem agenda items can also influence the timing of policy change.

Finally, even though the study timeframe extended only to 1999, multiple Washington respondents stated without prompting that policy decisions made in the 1980s and 1990s were integral to the policy changes that occurred in the 2000s. One respondent states, for example: “I think the only other unique thing is just, and I'm biased of course, is just that Washington has invested so strongly in training and TA for the last 30 years... that's one key piece of their success over the years” (WA_ind01, telephone interview August 2017). While this observation is aligned with those made by disability researchers (e.g., Hall et al. 2006; Winsor et al. 2007), neither the Systems Change framework nor the ACF provides a strong causal mechanism for linking previous policy decisions, especially minor ones, to subsequent policy change. That said, we might hypothesize a relationship
between these decisions, which heavily targeted service providers, subsequent service levels and the service provider coalition defection observed in the 2000s.

3.7 Discussion and Conclusion

From a policy perspective, considerable federal government resources invested in prioritizing competitive, integrated employment outcomes for individuals with I/DD and highlights the promise of policy instruments for outcome achievement. And yet, we continue to see variation in state-level policy change timing and content. Shining a spotlight on the policy process helps refine our understanding of the types of policy change (minor and major) and conditions that are conducive to major policy change. Moreover, modeling policy change as a coalition-based competition provides information about conditions under which major policy change is likely to occur, as well as likely responses to policy change.

This study offers insight into conditions conducive to state-level policy change that are expected to be useful to both policymakers and researchers. While some of these findings are unlikely to come as a surprise to DH&E stakeholders, the findings are likely to offer insight into an ongoing nationwide change process. This application points to a number of coalition-based strategies and resources that have the potential to accelerate or inhibit change. Moreover, application highlights the potential conflicts that arise in the context of major policy change. Changes to rate structures and assessment tools are not “major” changes (as defined by the ACF, in the sense of changing belief systems) but may still be effective and meaningful for achieving policy goals related to employment outcomes without introducing conflict. In a system that prides itself on collaboration and trust, reformers may need to weigh the costs and benefits of pursuing major change. Finally, the ACF shines light on the implications of the subsystem agenda and attention for policy change; limited stakeholder attention and capacity means that strategic decisions about priority issue areas matter. In a small, mobilization-reliant subsystem like DH&E, choosing to prioritize gains in one area (e.g., waitlist) may come at the expense of gains in another area (e.g., CIE policy).

This study also offers several contributions to the policy process literatures with respect to both application and theory development. First, it extends application of the
ACF to a low salience setting, substantiating several core ACF hypotheses related to policy change and coalitional activity, and illustrating common pathways to major policy change. Furthermore, several of the highlighted conditions, including bureaucratic advocacy, stakeholder mobilization and use of information, and heightened political attention, tell a story of change at the margins of public attention, which is aligned with Krause’s (1999) and Workman’s (2015) models of a dynamic role for bureaucrats. The study also substantiates Jones and Jenkins-Smith’s (2009) hypotheses that coalitions in low salience subsystems are less likely to rely on public opinion as a resource for pursuing policy change.

That said, there are limitations to what can be inferred from the study findings. First, the overall research design limits causal inference. Although the findings are likely to be analytically generalizable, findings from a two-case study are not generalizable to the larger population of US states, especially given the possibility of other pathways to change (e.g., hierarchical imposition). Furthermore, despite the use of variation in policy change timing as a counterfactual, the two cases selected for inclusion did not include any states that had not experienced policy change. The sample of respondents is small and non-representative and the sources of external information (e.g., media and policy documentation) are limited, although the study triangulates data from multiple sources wherever possible.

Looking forward, there are opportunities for the findings from this study to contribute to future applied and scholarly research. The Systems Change model, for example, is used as the basis for decision-making and technical assistance in a variety of government initiatives (e.g., Butterworth et al. 2017). While this study does not explicitly recommend changes to that model, it offers insights into categories of policy change and the influence of a variety of political factors on policy change. For example, the Systems Change model could be revised to more explicitly highlight the strategic activities of bureaucrats, service providers and other stakeholders. The causal mechanisms articulated by the Systems Change model also overlook the role of coalition-based activity. More explicit acknowledgment of coalitional differences and related strategies is likely to yield a more transparent and inclusive model of change.
The study also highlights opportunities to refine the ACF, which tends to treat policy change as dichotomous (minor/major) and focuses heavily on “dramatic and nonincremental” change (Jenkins-Smith et al. 2014, 201). In contrast, this study reveals a more complex process involving a sequence of major policy change that occur in multiple forms (e.g., policy directive and legislation) and at multiple timepoints, as well as coexisting minor and major policy changes. Moreover, this study highlights a potential connection between pre-1999 efforts to promote competitive, integrated employment, and subsequent changes in service provider coalition membership (i.e., defection) that are a main condition for early or late adoption. Indeed, Pierson 2004 describes a process of path dependence, by which relatively small events or decisions influence subsequent consequences due to increasing returns associated with the earlier decisions.

These observations suggest complexities in the policy change process that are not easily addressed by the ACF, and an opportunity for theoretical refinement. Streeck and Thelen (2005) identify a typology of gradual, transformative change that includes multiple types of institutional change, including layering, displacement, drift, conversion and exhaustion. There are parallels between these categories of change and those observed in this study. The minor policy changes, for example, resemble a process by which CIE-focused policy is “layered” onto the existing service mix without explicitly making changes to more traditional service options. The major policy changes, meanwhile, are similar to “displacement,” whereby policy changes both enhance CIE service options and limit non-CIE options. Mahoney and Thelen (2009) take their work a step further with the Theory of Gradual Institutional Change, which articulates theoretical connections between different types of change, including causal mechanisms that result in transition from one type of change to another. Extending the ACF with their Theory of Gradual, Institutional Change is likely to accommodate a more complex understanding of policy changes and offer a richer understanding of the policy change process.
3.8 References


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(October 16, 2015).


4. THE SLOW ROAD TO BIG CHANGE: EXTENDING THE ADVOCACY COALITION FRAMEWORK WITH THE THEORY OF GRADUAL, INSTITUTIONAL CHANGE

4.1 Introduction

The ACF is a policy process framework developed by Sabatier and Jenkins-Smith (1993) that explains subsystem-level policy change as a function of competition by advocacy coalitions. A recent comparative study by Giordono (2018b) applies the Advocacy Coalition Framework (ACF) to two states, Washington and Pennsylvania, which both achieved abrupt and major policy change with markedly different timing. That study identifies several conditions leading to major policy change in both states, including subsystem events, bureaucratic advocacy and heightened political attention, as predicted by the ACF. However, the study also identifies one condition, coalition defection by service providers, that is associated with the timing of policy change. While coalition defection is a key condition of major policy change in the case of early policy adoption (Washington), it is not a condition of later major policy change (Pennsylvania). Giordono (2018b) notes that in Washington, coalition defection is likely to have been associated with earlier, incremental policy changes in the 1980s and 1990s.

The ACF defines major policy changes as those exhibiting “significant shifts in the direction or goals of the subsystem” (Jenkins-Smith et al. 2017, 145), while minor policy changes primarily reflect a change in the means of achieving acknowledged goals (Jenkins-Smith et al. 2017, 145; Sabatier and Jenkins-Smith 1999). The ACF expects that abrupt policy changes are more likely to reflect major change, while incremental developments, such as policy-oriented learning, are more likely to yield minor changes (Jenkins-Smith et al. 2017). While the ACF does not explicitly preclude the possibility of major change occurring over a long time horizon via incremental developments, the theoretical pathways do not readily accommodate or explain such cases.

In contrast, Mahoney and Thelen (2009) offer both a typology associated with gradual (incremental), transformative (major) change, as well as an underlying theory to account for such changes. They build on Streeck and Thelen’s (2005) earlier distinction between the process of change (incremental or abrupt) and the result of change (discontinuity or continuity), and their identification of four “modes” of institutional change (i.e., displacement, layering, conversion and drift) to develop a Theory of Gradual Institutional Change (GIC). The GIC posits specific
configurations of rule changes (i.e., removal of old rules, neglect of old rules, changed enactment, and introduction of new rules) associated with each type of change. Importantly, Mahoney and Thelen (2009) suggest when displacement occurs over a shorter time frame, it is essentially analogous to the more abrupt and discontinuous process typically examined by traditional change frameworks. These advances suggest the potential for a richer and more complete explanation for the policy changes documented by Giordono (2018b). Indeed, that study notes the parallels between the GIC modes of change, especially layering and displacement, and the policy changes experienced in the two subsystems.

The GIC thus offers an opportunity to apply concepts of gradual, institutional change in the context of the ACF, which would expand its scope and relevance, as well as respond to recent calls to explore potential integration of the policy process and comparative politics literatures (e.g., John 2017; Tosun and Workman 2017). Given these theoretical and empirical observations, this study has two objectives: 1) to identify strategies for using concepts from the GIC in the context of the ACF; and 2) to illustrate the added value of an extended framework. The study begins with a description of the theoretical frameworks, including motivation and operationalization of the proposed integration, followed by an illustration applied to the disability policy subsystem in Washington State. The subsequent discussion includes both theoretical and policy implications.

The study finds that the proposed extension of the ACF provides a richer explanatory framework for certain types of major policy change, especially cases that exhibit signs of having transitioned from earlier incremental change to more abrupt change years later. This is likely to be particularly valuable when applied to subsystems that can accommodate a layered, dual-option system (i.e., two or more competing policy options), such as service-based systems. The proposed extension is accompanied by an illustration using a case of changes to disability-focused Day Habilitation and Employment policy in Washington State. The illustration describes incremental public policy changes (e.g., rule changes and investments) in a dual-option system that preceded differential changes to coalition membership over time, culminating in coalition defection and setting the stage for more abrupt, major policy change that places restrictions on previous options. The illustration demonstrates the relevance of GIC concepts and suggests that incremental policy change may be an important antecedent to abrupt change under certain conditions. This study highlights the potential for early policy decisions to set a differential
course for major policy change, as well as the signals, including coalition deflection and bureaucratic advocacy, that may foreshadow the transition from a layered, or dual-service system, to one that favors a single option.

4.2 Theoretical Frameworks

The ACF is a longstanding framework that has been tested in multiple contexts to explain dramatic policy change (i.e., discontinuous result, abrupt process). The GIC is a more recent theoretical contribution that focuses on gradual, transformative change (i.e., discontinuous result, incremental process), offering an opportunity to expand the ACF’s traditional focus on major change. This section describes both frameworks, identifies opportunities for integration, and addresses their epistemological compatibility.

4.2.1 Advocacy Coalition Framework

The ACF is a policy process framework developed by Sabatier and Jenkins-Smith (1993) that explains subsystem-level policy change as a function of competition by advocacy coalitions. According to the ACF, advocacy coalitions, which can include a variety of subsystem policy actors, form around a shared 3-tiered belief system (deep core, policy core and secondary) and coordinate to achieve their policy preferences (Jenkins-Smith et al. 2017; Sabatier and Jenkins-Smith 1993). The ACF typically applies a binary typology of policy change including “major” and “minor” change, reflecting shifts in the subsystem goals (i.e., policy core aspects) and the means for achieving subsystem goals (i.e., secondary aspects), respectively (Sabatier and Jenkins-Smith 1993). The ACF also distinguishes between incremental and nonincremental policy change; while nonincremental change is the primary focus, the ACF acknowledges the possibility of incremental change (Jenkins-Smith et al. 2017). As shown in Figure 4.1, the ACF hypothesizes multiple pathways to major policy change, including: 1) external perturbations; 2) internal events; 3) policy-oriented learning; 4) negotiated agreement; and 5) hierarchical imposition (Jenkins-Smith et al. 2017).
Figure 4.1: The Advocacy Coalition Framework, adapted from Jenkins-Smith et al. (2017)

All of these pathways are subject to subsystem conditions, including stable (contextual) parameters, long-term coalition opportunity structures and short-term constraints and resources, all of which act to influence coalitional beliefs, resources and strategies. While not explicitly hypothesized by the original ACF, Nohrstedt (2011) identifies three key causal mechanisms that are hypothesized to increase the likelihood of major policy change, including: 1) shifts in advocacy coalition membership; 2) redistribution of subsystem resources; and 3) opportunities to access new policy venues. The two major ACF policy change hypotheses are as follows:

*Policy change hypothesis 1: Significant perturbations external to the subsystem, a significant perturbation internal to the subsystem, policy-oriented learning, negotiated agreement, or some combination thereof are necessary, but not*
sufficient, sources of change in the policy core attributes of a governmental program.

Policy change hypothesis 2: The policy core attributes of a government program in a specific jurisdiction will not be significantly revised as long as subsystem advocacy coalition that instated the program remains in power within that jurisdiction -- except when the change is imposed by a hierarchically superior jurisdiction.

The ACF also specifies theories of coalition advocacy formation and maintenance, as well as policy-oriented learning (Jenkins-Smith et al. 2017; Sabatier and Jenkins-Smith 1993). Policy-oriented learning is more likely to occur incrementally and serve as a source of minor policy change (Jenkins-Smith et al. 2017).

4.22 Theory of Gradual Institutional Change

Streeck and Thelen (2005) offer a typology of institutional change that moves beyond the incremental/non-incremental dichotomy, instead distinguishing four types of change based on the process of change (incremental/abrupt) and the results of change (continuity/discontinuity). This typology describes four types of institutional change, including: 1) reproduction by adaptation (incremental and continuity); 2) survival and return (abrupt and continuity); 3) gradual transformation (incremental and discontinuity); and 4) breakdown and replacement (abrupt and discontinuity). The last type, breakdown and replacement, is the type of change typically associated with policy process frameworks. They further identify five “modes of gradual yet nevertheless transformative change”, including displacement, layering, conversion, drift and exhaustion.

Mahoney and Thelen (2009) subsequently describe the first four modes with respect to configurations of rule changes (removal of old rules, neglect of old rules, changed enactment, and introduction of new rules) that are associated with each type of change. Displacement involves the removal of old rules and the introduction of new rules; displacement that occurs abruptly is a more traditional theoretical focus. Layering occurs with the introduction of new rules without changing old rules, while drift involves the neglect, changed interpretation or modified enforcement of old rules without introducing new rules or removing old rules. Finally, conversion occurs when old rules are interpreted or enforced in new ways in the absence of any formal rule changes. Figure 4.2 displays the GIC framework for explaining modes of institutional change.
In addition to offering typological clarification, Mahoney and Thelen (2009) specify a Theory of Gradual Institutional Change (GIC), which is predicated on the idea that institutional change arises from distribution power struggles. As shown in Figure 4.3, the framework hypothesizes that different types of gradual, transformative change are associated with the characteristics of the political context (strong or weak veto possibilities) and characteristics of the targeted institution (low or high levels of discretion in interpretation/enforcement).

Furthermore, they posit that change agents act as a driving force for change, and that the type of change agent (insurrectionary, opportunist, subversive or parasitic symbiont) varies according to the political and institutional context.
Figure 4.3: Institutional Change Types and Change Agents (in parens), adapted from Mahoney and Thelen (2009)

The GIC, therefore, explicitly acknowledges that both institutional characteristics and individual action may act in tandem to influence the mode of change. Importantly, Mahoney and Thelen (2009) note that displacement can occur over a short or a long time horizon. When major change occurs abruptly, it more closely resembles the type of change typically examined by theories of the policy process, underscoring the potential for the proposed theoretical extension.

4.23 Conceptual Integration

Extension of the ACF with GIC concepts involves modifications to expected 1) policy change typology; 2) pathways to policy change; 3) conceptual elements; and 4) causal mechanisms.

Policy Change Typology

Streeck and Thelen’s (2005) framework of change is useful for comparing the frameworks, which exhibit complementary typologies of change. As shown in Figure 4.4, both frameworks describe policy change according to two main dimensions: 1) the discontinuity of the result; and 2) the nature of the policy process. However, they use different vocabulary to express similar concepts. Where the ACF labels discontinuous change as “major” change, with a focus on the change in policy core beliefs, the GIC describes such change as “transformative,” with less emphasis on framework-specific content. Where the GIC uses the terms “gradual” and “abrupt” to describe time horizons of change, the ACF uses “incremental” and “nonincremental.” Similarly, the frameworks place theoretical emphasis on different types of change. While the
ACF emphasizes discontinuous change experienced nonincrementally, the GIC is primarily interested in explaining discontinuous change experienced incrementally.

**Figure 4.4: ACF and GIC typologies of change (framework emphasis shown in bold)**

**Pathways to Policy Change**

The GIC suggests an alternative pathway to major policy change, marked by a long time-horizon, incremental change process, endogenous mechanisms and four main types of gradual, transformative change. As such, integration of the two frameworks suggests the following starting propositions:

*Proposition 1a: Significant perturbations external to the subsystem, a significant perturbation internal to the subsystem, policy-oriented learning, negotiated agreement, *gradual institutional policy change*, or some combination thereof are necessary, but not sufficient, sources of change in the policy core attributes of a governmental program.*

*Proposition 1b: Gradual, transformative change away from the status quo increases the likelihood and degree of abrupt reform-oriented change in response to subsystem events.*

Neither proposition directly contradicts current ACF propositions, given that the ACF acknowledges the possibility of major change resulting from both internal events, (likely to be
endogenous). However, they add the potential for a hybrid or two-stage pathway to major policy change, involving incremental policy change that yields conditions necessary for more abrupt change.

**Conceptual Elements**

The GIC hypothesizes two key conditions that matter to the type of change likely to emerge: political context and characteristics of the targeted institution. The GIC specification of political context relates specifically to the possibility of veto by “actors who have access to institutional or extrastitutional means of blocking change” (Mahoney and Thelen 2009, 19). This constraint resembles the ACF’s identification of “degree of consensus needed” as an important long-term opportunity structure in response to comparative work (Lijphart 1999; Sabatier and Weible 2007). However, the GIC offers a broader view of that concept than the ACF, which focuses primarily on differences between the national-level political systems (e.g., pluralist, corporatist, etc.). Instead, the GIC specifies that policy actors may have veto access via changes in formal rules, informal rules or practice, which opens that channel to more variation across time and subsystems than the analogous ACF concept. Furthermore, the GIC suggests that veto possibilities are institution-specific. Policy actors who have the potential for vetoing changes to one institution (or policy) may not have similar influence over other institutions (Mahoney and Thelen 2009). Finally, the GIC highlights the conceptual importance of the targeted institution, namely the level of discretion in interpretation and enforcement, while the ACF does not acknowledge discretion as an important element, except potential as it relates to formal legal authority. Incorporating these GIC conditions would add new long-term opportunity structures to the ACF, yielding the following proposition:

**Proposition 2:** Changes in the political context (veto possibilities by policy actors) and/or characteristics of the targeted institution (discretion in interpretation and/or enforcement) is a necessary, but not sufficient, condition for a shift in the mode of policy change experienced in a subsystem.

This proposition explicitly draws a connection between incremental change and abrupt change, specifying the change in conditions that would be necessary for such a shift.

**Causal Mechanisms**
Shifts in the balance of coalition resources, via coalition membership, political resources and/or access to alternative venues, are hypothesized as the main ACF causal mechanism (Nohrstedt 2011). Similarly, the GIC posits that shifts in the balance of power are an important source of institutional change, especially via mobilization of resources and coalition formation. However, the GIC further specifies that the strength of veto possibilities by institutional actors (above and beyond constitutional rules) may also influence the balance of power, suggesting a revision to Nohrstedt’s (2011) proposition (revisions in bold):

*Proposition 3a: Shifts in the advocacy coalition membership structure that significantly weaken the veto possibility by status quo actors increase the likelihood for more abrupt (ACF-style) policy change.*

Relatedly, both frameworks highlight the potential for individual policy actors to influence policy change. The GIC places a spotlight on leadership by “change agents” who influence institutional change, positing that specific types of change agents will be associated with the various modes of change (Mahoney and Thelen 2009), while the ACF acknowledges a potential role for “policy brokers” who facilitate learning and inter-coalition agreement (Ingold 2011; Sabatier and Jenkins-Smith 1993), suggesting an additional proposition:

*Proposition 3b: A dominant change agent(s) who seeks to eliminate an institution/policy and who does not follow the institution/policy rules increases the likelihood of abrupt (ACF-style) policy change.*

Integrating the GIC and the ACF leverages mutual conceptual elements related to coalition structure and subsystem leadership, thus offering a richer explanation for observed policy changes.

4.24 A Modified Framework

Discussion of the theoretical implications of integrating the GIC and the ACF can be incorporated into the ACF visual introduced earlier in this section. Figure 4.5 presents a modified ACF, with revisions shown in bold. The modifications add the two main elements of institutional change (target institution and veto possibilities) and identify gradual institutional change as a potential pathway to policy change.
Despite selected differences, the two theories are epistemologically, methodologically and conceptually compatible. Both frameworks are focused on explaining changes in institutional outputs, confined to policy outputs in the case of the ACF and acknowledge the cyclical nature of the policy process. The GIC and the ACF both acknowledge the role of both institutions and actors, without taking a hard stance, although it could be argued that the ACF is more interested in activity by policy actors and the GIC focuses more heavily on the institutions that influence those actors. That said, Mahoney and Thelen (2009) clearly articulate that change agents are the key link between contextual characteristics and the type of institutional change. Both frameworks accommodate the influence of endogenous and exogenous sources of change,
although the GIC is more focused on endogeneity, while the ACF has historically focused more heavily on exogenous events as the main source of change.

Both frameworks acknowledge that there is more than one pathway to change, although the GIC is clearly more focused on explaining evolutionary (incremental) change, while the ACF is arguably more focused on explaining revolutionary (nonincremental) change. Furthermore, there several conceptual similarities; both acknowledge that the distribution of political resources and long-term institutional structures, matter to policy outputs. The GIC and the ACF both accommodate the potential for both endogenous and exogenous influence on institutional results, although the GIC is predominantly focused on explaining variation in institutional outputs as a function of endogenous factors (Mahoney and Thelen 2009).

Finally, the frameworks are methodologically compatible, including traditions of taking a long-term perspective on the change process and using both qualitative and quantitative data to explore the change process.

4.3 An Illustration

Since 2000, there have been a series of abrupt, major state-level disability policy changes across the country that have prioritized competitive, integrated employment (CIE) services for individuals with intellectual and developmental disabilities (IDD) (Nord 2014). Known as “Employment First,” the new CIE-focused policy changes occurred in two states—Pennsylvania and Washington—under a certain set of conditions, including subsystem events (e.g., subsystem breakdown), heightened political attention via strategic use of mobilization and information, and bureaucratic advocacy (Giordono 2018b). However, Giordono (2018b) also noted that the timing difference in these major policy changes associated with service provider coalition defection. Specifically, Washington State experienced early coalition defection by most service providers in

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25 During the 1980s and 1990s, stakeholders used the term “supported employment” to distinguish between traditional facility-based services (e.g., day habilitation, sheltered workshops) and new service options focused on services that support individuals to perform “paid work in normal, integrated business environments” (Wehman 1989, 2). The more contemporary term is “competitive, integrated employment” (CIE) and the terms are used interchangeably in this study. However, there are minor differences between the two terms. For example, contemporary CIE is typically not inclusive of “group supported employment” services (e.g., work crews and enclaves), which were accommodated and even encouraged, under supported employment strategies.
favor of reform, while Pennsylvania did not. In fact, Pennsylvania service providers organized to resist proposed reform efforts in that state, placing limits on the degree of policy change, despite strong federal government guidance.

4.31 Methods

This study uses a process-tracing approach to specify the causal mechanism associated with coalition defection in Washington State. The approach illustrates that a process of policy layering, which began in the mid-1980s and resulted in a dual-service system, was an important antecedent to the coalition defection and major policy change in the early 2000s.

The data for this illustration come from multiple sources, including telephone interviews with 20 policy actors in Washington State, extant data on DH&E services, and state and federal policy documents, and extant literature. While the telephone interviews were focused on the period from 1999-2017, multiple stakeholders described events occurring during the 1980s and 1990s that they associated with the subsequent policy changes, which were corroborated by extant literature. Interviews were recorded, transcribed and coded using Dedoose 7.0. Relevant interview data, selected data from the policy documents and extant data, as well as evidence from previous studies of the subsystem, were catalogued in the form of causal process observations (Mahoney 2012).

Process-tracing is a method for studying the causal mechanisms that lead to an outcome of interest in a single case (Beach and Pedersen 2016; Collier 2011; Mahoney 2012). In this illustration, theory-building process-tracing is used to identify the causal mechanism that led to coalition defection in the selected case. The steps of theory-building process tracing include 1) conceptualization of the causal mechanism; 2) operationalization of the causal mechanisms; and 3) evidence collection.

While theory-building process tracing is often inspired by an underlying theoretical framework, it is inherently an exercise that relies on examining empirical data. In this study, the endeavor is inspired by the proposed expansion of the Advocacy Coalition Framework. Process-tracing permits inferences about the presence of the causal mechanism in the selected case but does not allow for generalization to the broader population in the absence of comparative analysis. The remainder of this section describes the events in Washington State in the context of the extended ACF.
4.32 Washington State: From Layering to Displacement

The events in Washington State underscore the potential for incremental policy change to influence coalition membership, ultimately yielding more abrupt and major policy change years later. Process tracing analysis suggests the presence of a five-part causal mechanism (layering) leading to widespread adoption of the new strategy, discarding of the old strategy and eventually, coalition defection. Figure 4.6 depicts the five parts of the layering process, including: 1) early innovation of the new strategy (i.e., CIE services); 2) collective promotion by champions; 3) government support for adoption; 4) new and successful adoption; 5) discontinuation of the old strategy; and finally, 6) formal declaration of coalition defection.
Figure 4.6: The Path to Coalition Defection in Washington State

- **Hypothesized Conditions**
  - Low degree of discretion in interpretation and enforcement
  - AND Strong veto possibilities
  - Low implementation/enforcement discretion
  - AND
  - Weak veto possibilities

- **Causal Mechanism**
  - Innovators adopt new strategy
  - Formal authorities adopt rules supporting adoption of new strategy
  - Champions collectively promote new strategy
  - New strategy successfully adopted by more stakeholders
  - Key adopters discontinue old strategy
  - Coalition defection publicly announced
  - Other conditions for major policy change

- **Evidence**
  - 1970s: SE development; PASS-3 model; WISE TA
  - 1990s: P2020 activity; Ellensburg conferences;
  - 1980s: SIG Participation; HB 1618; County Guidelines; HB1811
  - 1990s: New SE providers; IE participation increases
  - 2000s: Morningside Services conversion
  - 1990s: P2000/P2020 formation
  - 2000s: REW/P2020 merge CEA issues position paper and member requirement
  - 2000s: System events; Bureaucratic advocacy; Troop mobilization (Giordano 2018)
The first five steps are indicative of the layering process initially described by Streeck and Thelen (2005), in which new policy is adopted without amending older policies. The last two steps in the process, which more publicly signaled the decline in support for the dual-service system, paved the way for the development of the major policy changes that occurred in the 2006 policy directive and 2011 legislation.

The causal mechanism identified in this case begins with early adoption of a new strategy (in this case, supported employment) by a small number of innovators. In the 1970s and early 1980s, day habilitation and facility-based employment (i.e., sheltered workshops) were widespread. However, Washington service providers began to experiment with employment-based services as early as the 1970s, and early successes with supported employment were disseminated to other service providers via PASS-3, a conciliation-based program of program evaluation (Winsor et al. 2006; Wolfensberger and Glenn 1975).

The initial innovation period was followed by a cyclical process of government intervention, strategic communication, and new adoption of supported employment strategies without changes to rules governing sheltered workshops and other facility-based services. In 1985, for example, Washington State participated in the first competitive federal Systems Innovation Grant (SIG), which provided resources for states to modify existing adult day habilitation programs, such that supported employment could be offered to participants as an alternative option (Wehman 1989). The SIG was a major federal initiative that ultimately served all but two states by the late 1990s, but Washington State was part of the first cohort (McGaughey and Mank, 2001a; Wehman et al. 1989). As part of that grant, the Washington Initiative for Supported Employment (WISE) was created to provide technical assistance and training to service providers. By 1988, almost 50 new supported employment providers had been established (Wehman 1989). Subsequently, in 1988, the Washington State legislature recodified the statutory authority for I/DD services (HB1618), explicitly articulating that “a pattern of facilities and services should be established… which is sufficiently complete to meet the needs of each person with a developmental disability regardless of age or degree of handicap, and at each stage of the person’s development” (Substitute HB1618 1988, 770). The bill includes employment services as an example of authorized services but does not articulate a preference for either facility-based services or supported employment services.
The cyclical process continued throughout the late 1980s and 1990s, as efforts to promote supported employment via government intervention continued in Washington State. State-sponsored conferences at Ellensburg WA provided opportunities for stakeholders, including service providers, to gather to learn about and promote supported employment (Winsor et al. 2006). The major service provider membership organization, Rehabilitation Enterprises of Washington (REW) was founded in 1974 and largely represented sheltered workshop providers at that time (Community Employment Alliance n.d.; WA_ind01 telephone interview). However, in 1992, a group of service providers committed to supported employment formed a provider network called Partnership 2000 (P2000), which they used as a platform for promoting integrated employment (Community Employment Alliance n.d.). P2000 has been credited with promoting the passage of legislation promoting the creation of supported employment opportunities within state agencies, as well as defeat of legislation that would have reduced supported employment opportunities (Winsor et al. 2006). During that same year, the Washington State Division of Developmental Disabilities produced a document called the “County Guidelines,” which articulated six primary benefits expected to result from the services, which were (and are) managed at the county level, and highlighted the role of competitive, integrated employment in achieving those benefits. After the five-year SIG grant ended, WISE transitioned into a 501(c)3 organization that continued to receive contracts from the state to support and promote the adoption of supported employment services among service providers (WA_ind02 telephone interview).

Washington State achieved relatively high rates of participation in integrated employment services during the 1990s, hitting a maximum of 58% in 1999 (statedata.info n.d.). Despite that success, or perhaps because of it, the subsystem began to manifest signs of breakdown, including formal government reviews, a legislated stakeholder workgroup, and multiple lawsuits, as documented by Giordono (2018b). The last steps in the defection process involved the public renouncement of the dual-service model by most major service providers. In 2004, Morningside Services, a large service provider, fully transitioned from a sheltered workshop program to integrated employment services (Community Employment Alliance n.d.; WA_ind26 telephone interview).
interview;). In 2009, Rehabilitation Enterprises of Washington merged with P2020\textsuperscript{26} to form the Community Employment Alliance (CEA), and produced a position paper that declared CIE-focused services and policy, as well as a requirement for members to pledge their support for CIE-focused values (WA\_ind04 telephone interview). The few CEA members who did not agree with the new vision left the organization and continued to operate as a much smaller, competing Choice coalition (Giordono 2018a; Giordono 2018b).

4.4 Findings

The Working Age Adult Policy of 2006 via policy directive (and 2011 (legislation) limited access to more traditional facility-based services, representing a distinct retreat from the dual-service system. Importantly, the Working Age Adults Policy fulfills the ACF concept of major change, as it represents a change in the policy core and related beliefs. However, it does not represent a full breakdown and replacement of preceding policy, as it did not fully eliminate other service options, and it was followed by subsequent minor and major policy changes (Giordono 2018b). These events suggest that the subsystem’s policy change process, while aligned with the ACF, is perhaps better described as a process of layering followed by displacement, with coalition defection serving as the primary causal mechanism for the transition between the two modes.

The evidence suggests that coalition defection was the culmination of a longer-term and incremental process of policy change, which, in combination with the other short-term conditions experienced by the subsystem, including system breakdown, bureaucratic advocacy and troop mobilization (Giordono 2018b), were sufficient to bring about those policy changes. These findings offer evidence in support of Proposition 1a, although Proposition 1b cannot be tested in the absence of a comparative or frequentist research design.

Furthermore, Mahoney and Thelen (2009) posit that layering is likely to occur under conditions of 1) low discretion regarding implementation and enforcement of the targeted institution; and 2) strong veto possibilities. The services in Washington State are provided under a strong federal system responsible for issuing conditions and guidance, state guidance and a

\textsuperscript{26} In 1999, Partnership 2000 was renamed Partnership 2020, or P2020 (Community Employment Alliance n.d.).
system of local contracting and management by county agencies. While there were substantial opportunities for innovation of new services, more traditional services were likely to have been subject to strict implementation and enforcement conditions. Furthermore, the strong veto possibilities of the earlier era, reflect the higher levels of service provision and participation in traditional services, which gradually shifted over time. Indeed, the shift in the balance of support for a dual-service system, which occurred in the early 2000s, also represents the shift from strong to weak veto possibilities, thus opening the way to displacement, and substantiating Propositions 2 and 3a.

Finally, Mahoney and Thelen (2009) hypothesize that specific types of change agents are likely to be involved with different types of institutional change. In Washington state, respondents clearly describe subsystem leadership during the layering era, especially from the 1970s through the early 1990s, as “visionary,” but rarely describe them as revolutionary. In contrast, the Director of the Department of Developmental Disabilities was described repeatedly by stakeholders as seeking to replace the traditional dual-service model with an employment-focused model, although she was not described as a rule-breaker. This offers mixed evidence for the change agent hypotheses forwarded by the GIC, and relatedly, Proposition 3b.

A strength of the identified causal mechanism is the ability to accommodate multiple necessary elements of the change process. For example, a simple response to demand and/or collective action by individuals and families, are embedded as “success” of the new strategy as a necessary part of the causal mechanism; in the absence of it, coalition defection is unlikely to occur. Similarly, the ACF pathway of policy-oriented learning is also consistent with these results, and is embedded in early policy changes, which emphasized technical assistance and training to service providers.

Process tracing methods, when, used in a single case, are intended to be used to specify parts of a causal mechanism, make within-case inferences about the mechanism and contribute to the development of generalizable theories (Beach and Pedersen 2016). While the ACF is a powerful explanatory tool, the GIC extension augments the explanation with insights about 1) the character of the earlier era; and 2) the transition from one type of policy change to the other. The illustration offers strong evidence of a shift from layering to displacement and supports the proposed extension of the ACF. Furthermore, it suggests that coalition defection and bureaucratic advocacy may function as signals of an upcoming shift in the mode of change. The
results are aligned with the ACF but offer a richer explanation of antecedents to the major policy changes that occurred in that subsystem. That said, comparative analysis is needed to more broadly test the propositions, suggesting potential steps for future research.

4.5 Discussion and Conclusion

For us it is an important question to what extent the fringe and the core can peacefully coexist, or whether the fringe can attract enough defectors from the core eventually to displace it.

Streeck and Thelen (2005, 24)

The above sentiment is strikingly aligned with the ACF research agenda established by Sabatier and Jenkins-Smith (1988). The opportunity to unite the two frameworks stems in part from their attention to different manifestations of the dependent variable, policy change, whereby the ACF is more concerned with explaining abrupt (and discontinuous) change, while the GIC is focused on explaining incremental (and discontinuous) change.27

This study’s objectives were to 1) to identify strategies for using concepts from the GIC in the context of the ACF; and 2) to demonstrate the value of an extended framework using an empirical illustration. Both objectives were met, with limitations. The extended framework will benefit from continued efforts to refine concepts and test propositions. The value of the illustration is limited by methodological choices, including the decision to focus on a process study, rather than a comparative study. The illustration is also limited to an analysis of a layering/displacement process, while the GIC proposes several forms of incremental change, which might manifest very differently (or not at all) in the context of the ACF. However, it demonstrates the applicability of GIC concepts and hypotheses to a single case and shows the potential for the GIC to offer a richer understanding of major policy change to ACF applications.

Extending the ACF to accommodate the GIC provides a richer explanation for policy change, yields insights into causal mechanisms, and is likely to expand its scope to subsystems that experience major, incremental change over a longer time horizon. The ACF is applied most heavily in environmental and energy subsystems (Pierce et al. 2017), which may be less likely to

27 Admittedly, the GIC takes a broader view of the dependent variable than the ACF. The focus on policy change is the ACF’s primary focus, but only a subset of the GIC’s interest in institutional change more broadly.
accommodate dual-tracked systems due to the nature of conflict and coalition activity in subsystems where common pool resources and property rights are contested. In contrast, social policy systems, which are constrained by financial resources and political will, may be more likely to accommodate gradual, institutional change. An extended framework may also open avenues to examining cases in which policy change appears to be lacking, despite conditions that would otherwise be expected to yield major change. Finally, extending the ACF with the GIC may provide a template for gaining a richer understanding of policy change that can be applied to other policy process frameworks, such as the Narrative Policy Framework (NPF) and Policy Conflict Theory (PCT), both of which are theoretically and epistemologically aligned with the ACF.

From a policymaker’s perspective, an extension to an existing theoretical framework is unlikely to yield substantial added value for their everyday work. However, the application of such a framework to a variety of settings is likely to provide new insights into the policy process, inclusive of policy formation, adoption and implementation. The illustration in this study, for example, suggests that coalition defection and bureaucratic advocacy may signal of an upcoming shift in the type of policy change pursued by coalitions. While such observations are unlikely to be novel for an astute policymaker, they may nevertheless inform strategic advocacy efforts, and prepare policymakers for other shifts in subsystem characteristics, such as the level of conflict. Finally, the findings highlight the potential for differential policy paths to influence the timing of subsequent policy decisions; overcoming such differences, if desired, may require targeted investments in straggling jurisdictions.

This study offers several opportunities for future research. The illustration, while informative, invites additional comparative analysis, preferably to a sample that moves beyond the two-case study conducted by Giordono (2018b). A similar study of a larger sample over a longer timeframe (e.g., starting in 1980) would provide an opportunity to test some of the propositions and the overall model. Furthermore, comparative applications in other subsystems that are likely to exhibit gradual, transformative change will offer fruitful opportunities for advancing the proposed integration. Applications to subsystems that have been shown to experience other forms of gradual institutional change, such as the drift experienced in the US welfare state (Hacker 2005), would also be fruitful.
Finally, the illustration highlights the potential for refinements to the dependent variable, major policy change. Giordono (2018b) uses a dichotomous variable aligned with typical ACF applications to identify major/minor policy change. However, that study also notes the multiple junctures (and venues) in which similar major policy changes occur in both Washington and Pennsylvania, suggesting that the time horizon of the policy change outcome may be more aligned with a GIC-style incremental displacement process than the typical ACF-style abrupt change. Multiple authors have described a “dependent variable problem” associated with conceptualizing and operationalizing policy change (e.g., Green-Pedersen 2004; Howlett and Cashore 2009; Spicker 2018). Perhaps an extended framework, and closer connections between the policy process and comparative politics traditions, provides a dependent variable opportunity.
4.6 References


5. CONCLUSION

This study turns a policy process lens on state-level policy changes experienced in state-level Day Habilitation and Employment systems that serve working-age adults with Intellectual and Developmental Disabilities (I/DD). Since 2000, over 30 states have adopted policy prioritizing services and supports focused on the achievement of Competitive, Integrated Employment (CIE) outcomes over other service options (e.g., day habilitation, facility-based employment and sub-minimum wage employment) (Nord 2014, Nord and Hoff 2018). The policy changes vary substantially in timing, form and content, but there has been little systematic analysis of them. These observations lead to the study’s main research questions: What do these policy changes look like, and how can we explain both the occurrence of major policy changes and the variation in timing?

In 2015, over 600,000 individuals were served by state-level Day Habilitation and Employment systems, and recent estimates suggest that the number of individuals who would benefit from such services may be as many as five times that number (University of Minnesota n.d.). Disability researchers have shown that participation in competitive, integrated employment can lead to substantial earnings increase and is preferred by both individuals and their families (Wehman 2018). Both disability researchers and federal government agencies have reached a consensus that CIE outcomes are both desirable and achievable, especially in the context of appropriate services and supports. Despite that consensus, the use of segregated work services and nonwork day services have grown at a faster rate than CIE programming and nationwide participation in CIE-focused services and supports remain low (Wehman 2018).

The recent adoption of state-level policy to prioritize CIE outcomes over other alternatives, thus shifting the service mix, has been commended by disability researchers and federal government agencies alike as an important strategy for improving the achievement of employment outcomes. Moreover, in response to a request to describe the “top two or three changes to policies and practice,” stakeholders overwhelmingly identified CIE-focused policy change as a major shift, whether for or against it the change. One Employment First coalition member described the changes in Pennsylvania as follows:

“So, the top [policy change], is absolutely that we are now an Employment First state, which means that when ... I'll speak as a mother, because it's easier for me to explain that way. When I sit at a planning meeting with my son, and his
supports coordinator, they are required to talk about employment. They pretty much talk about that at every meeting and encourage people to explore that. Where[as], in years past, someone like my son, that was never even brought up at the table” (PA_ind21, telephone interview, September 2017)

Other stakeholders, such as this Choice coalition member, were less supportive of the policy changes, but equally cognizant of a major shift in the service mix brought about by CIE-focused policy change:

“I think the Working Age adult policy was one of the worst things we put in. That’s my opinion based on where I live now. Making it an Employment First state ... is not working. ... In Washington state, the DDA or the Developmental Disabilities Administration has made a choice to close down pre-vocational [programs]. And in doing so, in our area anyway, there’s a lot of people that are now going home to couches.” (WA_ind37, telephone interview, July 2017)

The practitioner-oriented Systems Change model identifies strategies for improving employment outcomes, including policy change, and has been used extensively to inform federal government initiatives and CIE-focused advocacy. However, it lacks specification of the political factors highlighted by other disability-focused policy process literature, such as interest group mobilization, agenda-setting, framing and narrative and venue-shopping. Relatedly, the goal-oriented nature of the Systems Change model obscures any opposition to policy change. In response to that gap, this study turns to the policy process literature to shine the spotlight on political factors that might influence policy adoption, and ultimately, individual outcomes.

Prior to the most recent wave of policy changes, disability researchers McGaughey and Mank (2001a) used an innovation and diffusion model to examine the influence of state environmental factors on state-level policy innovation in supported employment. While they identify several predictors of state-level innovation, including economic indicators, socio-political measures and the degree of liberalism, they ultimately conclude that “systems change is complex, and the implementation of supported employment across states has been highly varied” (221). Public policy scholars have long noted that the phenomenon of policy change defies easy characterization, explanation and prediction (Smith and Larimer 2016). The distinction between “analysis in” the policy process and “analysis of” the policy process further compounds the complexity (Lasswell 1970), as researchers toggle between goal-oriented frameworks that explore policy options most likely to achieve outcomes of interest (e.g., the Systems Change model) and explanation-oriented frameworks that focus more explicitly on the change process
itself (e.g., the Advocacy Coalition Framework). Moreover, the wide variety of policy process frameworks compounds the complexity by offering multiple lenses that vary substantially with respect to the scope and levels of analysis, vocabulary and concepts, model of the individual and conceptual relationships (Heikkila and Cairney 2017).

Despite the acknowledged complexity of the policy process, previous scholars have made substantial in-roads in creating valuable theories of policy change. The Advocacy Coalition Framework is one such example. In this study, the Advocacy Coalition Framework provides an important scaffold for demonstrating the role of political factors on policy change in the Day Habilitation and Employment subsystem, especially when contextualized with insights from the Systems Change model. However, the application of Advocacy Coalition Framework to this subsystem and issue area also reveals opportunities for framework enhancement. Extending the Advocacy Coalition Framework with concepts from the Theory of Gradual Institutional Change strengthens the framework’s capacity to accommodate a more nuanced typology of major policy change, and to more fully explain the transition to a service mix that prioritizes competitive, integrated employment over alternative service options strengthens its explanatory capacity. The study’s approach, which integrates multiple frameworks from diverse contexts in an iterative fashion, offers a model for generating new insights about complex phenomena.

5.1 Contributions

This study contributes substantive findings related to policy changes experienced in the Day Habilitation and Employment subsystems of two states, while making theoretical contributions to existing frameworks of change. While the three manuscripts are tailored for slightly different purposes and audiences, they are all expected to contribute to both policy and theory. This study takes advantage of multiple frameworks of change to identify a combination of subsystem conditions resulting prioritization of CIE services in two states, Washington and Pennsylvania. The study identifies competing advocacy coalitions in both states, highlights the political conflict, resources and strategies in DH&E subsystems that influence policy change, and illustrates the path-changing nature of historical policy change.

The theoretical contributions are threefold. The first manuscript extends the application context to explain policy change a low salience policy subsystem, responding to recent calls for application in “nontraditional” settings (Jenkins-Smith et al. 2017), demonstrating the range of that framework. The second manuscript takes advantage of parallels between the policy-focused
Advocacy Coalition Framework and the goal-oriented Systems Change model, yielding mutual contributions to both. The Systems Change framework allows the ACF application to be contextualized with existing knowledge, while shining a spotlight on political factors that the Systems Change model lacks. This dual-framework approach also illustrates an avenue for improving the interface between theories of the policy process and practitioner-oriented models. Finally, the third manuscript identifies complementarities between the Advocacy Coalition Framework and the Theory of Gradual Institutional Change, which focus on diverse but overlapping types of change, and rely on similar concepts and causal mechanisms, thus offering an approach for bridging distinct policy periods. These contributions thus extend the scope, relevance and explanatory power of the ACF to new subsystems and observations of policy change.

From a subsystem-level perspective, many of the findings from this study are unlikely to be novel or surprising to advocates; indeed, the findings are primarily generated from the information provided by subsystem stakeholders, most of whom would likely describe themselves as system advocates. However, the findings from all three manuscripts could be used to refine the widely used Systems Change model to achieve better explanatory and predictive results. The Systems Change model, which has been widely used by government agency and advocacy initiatives to inform subsystem practices and promote CIE-focused services, includes policy change as a key mediator of individual outcomes, but downplays the role of coalitional conflict and related strategies. It also tends to treat policy change monolithically, without distinguishing between the nature, size or direction of policy change. Selected conceptual elements highlighted by this study, such as the interplay between coalition-based activities and resources (e.g., framing, narrative and mobilization), political opportunity (e.g., bureaucratic advocacy) and sources of change (e.g., coalition membership shifts), could be incorporated more explicitly into the Systems Change model. Such a change would yield a more transparent model allowing for policymakers to more fully understand the implications of their policy decisions without altering the framework’s inherently advocacy-focused objectives. Moreover, this study may open a dialogue among advocates about the coalitional similarities and differences which may offer a path to conflict resolution. Finally, the study may offer insights to state legislators about subsystem dynamics and the potential implications of major change, especially for coalition-based conflict. Given the low salience nature of the policy issue, they are less likely to
be attuned to subsystem dynamics, thus are likely to find these findings useful as they consider a variety of policy options.

While the results from the study cannot be generalized to the broader population of US states, the findings are analytically generalizable, and can inform our understanding of the state-level policy changes that have occurred throughout the US. Given that the ACF hypothesizes multiple potential pathways to change, we might expect alternative pathways to emerge from a broader study. For example, at least two states (Oregon and Rhode Island) were subject to a Department of Justice lawsuit and settlement agreements, which suggests a pathway more closely aligned with hierarchical imposition. Further research is needed to test whether these conditions hold for the broader population and/or whether other combinations of conditions lead to major policy change in other states, especially in the presence of additional counterfactuals (i.e., states that never experienced major policy change). The next steps for the substantive line of inquiry pursued in this study involves expansion to a broader sample (or the population of US states). While this study focused predominantly on two states, the results are not generalizable to the broader population. The objective of an expanded study would be to better understand the typical degree of, and pathways to, policy change experienced among I/DD agencies in the United States. The use of an alternative methods would also add value. For example, fuzzy set Qualitative Comparative Analysis (fsQCA) is a medium-n approach that uses set-theoretic analytic processes and set membership scores along a 0-1 continuum to identify configuration of causal conditions that explain observed outcomes (Ragin 1987/2014). Applied to an expanded study of Employment First policy change, the use fsQCA would permit more nuanced characterization of state-level policy outcomes and conditions, incorporation of additional counterfactuals and identification of multiple pathways to change.

Given the proposed ACF extension and related illustration in the third manuscript, expanded study would also likely benefit from a longer timeframe and incorporation of the proposed theoretical refinements. The Theory of Gradual Institutional Change stems from the historical institutionalist tradition, which has been used in a variety of settings to explain the enduring nature of institutions via policy legacies (Weir and Skocpol 1985), path dependency (Pierson 2004) and critical junctures (Capoccia and Kelemen 2007). While the Theory of Gradual Institutional Change is an effort to move beyond theories of continuity, it draws heavily on related conceptual elements and an historical approach to understanding the change process.
As illustrated in the third manuscript, extending the timeframe to at least the mid-1980s would be fruitful for a better understanding of the state-level landscape and subsequent policy changes. However, an expansion would also potentially benefit from an even longer historic view to the 1970s origins of the (ongoing) deinstitutionalization movement (Scott et al. 2008) and the subsequent, early 1980s shift to Home and Community-based Services waivers (LeBlanc et al. 2000). Such an exploration might reveal that much earlier policy events and conditions set the stage for contemporary state-level policy changes.

5.2 Broader Implications

In addition to the substantively-focused implications and next steps, the study yields several observations with broader implications and opportunities for ongoing research. First, the findings contribute to ongoing dialogue about the nature of the relationship between public administration and politics. In the cases presented in this study, the politico-administrative boundary is permeable, contrasting with the traditional dichotomy initial asserted by Wilson (1887) and aligning with contemporary accounts of a dynamic relationship between bureaucrats and policymakers (e.g., Krause 1999; Workman 2015). Relatedly, the findings underscore the challenges associated with public management of contracted service providers, especially in conditions of reduced market competition and capacity (Van Slyke 2007); in this study, the “principal-agent problem” has implications for the policy process, in addition to simple goal achievement. Finally, the findings highlight the ambiguous relationship between policy adoption and implementation. If the federal government clearly supports change, then are the CIE-focused policy changes observed in this study merely a matter of federal implementation, or should they be approached (as in this study), as distinct and independent state-level policy adoption? Nicholson-Crotty and Carley (2016) argue that potential policy adopters “are likely to ask not only, ‘Was the policy effective in other states that adopted it?’ but also, ‘Can we make the policy work for us?’” The results from this study suggest that states do indeed make such decisions, and furthermore suggest that service provider embrace of CIE-focused policy (via coalition defection) signals to policymakers that implementation is more likely to be effective, while service provider resistance projects is likely to suggest implementation roadblocks. Relatedly, Robichau and Lynn (2009) call for better theoretical integration of public administration and policy process frameworks, pointing to opportunities for additional research at the boundary of the two disciplines.
The study also identifies ongoing opportunities for articulating the theoretical links between policy continuity and change. Such an effort, however, will benefit from attention to the underlying conceptualization and operationalization of both policy continuity and change. Multiple typologies of change and continuity exist, and the variation observed among frameworks and applications has been labeled by some scholars in the comparative politics tradition as the “dependent variable problem” (Green-Pedersen 2004; Howlett and Cashore 2009; Spicker 2018). Such variation poses a challenge to the process of identifying an appropriate framework, conducting valid within-study inference, and comparing findings across frameworks. In the policy process tradition, which tend to view frameworks as distinct lenses on the policy process (Heikkila and Cairney 2017), such variation may not be considered a major barrier. At the very least, better understanding of the implications of such variation, will add value to ongoing efforts to identify, describe and understand observations of policy continuity and change.

Finally, the findings from this study are likely applicable to a wide variety of other policy settings. In the realm of closely related social policy areas, we are likely to observe similar patterns of policy layering and displacement with respect to changes in residential policy (i.e., deinstitutionalization) in this target population, as well as in substantive areas that serve well-defined target populations who experience similar barriers to independent living and employment (e.g., individuals who experience mental health conditions, homelessness, etc). More broadly, we might expect to find similar pathways to change in other policy settings where innovations initially coexist alongside existing policy, but are embraced to varying degrees by subsystem stakeholders, ultimately exposing existing policy to coalition-based competition due to beliefs, interests, resource availability or some combination thereof. Contemporary examples might include school privatization efforts (vs public), single-payer healthcare (vs two-tier system), climate change mitigation initiatives (vs adaptation). Those examples are more salient than the policy issue addressed by this study but may exhibit similar patterns of policy continuity and change in response to changing conditions and coalition-based activity.

5.3 Looking Forward

As Weible (2014) notes, “the need for theories is ever essential to studying the complexity of the policy process” (3). The study responds to Weible’s observation by drawing on distinct theories to expanding our understanding of the policy process. However, there has
been little attention to the connection between policy process theories and the theories of changed used by policymakers and advocates in the policy process. This study strikes a balance between the theoretical and the practical by making an introduction between two parallel frameworks from both traditions and invoking a dialogue between them. Furthermore, the study draws from a parallel theoretical tradition to expand the scope of an existing policy process framework. This study does not invent a wholly new approach for explaining observations of policy continuity and change. Rather, it explains more of the complexity in the policy process along a greater range of policy settings by leveraging existing frameworks, making connections between disparate traditions, and setting a pathway for improving our understanding of the policy process.
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APPENDICES
### Appendix A1: Sampling Frame

#### Table A1.1: Supported Employment and EF Policy Adoption by US State

<table>
<thead>
<tr>
<th>Proportion in Supported Employment: 1999</th>
<th>Percentage Point Change in Proportion in Supported Employment: 1999-14</th>
<th>EF policy adoption</th>
<th>Timing of EF policy adoption</th>
<th># of states</th>
<th>States**</th>
</tr>
</thead>
<tbody>
<tr>
<td>High</td>
<td>High</td>
<td>Yes</td>
<td>Early</td>
<td>1</td>
<td>WA</td>
</tr>
<tr>
<td>High</td>
<td>High</td>
<td>Yes</td>
<td>Late</td>
<td>1</td>
<td>OK</td>
</tr>
<tr>
<td>High</td>
<td>High</td>
<td>No</td>
<td>None</td>
<td>4</td>
<td>MA, MD, MO, VT, DE, FL, IA, KS, OH, TX, UT</td>
</tr>
<tr>
<td>High</td>
<td>Low</td>
<td>Yes</td>
<td>Early</td>
<td>7</td>
<td>IN, NV</td>
</tr>
<tr>
<td>High</td>
<td>Low</td>
<td>Yes</td>
<td>Late</td>
<td>2</td>
<td>AL, AZ, CT, GA, ID, IA, KY, MI, MN, NE, NY, SC, SD</td>
</tr>
<tr>
<td>High</td>
<td>Low</td>
<td>No</td>
<td>None</td>
<td>13</td>
<td>VA</td>
</tr>
<tr>
<td>Low</td>
<td>High</td>
<td>Yes</td>
<td>Early</td>
<td>1</td>
<td>MS</td>
</tr>
<tr>
<td>Low</td>
<td>High</td>
<td>Yes</td>
<td>Late</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Low</td>
<td>High</td>
<td>No</td>
<td>None</td>
<td>4</td>
<td>NC, NM, TN, WI</td>
</tr>
<tr>
<td>Low</td>
<td>Low</td>
<td>Yes</td>
<td>Early</td>
<td>3</td>
<td>CA, IL, OR</td>
</tr>
<tr>
<td>Low</td>
<td>Low</td>
<td>Yes</td>
<td>Late</td>
<td>2</td>
<td>PA, WY</td>
</tr>
<tr>
<td>Low</td>
<td>Low</td>
<td>No</td>
<td>None</td>
<td>2</td>
<td>CO, NH</td>
</tr>
<tr>
<td></td>
<td>n/a in one or more of the selection indicators</td>
<td></td>
<td></td>
<td>9</td>
<td>AK, AR, HI, ME, MT, ND, NJ, RI, WV</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
<td></td>
<td></td>
<td>50</td>
<td></td>
</tr>
</tbody>
</table>

High level: 1999 proportion above median (high initial SE proportion)
Low level: 1999 proportion below median (low initial SE proportion)
High change: 1999-2014 percentage point change below median
Low change: 1999-2014 percentage point change below median
Early = Executive Order or Legislation adopted before 2014
Late = Executive Order or Legislation adopted 2014 or later
*States in bold font adopted EF legislation. All others adopted via Executive Order.
Appendix A2: Interview Guides

State-level Telephone Interview Questions

1) Please tell me about your background and your current role.

2) How would you describe your state’s current approach to employment services and supports for individuals with I/DD, and important policies or practices? *For my purposes, policies and practices can mean many things, from formal legislative action and rulemaking to the “business” of service provision to less formal norms and priorities.*

3) Thinking back over the last fifteen to twenty years, since about 2000, what major changes to policies and practices have occurred, for better or worse, relating to employment services and supports in your state?

4) [AS NECESSARY, FOR THE 2-3 TOP CHANGES CITED ABOVE. ALSO ASK ABOUT EMPLOYMENT FIRST IF NOT MENTIONED.]:
   a. What (specifically) changed and when did it occur?
   b. What problem was the change intended to address?
   c. Which stakeholders or groups were most heavily involved, and what was their position?
   d. What were the main arguments for and against the change?
   e. How did supporters and opponents attempt to influence the outcome?
   f. What conditions or events were they key drivers of the change?
   g. How were any differences resolved, if at all?
   h. What role did you or your organization play in efforts to influence the outcome?
   i. Were there any specific individuals who were essential to influencing the outcome?

5) With which groups does your organization collaborate most at the state level to influence policies and practices, and why? With which groups do you avoid collaborating, and why? How has this changed over the last fifteen to twenty years, if at all?

6) With which national groups does your organization collaborate or avoid collaborating, and why? How has this changed, if at all?

7) Is there anything else about your state’s policies and practices related to employment services for individuals with I/DD that you’d like to tell me about?

8) Is there anyone else that you would recommend contacting about these issues? [IF YES, request name and organization]
National-level Telephone Interview Questions

1) Please tell me a little bit about your background and your current position.

2) How would you describe current state-level approaches to providing employment services and supports to individuals with IDD, including important policies and practices? For my purposes, policies and practices can mean many things, from formal legislative action and rulemaking to the “business” of service provision to less formal norms and priorities.

3) Thinking back over the last fifteen to twenty years, since about 2000, what major changes to state-level policies, practices, and priorities have occurred, for better or worse, relating to employment services and supports? [AS NECESSARY, FOR THE 2-3 TOP CHANGES CITED ABOVE]:
   a. What (specifically) changed and when?
   b. To what degree did the change occur across states?
   c. What problem was the change intended to address?
   d. Who were the most involved stakeholders or groups, and what was their position?
   e. What conditions or events were the key drivers of change?
   f. What were the main arguments for and against the change?
   g. How did supporters and opponents attempt to influence the outcome?
   h. How were differences resolved, if at all?
   i. What role did you or your organization play in efforts to influence the outcome?
   j. Which states moved quickly to change? Which states resisted change?

4) With which national stakeholders or groups does your organization collaborate most to influence policies and practices related to employment services, and why? How has this changed over the last fifteen to twenty years, if at all?

5) With which groups do you avoid collaborating, and why? How has this changed over the last fifteen to twenty years, if at all?

6) Is there anything else about state-level policies, practices and priorities relating to employment services that you’d like to tell me about?

7) Is there anyone else that you would recommend contacting about these issues? [IF YES, request name and organization]
### Appendix A3: Number of Completed Interviews by Stakeholder Type

#### Table A3.1: Number of Completed Interviews by State and Stakeholder Type

<table>
<thead>
<tr>
<th>Stakeholder Type</th>
<th>Washington</th>
<th>Pennsylvania</th>
</tr>
</thead>
<tbody>
<tr>
<td>Government agencies</td>
<td>4</td>
<td>6</td>
</tr>
<tr>
<td>Interest group/advocacy organizations</td>
<td>8</td>
<td>2</td>
</tr>
<tr>
<td>Service providers</td>
<td>4</td>
<td>3</td>
</tr>
<tr>
<td>Professional associations</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Other (e.g., consultant, media, lobbyist, etc)</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>20</strong></td>
<td><strong>14</strong></td>
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</table>
### Appendix A4: Abbreviated Coding Tags

#### Table A4.1: Concepts and Coding Tags

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<tr>
<th>ACF Belief System</th>
<th>Concept</th>
<th>Coding Tag</th>
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<tr>
<td><strong>Core beliefs</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Stakeholder motivations</td>
<td>Stakeholders motivated by concern for individuals</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Stakeholders motivated by self-interest</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Stakeholders motivated by values and beliefs</td>
</tr>
<tr>
<td></td>
<td>Govt authority</td>
<td>Govt can/should prescribe choices</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Govt cannot/should not prescribe choices</td>
</tr>
<tr>
<td></td>
<td>Value of services and supports</td>
<td>Individuals with I/DD should have access to appropriate services and supports</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Services and supports for individualized with I/DD should be individualized</td>
</tr>
<tr>
<td><strong>Core policy beliefs</strong></td>
<td>Nature of the problem (individual)</td>
<td>Un/underemployment</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Individuals at home &quot;on the couch&quot;</td>
</tr>
<tr>
<td></td>
<td>Nature of the problem (system)</td>
<td>Appropriate services and supports at risk</td>
</tr>
<tr>
<td></td>
<td>Causes of the problem</td>
<td>Lack of capacity-building</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Lack of exposure</td>
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<tr>
<td></td>
<td></td>
<td>Misunderstanding benefits</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Lack of economic opportunities</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Individual skills or productivity</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Implementation challenges</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Insufficient funds</td>
</tr>
<tr>
<td></td>
<td>Priority individual outcomes</td>
<td>Lack of services and service providers in area</td>
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<tr>
<td></td>
<td>NOT priority individual outcomes</td>
<td>Stakeholder expectations</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Earning a wage</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Learning</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Making choices</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Being independent</td>
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<td></td>
<td></td>
<td>Being safe</td>
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<td>Being engaged</td>
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<td></td>
<td>Being happy</td>
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<td></td>
<td>Being in community</td>
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<td></td>
<td></td>
<td>Being employed</td>
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<td></td>
<td>Priority family outcomes</td>
<td>Earning a wage NOT a priority</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Respite</td>
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<td></td>
<td></td>
<td>Financial security</td>
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<tr>
<td></td>
<td>Nature of employment</td>
<td>Stability</td>
</tr>
<tr>
<td></td>
<td></td>
<td>All individuals can work in CIE</td>
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<tr>
<td>Sub-groups</td>
<td>High-acuity Rural areas</td>
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<tr>
<td>Secondary policy beliefs</td>
<td>Data findings Data not supportive of CIE Data supportive of CIE</td>
<td></td>
</tr>
<tr>
<td>Data use</td>
<td>Data should drive decision-making</td>
<td></td>
</tr>
<tr>
<td>Policy preferences</td>
<td>Policy preferences Prioritize waitlist reductions Allow non-CIE services Prioritize array of services Limit or eliminate facility-based services</td>
<td></td>
</tr>
<tr>
<td>Coordination</td>
<td>Policy preferences Prioritize CIE</td>
<td></td>
</tr>
<tr>
<td>Participation in activities to influence policy</td>
<td>Activity in support of CIE prioritization Activity opposed to CIE prioritization</td>
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</tr>
<tr>
<td>Collaboration participation</td>
<td>Collaboration with non-EF stakeholders Collaboration with EF stakeholders</td>
<td></td>
</tr>
<tr>
<td>Collaboration avoidance</td>
<td>Avoid collaboration with non-EF stakeholders Avoid collaboration with EF stakeholders No collaboration avoidance</td>
<td></td>
</tr>
<tr>
<td>Policy Preferences</td>
<td>Allowing selected services Allow selected non-CIE activities</td>
<td></td>
</tr>
<tr>
<td>Prioritizing selected services</td>
<td>Prioritize a full array of services Prioritize CIE services Prioritize restricting or eliminating facility-based services</td>
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</tr>
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Appendix A5: Technical Appendix

Table A5.1: Tests of Equality of Group Means

<table>
<thead>
<tr>
<th></th>
<th>Washington (n=20)</th>
<th></th>
<th></th>
<th></th>
<th>Pennsylvania (n=16)</th>
<th></th>
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<tbody>
<tr>
<td></td>
<td>Wilks' Lambda</td>
<td>F</td>
<td>df1</td>
<td>df2</td>
<td>Sig.</td>
<td>Wilks' Lambda</td>
<td>F</td>
<td>df1</td>
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Significance levels: *** p<0.01; ** p<0.05; * p<0.10
* Cannot be computed because variable is constant in sample
Table A5.2: Cross-tabulations, Beliefs by Subsystem

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Significance levels: *** p<0.01; ** p<0.05; * p<0.10

*Cannot be computed because both variables are constant in sample
**Table A5.3: Cross-tabulations, Coordination, Avoidance and Conflict by Subsystem**

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Significance levels: *** p<0.01; ** p<0.05; * p<0.10

*Cannot be computed because both variables are constant in sample*
## Appendix A6: Detailed Codebook

### Table A6.1: Codebook (Beliefs and Coalitions)

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**Table A6.3: Codebook (Resources Availability and Use)**
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Appendix A7: Detailed Case Summaries

Washington State

Washington was an early adopter of CIE-focused policy changes, with minor and major changes adopted during the mid-2000s to early 2010s.

History of Support for Integrated Employment

Multiple respondents describe early efforts by the state of Washington to institutionalization of integrated employment opportunities during the 1990s, including participation in a federal Systems Infrastructure Grant (SIG), continued support for the resulting technical assistance organization Washington Initiative for Supported Employment, an in-depth county visioning process and regular state-supported visioning conferences (e.g., Ellensburg, Alderbrook). By 1999, 58% of Day Habilitation and Employment participants were participating in integrated employment services, which subsequently grew to 85% by 2015.

System Failure and a Closed Venue Leads to an Opportunity

In the late 1990s, the I/DD system as a whole was experiencing substantial criticism and review, resulting in a Joint Legislative Audit Review Committee (JLARC) study, a review of the DD Home and Community Based Waiver by the Center for Medicare, an independent review contracted by DSHS, and multiple lawsuits (Washington Department of Social and Health Services, 2014). One DSHS report summarizing the early 2000s states that “Just prior to the turn of the century, the Division of Developmental Disabilities (DDD) was facing what appeared to be an oncoming super storm” (Washington Department of Social and Health Services, 2014, 3). One of the lawsuits was filed in 1999 by the Arc of Washington State (Arc of Washington State et al. v Quasim), which used the Olmstead decision to argue that “Washington State had failed to provide the full range of services offered through its HCBS waiver” (Washington Department of Social and Health Services, 2014, 6). The Arc of WA case was initially dismissed in 2003 based on the argument that it could be addressed via the administrative process. While the case was remanded in 2005 to discuss elements of the case related to the waitlist, resulting
in a 2007 settlement agreement (Washington Department of Social and Health Services, 2014; University of Michigan Law School, n.d.), the earlier dismissal effectively closed the judicial venue to arguments in favor of a full range of services.28

In the meantime, the Secretary of DSHS and the Chair of the Senate Health and Long-term Care Committee issued a joint “challenge” for the system to undertake a serious self-reflection process and in response, DHS convened a multi-year DDD Strategies for the Future Stakeholder Workgroup (Stakeholder Workgroup), which was formalized by legislative statute (Washington Legislature 1998). One respondent draws a clear connection between the ongoing stakeholder tensions and the formation of the Stakeholder Workgroup: “In the late ’90s the department put together a stakeholder task force that were supposed to arrive at an agreement because the field of developmental disabilities is always filled with anger and hostility and tension. … Said ‘okay you guys achieve agreement on how we go forward’” (WA_ind39).

The Stakeholder Workgroup was a 5-year, 3-phase process that incorporated input from over 100 stakeholders (Washington Department of Social and Health Services, 2014; Braddock et al., 2002), charged to reach agreement and make recommendations on “future direction and strategies” (Braddock et al., 2002, 16) for five major programs in the DD system, including Employment and Day Services. With respect to those services, the third and final report clearly articulated the Workgroup’s assumption that “All people will be considered to be on a ‘Pathway to Employment’” (Braddock et al., 2002, 57).

Convening stakeholders for the purpose of establishing shared values was not new to Washington stakeholders. Multiple interview respondents note Washington’s history of

28 A second, related lawsuit (Boyle vs. Arnold-Williams) was filed in 2001 with a similar argument, but was initially dismissed in 2003, and was not permitted as intervenor in the Arc of Washington lawsuit. However, an amended complaint to that lawsuit in 2005 resulted in a settlement agreement in 2006 requiring the state to implement a new comprehensive assessment process (DSHS, 2014).
convening stakeholders for that purpose, including formal conferences and workshops, such as the Ellensburg Employment Conference, which was convened for over thirty years. One interview respondent states: “A long time ago in the late ’70s throughout the ’80s and early ’90s Washington did a lot of work on values. Washington did a lot of path workshops, pathing workshops, transformational workshops, a lot of work on values, a lot of forums and Ellensburgs and Alderbrooks and all of that kind of thing. ... I think that set a very strong base for people to have real lives and real options, employment being one of them” (WA_ind39).

**Initial Working Age Adult Policy**

Washington State stakeholders widely consider the Working-Age Adult Policy as the primary change to Employment and Day Services during the last two decades. The Working-Age Adult Policy, which was initially adopted as a policy directive in 2004 for pilot implementation (Washington Department of Social and Health Services 2004) and subsequently codified by legislative action via SSB 6384 in 2012 (Washington Legislature 2012), remains a current foundation of Washington service delivery policies and related rules (Washington Department of Social and Health Services, n.d.). The Working-Age Adult Policy established that employment supports are the first use of employment and day program funds for working-age adults (21 through 61 years) (Hall et al., 2007; Washington Department of Social and Health Services, 2011).

**DDD Leadership:** “like fire and brimstone.”

The Working Age Adult Policy references the Pathway to Employment vision articulated during the Stakeholder Workgroup process. Furthermore, stakeholders describe the Strategies for the Future Workgroup process and the resulting Pathway to Employment vision as a major impetus for the Working Age Adults Policy. For example, one respondents states “Then from the outcome of this Strategies for the Future group came the Working Age Adult Policy and the thought that regardless of the severity of a person's disability, that everybody needed to be afforded the chance to basically work and that working, again, supported all our values: the power and choice, relationship status, contribution, integration, competence, and health and safety” (WA_ind24).
However, the policy directive was also widely attributed to Ms. Rolfe’s initiative and leadership. For example, interview respondent said “*Linda Rolfe was the one driving it. She used to be the assistant secretary over developmental disabilities. That’s what it was called at the time. She’s the one that pushed this*” (WA_ind37). One respondent even described the policy as a single-handed effort by Ms. Rolfe: “*There weren't other people involved with the decision by the DD Director. I'm sure that the employment providers, and maybe the bureaucracy was, but that policy, her internal policy was her direction. Period. It wasn't a legislative direction, it wasn't like she asked the [advocacy organizations], she wasn’t asking for all of our input, that was her goal*” (WA_ind02).

Ms. Rolfe is described by multiple respondents, even those who disagreed with her policy positions, as a highly energetic and skilled leader with a strong commitment to employment. For example, one respondent stated “*When you talk with Linda, it's like fire and brimstone. She's just really on it.*” (WA_ind02) and another noted that “*The legendary Linda Ralph, [who] was the DDA director, [she] really had a solid commitment to employment*” (WA_ind04).

**Service Provider Coalition Defection**

As noted earlier, Washington State had a strong history of supporting service providers to innovate in the field of supported employment, as well as supporting service providers to transform from day activities and segregated employment settings to supported employment settings. However, a contingent of service providers continued to provide segregated employment services in the early 2000s. At that time, service providers were represented by two distinct membership organizations, the Rehabilitation Enterprises of Washington (REW) and P2020. In the mid-2000s, those organizations merged and formed the Community Employment Alliance (CEA), which effectively represented a defection from the Choice position. One respondent states “*There were two separate groups at one time. There [were] the Rehab Sheltered Workshop folks and there was a group called P2020 that was focused around supported employment and community employment. And I think it was around 2007 or so, maybe 2008, that those two organizations came together around integrated community employment. And the vision*
that that could work for all, that we would support each other, in moving away from sheltered workshops and sub-minimum wages, and that we would train and build capacity across the state.” (WA_ind06). The CEA’s formal Declaration states the organization’s preference for integrated employment and the elimination of sub-minimum wage opportunities (Community Employment Alliance, n.d.).

Respondents cite multiple reasons for transforming their own organizations and more broadly pushing a supported employment agenda. Some respondents cite values as important elements in those decisions, but also refer to a growing recognition of change, and a strong interest in adapting to it. For example, one respondent states “We had a strong leadership group within REW and P2020 that really wanted to bring it back together. Like, we're not going to survive unless we come together and we believe this.” (WA_ind06) Other respondents cite growing information about the preferences of individuals with I/DD, suggesting a learning pathway to change. For example, another respondent who transformed his organization in the early 2000s stated “It started with, well, really David Mank who was then at the University of Oregon, brought some students up and surveyed our clients in sheltered workshop and 80% of the clients said they wanted to work in the community like their mom and dad, or brother and sister... So we had a five year plan, and so then we closed our sheltered workshop in 2004” (WA_ind26)

Not all service providers were willing to support the new organization’s mission, however. One respondent notes that the initial position paper resulted in four service providers members leaving the organization by 2011, which subsequently formed the organization The Coalition of Developmental Disabilities Voices to serve as the lead organization for the Choice coalition in Washington State.

**Strong Support and Emerging Concerns**

The Working Age Adult Policy was implemented in phases from 2004 to 2006. There is little evidence of any immediate challenges to the Working Age Adult Policy, and there was strong support for the new policy among county governments, which were responsible for service provider contract administration. That said, there were concerns among some interest groups, service providers and legislators about impacts of the policy
on high-acuity individuals. One respondent states “I remember the director, Linda Rolfe was the director that created this policy. She told me once that she knew that some people would be left behind for a while, and she knew that and that was okay with her, and it wasn’t okay with me. I mean I just don’t think you should have a policy you know you’re not going to take care of all of the people” (WA_ind02).

Respondents clearly articulate that the Working-Age Adult policy reflected a departmental decision to prioritize employment services. One respondent describes the policy as “an internal policy, it wasn’t a legislative directive, but an internal policy… that was really the emphasis of moving the state even further into individualized employment” (WA_ind02). Similarly, interview respondents also noted the adoption of a policy in the absence of legislative statute. For example: “Well, it was a policy commitment by the director of the DD administration then, and she established it as a policy and it got embedded into provider contracts and it eventually got embedded into state law. That was backwards, you thought it would be in state law first, and then kind of trickle down from there, but it kind of worked backwards… We've been un-ruffling those feathers for about, three or four, maybe even a couple more sessions of the legislature ever since.” (WA_ind12)

Initial Pushback

Legislation to counter the Working Age Adult Policy (HB 3078/SB 6736) was introduced in 2008, just after the Working Age Adults Policy had been fully adopted (Washington House of Representatives 2008; Washington Senate 2008). That bill’s final substitute legislation acknowledged the relevance of employment as a goal for individuals with I/DD, but also promoted the development and promotion of community access services for individuals with severe or profound developmental disability (Washington State Legislature, n.d.). Testimony was held in both the House and Senate to discuss the bills; individuals supporting the bills, including the Arc of Washington and selected family members, expressed strong concerns about the availability of access to appropriate options, especially community access services, for individuals with severe disabilities. Individuals opposing the bills, including P2020 and the Association of County Human Services,
expressed concern that the bills would dilute funding for supported employment services (Washington State Legislature, n.d.). Despite proceeding through multiple amendments in both the House and Senate, the bill was never voted on. One respondent indicates that “Other people were working against it, so that Bill just kind of went away” (WA_ind40). However, another respondent also states that there were budget repercussions, despite the bill’s failure in committee. “So, no bill passed, but then there were a couple of legislators, who in the budget process then, because they didn’t get their bill, basically took away half of the funding for employment” (WA_ind40).

The 2009 operating budget legislation ESHB 1244 called for the Joint Legislative Audit and Review Committee to conduct a study of Employment and Day Services with a focus on developing recommendations for utilizing outcome-based contracts at the county level (Washington Legislature 2009). In response to that study, which recommended more consistent review and monitoring of county DD contracts, DDA underwent a process in 2011-12 to establish an outcomes-based rate structure.

Attempts to Negotiate a Peace

As instructed by the 2011 operating budget legislation SB 1087 (Washington Legislature 2011), the DDD convened a workgroup “to develop a proposal regarding a new approach to Employment and Day Services” (DDD Employment and Day Services Report, 1), which was submitted to the legislature in December 2011. The legislative objective of the workgroup was to “ensure that adults with developmental disabilities have ‘optimum’ choices and that Employment and Day offerings are ‘comprehensive enough to meet the needs of all clients currently served on a home and community-based waiver’” (DDD Employment and Day Services Report, 4).

The workgroup, which was composed of 23 participants, including an inclusive group of service providers, legislators, family members and interest groups, reached agreement on individuals’ needs, family’s needs additional objectives, and also developed four potential options, but did not reach consensus on recommendations. Three of the four options involved maintaining the working age adults policy requirement. Only one of the options explicitly proposed to “eliminate the Employment First policy” (DDD
Employment and Day Services Report, 10). The workgroup ultimately recommended two options that were supported by a majority of Workgroup members, both of which called for maintaining existing working age adult policy requirements and adding more comprehensive day services. The report includes unedited statements by selected members of the workgroup, which highlighted ongoing issues related to funding for services, services for high-acuity clients, rural/urban differences and overall concerns that the working age adult policy led to some clients’ needs remaining unmet.

A Win in Disguise

In addition to ongoing dialogue about the future of the Working Age Adults Policy, budget cuts continued to threaten the Working Age Adult Policy through 2011-12. One respondent states that “In 2011 in the middle of a really contentious session here, employment funds were being threatened, and we were able to save funds that year. And our response in 2012 was to come back and introduce the Employment’s first policy so we didn’t have to deal with the threat of the budget cuts every year” (WA_ind04).

In the wake of the workgroup recommendations, supporters of the Working Age Adult Policy introduced SB 6384 with the title “An Act related to ensuring that persons with developmental disabilities be given the opportunity to transition to a community access program after enrollment in an employment program.” The major provisions of SB 6384 state that 1) adult clients must be offered the opportunity to transition to a community access program after nine months of enrollment in an employment program; 2) adult clients must be offered the opportunity to transition from a community access program to an employment program at any time; 3) clients may not be authorized to participate in both community access program and an employment program at any given time; 4) the department shall strengthen and expand the community access program; and 5) the department must develop rules to allow for an exception to the nine-month employment program participation policy. The third provision stems from a budget proviso from the 2011 legislation HB 1087 (Washington Legislature 2011), which authorized individual clients for only one service option, either community access or employment services. One respondent describes the budget proviso as having been required by a “What it did was
limit people to only get ... they had to choose either between employment or Community Access, they couldn’t get some employment and some Community Access.” (WA_ind02).

Respondents describe the legislation adopted in 2012 (Washington Legislature 2012) as the “Employment First” or “Work First” law, although that language is not used in the bill, and describe it as a major step in prioritizing CIE. For example, one respondent states “The Working Age Adults Policy, the... what was called the Employment First law, legislation were huge, had a huge impact” (WA_ind39). While respondents describe the legislation as an important factor in the effort to prioritize CIE, they do not always describe it as a major change because it was preceded by the Working Age Adults Policy. For example, one respondent states that the legislative statute “just cemented it in” (WA_ind38).

The bill’s promotion and passage represented a strategic effort by advocates to codify the earlier Working Age Adults Policy. One respondent states that “We talked to stakeholders and were very careful to not use the words ‘Working Age Adults Policy’ or ‘Work First’ because they’re very... they set people off, they didn’t like that. So we called it an employment bill, we called it just ‘Developmental Disabilities Employment’” (WA_ind40).

Key stakeholders involved in promoting the legislation included the Washington State Association of Counties, and the counties themselves; while the counties were precluded from lobbying, WSAC lobbying staff provided substantial leadership support during the legislative process. The counties are described as having been “probably the most valuable when it went from Working Age Adult Policy to transitioning to the Employment First legislation” (WA_ind04). Other important stakeholders including county-based Parent Coalitions and technical assistance provider Washington Initiative for Supported Employment (WISE).

Despite strong support, respondents expressed surprise by the ease with which the bill moved forward, given the earlier attempts to introduce legislation countering Employment First: “So it got to the house and we were like ‘there's no way it's going to get a hearing. If it does, there's no way she’s going to pass it out.’ So, it got a hearing and all
the people got to come in to talk about their jobs and how much they loved them and how valuable it is. With a focus again just on employment...” (WA_ind40)

Hearings were held in both the House and Senate, with supporters of the bill articulating 1) the importance of supported employment programs for providing the opportunity to work; and 2) the “hope” for more robust community access programs in the future. Testimony in favor of the bill came from a variety of interest groups, including the Arc of Washington State and the Washington State Developmental Disabilities Council, and some service providers, including a representative of the Community Employment Alliance (Washington State Legislature, n.d.). A smaller group of individuals provided “Other” testimony, which centered around a proposal to amend the bill to Adult Day Health services.

Ultimately, the bill passed unanimously, suggesting that the legislation was wholeheartedly supported by most stakeholders and legislators. However, the legislation was described by several respondents as having been passed without a full understanding of the implications by some members of the legislature who had previously been opposed to the Working Age Adults policy. One respondent indicates that “We did slip it in under the radar.” (WA_ind40) and another respondent states that “some of the House members didn’t realize that that’s what happened.” (WA_ind25). Another indicates “So then, you know, we made it into the legislation and the new statute. They had conferences in D.C. and they talked about how it’s the first state that got it in statute, and then I guess someone talked to Representative Dickerson and she said, ‘we did what?!’” (WA_ind40)

Furthermore, as stated above, SB 6384 included explicit language requiring the department to “work with counties and stakeholders to strengthen and expand to Community Access services” (Washington Legislature 2012), which echoed language in the 2011 operating budget legislation HB 1087 directing the DDD to convene the Employment and Day Services Workgroup (Washington Legislature 2011). Some respondents described support for the legislation as being contingent on an informal understanding that alternative services would be developed, as recommended by the Employment and Day Services Workgroup. “So, there was a work group to look at the
policy during that time. They were also supposed to look at how to expand community access as an option. And that never, even up until now, I mean that was it was six, seven, eight years ago, it still hasn't really happened.” (WA_ind40).

Growing Conflict in the Wake of the Settings Rule

The growing federal interest in eliminating segregated settings was signaled by the CMS February 2011 proposed rule, which articulated initial settings requirements (i.e., integrated vs segregated) for individuals receiving HCBS services (Centers for Medicare and Medicaid, 2011). Shortly thereafter, in 2013-14, SB 5470 was introduced as “AN ACT Relating to facility-based vocational services”, which called for the term “sheltered workshop” to be replaced by “facility-based services vocational services” and for the Department of Social and Health Services to consider such services as “a viable work preparation option for individuals with disabilities” (Washington State Legislature, n.d.). It is recalled by one respondent as supporting “preservation of sheltered workshops” and the group promoting the bill as “very pro-workshops and they’ve caused a lot of legislative challenges” (WA_ind04).

After the HCBS rule was finalized in 2014, Washington State submitted a transition plan to CMS in March 2015, which proposed to eliminate new admissions to pre-vocational services and supports (i.e., sheltered workshops), and re-route existing participants into integrated service options by 2019. The move is described by one respondent as DDD having taken a “strong stance to close sheltered workshops by 2019” (WA_ind02). Choice stakeholders, however, take issue with Washington State’s interpretation of the federal rule. One respondent notes “I’m not sure that when it comes down to CNS policy language, that CNS wants to see all engagement curtailed because I don’t believe that that’s what the federal regulation is saying. I think that the federal regulation actually states that choice and the experiential nature of the training that a person derives from participating in a pre-voc[ational] program is still a core tenant of CNS reimbursement, federal reimbursement for pre-vocational services and the payment of sub-minimum wage” (WA_ind30). Only about 150 current participants are expected to be impacted by the change, but respondents note that it is controversial nonetheless. One
Choice respondent states “As of July or September of 2015, the front door is locked. In March 2019, every door is locked. So, I was hoping that they would have rounded those corners and recognized that for some folks it’s a stepping stone” (WA_ind38).

**Using Information as Tools of Persuasion**

Both coalitions use framing and narrative as a major part of their strategy to achieve policy change. The Employment First coalition’s frames CIE as both a civil right and as an individual responsibility, while the Choice coalition asserts non-CIE services are the civil rights in need of protection. The Employment First coalition tends to portray individuals with I/DD, and some service providers, as heroes in the context of Employment First policy and as victims in the context of Choice policy. Families of individuals with I/DD who do not support Employment First policy are typically portrayed as either victims or inadvertent villains. The Choice coalition typically portrays individuals with I/DD and their families as victims of Employment First policy, and selected advocates (including families and selected service providers) as heroes. Both coalitions use stories of hope and decline to advance their policy positions. However, few respondents describe the opposing side as operating out of intentional animosity; most respondents tend to describe the opposition as inadvertently supporting the wrong side due to fear, costs, etc. Similarly, there is little evidence of “the devil shift.”

Washington State respondents from both coalitions express strong support for using data to inform decision-making. However, they do not fully agree on the degree to which the data support the policy changes that have occurred. Employment First respondents tend to cite two key data points. First, they describe research that shows that individuals with I/DD would largely prefer employment over non-employment. For example, the Community Employment Alliance website refers to relevant research along those lines (Community Employment Alliance, n.d.). Second, they cite Washington State’s national reputation for achieving high employment outcomes among participants with disability as evidence of the Working Age Adults Policy’s success. For example, one respondent states “The part that we fund well and do really well in is supported employment. I think we lead the nation in outcomes.” (WA_ind25).
In contrast, respondents aligned with the Choice coalition tend to cite selected employment outcomes, especially wages and hours, to argue against the Working Age Adults Policy. One respondent declares “It’s messed up. Our state says, ‘X thousands of people are in supported employment’. Well, that might be that they're getting authorized by the state to get employment services, but then you go deeper and say, ‘how many people actually have a job and how many hours is that job a week and how much money are they making?’ When you start going deeper, then we don’t look as good” (WA_ind02). Similarly, another respondent states “I’m data-oriented and I see the trendlines in the employment rates, the employment outcomes, and wages, and hours trending down, especially for the high acuity folks.” (WA_ind38). Choice respondents also express strong concerns about outputs and outcomes heterogeneity by both region and acuity, contending in particular that clients in rural areas and high-acuity clients (i.e., those with the most severe disabilities) are left behind by the Working Age Adults and subsequent CIE-focused policies (e.g., elimination of pre-vocational services).

Employment First respondents acknowledge these issues, but do not necessarily conclude that non-CIE options are appropriate and tend to describe them as implementation challenges. One respondent states “I also think it represents an experiment in the struggle of fully implementing those policies because of how long it’s been around. And you can see about a 10-year mark now and look at the data and see how much progress has been made and in what areas there hasn’t been progress made. And what the areas of struggle on the application side are” (WA_ind01)

“High Drama” and an Uncertain Future

During the 2017 session, the Washington State Senate introduced HB 1304/SB 5201, bwhich initially proposed to retract the Working Age Adults Policy requirement of 9 months of participation in Employment services and replace it with access to at least 20 hours/week of either Employment or Community Access Services (Washington House of Representatives 2017; Washington Senate 2017). Members of the House of Representatives opposed the bill and proposed amendments. After multiple public hearings in both the House and Senate committees, both House and Senate insisted on their
positions and refused to recede, and the legislation did not proceed. The session was described by one respondent as “one of the highest drama I’ve ever been in, and I’ve been in some drama” (WA_ind32). Another respondent describes ongoing legislative discontent with the Employment First approach: “Obviously, there are people who have not always been fans, so we’ve got some legislators who continue to oppose it. Say, "Why would we force people to try our most expensive service." And we live that every year are in legislation, and again, this year. So, even though we put employment first in policy, now that policy is continually threatened by, you know ... particularly on the East side of our State” (WA_ind04).

The initial legislative effort was coordinated by members of the Choice coalition, with leadership from the Coalition for Developmental Disabilities Voices (CDDV). One Employment First respondent notes that the bill was introduced “out of nowhere” (WA_ind28) and that efforts to negotiate with members of the Choice coalition were not fruitful. The Choice coalition also lobbied successfully for strategic text in operating budget legislation 5883-S.SL, calling for a Joint Legislative Audit and Review Committee (J-LARC) study of DDA Employment and Community Access services (Washington State Legislature, n.d.). One Choice respondent describes a conviction that the study will demonstrate the poor outcomes associated with the Working Age Adults Policy, “What we’re hoping from the study is that it will show that the trendlines are going down. People aren’t getting hired. It takes, on average, 18 months with an individual with a significant disability to get a job” (WA_ind30).

Respondents from both coalitions continue to convey conflict. One Choice respondent states “If the jobs were available now, then Washington would already be an Employment First state. It’s our position that Washington wants to become an Employment Only state under the guise of Employment First” (WA_ind30). Similarly, an Employment First respondent describes ongoing discontent with the Employment First approach: “Obviously, there are people who have not always been fans, so we’ve got some legislators who continue to oppose it. Say, ‘Why would we force people to try our most expensive service.’ And we live that every year are in legislation, and again, this year. So, even
though we put Employment First in policy, now that policy is continually threatened...” (WA_ind04).

Causal Process

In the early 2000s, system failure and the closure of a judicial venue provided ripe conditions for a skilled administrator to implement an initial (major) change to institutional rules in the form of the Working Age Adult Policy. There is some evidence of policy-oriented learning among service providers, although it was not highlighted in technical debate by policymakers. Subsequent (minor) changes were achieved via a variety of coalition resources and strategies, including formal authority, troop mobilization, use of information (especially framing/narrative and data) and strong national support. The Choice coalition formally mobilized after the initial major change and continues to pose regular threats to the Employment First policy changes. See Figure A7.1 for a visual representation of the causal process.

Figure A7.1: Washington Pathway to Policy Change
Pennsylvania

Pennsylvania was slow to prioritize CIE-focused policy. No policy changes occurred until after the 2014 HCBS Final Rule and related guidance, despite early attempts to renew the state’s commitment to employment policies via policy directive. After the federal rulemaking, however, several minor and major changes occurred in Pennsylvania.

History of Low Participation in Integrated Employment Services

Since the 1990 adoption of MR Bulletin 6000-90-06 (Pennsylvania Department of Public Welfare 1990), Pennsylvania has had a written policy supporting access to and prioritizing employment opportunities for individuals with intellectual disability. The state also conducted a visioning process in 1991 that culminated in a document that highlighted the vision of an “everyday life” in community, including opportunities for supported employment, which was renewed in both 2001 and 2016 (The Arc, n.d.). However, Pennsylvania’s record of service provision in the last two decades suggests a low level of attention to integrated employment services. In 1999, Pennsylvania reported that 19% of participants received integrated employment services, substantially lower than the average of 29% among all states, and by 2015 the percentage had decreased to 17% (statedata.info, n.d.).

Policy Stasis and Diverted Attention in the 2000s and 2010s

Pennsylvania saw no policy change during the 2000s and early 2010s, with the exception of policy bulletins that renewed the state’s commitment to employment. For example, a 2005 MR Bulletin 00-05-07 “reemphasizes [OMR] commitment to the principles of the existing employment policy” (Pennsylvania Department of Public

29 The PA Office of Developmental Programs provides services only to individuals with Intellectual Disability and Autism. Individuals with other Developmental Disabilities are served through the Office of Long-term Aging.
Welfare 2005), suggesting that an interest by OMR leadership in achieving gains in the area. Similarly, proposed and final policy directives PA. B# 38-1937 (Pennsylvania Department of Welfare 2008) and PA. B# 40-4935 (Pennsylvania Department of Welfare 2010) highlighted community-integrated employment as a goal. These documents were released under one Deputy Secretary (Kevin Casey), suggesting an interest by agency leadership in prioritizing employment. However, no respondents cited them as important indicators of change, and respondents describe much of the 2000s and early 2010s as being static with respect to CIE changes: “Pennsylvania was one of the first states that really considered itself, touted itself as an Employment First state. That was policy that was written, but we never really got to the place where it was sort of enforced, managed, considered, and had oversight” (PA_ind51).

Indeed, the 2000s and early 2010s were characterized by political and administrative attention to other issues. Respondents describe heavy involvement in other policy changes during that period, including waiting list and contract reform. The Pennsylvania Waiting List Campaign, which was launched in 1997 to pursue full funding for HCBS services, achieved major gains in 2007 (PA Waiting List Campaign, n.d.). Similarly, the late 2000s and early 2010s shifted administrative attention to contract administration and rate structures. In response to concerns voiced by the Centers for Medicare and Medicaid Services (CMS), Pennsylvania removed administrative control from the counties, centralized control at the state level, and imposed a fee schedule on service providers, replacing the previous county-controlled cost-reimbursement system. Multiple respondents describe the waitlist and administrative changes as the political priority during that time period. One respondent even makes a direct connection between the focus on the waitlists, the subsequent changes to county authority, and the delays in CIE-focused policy changes, stating “We had our county and county-administered funds and as far as ODP was concerned, all the money got spent on waiting list progress, so they didn’t have a real hands-on approach and they got in some trouble with the feds, that they really weren’t running a state-wide system. So, I think that’s one of the answers as to why things didn’t happen sooner.” (PA_45).
Pennsylvania Learns from Other States and from National Organizations

Respondents describe events stemming from other states as an important consideration in Pennsylvania, although not necessarily as a driving force. For example, several respondents note that Olmstead litigation in other states, such as Oregon and Rhode Island, was followed by Pennsylvania policymakers, administrators and advocates. In 2013-14, HR 903 directed the legislative and budget finance committee to conduct a review of Olmstead implementation. The report that resulted from that investigation cited that DHS would rely on a 2014 settlement agreement related to residential services (the Benjamin settlement) for its Olmstead implementation plan (Pennsylvania Legislative Budget and Finance Committee, 2015).

Several respondents also refer to the adoption of “Employment First” policies by other states. For example, one respondent states “I do think it I think it started right around when you started hearing about the national employment first movement... In Pennsylvania I think you started hearing about employment first and discovery and all that, probably around 2012 or 2013” (PA_ind01).

One respondent also notes the influence of the “A Better Bottom Line: Employment People with Disabilities” initiative of National Governor’s Association under leadership of Governor Markell (D) of Delaware (National Governor’s Association, 2013). In 2013, Pennsylvania hosted an institute for state policymakers associated with that initiative that focused on employment challenges faced by individuals with intellectual and other significant disabilities. That event was described as an important turning point: “Our state really sat together in a powwow at that moment and said ‘It's time. We have to do something much more proactive.’ Everybody started trying to educate folks, leadership about this.’ (PA_ind51)

Respondents note that national-level organizations, especially professional associations (e.g., NASDDDS, ACCSES, ANCOR, APSE) play a role in providing resources and support to both Employment and Choice coalition actors. For example, Pennsylvania was a State Employment Leadership Network (SELN) member from 2007-11 and from 2013-current. One Employment First respondent describes SELN as providing
“a tremendous amount of technical assistance to Pennsylvania” (PA_ind21). Similarly, Choice respondents frequently note the role of ACCSES in providing strategic information and resources, stating “Agencies like Access totally agree with that and ANCOR, likewise, and they're working from the standpoint, ‘Well, maybe what we have to do is get something like this reintroduced at a federal level, maybe rewritten or an amendment to some of the regulations to give information to the state of Pennsylvania here to say no, no, no. That was never the federal intent of this. This is what we're looking for’ so we are working likewise at the federal level with Access and ANCOR.” (PA_ind65).

ODP Leadership: “People listen when she speaks”

ODP leadership has been characterized by considerable turnover during the last two decades. The position of ODP Deputy Secretary has been filled by five individuals, one of whom served twice (in the early 2000s and current). Substantial instability was experienced during the administration of Governor Corbett (R), during which three Deputy Secretaries were appointed. There is no evidence that early ODP leadership worked against prioritizing CIE policy; in fact, Deputy Secretary Kevin Casey signed the 2005 and 2010 policy directives that renewed the 1990 commitment to employment as a goal. However, there is also little evidence that other Deputy Secretaries were champions of CIE policy.

In contrast, the most recent ODP Deputy Secretaries Steve Suroviec (2014-15) and Nancy Thaler (2015-current), prioritized both CIE-focused policy and Employment First. Mr. Suroviec, Ms. Thaler’s predecessor, was ODP Deputy Secretary during a 2013-15 Futures Planning Workgroup that was convened by ODP, and which culminated in a 2015 report that included a recommendation to “make Pennsylvania an ‘Employment First state’ with employment as the priority for people with disabilities” (PA Legislative Budget and Finance Committee, 2015). Mr. Suroviec was subsequently responsible for preparation of the Executive Order text, as well as the subsequent Employment First Implementation Plan. Similarly, Ms. Thaler has presided over the most recent policy changes, as well as leadership of an Information Sharing Advisory Committee (ISAC) that yielded a renewed “Everyday Lives” document, which is a vision document described as having recommendations that “are absolutely the template for everything we do” (PA_ind02). The
2016 Everyday Lives visioning process and 2016 document was spearheaded by the Ms. Thaler as a sequel to an early 1990s visioning process and document of the same name.

Furthermore, their backgrounds suggest a longstanding commitment to employment. Mr. Suroviec took the position of Deputy Secretary after having introduced reforms as the Director of the Office of Vocational Rehabilitation and serving as a leader in both the advocacy community and state government. Nancy Thaler re-entered the position after more than a decade as Executive Director of the National Association of State Directors of Developmental Disabilities Services (NASDDDS), which is the organization that founded and operates the State Employment Leadership Network (a CIE-focused initiative).

They are both described by respondents as skilled leaders. Ms. Thaler is widely described as an exceptional and strategic leader. For example, one respondent states “Nancy Thaler, she is probably one of the best professionals in the field that I've ever worked with. She is knowledgeable, she has the respect not only in Pennsylvania and throughout the country, and whose experience brings the opportunity to influence change. I think that people listen when she speaks, and I think that she has the perspective, national perspective, but she also has state government, federal government, and local provider experience that helps her form teams and decisions around policy and implementation of policy” (PA_ind12). Mr. Suroviec is also described in favorable terms, although neither he, nor any of the other Deputy Secretaries, are described in terms of their leadership skills with the same fervor as Ms. Thaler.

Relatedly, some respondents describe administration changes as being a driving factor in employment-related policy. Indeed, multiple respondents note Pennsylvania’s history of divided government and frequent shifts in gubernatorial and legislative party control, suggesting that CIE-focused policy changes may not be lasting. For example, one respondent notes “… if I were a betting person, I would think that our current Governor in another year will probably be voted out. It's currently Democrat. It will probably swing to Republican. The person who is in charge right now will be gone. I think as I sit here today, this is probably going to stick, at least for the short to midterm length of time, and
depending on what happens in the next general election may undue everything that is being done at this point.” (PA_ind65).

Pennsylvania Responds to the HCBS Final Rule

Most respondents attribute the observed policy changes to events at the national level, especially the 2014 HCBS Final Rule and the original 1999 Olmstead decision. Over half of respondents described the HCBS final rule as having had a major impact on the system. For example, one (Employment First) respondent states “The HCBS rule change really forced the I/DD system to look at its settings…” (PA_ind01), while a second (Choice) respondent notes the importance of interpretation of the final rule, stating “A lot of this comes down to how people interpret and states interpret the home and community-based services regulations that have come down from the federal government... individuals that have looked at this and have talked about how other states are viewing this, they're basically just mouth wide open saying, ‘I can't believe Pennsylvania is doing something like this. That wasn't the intent of the federal government. Why are they interpreting things some of the ways they are?’ I think it's just that they've decided they would take an extreme approach” (PA_ind65).

In response to HCBS Final Rule requirements, Pennsylvania submitted a draft statewide transition plan (STP) to the Centers for Medicare and Medicaid Services (CMS) in April 2015, after incorporating input from a public comment process. The final transition plan was submitted in August 2016. The transition plan asserts that a systematic assessment found that “there are no direct conflicts with the new federal requirements” (DHS, 2016, 19), but that DHS would take steps to “to address areas where all documents reviewed were found to be silent” (DHS, 2016, 19) to assure compliance with the HCBS Final Rule by 2019 (as required). The transition plan also notes that during webinars to solicit stakeholder input “did not end with a consensus, [but] there did seem to be a general recognition that the status quo would not be acceptable and could not continue… Participants urged ODP to consider the full range of abilities and needs of individuals and to ensure a wide range of services are available that will provide opportunities for each individual to grow and achieve his or her goals.” (DHS, 2016, 19), suggesting that stakeholders experienced conflict
related to system goals, although it is not specified whether the conflicts were specific to employment or other services.

The waiver-specific documents associated with the transition plan note an intention to “draft and publish an Executive Order on employment that will clearly articulate employment principles for people with all disabilities” (DHS, 2016, 2). Those documents also include plans to 1) revise service definitions and incorporate revisions in the waiver renewal process; 2) actively engage SELN in those and related efforts; and 3) build service provider capacity for CIE-focused services. Finally, the transition plan noted the formation of a new stakeholder workgroup, the Information Sharing and Advisory Committee (ISAC).

Employment First Supporters Engage Allies

Governor Tom Wolf (D) entered office in January 2015, and the Executive Order 2016-03 (“Establishing ‘Employment First’ Policy and Increasing Competitive Integrated Employment for Pennsylvanians with a Disability”) was signed on April 16, 2016. The Executive Order proclaims that “Competitive integrated employment is the first consideration and preferred outcome of publicly-funded education, training, employment and related services, and long-term supports and services for working-age Pennsylvanians with a disability,” and directs preparation of a written implementation plan with related goals be prepared by the Department of Human Services, the Department of Labor and Industry, and the Department of Education (Office of the Governor, 2016).

Respondents report engaging Governor Wolf and his Advisory Cabinet on Disability even prior to his term. The decision to engage the Governor and proceed with an Executive Order is described in strategic terms. One respondent indicates “We pushed the governors. We worked with community leaders who talked to the future Governor Wolf to make sure that was a priority. We put language in their hands. They worked on language. They did this detailed executive order” (PA_ind51). Similarly, another respondent says, “So you know we had been pushing for either legislation or an executive order for a while, so, and Governor Wolf was very open to it.” (PA_ind42). A third respondent indicates that by “having the Employment First policy written down,” the state was “positioned” to make
subsequent changes to service definitions as part of the Waiver renewal process (PA_ind01).

While there is little evidence of opposition to the Executive Order, there is some evidence of pushback around the Implementation Plan, which was published in September 2016, and ultimately included 70 recommendations involving multiple stakeholders, including government agencies. One respondent notes opposition from multiple sides, including service providers: “So when we signed the executive order the you know most people looked and said oh this is great we're now an employment first state. But then when we start writing the plan a lot of the pushback came from sort of the folks in Pennsylvania ... some of the workshop providers, but [also] some of the state use programs people.” (PA_ind01).

**Employment First Supporters Launch a Media Campaign**

Self-advocates and advocates also launched a media and advocacy campaign during that period called #iwanttowork that has been described as a major effort to promote CIE-related policy. That initiative began with a grant from the United Way of Southwestern Pennsylvania and the Arc of Pennsylvania to hire five young adults with disability to promote legislative changes related to transition funds for youth (HB 400/SB 26), which passed in 2015 (Pennsylvania Legislature 2015). In addition, the sponsors provided funds for professional support: “They didn’t just sort of say ‘Okay. All of you advocates go out and do this.’ They funded the project to the tune of getting professional lobbying support and really thinking strategically with some very good consultants about how to operate in the current political climate in Pennsylvania. It wasn’t just ... It had that feeling of being a grassroots effort, but it also has a very professional feeling.” (PA_ind51)

One respondent describes the campaign as having been instrumental to the Employment First effort: “There was a lot of advocacy. The Arc of Pennsylvania and a lot of the Arc chapters participated in a coordinated movement. There's also a huge campaign in Pennsylvania called, #iwanttowork. That organization has had a huge impact, and so that was one of their initiatives was to create the atmosphere in the legislature and in the
governor's office to promote an Employment First approach. That had a big impact.” (PA_ind47).

**The Choice Coalition Mobilizes and Employment First Coalition Capitulates**

As anticipated by the HCBS Transition Plan, ODP proceeded with the waiver renewal process in 2016. Changes to service definitions and regulations that followed the Executive Order are described as being among the top policy changes that have occurred in the last 15-20 years and are generally described as being aligned with a CIE focus. One respondent states that “we renewed and radically changed our Medicaid waivers and our reimbursement system to achieve a lot of goals” (PA_ind02). The changes occurred as part of the most recent CMS Waiver renewal process in 2016-17, during which the state made substantial amendments to the existing Consolidated and P/FDS Waivers.

The most controversial change to the waivers involved the community settings requirement for day habilitation services, renamed “Community Participation Support” services in the waiver renewal. Specifically, the state initially proposed a requirement for individuals being provided those services to be served in integrated, community-based settings (i.e., outside of the segregated settings) for at least 75% of the time spent in services. In response, Choice stakeholder mobilized quickly and dramatically. In addition to substantial opposition expressed during the formal public comment period, stakeholders engaged their legislators and staged a rally/protest in Harrisburg in March 2017 (Erdley, 2017). The public comment mobilization and protest were largely spearheaded by two Western Pennsylvania service providers, the Cambria County Association for the Blind and Handicapped, and the Westmoreland County Blind Association, who were inspired by similar “A-Team” efforts in other states to engage individuals and family members to mobilize against the proposed changes.

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30 The CMS Waiver renewal process occurs every five years.
Multiple respondents note the conflict that arose over the proposed change. One respondent states “There was tremendous push back against that change. We have about 20,000… people who are currently served in those settings in Pennsylvania, and so for many families, that was a very scary proposal. Last year there was a significant push back against that change and consistent advocacy against changing any of the sheltered workshop settings” (PA_ind44). In response to the opposition, DHS/ODP scaled back the proposed changes on the day of the scheduled protest, decreasing the amount to be spent in integrated settings to 25%, and making the “requirement” optional by allowing individuals and families the option to refuse participation.

Other changes in the waiver renewal were also described as being aligned with a CIE focus. For example, the waiver renewal included changes to selected waiver regulations to incentivize continued employment participation, the elimination of sub-minimum wage for small group employment, staff certification requirements and new Customized Employment and Benefits Counseling service definitions. The waiver changes were also accompanied by a new rate structure that is intended to incentivize provision of services in the community. One respondent remarks that the changes are likely to do so, stating “Nobody's going to go out and build more of them. There's certainly no incentive to do that business. If you're in that business, you'll certainly incentivized to get out of that business” (PA_ind45).

Using Information to Persuade

There is very little use of data by either coalition to support their position or to provide evidence against the opposition. However, there is widespread use of framing and narrative. The Employment First coalition frames CIE as a civil right (e.g., the #iwanttowork campaign) and as an avenue to prosperity (e.g., the NGA Blueprint for Governors). In contrast, the Choice coalition frames non-CIE services as a civil right in danger of restriction. From a narrative perspective, Employment First heroes include individuals with I/DD, their families and selected service providers in the context of Employment First policy, although those groups are portrayed as victims in the context of Choice policy. Choice families of individuals with I/DD are portrayed by Employment
First as inadvertent villains. In contrast, the Choice coalition portrays individuals with 
I/DD and their families as victims of Employment First policy. Both coalitions use stories 
of hope and decline to advance their policy positions. The evidence does not indicate “the 
devil shift,” wherein policy actors misinterpret and distrust opposing coalitions and 
perceive them as more powerful and evil than they are (Fischer, 2016; Sabatier, 1987; 
Shanahan et al., 2011). Instead, they typically describe the opposition as inadvertently 
supporting false position due to understandable costs, fears and constraints.

Recent Attempts to Codify Employment First in Legislation

Most recently, Employment First advocates have organized to promote 
Employment First legislation, which was introduced as HB 2130 in the 2015-16 session 
(Pennsylvania House of Representatives 2015) and as HB 1641 during the 2017-18 session 
(Pennsylvania House of Representatives 2017). The legislation was developed by the 
#iwanttowork initiative with support from over twenty agencies, with special coordination 
and resources from the United Way of Southwestern Pennsylvania. The legislation calls for 
Pennsylvania to prioritize Employment First policies, establishes an Employment First 
Oversight Commission and establishes goals for state workforce participation by 
individuals with disability. A memo submitted prior to introducing the legislation indicates 
that the legislation “will not require additional budgeted state spending but will require 
Commonwealth agencies to shift priorities within existing budgets” (Pennsylvania House 
of Representatives, 2017). As noted by one respondent, the legislation is also an 
opportunity to codify preceding policy changes. “There's a House bill and a Senate bill. 
They're essentially emulating and expanding and further defining and putting into law 
what the governor put forward as far as Employment First goes.” (PA_ind44). Another 
respondent describes it as an intentional strategy to ensure permanence, to the degree 
possible, stating “We didn't want to lose it again like we did 20 years ago. We immediately 
started writing legislation” (PA_ind51). Ultimately, the legislation passed in 2018 and was 
signed into law by Governor Tom Wolf (Pennsylvania Legislature 2018).

Several respondents note that organizers deliberately avoided including dramatic 
changes to sheltered workshop rules in the legislation. One respondent states “I'll be
absolutely frank in saying that we did not want to get into the middle of the sheltered workshop fight. We didn't think that was a fight that we could win... As much as we would like it to go further, we think there's only so much appetite politically that we can manage right now” (PA_ind51). Similarly, another respondent notes “The state's really careful to say they're not mandating closure of these workshops or adult training facilities, but the landscape is really changing.” (PA_ind45). Respondents do not describe the legislation as particularly contentious, noting that service providers and provider associations seem to be on board. However, at least one respondent highlights political tensions that have made the bill’s passage less certain. As of January 2, 2018, the legislation had been referred to the Committee on Labor and Industry.

Causal Process

The pre-2014 period was characterized by political attention and advocacy mobilization around other issues, including the waitlist and centralization of administrative authority. There is substantial evidence that the Final Rule yielded strategic opportunities for the Employment First coalition to use a variety of resources and strategies to heighten political attention and shift the subsystem agenda, including use of information (especially framing), skilled leadership and mobilizable troops, to pursue policy change. Opposition by the Choice coalition was not activated until major changes were introduced, although there is evidence that Employment First actors were aware of the presence and magnitude of a low-lying Choice coalition, as well as the possibility of Choice action, which tempered their own actions. Ultimately, several minor changes and at least one major change occurred, based on the definition employed for this study. See Figure A7.2 for a visual of the causal process.
Figure A7.2: Pennsylvania Pathway to Change