



JB Pritzker, Governor

Dulce M. Quintero, Secretary

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DATE: April 1, 2026

MEMORANDUM

TO: The Honorable Don Harmon, Senate President
The Honorable John F. Curran, Senate Minority Leader
The Honorable Emanuel "Chris" Welch, Speaker of the House
The Honorable Tony McCombie, House Minority Leader

FROM: Dulce Quintero *Dulce M. Quintero*
Secretary *by [Signature]*
Illinois Department of Human Services

SUBJECT: Illinois Economic and Employment Opportunity for Persons with Disabilities (EEOPD) Task Force Dignity in Pay Act Multi-Year Plan

The Illinois Department of Human Services respectfully submits the Illinois Economic and Employment Opportunity for Persons with Disabilities (EEOPD) Task Force Dignity in Pay Act Multi-Year Plan on behalf of the Illinois Department of Human Services Division of Rehabilitation Services in order to fulfill the requirements set forth in 20 ILCS 4095/16.

If you have any questions or comments, please contact Tereta Love-Rutherford, DRS Policy Advisor at Tereta.Love-Rutherford@illinois.gov or 217-606-9012.

cc: The Honorable JB Pritzker, Governor
John W. Hollman, Clerk of the House
Tim Anderson, Secretary of the Illinois Senate
Legislative Research Unit
State Government Report Center



2025
ANNUAL
REPORT

PREPARED BY

THE ILLINOIS COUNCIL ON
DEVELOPMENTAL DISABILITIES IN
PARTNERSHIP WITH THE EMPLOYMENT
AND ECONOMIC OPPORTUNITIES FOR
PEOPLE WITH DISABILITIES TASK FORCE



DIGNITY IN PAY ACT MULTI-YEAR PLAN

JANUARY 1, 2026, ANNUAL REPORT ON IMPLEMENTATION

The Dignity in Pay (DIP) Act was enacted into law in January of 2025 and required a Multi-Year Plan (MYP) be developed, presented to the Employment and Economic Opportunities for People with Disabilities (EEOPD) Task Force, and submitted to the Governor’s Office and the General Assembly by July 1, 2025. Implementation of the DIP Act MYP began shortly thereafter, where the first few months focused on reengaging in the work and reestablishing the structures by which the work will be done.

As per the DIP Act, “annual reports on implementation shall be required by no later than January 1 of each subsequent year through January 1, 2030.”

This report represents the first annual submission on implementation. This report has two main sections:

1. Reporting on certain requirements in the legislation
2. Reporting on the implementation of the MYP
 - a. Narrative on the efforts since July to initiate the implementation work
 - b. Outline of priority work for January 2026 through July 2026.

Overall Effort to Launch Implementation

The Illinois Council on Developmental Disabilities (ICDD) is named in the Dignity in Pay Act as the entity responsible for developing the Multi-Year Plan and supporting coordination and project management for its implementation. Upon submitting the MYP, ICDD worked to secure funding for a project management role and identify and contract with the project manager starting in mid-August. Subsequently implementation planning began, including the following efforts:

1. Outreach to State agency partners to discuss their respective MYP recommendations
2. Pursuing information about existing data systems utilized by other states to collect data required by the DIP Act and MYP
3. Reconvening the DIP Interagency collaboration meetings
4. Reconstituting the DIP Workgroup
5. Engaging current 14(c) providers who appeared less connected to the DIP efforts
6. Solidifying partnerships with entities, executing complimentary work and developing shared work strategies
 - a. Systems Redesign Coleman Coalition
 - b. Subminimum Wage to Competitive Integrated Employment (SWTCIE)
 - c. Illinois Center for Transition and Work

d. Illinois Workforce Innovation Board (IWIB)

7. Implementing trainings on the DIP MYP to a variety of constituents

Additionally, ICDD and their Board of Directors approved a proposal for investment in Illinois for technical assistance for 14(c) providers to leverage national expertise and learning from other states to bolster efforts in Illinois.

Reporting on the DIP Act Requirements

Within the body of the DIP Act, some requirements of the MYP outlined points of information to be utilized to show progress on implementation.

Below are some data elements the DIP Act requires:

1. Total entities utilizing 14(c) certificates
2. Total number of people with disabilities paid subminimum wage and those who are paid at least minimum wage

Utilizing the August 2025 federal Department of Labor data provided by organizations, Illinois has 59 entities utilizing 14(c) certificates, with just over 3,100 workers being paid by these entities. A reasonable estimate of how many of those workers are making at least minimum wage in these entities is 8%, based on a survey of current Illinois 14(c) entities in April 2025, so approximately 250 people. The remaining earn subminimum wage (SMW).

There is language in the Act about “facility-based employment” and those in that setting making at or above minimum wage. Unfortunately, there is no data source for “facility-based employment,” nor is there a clear definition of “facility-based employment.” As such, this data is not available.

The Act lists additional indicators that will be collected as part of implementation and reported on at a future date if and when it becomes available:

1. Total number of people paid SMW who want to transition to competitive integrated employment (CIE)
2. Total number of people who do not wish to pursue CIE and would benefit from meaningful day opportunities
3. Existing state employment programs designed to support workers with disabilities
4. An evaluation of capacity limits in providers' contracts with DHS's DDD and DRS
5. Personal choice of people with disabilities regarding employment goals and planning in the person-centered planning process (needed from ISCs)
6. Use of technologies to assist people with disabilities in achieving employment goals
7. Impact on access to reliable transportation on achieving employment goals
8. Activities of youth with disabilities within one year of exiting high school
 - Education and training needs of staff working in community-based provider agencies

Report on the Implementation of the MYP

Below is a listing of the titles of the 46 DIP MYP recommendations and status of the implementation of each recommendation¹. It is important to recognize that not all recommendations will be implemented in Year 1. The Interagency team continues to meet regularly to discuss implementation, and specifically those recommendations that require cross-department collaboration.

Recommendations are organized in four drivers:

1. Persons with Disabilities (18 recommendations)—purple
2. 14(c) Providers (5 recommendations) --blue
3. Systems (14 recommendations) --orange
4. Results (9 recommendations) --green

Color-coding for the dashboard is as follows:

1. White: Pending additional feedback
2. Grey: No implementation in Year 1
3. Yellow: Implementation discussions active
4. Green: Active progress on recommendation has begun
5. Blue: Accomplished

Persons with Disabilities		
Recommendation Title	Owner	Status
1. Subminimum Wage Transformation Education Effort	DRS/DDD	Planning Implementation
2. Centering Disability Voice in State Planning	DRS	No Implementation Year 1
3. Disability Representation on State and Local Workforce Boards	IWIB	Planning Implementation
4. Rule 116 Flexibility to Support Medication Access in CIE	DDD	No Implementation Year 1

¹ The full text of each recommendation, along with objectives and indicators of success, can be found in the MYP: <https://icdd.illinois.gov/content/dam/soi/en/web/icdd/about/documents/2025-July%201-EEOPD%20Dignity%20in%20Pay%20Act%20Multi-Year%20Plan%20Final%20Report-Final-Signed.pdf>

5.	Streamlining Services and Shared Tools Across DRS and DDD	DRS/DDD	Active Progress
6.	Expanding Employment Pathways Through Comprehensive Transition and Post Secondary (CTP) Programs	DRS/DDD/ ICDD	Active Progress
7.	Innovative CE Payment Model and System Alignment Strategy	DRS	Active Progress
8.	Earned Income and Asset Protections for HCBS Participants in CIE	HFS/DDD	No Implementation Year 1
9.	Rural Transportation Pilots to Support Employment Access	DRS/DDD/IWIB/IDOT	Active Progress
10.	Employment Services Mapping and Definitions Resource	ICDD	Planning Implementation
11.	Day Service Rate Redesign for CIE Alignment	DDD	No Implementation Year 1
12.	Unlocking Employment Supports Through IL488-2234 Form Submission	DDD	No Implementation Year 1
13.	Ensuring Access to Discovery through DRS, DDD, and Waiver Enhancements	DRS/DDD	Active Progress
14.	Waiver-Based AT Access for Employment	TBD	Planning Implementation
15.	AT Pathways for Non-VR Participants	TBD	Planning Implementation
16.	Self-Employment as a Pathway to CIE	DRS	Active Progress
17.	Integrating Benefits Counseling into Waiver Services to Support CIE	DDD	No Implementation Year 1
18.	Exploration of Alternatives to CDS/CDS Subgroup	DDD	Active Progress

14(c) Providers		
Recommendation Title	Owner	Status
1. Coordinated Technical Assistance for 14(c) Provider Transformation	ICDD	Active Progress

2.	Marketing Campaign for Businesses	DRS	Planning Implementation
3.	Provider Training Needs Survey to Support CIE Transitions	ICDD	Planning Implementation
4.	Rule 119 Update on Employment-Related Day Services	DDD	No Implementation Year 1
5.	Statewide Cross-Agency Training Hub	ICDD	Planning Implementation
Systems			
Recommendation Title		Owner	Status
1.	Unifying State Disability Employment Supports through Cross-Agency Coordination	ICDD	No Implementation Year 1
2.	Employment First Policy and Strategy for CIE Prioritization	DDD/DRS	Active Progress
3.	State Policy Alignment for CIE	ICDD+	Planning Implementation
4.	Cross-Agency Alignment of Employment Planning Tools	DRS/DDD	Pending Additional Feedback
5.	State Policy on Customized Employment (CE) Services and Standards	DRS	Active Progress
6.	Expanding AT and Training under the DDD Waiver to Support CIE	TBD	Planning Implementation
7.	Modernizing Medicaid Buy-in to Support Employment and Independence	HFS	No Implementation Year 1
8.	AT and ACC Transition Continuity	TBD	Planning Implementation
9.	BEP Certification Reform for Disability-Owned Businesses	TBD	Accomplished

10.	Tools and Training Resources for Businesses		Planning Implementation
11.	Ensuring Equitable BEP Certification	TBD	Complete
12.	IDOL Phaseout Plan for 14(c) Certificates	IDOL	Active Progress
13.	Statewide Accessible Transportation Strategic Plan	DRS/DDD/IWIB/IDOT	Active Progress
14.	Advancing CIE through Technology First Implementation	TBD	No Implementation Year 1

Results		
Recommendation Title	Owner	Status
1. Accessible Resource Hub	ICDD	Planning Implementation
2. Academic Partner Engaged	GO	Pending Additional Feedback
3. Advancing Equity through Inclusive Outcome Data	TBD	No Implementation Year 1
4. 14(c) Transformation Feedback System	ICDD+	Pending Additional Feedback
5. Equity Impact Tool for DIP Implementation	ICDD/GO on Equity	Active Progress
6. Project Management to Support Cross-Agency Coordination and Implementation	ICDD	Active Progress
7. 14(c) Transformation Dashboard and Data Tracking System	ICDD	Planning Implementation
8. Utilizing a Modernized Cross-Agency Disability Employment Data Infrastructure	ICDD+	Active Progress
9. Lead Employment First Implementation Officer	GO	No Implementation Year 1

Accomplishments and Early Signs of Progress

In the months of implementation thus far, progress is evident. There is active progress with relaunching statewide efforts to facilitate coordination and implementation of the MYP towards ending payment of SMW by January of 2030, including efforts beyond recommendations identified in the MYP.

Some of those activities include the following:

- ICDD reconstituted the DIP Workgroup shifting the focus from developing the MYP to supporting implementation
- As per the law, DDD increased the program rate for Supported Employment –Small Group Supports
- ICDD launched an extensive technical assistance program to ensure coverage of all 14(c) entities
- DDD launched the DIP Transition grant program for 15 14(c) providers
- ICDD has outreached to multiple other states and federal researchers to understand valuable systems used to ensure adequate tracking and reporting of outcomes.

Additionally, there is evidence of current 14(c) providers engaging in transformation efforts:

- Providers are engaging in best practice training in customized employment
- More than 10 14(c) providers attended a day-long training on Behavioral Health Clinics, a model of community support for individuals that can also include employment supports
- Providers are engaging in the monthly newsletter and “office hours” to provide information and support
- Providers are requesting support in areas like business development and transformation

In this first 4 months, 6 organizations have confirmed that they have either ceased paying SMW or plan to let their DOL 14(c) expire in early 2026, well ahead of implementation requirements.

Subminimum Wage to Integrated Employment Illinois (SWTCIE Illinois)

(supports PWD17, Systems1, Systems3, Results8)

Illinois continues to make significant progress through the Subminimum Wage to Integrated Employment Illinois initiative, a five-year project funded by the United States Department of Education Disability Innovation Fund. Illinois was one of thirteen states selected for this award in Federal Fiscal Year 2023 and received \$13,943,946, the second highest award amount. The project supports innovative strategies to increase Competitive Integrated Employment for youth and adults with disabilities who are seeking or engaged in subminimum wage employment. The Illinois Department of Human Services Division of Rehabilitation Services administers the project in partnership with the University of Illinois Urbana-Champaign (UIUC.)



The project provides funding to six organizations that hold certificates issued under section 14(c) of the Fair Labor Standards Act and delivers technical assistance to support organizational transformation and the development of sustainable employment pathways. Over the past year, the project has expanded partnerships, strengthened capacity, and advanced several key accomplishments.

- The project has built strong partnerships with statewide stakeholders, including the Illinois Council on Developmental Disabilities, Access Living, the Illinois Center for Training and Work, and multiple Centers for Independent Living, to support long-term sustainability (*supports Systems1, Systems3*).
- Project managers have established working relationships with members of the General Assembly to advance Competitive Integrated Employment for individuals with significant intellectual disabilities (*supports PWD-17*).
- The Illinois Institute for Rehabilitation and Employment Research at the UIUC serves as a key partner in the Dignity in Pay Grant awards, supporting agencies in transitioning individuals from subminimum wage to Competitive Integrated Employment (*supports Results8*).
- A stakeholder study group has developed a toolkit outlining strategies and best practices for transitioning individuals with significant disabilities into Competitive Integrated Employment. The toolkit is expected to be released in mid-2026 (*supports PWD-17, Results-8*).
- A Subminimum Wage to Integrated Employment Illinois Advisory Council has been formed and will hold its first meeting in early 2026. Staff from the six participating agencies have also been recruited to serve on the State Rehabilitation Council (*supports Systems-1*).
- The project is refining its technical assistance model to focus more directly on executive and management staff to support organizational change and sustainability, while continuing to provide training to frontline staff (*supports Systems-3*).
- A baseline survey was developed, and 31 individuals have completed intake survey records to date (*supports Results8*).
- All Employment Specialists funded through the project have completed or are completing Association of Community Rehabilitation Educators certification through Virginia Commonwealth University and the UIUC. Staff from 14(c) agencies and school personnel not officially in the SWTCIE project are also receiving this training to build an internal culture of employment (*supports Systems3, PWD17*).
- The project is working with the six participating agencies to develop operational plans that will be sustained after the project concludes, including strategies to reduce reliance on workshop models, engage day program participants, and strengthen youth engagement through coordinated, person-centered planning (*supports PWD17, Systems1*).
- Future areas of project improvement include strengthening data collection, expanding customized employment implementation, and emphasizing five priority job categories: essential workers, green jobs, home and community-based services, arts related positions, and transportation related jobs (*supports Results8, PWD17*).

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- In late 2025, the Center for Studying Disability Policy at Mathematica reported that Illinois' Subminimum Wage to Integrated Employment Project was the national leader in placements and engagements among all participating states (*supports Results-8*).
 - A dedicated project website has been launched to share accomplishments, resources, and updates (*supports Systems1*).

Project Totals (October 1, 2023 – December 31, 2025)

- **Customers Engaged:** 165
- **Individuals in Subminimum Wage Employment:** 67
- **Individuals Who Obtained Customized Integrated Employment:** 76
- **Average Hours Worked per Week:** 13.3
- **Average Hourly Wage:** \$15.57

Strengthening VR and Employment Network Partnerships to Expand Benefits Counseling and CIE Supports

Illinois has also taken steps to strengthen collaboration between the Division of Rehabilitation Services (DRS) and Social Security Administration approved Employment Networks (ENs) to expand access to benefits counseling and long-term employment supports. This work aligns with the Dignity in Pay Act's emphasis on informed choice, continuity of services, and sustainable pathways to competitive integrated employment (CIE).

DRS has begun compensating ENs for the provision of benefits counseling services. This increases statewide capacity to deliver timely and accurate information about work incentives, earnings, and the impact of employment on public benefits. This approach reduces one of the most significant barriers for individuals who are transitioning from subminimum wage settings, which is the fear of losing essential benefits. It also supports individuals in making informed decisions about pursuing CIE.

By using the federal Ticket to Work program and the existing EN infrastructure, Illinois is expanding access to post-employment supports that help individuals maintain and advance in employment after VR case closure. This strategy strengthens provider readiness, supports long-term employment stability, and aligns state and federal funding streams to create a more sustainable system of CIE supports.

This collaboration also complements the broader systems-change efforts of the Dignity in Pay Act by increasing the availability of benefits counseling outside of waiver services, supporting provider transformation, and reinforcing the state's commitment to ensuring that individuals have the information and supports needed to succeed in competitive employment.



Customized Employment Demonstration Program: Alignment with the Dignity in Pay Act Multiyear Plan (MYP)

The Customized Employment for Individuals with Disabilities Act, enacted in 2020 and amended in 2024, directs the Illinois Department of Human Services Division of Rehabilitation Services (DRS), in collaboration with the Division of Developmental Disabilities (DDD), to implement a statewide Customized Employment (CE) Demonstration Program. The Demonstration Program is a core strategy supporting the Dignity in Pay Act (DIP Act), particularly the transition from subminimum wage (SMW) to competitive integrated employment (CIE) by January 2030.

The CE Demonstration Program expands access to individualized, person-centered employment services for individuals with the most significant disabilities and establishes a statewide framework for implementing CE practices consistent with national best practices, including the Workforce Innovation Technical Assistance Center’s Essential Elements of Customized Employment.

This section provides an overview of CE Demonstration Program implementation, accomplishments, and outcomes for January 1, 2025, through December 31, 2025, and describes how CE activities directly support the DIP Act Multiyear Plan (MYP).

Role of Customized Employment in Advancing the DIP Act

Customized Employment is a critical strategy in Illinois’ transition away from SMW. CE provides a structured, person-centered pathway to CIE for individuals who require highly individualized supports, including many current 14(c) workers. The CE Demonstration Program directly advances multiple MYP recommendations, including:

Cross-references to MYP Recommendations

Persons with Disabilities (PWD) Recommendations

1. **PWD6** – Expanding Employment Pathways through Comprehensive Transition and Postsecondary Programs
2. **PWD12** – Unlocking Employment Supports through IL488-2234 Form Submission
3. **PWD13** – Ensuring Access to Discovery through DRS, DDD, and Waiver Enhancements
4. **PWD14 & PWD15** – Assistive Technology access and pathways for employment
5. **PWD17** – Integrating Benefits Counseling into Waiver Services

14(c) Provider Recommendations

1. **Providers1** – Coordinated Technical Assistance for 14(c) Provider Transformation
2. **Providers3** – Provider Training Needs Survey
3. **Providers5** – Statewide Cross Agency Training Hub

Systems Recommendations

1. **Systems1** – Unifying State Disability Employment Supports
2. **Systems3** – State Policy Alignment for CIE
3. **Systems5** – State Policy on Customized Employment Services and Standards
4. **Systems6 & Systems8** – Expanding AT and ensuring continuity across systems

Results Recommendations

1. **Results7** – 14(c) Transformation Dashboard and Data Tracking System
2. **Results8** – Modernized Cross Agency Disability Employment Data Infrastructure

By embedding CE within the broader DIP implementation structure, Illinois is ensuring that individuals with the most significant disabilities have equitable access to meaningful, competitive employment opportunities.

Target Population and Provider Requirements

Individuals Served

Participants in the CE Demonstration Program must:

- Be eligible for vocational rehabilitation services
- Meet the Criteria for Most Significant Disability
- Require highly individualized placement services

These requirements align with **PWD13** (ensuring access to discovery) and **PWD6** (expanding employment pathways).

Provider Participation

Community Rehabilitation Providers (CRPs) participating in the Demonstration Program must:

- Meet requirements in 89 Ill. Adm. Code 530
- Employ at least one staff member certified in Customized Employment through ACRE or another qualified training entity

This supports **Providers1**, **Providers3**, and **Providers5**, which focus on provider readiness, training, and technical assistance.

Program Structure

DRS organized CE Demonstration Program into five phases that align with statutory requirements and support **Systems5** (state policy on CE services and standards):

1. **Consultation and Initiation**
2. **Discovery**
3. **Customized Employment Planning**
4. **Job Development and Negotiation**
5. **Post-Employment Support and Monitoring**

Upon successful completion of Phase 5, the case is closed with DRS. Individuals may then access Medicaid Home and Community-Based Services through DDD to support long-term employment stability, aligning with **PWD17** (benefits counseling) and **Systems6/Systems8** (AT and continuity).

Accomplishments and Early Signs of Progress

In alignment with the DIP Act's first year implementation activities, the CE Demonstration Program achieved several foundational milestones that strengthen statewide capacity for individualized employment supports.

Provider Capacity Building

(Advances Providers1, Providers3, Providers5)

- All CE providers completed **Marc Gold & Associates Customized Employment training**, ensuring statewide consistency and fidelity to CE practices.
- Providers engaged in ongoing technical assistance, including CE fidelity coaching and implementation support.

Standardization and Systems Alignment

(Advances Systems3, Systems5, Results7, Results8)

- Development and statewide rollout of standardized CE documentation tools:
 - **IL 488-4669 – Discovery Action Plan**
 - **IL 488-4668 – Customized Employment Discovery Profile**
- Updated contract structure and pricing aligned with CE phases (Phase 1–5.5), supporting transparency and fidelity.

Cross-Agency Collaboration

(Advances Systems1, Systems3, PWD17)

- Strengthened coordination between DRS and DDD to align CE with DIP Act implementation.
- Co-hosted statewide webinar, **“Employment Collaboration: Services and Supports through DRS & DDD”** on November 18, 2025.
- CE activities were integrated into broader statewide efforts, including transportation planning, benefits counseling expansion, and provider transformation initiatives.

These accomplishments mirror the broader statewide momentum described in the DIP Annual Report and reinforce CE as a core strategy in the transition away from SMW.

Program Outcomes

CE Pilot Program (January 1, 2020 – December 31, 2024)

- Total customers served: **312**
- Total customers achieving CIE: **94**
- Average cost per customer: **\$15,514**
- Average annual expenditure: **\$875,322**
- CE success rate: **30%**

CE Demonstration Program – Year One (January 1, 2025 – December 31, 2025)

*(Advances **Results7** and **Results8**)*

- Total customers served: **156**
- Total customers achieving CIE: **73**
- Average cost per customer: **\$15,514**
- Total expenditure: **\$1,151,900**
- CE success rate: **46.8%**
 - A **17% increase** over the pilot program years

These outcomes demonstrate the effectiveness of CE as a pathway to CIE and highlight its importance in achieving the DIP Act's statewide transformation goals.

Cross-Driver Progress on PWD9 and Systems13: Rural Transportation Pilots and the Statewide Accessible Transportation Strategic Plan

Illinois has advanced significant transportation work that supports both Recommendation PWD9, which focuses on rural transportation pilots to improve access to competitive integrated employment, and Recommendation Systems13, which calls for a statewide accessible transportation strategic plan. Transportation continues to be one of the most substantial barriers to employment for individuals with disabilities, particularly in rural and underserved regions. To address these challenges, the Illinois Department of Human Services Division of Rehabilitation Services and the Illinois Department of Transportation Transit Division have initiated a coordinated effort to better understand the statewide mobility landscape and identify strategies that can guide both pilot development and long-term systems planning.



On November 13, 2025, the two agencies convened a statewide workshop to examine transportation barriers and opportunities across Illinois. The purpose of the workshop was to identify the most significant mobility challenges affecting individuals with disabilities and to establish measurable outcomes that can guide improvements in access and mobility equity. The event brought together a broad coalition of stakeholders, including state and local agencies, public transit providers, community organizations, and advocates who are committed to improving mobility for older adults, individuals with disabilities, and people with low incomes.

The Community Transportation Association of America's Coordinating Council on Access and Mobility Technical Assistance Center sponsored the workshop. Community Roots and Yellow Wood Associates facilitated an interactive systems-based planning and measurement session. The consultant team has prepared a summary of the workshop that includes indicator analyses and measurement concepts developed collaboratively with participants. These materials will inform the development of rural transportation pilots under Recommendation PWD9 and will also support the creation of a coordinated statewide transportation strategy under Recommendation Systems13.

To further advance this work, the Illinois Department of Human Services Division of Rehabilitation Services invested 94 thousand dollars in the Statewide Independent Living Council of Illinois for Fiscal Year 2026. This investment supports efforts to address transportation barriers, strengthen regional mobility coordination, and expand community driven solutions that improve access to employment for individuals with disabilities. This funding reinforces the cross-agency commitment to building a transportation system that supports the goals of the Dignity in Pay Act.

This initiative has strengthened collaboration with the Departments of Transportation and Human Services in Transportation Planning Regions Nine, 10, and 11, which include several rural and underserved areas. These partnerships have created new momentum for coordinated mobility planning and have laid the groundwork for both pilot implementation and statewide strategy development. The next Illinois Department of Transportation and Illinois Department of Human Services Mobility Access Coordination debriefing meeting is scheduled for February 27th and will continue the cross-agency effort to improve transportation access in support of the Dignity in Pay Act.

Greater Options for Competitive Integrated Employment

(supports PWD16, Results8)

In support of the Dignity in Pay Act's commitment to expanding equitable employment pathways, IDHS-DRS advanced revisions to its self-employment policies and administrative rules. In addition, analysis of the feedback/data received from the Comprehensive Statewide Needs Assessment identified self-employment as a top priority for improvement in employment programs. Of those who completed the survey, 67.6% of individuals (and/or their parents) and 54% of providers said the current program does not fit their needs. These updates intend to strengthen self-employment as a viable route to Competitive Integrated Employment (CIE) and ensure that individuals with disabilities have access to opportunities that uphold Dignity in Pay. These updates operationalize the DIP Act's vision by embedding Dignity in Pay

into self-employment programs. They expand employment options for individuals with disabilities while ensuring accountability, sustainability, and equity. The changes position Illinois to accelerate progress toward the 2030 goal of eliminating subminimum wage employment.

Technical Assistance

Illinois has spent more than a decade building momentum toward ending subminimum wage and expanding competitive integrated employment for people with DD. This progress has been strengthened by technical assistance from State and national subject matter experts and through participation in national initiatives such as (but not limited to):

- Employment First State Leadership Mentoring Program (SELN)
- National Expansion of Employment Opportunities Network (NEON)
- Association for People Supporting Employment First (APSE)
- Subminimum Wage to Competitive Integrated Employment (SWTCIE)
- State Exchange on Employment and Disability (SEED)
- Marc Gold & Associates (MG&A)

From October 2024 to September 2025, Illinois was selected as one of 13 NEON Core States. This means Illinois was chosen to receive intensive, yearlong technical assistance (TA) from subject matter experts (SME). As a Core State, Illinois received direct support from national experts to strengthen Employment First policies, build provider capacity, and expand competitive integrated employment opportunities for people with disabilities. NEON experts helped shape the Dignity in Pay Act Multi-Year Plan, contributed to key recommendations, and supported the EEOPD Task Force throughout development. Their work also strengthened provider's readiness.

Moreover, more than 34 Illinois providers have already benefited from the Provider NEON initiative that was secured through the Illinois Association of Rehabilitation Facilities (IARF), and peer-based coaching through APSE cohorts. All of which have been helping build readiness for the transition away from SMW.

With the DIP Act now in full implementation, the Council recognized a need to sustain TA during the first critical year of the transformation. The shift away from SMW requires coordinated policy work, provider-level transformation, individual-level tracking, and strong data systems. Illinois needed a team with deep familiarity with the state's landscape, the DIP recommendations, and national best practices for systems change. EconSys was the natural partner to continue this work. They bring seasoned project management, experience working directly with Illinois agencies, and a team of SMEs who know Illinois providers and have guided multiple states through similar transformation.

The Council's one-year investment ensures continuity during the most pivotal stage of implementation. The project supports group and one-on-one assistance for 14(c) providers, coordination with state agencies to align policies and funding, and development of the data tools needed to measure statewide progress. This investment allows Illinois to sustain the momentum built through NEON, reinforce the



infrastructure outlined in the MYP, and protect the long-term success of individuals with DD transitioning out of SMW.

Economic Systems (EconSys) and its partners played a central role in developing the Dignity in Pay Multi-Year Plan and continue to guide implementation through research, training, and technical assistance. Their support is helping Illinois modernize service models, expand employment pathways, and strengthen cross-agency coordination.

The From Promise to Progress project builds on this foundation. The project focuses on supporting providers transitioning away from 14(c) certificates, improving alignment among state agencies, and enhancing data systems needed to track progress and outcomes. Together, these efforts position Illinois to complete the phaseout of subminimum wage employment and increase access to meaningful, competitive work.

Key Strengths of the EconSys Proposal

- **Direct Support for Providers:** The project offers both group and individualized technical assistance to the 59 remaining providers with 14(c) certificates. Assistance is tailored to their needs and designed to accelerate the shift toward community-based employment.
- **Stronger Agency Coordination:** The proposal brings together DDD, DRS, IDES, IDOL, and other state partners to advance joint projects that address funding, policy alignment, and systems improvements that support competitive integrated employment.
- **Individual-Level Data Tracking:** The project will track individuals moving from subminimum wage settings into competitive integrated employment. Providers may opt in to participate, allowing Illinois to measure progress and outcomes more accurately.
- **National Expertise:** The work is led by EconSys and a team of nationally recognized Employment First and provider transformation experts, including Lisa Mills, Rachel Pollock, Duane Shumate, Marc Gold & Associates, Dale Verstegen, Shannon Webb, and Abby Cooper.
- **Alignment with the Multi-Year Plan:** The project directly advances the Dignity in Pay Multi-Year Plan by strengthening system capacity, improving data infrastructure, and providing targeted technical assistance that supports sustainable and long-term change.

Dignity in Pay Grant Program

Illinois House Bill 793, the Dignity in Pay Act, was enacted as Public Act 103-1060 on January 21, 2025. The Act requires the elimination of authorizations to pay subminimum wages (SMW) to individuals with disabilities in Illinois by December 31, 2029.



The law includes provisions to support a successful transition away from SMW and expand opportunities for Individuals with Intellectual and Developmental Disabilities (I/DD) to explore, obtain, and sustain competitive integrated employment (CIE). One provision authorizes “Transition Program Grants” to help provider agencies build capacity, increase responsiveness, and transition individuals engaged in SMW to alternatives.

In response, the Illinois Department of Human Services, Division of Developmental Disabilities (DDD), issued a Notice of Funding Opportunity (NOFO) for the Dignity in Pay Grant Program, which supports provider agencies serving individuals with I/DD to transition from SMW activities to competitive integrated employment and inclusive day services.

The NOFO offered an estimated \$2,000,000 to an anticipated 15 provider agencies during FY2026–FY2027. A total of 28 agencies applied, and applications underwent a Merit-Based Review (MBR) that produced funding recommendations. 15 agencies were recommended for grant awards totaling \$2,414,335.88.

Since the program’s launch on July 1, 2025, the DDD has engaged these agencies in funding, training, and technical assistance to support implementation of the Dignity in Pay Grant Program.

Data is actively collected, through standardized reporting, that includes progress on multiple Grant Deliverables:

- Transition Planning
- Participation in Dignity in Pay Grant Community of Practice
- Activities / events / meetings, designed to engage individuals served and their families, related to Dignity in Pay
- Number of individuals earning Subminimum Wage
- Scope of work contracts which result in Subminimum Wage payments
- Number of agency personnel dedicated to Subminimum Wage activity
- Efforts to modify and distribute messaging related to changes
- Recruiting, hiring, onboarding and retaining personnel to focus on Competitive Integrated Employment and related services
- Formal assessment of vocational and career interest, strengths, preferences & conditions of employment
- Engagement with local businesses

Additional Initiatives Supporting Transition from 14(c) SMW

The initiatives below directly and positively impacted the Statewide transition from 14(c) but are not a direct component of the DIP MYP:

- The Coleman Family Foundation has provided funding for the IDD Systems Redesign Coalition, including some funding that bolsters programs that can support employment initiatives for people

with IDD (like Behavioral Health Centers and Certified Transition and Post-secondary programs), as well as hosting feedback sessions with 14(c) workers, provider agencies, and guardians to solicit feedback about the DIP initiative.

BEP Certification Reform for Disability-Owned Businesses

The Dignity in Pay Act addressed a key policy question tied to the Act's broader economic inclusion goals for Illinoisans with disabilities. As of January 2025, the Illinois Commission on Equity and Inclusion (CEI) no longer classifies 14 (c) certificate holding organizations as Business Enterprise Program (BEP) firms eligible for goal achievement. Sheltered workshops may still be registered under the State Use Program and by October 4, 2021, Executive Order, workers must be paid minimum wage. The January 2025 change removes sheltered workshops from counting toward BEP participation goals, which historically allowed certain disability-serving entities to be included in state diversity contracting metrics. In contrast, Centers for Independent Living (CILs) are now recognized as disability-owned businesses for BEP purposes. CILs are federally required to have at least 51% of their board, staff and management comprised of people with disabilities and excluded from the BEP.

Priority Work for the Next Six Months

As we look to the second 6-months of implementation, there are recommendations from the MYP will be prioritized. These recommendations are listed below along with their driver category and recommendation number:

- Launch the Assistive Technology Subgroup (*PWD-14, PWD-15, Systems-6, Systems-8, Systems-14*)
- Create and disseminate communication to all DRS, DDD, and ISC employees about DIP and how the phase out of SMW impacts conversations with clients/those accessing services
- Review and confirm data system options (*Results-8*)
- For each 14(c), identifying existing employment efforts in their region/area and make direct connections between 14(c) and the chamber of commerce, local employment network, etc. (*Per request from current 14(c) organizations*)
- Business support for current 14(c) organizations: marketing, business scenario planning, consultation with existing business models that employ people with I/DD (*Per request from current 14(c) organizations*)
- Audit current trainings available to create the training hub (*Providers-4*)
- Develop survey for state agencies to confirm policy/regulation alignment with DIP (*Systems-3*)
- Confirm 14(c) Transformation Feedback System by June 2026 (*Results-4*)
- Launch 14(c) Dashboard and Tracking System by July 2026 (*Results-7*)
- Strengthen integration of CE within statewide DIP implementation structures (**Systems1, Systems3**)
- Expand provider training and technical assistance (**Providers1, Providers5**)
- Enhance data collection and reporting (**Results7, Results8**)
- Increase employer engagement and business development supports (**Providers3**)

- Strengthen coordination between DRS, DDD, and Employment Networks (**PWD17, Systems1**)
- Support 14(c) providers in identifying CE pathways for individuals transitioning from SMW (**Providers1**)

In conclusion, the first months of implementation have allowed for significant early gains in the progress towards this transformation. Partners will continue to engage in the established workstreams to ensure the MYP is implemented and has the intended impact to support current 14(c) workers having choice to engage in CIE. There is much to do in the coming 4 years, but the foundation has been laid to ensure the DIP Act actualizes the changes intended. If you would like to discuss any aspect of this report further, please do not hesitate to contact DIP.Contact@illinois.gov.