



Advocating Change Together

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April 6th, 2015

Judge Donovan Frank
United States District Court
724 Federal Building
316 North Robert Street
St. Paul, MN 55101

ENTERED

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BY: Reb. USM

Honorable Donovan W. Frank,

Thank you very much for allowing ACT to provide comments as you review the modifications to the State of Minnesota Olmstead Plan. We are responding specifically to the plan's section on Community Engagement Section (OP-CES). Empowering people with disabilities to advocate for themselves is the mission of Advocating Change Together.

Before itemizing concerns, please note that we agree with the majority of the Olmstead Plan's Community Engagement Section, which begins on page 272 of the report dated March 27. The principles and values set forth in this document are sound. Our concerns are outlined below.

Person Centered Planning: At the start, let us state that we strongly support Person Centered Planning. Our only concern is that people must have the supports in place to bring their plans into fruition. During the first Olmstead Academy, two of the groups chose working on the implementation of Person Centered Plans as their Disability Integration Project. Academy members reported that they have had Person Centered Plans drawn up in the past, and that they are then filed away and not implemented. We recommend strong follow up of the Person Centered Plans that includes peer to peer support. We would like to see more on follow up and supports in the Plan.

Cultural Competence: The OP-CDS calls for engagement efforts to be culturally competent in the experiences of people and communities. For us this is vitally important. For people with intellectual and developmental disabilities (I/DD) to have a meaningful voice in policy and decision making, simply attending meetings--with lots of sitting, lots and lots of verbiage-- is not an accessible method. The culture of the self advocacy movement for folks with I/DD includes music, art, stories, laughter, hugs, and theater and lots of movement and BIG visuals. In our 35 years of experience, successful engagement must start with the personal experiences of the individual and build from there. The

culture is kinesthetic, energetic and almost always includes food.

Appoint Community Engagement directors: On the state agency side, we recommend that each state agency appoint a community engagement director from their department. This director would immerse themselves into the disability community and show people--by coming to them--that people with disabilities count.

Current Level of Self-Advocacy: The OP-CES mentions the self advocacy groups in the state (p297). We were surprised to see how few groups were noted; we believe the surface was barely skimmed. In reality there are many other groups in the state. Seven years ago, when Advocating Change Together launched the SAM (Self Advocacy Minnesota) network, we hired an outside consultant to conduct an environmental scan of self advocacy activity for people with I/DD in the state.

We are currently planning a second such scan to update the findings; and we will be glad to share this information to all interested state agencies. We do not think the state should consider this part of the OP-CES complete until an adequate scan is completed.

Acknowledge the different levels of engagement: Not all activities described as community engagement are of equal depth. If the goal is placing people with disabilities in positions of equal power in decision-making, we must distinguish between low levels of engagement and deeper levels. We propose that various activities called for in the OP-CES be ranked on a scale from 0 to 5, as outlined below, and that more than one level must be met, preferably all.

0-Transparency--information is available

1-Public input--getting people to testify, tell story at capital, providing information for others to consider and act on or ignore

2-Representation--Single individual, representing themselves, on an advisory board
Others can act or ignore input

3-Consultant--decision making bodies negotiate and/or make plans with organizations made up of people with disabilities

4-Decision Maker arriving late--after plans in place, person with disability brought in and given some shared power to guide going forward

5-Decision Maker before plans made--person/ people with disabilities is in a decision making position with equal power

Monitoring Successful Engagement: Finally, we are very concerned with how engagement and progress will be monitored. First, the word "should" is used frequently in the OP-CES's section on Principles of Engagement. We recommend the word "should" be replaced with "will". Then the activity can be assessed by tracking which principles of engagement are actually being followed and implemented. Second, while these principles do address being culturally competent, providing a meaningful experience for participants, and compensation for needed accommodations, we would add another principle: that people with disabilities who take time to be civically engaged should be paid just as state employees are paid for their time.

Closing Remarks: We have no comment on the Best Practices or Toolkit mentioned in the Plan as we have not seen them.

We have reviewed the Engagement Planning Worksheet and do not note this as an appropriate process to use in developing a comprehensive Engagement Plan. State agencies will have more sophisticated planning tools.

The Olmstead Engagement Plan has many positive qualities. With an accurate environmental scan, Person Centered Plans that are fully implemented, a measurement tool that assess how people with disabilities are truly engaged in their communities, and an understanding of disability culture by state agencies, The Olmstead Plan can be effective.

In conclusion, we look forward to the Olmstead Implementation office having the resources available to implement the entire Olmstead Plan. They do need to increase capacity to meet the mandates of the entire Plan.

Sincerely,



Mary Kay Kennedy
Executive Director