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July 10, 2007

Social Security Administration  
ATTN: Michael J. Astrue, Commissioner of Social Security  
6401 Security Boulevard  
9th Floor Altmeyer Building  
Baltimore, MD 21235

April Myers  
Project Officer  
Social Security Administration  
Office of Program Development and Research  
3523 Annex  
6401 Security Boulevard  
Baltimore, MD 21235-0001

RE: California RISE Project

Dear Commissioner Astrue and Ms. Myers:

The National Working Positive Coalition (NWPC) is a diverse and multi-disciplinary coalition of people devoted to making improvements in work-related policies and programs affecting Persons Living with HIV/AIDS. Our mission is to promote research, development and implementation of effective practices in employment services; coordinate sharing and dissemination of this information and advocate for work options and opportunities for people living with HIV/AIDS.

We are writing to you with the NWPC's views about the California RISE Project. We are stating our support for the demonstration project and making some suggestions about ways to improve the project that will make its outcomes more meaningful. We are also suggesting some areas for future research.

The NWPC truly appreciates that the Social Security Administration (SSA) is supporting a demonstration project that looks at the issues faced by people with HIV/AIDS and autoimmune disorders who are considering re-entry to the workforce. The California RISE demonstration project has the potential to deliver critical data and information that can work towards a goal shared by SSA and the NWPC- increasing opportunities for people living with HIV/AIDS to enter the workforce.

Moreover we believe that the project can be an important and exciting step towards federal and state government agencies working together with community based organizations on this issue.

The NWPC is aware that Mathematica Policy Research, Inc. (MPR) has a rich history of research on issues related to employment for people living with disabilities and we believe that their work evaluating the California RISE project will be a critical part of the canon of research and analysis that can help provide important data and information for future planning.

We understand that SSA has contracted with MPR to administer the medical and health benefits component of the project and that the California Department of Rehabilitation (DOR) will oversee the vocational component. We were very encouraged by the community dialogue that MPR initiated on recent conference calls with providers in the HIV/AIDS community and we would like to strongly advocate that DOR initiate a similar conversation with the community.

We believe that the more dialogue that those charged with implementing the project have with those programs in the community that provide vocational services, case management and health services to the target population, the more successful the project will be.

Because the community has had an opportunity to discuss the medical and health benefits component of the project with MPR, we are able to offer some concrete thoughts about this side of the study. While we have some suggestions about the vocational component of the project, having a similar opportunity with DOR will allow the community to offer some more specific feedback.

- **Medical and Health Benefit Component**

The NPWC fully supports both components of the California RISE project. After community conversations with MPR we do have some questions and some thoughts about the medical and health benefits portion of the project. We recognize that the demonstration project targets both people living with HIV/AIDS and people with autoimmune disorders but since the NWPC focuses on issues related to people living with HIV/AIDS our comments are specific to that portion of the target population.

The four counties targeted (San Francisco, Alameda, San Diego and Los Angeles) have some of the best HIV/AIDS care in the nation. The public health systems in these counties are quite comprehensive and have provided an array of primary care and wrap around services that are models for many other systems of care. Moreover the options available in these counties for Medicare beneficiaries

through fee for service Medicare, Medicare Advantage programs and dual eligibility with Medi-Cal are quite comprehensive.

Additionally the California AIDS Drug Assistance Program (ADAP), the California Therapeutic Monitoring Program (TMP), and the California Medicare Part D Premium Payment Program all add to the benefits available to the target population.

In the four counties within the project, local and federal Ryan White Part A and Part B (formerly Titles I and II) funds are used for some of the wrap around services that help support the health care of the target populations. While it is true that in recent years Ryan White funds have become stretched in all jurisdictions and resources are not sufficient to provide the breadth of services needed by people living with HIV/AIDS, these four counties continue to develop strategies that help provide as comprehensive a system of care as possible.

The NWPC knows that the successes that the four target counties have achieved in HIV/AIDS care have provided a potential base of participants that are important to the project's recruitment and potential outcome evaluation and we encourage SSA to consider integrating MPR's medical and health benefits component of this project with existing systems in these counties and the benefits provided by the state. We strongly advocate that there be coordination and collaboration with the California State Office of AIDS which coordinates the ADAP, TMP and Medicare Part D Premium Payment Programs. We also encourage coordination with public health officials in the four counties who can best describe the local systems of care that are available to the target populations and where the project's medical and health services intervention will minimize redundancy and maximize efficacy.

- **Vocational Component**

As stated above, the NPWC encourages DOR to initiate a dialogue with the community about the vocational component of the California RISE project. While we are herewith offering some thoughts and suggestions about this component of the project we do believe that the community would be able to offer more concrete input after a dialogue with DOR.

Vocational rehabilitation counselors who can provide individualized and group career counseling and who have the cultural sensitivity and knowledge of HIV/AIDS disability are rare. It is vital that the demonstration project provide sufficient resources through contracting to train and hire appropriate counselors within all aspects of the vocational intervention. It will take time to train staff appropriately. Sufficient training time and resources should be built into the project's overall design.

A critical aspect of the vocational component should be the provision of coaching for project participants that provides support in negotiating accommodations in their employment and on going support that will help them maintain employment. Such support will provide a more successful employment relationship for both the employer and the employee.

- **Reducing Barriers for Demonstration Project Participation**

SSDI income is vital to life, supplying income for food and shelter for beneficiaries. Protecting that life line is of paramount importance for this population and some beneficiaries may be very concerned about identifying themselves as potentially able to work and therefore being declared ineligible for SSDI benefits. Ensuring identity protection as well as providing guarantees that the current benefit status of those expressing interest in the program will in no way be jeopardized would greatly reduce barriers to participation.

The NWPC strongly supports work related and medical Continuing Disability Review (CDR) waivers for all participants with an extension for a period of 5 years beyond the conclusion of the demonstration project. We believe that such waivers will facilitate recruitment for this project.

The NWPC advocates for greater flexibility in policies associated with the Trial Work Period for California RISE participants. We believe that during the course of the demonstration project there should be no application of the trial work period to employment by project participants and that any month where a participant earns more than \$640.00 a month not count towards the 9 months of trial work. By ensuring that the Trial Work Period is not a factor for project participants, there will likely be more incentive to fully utilize the resources of the project without apprehension and with a goal of employment.

- **Areas for future study**

The NWPC believes that vocational resources should be part of the continuum of services available for all people living with HIV/AIDS. Often through employment come stability, self-esteem, empowerment and better health outcomes. Studying the benefits of vocational services for SSDI beneficiaries- individuals with substantial work history- is an important first step in this process.

The NWPC vigorously encourages SSA to consider future projects that offer vocational training and support to SSI beneficiaries who may be considering employment options and may not have a history of work or skills necessary for employment. The NWPC believes that this population could benefit enormously from programs tailored to their specific needs.

- **Conclusion**

The NWPC is committed to the improved health, dignity and empowerment that come through offering vocational programs to people living with HIV/AIDS. We are aware of the specific needs of this community in employment and we feel that addressing the issue from a standpoint of improved health outcomes and empowerment as the primary overarching goals will eventually lead to cost savings for SSA and associated programs supporting people living with HIV/AIDS.

We would be happy to be a resource for future discussions on this project or other interventions that you may consider in the future.

Sincerely,

Randy Allgaier  
Chair, Policy and Advocacy Work Group  
National Working Positive Coalition, Board of Directors