

The Connection Commission

Program Charter and Theory of Change

ARTICLE I

Mission Statement

The Connection Commission exists to enable disabled people to participate meaningfully in work, civic, and creative life without being harmed by administrative burden, fiscal inability and legal complexity by shifting financial risk, administrative labor, and navigation demands from individuals to a disability-led institution.

ARTICLE II

Issue Identification

Claim

Disabled people are not failing to participate in society. Systems are failing to allow participation safely.

Supporting facts

- Creative, civil and work projects require liquid capital for approval, implementation and long-term success. Without adequate liquidity, projects face significant risks, including delays, cost overruns, and failure to meet long-term objectives.¹
- Disability benefit programs penalize earned income and asset ownership through hard eligibility cliffs, reducing the amount of capital available to disabled individuals..²
- SSI asset limits have remained at \$2,000 for individuals since 1989, creating structural poverty traps and enforcing the reduction of capital available to disabled individuals.³
- Administrative burden disproportionately excludes disabled people due to cognitive, physical, and fatigue limitations.⁴
- Executive functioning differences are strongly associated with neurodevelopmental disability and chronic illness.⁵
- Legal rights without access to counsel or navigation fail to protect disabled people in employment and benefits contexts.⁶
- Existing disability nonprofits skew toward crisis response rather than participation or contribution.⁷

¹ Steven M. Fazzari, R. Glenn Hubbard, and Bruce C. Petersen, “Financing Constraints and Corporate Investment,” *Brookings Papers on Economic Activity*, no. 1 (1988): 141–206.; Bent Flyvbjerg, “What You Should Know About Megaprojects and Why: An Overview,” *PM World Journal* 3, no. 2 (2014): 1–18.

² Social Security Act, Title XVI, 42 U.S.C. §§ 1381–1383f; Social Security Administration, *Red Book: A Guide to Work Incentives and Employment Supports for People Who Have a Disability* (Washington, DC: Social Security Administration, 2024), <https://www.ssa.gov/redbook/>.

³ Social Security Administration, *Program Operations Manual System (POMS): SI 01110.003 – Resource Limits*, <https://secure.ssa.gov/poms.nsf/lnx/0501110003>; Congressional Research Service, *Supplemental Security Income (SSI): Background and Issues*, Report R45025 (Washington, DC: Congressional Research Service, 2021), <https://crsreports.congress.gov/product/pdf/R/R45025>.

⁴ Pamela Herd and Donald P. Moynihan, *Administrative Burden: Policymaking by Other Means* (New York: Russell Sage Foundation, 2018).

⁵ Adele Diamond, “Executive Functions,” *Annual Review of Psychology* 64 (2013): 135–168, <https://www.annualreviews.org/doi/abs/10.1146/annurev-psych-113011-143750>; Michael J. Kofler et al., “Executive Functioning Heterogeneity in ADHD and Related Conditions,” *Clinical Psychology Review* 70 (2019): 1–19, <https://www.sciencedirect.com/science/article/pii/S0272735818303986>.

⁶ Catherine R. Albiston, Lauren B. Edelman, and Joy Milligan, “The Institutionalization of Rights and the Legal Mobilization of the Workplace,” *Law & Society Review* 48, no. 4 (2014): 1–36, <https://onlinelibrary.wiley.com/doi/abs/10.1111/lasr.12083>

⁷ National Council on Disability, *Designing for Inclusion: Tools for Improving Participation* (Washington, DC: National Council on Disability, 2018), <https://ncd.gov/publications/2018/designing-for-inclusion>.

ARTICLE III. Theory of Change

(1) Disabled people are excluded from sustained participation not due to lack of capacity, but because institutional designs impose predictable harm: (a) income- and asset-tested disability benefits penalize earnings and savings through hard eligibility cliffs⁸; (b) modern participation requires individuals to front costs and absorb financial volatility that disabled people disproportionately cannot safely carry⁹; (c) administrative and navigation demands exceed available executive functioning under disability, chronic illness, and trauma, converting paperwork and compliance into structural exclusion mechanisms¹⁰; and (d) legal rights fail to protect without navigation and representation, leading to avoidable benefit loss and procedural default.¹¹ (2) If these barriers are shifted from individuals to an institution that absorbs financial risk, centralizes administrative labor, and provides benefit-aware navigation and legal access, then participation can occur without requiring disabled people to incur financial, cognitive, or legal harm as a condition of engagement.¹² (3) If these supports are delivered through legally reviewed, opt-in structures that distinguish participation-enabling accommodations from income compensation, participants should experience fewer crises, lower rates of benefit disruption, and greater durability of engagement even while underlying systems remain unchanged.¹³ (4) If service degradation in social services is driven primarily by excessive caseloads, moral injury, and boundary collapse rather than by disability status, then a disability-led, telework-only workforce with strict caseload caps and standardized workflows should demonstrate higher fidelity, lower burnout, and greater sustainability than high-throughput crisis models.¹⁴

⁸ Social Security Act, Title XVI, 42 U.S.C. § 1382; Code of Federal Regulations, Title 20, §§ 416.1100–416.1124, <https://www.ecfr.gov/current/title-20/chapter-III/part-416/subpart-K>

⁹ Jacob S. Hacker, *The Great Risk Shift: The New Economic Insecurity and the Decline of the American Dream* (New York: Oxford University Press, 2006); David C. Stapleton et al., “Dismantling the Poverty Trap: Disability Policy for the Twenty-First Century,” *Journal of Disability Policy Studies* 23, no. 4 (2013): 193–206, <https://journals.sagepub.com/doi/abs/10.1177/1044207312457820>.

¹⁰ Herd and Moynihan, *Administrative Burden*; Diamond, “Executive Functions.”

¹¹ Albiston, Edelman, and Milligan, “Institutionalization of Rights”; Rebecca L. Sandefur, “Access to Civil Justice,” *Annual Review of Law and Social Science* 11 (2015): 339–358, <https://www.annualreviews.org/doi/abs/10.1146/annurev-lawsocsci-120814-121753>.

¹² Stapleton et al., “Dismantling the Poverty Trap”; D. James Greiner, Cassandra Wolos Pattanayak, and Jonathan Hennessy, “The Limits of Unbundled Legal Assistance,” *Harvard Law Review* 126, no. 4 (2012): 901–989, <https://harvardlawreview.org/print/vol-126/the-limits-of-unbundled-legal-assistance/>

¹³ Stapleton et al., “Dismantling the Poverty Trap”; Rebecca L. Sandefur, “Access to Civil Justice,” *Annual Review of Law and Social Science* 11 (2015): 339–358, <https://www.annualreviews.org/doi/abs/10.1146/annurev-lawsocsci-120814-121753>.

¹⁴ Christina Maslach and Michael P. Leiter, “Understanding the Burnout Experience: Recent Research and Its Implications for Psychiatry,” *World Psychiatry* 15, no. 2 (2016): 103–111, <https://pubmed.ncbi.nlm.nih.gov/27265691/>; Hyejin Kim and Madeleine Stoner, “Burnout and Turnover Intention among Social Workers,” *Social Work* 53, no. 3 (2008): 251–261, <https://academic.oup.com/sw/article/53/3/251/1931095>; Julie Repper and Tim Carter, “A Review of the Literature on Peer Support in Mental Health Services,” *World Psychiatry* 10, no. 2 (2011): 132–140, <https://pubmed.ncbi.nlm.nih.gov/21692942/>.

ARTICLE IV. Mechanism analysis

- Mechanism A: *Capital as Structural Accommodation*
- Mechanism B: *Modular participation, compensation, and ownership architecture*
- Mechanism C: *Centralized administrative infrastructure as accommodation*
- Mechanism D: *Legal access*
- Mechanism E: *Practical how-to education without judgment*
- Mechanism F: *Disabled-only staffing*
- Mechanism G: *Telework-only operations*
- Mechanism H: *Structured intake and self-selection*
- Mechanism I: *Caseload per caseworker cap of five*

Mechanism A: Capital as Structural Accommodation

Mechanism explanation:

Disabled people are systematically excluded from participation not only by lack of income, but by lack of access to liquid capital, upfront resources, and risk buffering ability. Modern work and civic participation routinely require individuals to front costs, absorb delays, manage volatility, and carry financial risk personally which is actively damaging to disabled individuals.

The Connection Commission treats money itself as an institutional accommodation.

Rather than paying income as the default mechanism of inclusion, the Commission uses organizational capital to:

- pay for tools, services, collaborators, and infrastructure directly,
- absorb upfront and recurring costs that would otherwise block participation,
- buffer financial volatility and timing gaps,
- eliminate the requirement that individuals carry liquidity, credit, or risk personally.

This allows disabled people to participate without needing personal capital, debt tolerance, or financial resilience that disability and structural exclusion often preclude.

For participants receiving income-tested disability benefits, this structure also functions as a benefit-protective accommodation by avoiding direct income or asset ownership where required. For the majority of participants not on such benefits, it functions as risk shielding and access infrastructure.

This approach aligns with research distinguishing participation-enabling supports from income compensation in disability policy,¹⁵ with broader institutional design research on the redistribution and absorption of individual financial risk,¹⁶ and with established nonprofit intermediary and fiscal sponsorship models that centralize resource control and liability at the institutional level.¹⁷

Risk

This structure may be misinterpreted as income substitution or benefit circumvention.

Counter-argument

The Commission does not conceal income or misrepresent compensation. It uses institutional capital to remove participation barriers that arise from upfront cost requirements and risk exposure. This is a recognized nonprofit and fiscal sponsorship practice. Benefit-protective structuring is limited, opt-in, and legally reviewed.

¹⁵ Stapleton et al., “Dismantling the Poverty Trap.”

¹⁶ Hacker, *Great Risk Shift*; Herd and Moynihan, *Administrative Burden*.

¹⁷ National Network of Fiscal Sponsors, *Fiscal Sponsorship: Six Ways* (San Francisco, 2022), <https://fiscalsponsors.org/fiscal-sponsorship/>; Internal Revenue Service, *Exempt Organizations Continuing Professional Education (CPE) Text* (Washington, DC: U.S. Department of the Treasury, 2019), <https://www.irs.gov/charities-non-profits/exempt-organizations-cpe-text>

Mechanism B: Modular participation, compensation, and ownership architecture

Mechanism explanation:

Modern participation systems tightly couple contribution, compensation, ownership, and administrative responsibility. This coupling excludes disabled people whose health, cognitive capacity, legal status, or benefit eligibility makes such bundling unsafe or inaccessible.

The Connection Commission deliberately decouples these elements.

Participants may engage in projects, creative work, or civic contribution without mandatory linkage to:

- wages or income,
- asset ownership,
- revenue participation,
- productivity quotas,
- rigid schedules,
- or administrative responsibility.

Instead, participation pathways are modular and recombined based on individual constraints and informed consent.

Where legally and practically feasible, participants may:

- receive compensation,
- retain intellectual property ownership,
- participate in revenue streams.

Where compensation or ownership would cause harm (for example, due to income-tested disability benefits, health instability, or legal risk), the Commission may:

- retain ownership and control of intellectual property,
- manage revenue institutionally,
- provide material, legal, and infrastructural support in lieu of income.

Future royalties or transfer of ownership may be evaluated, where legally permissible on a case-by-case basis through the Commission's legal team. This architecture aligns with established nonprofit publishing, arts sponsorship, fiscal sponsorship, and work-for-hire practices.¹⁸

Risk

This structure may be perceived as exploitative or as unequal treatment across participants.

Counter-argument

Participation is voluntary, bounded, and non-coercive. No participant is required to forgo compensation or ownership to participate. Differentiation is based on documented constraints, not moral judgment. Treating all participants identically would predictably harm some. Adaptive structure is required for equity under real-world conditions.

¹⁸ National Network of Fiscal Sponsors, *Fiscal Sponsorship: Six Ways*; Copyright Act, 17 U.S.C. § 101; Americans for the Arts, *Arts Contract Resources and Model Agreements* (Washington, DC, 2020), <https://www.americansforthearts.org/by-topic/business-and-law/contracts>; Internal Revenue Service, *Exempt Organizations Continuing Professional Education (CPE) Text* (Washington, DC: U.S. Department of the Treasury, 2019), <https://www.irs.gov/charities-non-profits/exempt-organizations-cpe-text>

Mechanism C: Centralized administrative infrastructure as accommodation

Mechanism explanation:

Administrative tasks such as paperwork, scheduling, compliance, follow-ups, contracting, and payment coordination impose disproportionate cognitive and energy costs on disabled people.¹⁹ By centralizing all administrative labor within the nonprofit, executive functioning ceases to be a prerequisite for participation. Cognitive labor is transformed into organizational labor.²⁰

This directly addresses administrative burden as a structural exclusion mechanism.²¹

Risk

Centralization may create organizational bottlenecks.

Counter-argument

Standardized workflows, templates, and capped caseloads reduce bottleneck risk.²² The burden already exists for disabled individuals. This mechanism redistributes it.

¹⁹ Pamela Herd et al., “Administrative Burden as a Mechanism of Inequality,” *Journal of Public Administration Research and Theory* 23, no. 4 (2013).; Adele Diamond, “Executive Functions,”

²⁰ Arlene R. Young et al., “Cognitive Load Theory and Chronic Illness,” *Health Psychology Review* 12, no. 2 (2018).

²¹ U.S. Government Accountability Office, *Human Services Programs: Improved Service Coordination Can Help Reduce Administrative Burdens* (GAO-19-521, 2019).; OECD, *Behavioural Insights and Public Policy* (Paris: OECD Publishing, 2017).; Russell A. Barkley, *Executive Functions: What They Are, How They Work, and Why They Evolved* (New York: Guilford Press, 2012); Herd and Moynihan, *Administrative Burden*.

²² Henry Mintzberg, *Structure in Fives: Designing Effective Organizations* (Englewood Cliffs, NJ: Prentice Hall, 1983).

Mechanism D: Legal access

Mechanism explanation:

Legal rights related to employment, benefits, contracts, and accommodations are ineffective without navigation and advocacy.²³ The Commission provides access to pro bono disability attorneys whose time is funded by the nonprofit. This converts formal rights into practical protection.²⁴

As our participants engage in contractual arrangement via their funded projects, legal guidance is required to ensure safe navigation and advocacy. Empirical evidence shows outcomes improve dramatically with representation.²⁵

Retained legal counsel will also help ease any royalties disputes or claims of discrimination by the nonprofit, thus directly supporting the sustainability of the nonprofit long-term.²⁶

Risk

Legal services increase operational cost.

Counter-argument

Preventing exploitation, benefit loss, and institutional harm reduces downstream costs and crisis intervention expenses which helps the nonprofit long-term.²⁷

²³ Rebecca L. Sandefur and Thomas M. Clarke, *Roles Beyond Lawyers: Summary, Recommendations, and Research Report* (American Bar Foundation, 2016).

²⁴ Michael Ashley Stein and Janet E. Lord, "Future Prospects for the United Nations Convention on the Rights of Persons with Disabilities," *Human Rights Quarterly* 32, no. 2 (2010).

²⁵ Jon C. Dubin, "Torquemada Meets Kafka: The Misapplication of the Issue Exhaustion Doctrine to Inquisitorial Administrative Proceedings," *Administrative Law Review* 66 (2014); Sandefur, "Access to Civil Justice."; Greiner, Pattanayak, and Hennessy, "Limits of Unbundled Legal Assistance."

²⁶ Deborah L. Rhode, *Access to Justice* (New York: Oxford University Press, 2004); Legal Services Corporation, *The Justice Gap: Measuring the Unmet Civil Legal Needs of Low-Income Americans* (Washington, DC: LSC, 2017).

²⁷ Laura K. Abel, "Evidence-Based Access to Justice," *University of Pennsylvania Journal of Law and Social Change* 13 (2010).

Mechanism E: Practical how-to education without judgment

Mechanism explanation:

Many skills labeled as common sense are unevenly taught or inaccessible due to disability or trauma.²⁸ The Commission provides explicit instruction in practical life and system navigation skills without shame or infantilization.²⁹ These sessions are taught via Zoom by volunteer disabled educators, with both how and why explained, with no costs to the nonprofit associated.

This reduces preventable crises and adds a no-cost benefit to participants.³⁰

Risk

Education may be misconstrued as patronizing.

Counter-argument

Instruction is optional, explicit, and framed as access rather than correction. Participants choose engagement and the sessions are designed and executed by disabled instructors, with curriculum vetting done by other volunteer disabled educators.³¹

²⁸ Pierre Bourdieu, *Distinction: A Social Critique of the Judgement of Taste* (Cambridge, MA: Harvard University Press, 1984).; National Academies of Sciences, Engineering, and Medicine, *Trauma-Informed Care in Behavioral Health Services* (Washington, DC: National Academies Press, 2014).; American Psychiatric Association, *DSM-5-TR: Diagnostic and Statistical Manual of Mental Disorders*, 5th ed., text rev. (Washington, DC: APA, 2022).; Substance Abuse and Mental Health Services Administration, *SAMHSA's Concept of Trauma and Guidance for a Trauma-Informed Approach* (HHS Publication No. SMA 14-4884, 2014).

²⁹ Paul J. Silvia, *How to Write a Lot* (Washington, DC: American Psychological Association, 2007).; World Health Organization, *Guidelines on Community-Based Rehabilitation* (Geneva: WHO, 2010).

³⁰ U.S. Government Accountability Office, *Human Services Programs: Improved Service Coordination Can Help Reduce Administrative Burdens* (GAO-19-521, 2019).; R. D. Goodman et al., "Trauma-Informed Care as a Framework for Organizational Change," *Journal of Trauma & Dissociation* 17, no. 4 (2016): 425–442, <https://www.tandfonline.com/doi/abs/10.1080/15299732.2016.1141147>; Herd and Moynihan, *Administrative Burden*; Diamond, "Executive Functions."

³¹ National Disability Rights Network, *Respect, Autonomy, and Self-Determination in Disability Services* (Washington, DC: NDRN, 2016).; Sheryl Burgstahler, *Universal Design in Education: Principles and Applications* (Seattle: DO-IT, University of Washington, 2015).

Mechanism F: Disabled-only staffing

Mechanism explanation:

Employing only disabled staff reduces power asymmetry, improves accuracy of accommodation decisions, and increases trust and disclosure.³² Disability-competent caseworkers are disabled-only contract employees rather than W-2 staff, are compensated pursuant to board-approved contractor agreements, with caseloads capped at five.*³³ Peer-led service models demonstrate higher engagement and fidelity.³⁴

Risk

Hiring pool is smaller.

Counter-argument

Fidelity and sustainability are prioritized over rapid scaling.

**See Mechanism I for details*

³² Rochelle E. Woods et al., “Peer Support and Power Sharing in Disability Services,” *Disability & Society* 33, no. 7 (2018).; Lisa I. Iezzoni et al., “Patient–Provider Communication about Disability,” *Disability and Health Journal* 7, no. 4 (2014).

³³ U.S. Department of Labor, *Independent Contractors in Social Services: Compliance and Risk Considerations* (2015).; National Academies of Sciences, Engineering, and Medicine, *Burnout in the Health Professions* (Washington, DC: National Academies Press, 2019).

³⁴ Meredith Minkler, “Community-Based Participatory Research for Health,” *Annual Review of Public Health* 26 (2005): 255–274, <https://www.annualreviews.org/doi/abs/10.1146/annurev.publhealth.26.021304.144122>; Repper and Carter, “Review of the Literature on Peer Support,” *World Psychiatry* 10, no. 2 (2011): 132–140, <https://pubmed.ncbi.nlm.nih.gov/21692942/>; Elizabeth F. Emens, “Disabling Attitudes: U.S. Disability Law and the ADA Amendments Act,” *American Journal of Comparative Law* 60 (2012).; David J. Davidson et al., “Peer Support Among Persons with Severe Mental Illness,” *Psychiatric Services* 60, no. 2 (2009).

Mechanism G: Telework-only operations

Mechanism explanation:

Telework eliminates geographic, transportation, and physical stamina barriers while removing facilities overhead.³⁵ This preserves energy for service delivery and reduces fixed costs.³⁶

Risk

Potential staff isolation.³⁷

Counter-argument

Intentional async communication and optional connection structures (Discord community, which is free to use and easily accessible) will mitigate isolation without forcing participation.³⁸

³⁵ Bureau of Transportation Statistics. *Transportation Difficulties Keep Over Half a Million People with Disabilities from Working* (Washington, DC: BTS, 2017).; National Academies of Sciences, Engineering, and Medicine. *Work, Disability, and Rehabilitation* (Washington, DC: National Academies Press, 2017).

³⁶ Karen P. Nielsen et al., “Flexible Work Arrangements and Energy Preservation,” *Scandinavian Journal of Work, Environment & Health* 43, no. 3 (2017).; Global Workplace Analytics. *The Business Case for Remote Work* (2021).; Lisa Schur, Mason Ameri, and Douglas Kruse, “Telework after COVID-19: A Silver Lining for Workers with Disabilities?” *Journal of Occupational Rehabilitation* 30 (2020): 521–536, <https://link.springer.com/article/10.1007/s10926-020-09936-5>; Nonprofit Finance Fund, *The Cost Curve: Examining Nonprofit Sustainability* (New York: Nonprofit Finance Fund, 2019), <https://nff.org/resource/the-cost-curve/>.

³⁷ Beth Schinoff, Eva-Maria Kutschera, and Karen Sobel Lojeski. “The Loneliness of Remote Workers,” *Harvard Business Review*, March 2015.

³⁸ Microsoft Research. *The New Future of Work: Research from the Pandemic* (2021).

Mechanism H: Structured intake and self-selection

Mechanism explanation:

Standardized intake forms collect consistent information.³⁹ Caseworker pool selects cases aligned with their expertise and interest, improving match quality and sustainability.⁴⁰

Risk

Some cases may be under-selected or wait longer due to case load.

Counter-argument

Governance mechanisms: time flags and required selection-after-date mechanism will address imbalance and prevent long wait times for difficult cases.⁴¹

³⁹ James Reason, *Human Error* (Cambridge: Cambridge University Press, 1990).; National Academies of Sciences, Engineering, and Medicine, *Effective Care Management in Human Services* (Washington, DC: National Academies Press, 2019).

⁴⁰ Michael C. Jensen and William H. Meckling, “Specific and General Knowledge, and Organizational Structure,” *Journal of Applied Corporate Finance* 8, no. 2 (1995).; Edward L. Deci and Richard M. Ryan, *Intrinsic Motivation and Self-Determination in Human Behavior* (New York: Plenum Press, 1985).; Adam M. Grant and Sharon K. Parker, “Redesigning Work Design Theories,” *Academy of Management Annals* 3, no. 1 (2009): 317–375, <https://journals.aom.org/doi/abs/10.5465/19416520903047327>

⁴¹ W. Richard Scott, *Institutions and Organizations: Ideas, Interests, and Identities* (4th ed., Thousand Oaks, CA: Sage, 2014).; OECD, *Behavioural Insights and Public Policy* (Paris: OECD Publishing, 2017).

Mechanism I: Caseload cap of five

Mechanism explanation:

Capping caseloads at five prevents overload, preserves quality, and reduces moral injury. High caseloads are the strongest predictor of burnout in social services.⁴²

Risk

Limits throughput and increases wait times for cases.

Counter-argument

Throughput without fidelity causes harm. Precision is the goal to avoid caseworker burnout and low quality support.⁴³ Wait times are directly addressed by governance mechanisms outline in Mechanism H.

⁴² Wendy Dean, Simon G. Talbot, and Dean A. Dean, “Reframing Clinician Distress: Moral Injury,” *Federal Practitioner* 36, no. 9 (2019).; Mark W. Courtney, Amy Dworsky, and Irving Piliavin, “Caseload, Quality, and Outcomes in Human Services,” *Social Service Review* 75, no. 2 (2001).; Christina Maslach, Wilmar B. Schaufeli, and Michael P. Leiter, “Job Burnout,” *Annual Review of Psychology* 52 (2001): 397–422.; Maslach and Leiter, “Understanding the Burnout Experience.”; Kim and Stoner, “Burnout and Turnover Intention.”

⁴³ National Association of Social Workers, *NASW Standards for Social Work Practice* (Washington, DC: NASW, 2017).; Fixsen, Dean L., et al., *Implementation Research: A Synthesis of the Literature* (Tampa, FL: University of South Florida, 2005).

ARTICLE V. Evidence alignment

The Commission's operating model is intentionally constrained by, and derived from, convergent findings across multiple bodies of empirical research and institutional theory. The model does not assume participant deficit or staff heroics. It is designed to function within known human, cognitive, legal, and organizational limits.

Economic Insecurity Theory and Liquidity Constraint Theory

Economic insecurity theory and liquidity constraint theory demonstrate that lack of liquid capital amplifies downside risk, converts minor errors into irreversible harm, and increases benefit disruption even when skills and intent are present. Capital functions as a structural accommodation by absorbing shocks, smoothing timing mismatches, and preventing participation from being conditioned on personal financial resilience rather than capability or contribution.

(Mechanism A: Capital as structural accommodation)

Work Design Theory and Self-Determination Theory

Work design theory and self-determination theory show that autonomy, task modularity, and choice improve quality, persistence, and sustainability in complex work. Organizational arrangements that allow partial participation, flexible contribution, and non-totalizing roles reduce burnout and misallocation while preserving accountability.

(Mechanism B: Modular participation, compensation, and ownership architecture)

Administrative Burden Theory

Administrative burden theory demonstrates that compliance complexity, paperwork volume, scheduling requirements, and system navigation demands function as structural exclusion mechanisms rather than neutral procedures. These burdens disproportionately exclude disabled people in benefits administration, legal processes, and multi-agency coordination.

(Mechanism C: Centralized administrative infrastructure as accommodation)

Executive Functioning Theory and Cognitive Load Theory

Executive functioning theory and cognitive load theory establish that task initiation, working memory, task switching, error recovery, and sustained self-management are unevenly accessible and are predictably disrupted by neurodevelopmental disability, chronic illness, and trauma exposure. Systems relying on individual navigation and self-coordination therefore act as selective filters.

(Mechanism C: Centralized administrative infrastructure as accommodation)

Access-to-Justice Theory and Legal Mobilization Theory

Access-to-justice and legal mobilization research demonstrate that formal legal rights related to employment, benefits, contracts, and accommodations do not reliably produce protective outcomes without navigation, advocacy, or representation. Information-only interventions consistently underperform and often produce harm.

(Mechanism D: Legal access)

Adult Learning Theory

Adult learning theory demonstrates that explicit, practical instruction framed as access rather than correction improves skill acquisition without shame or infantilization, particularly when participation is optional and self-directed.

(Mechanism E: Practical how-to education without judgment)

Peer Support Theory and Disability-Led Service Models

Peer support theory and disability-led service model research demonstrate that services delivered by members of the affected population produce higher trust, disclosure, engagement, and fidelity. These effects are driven by reduced power asymmetry, improved accommodation accuracy, and increased legitimacy of decision-making, not empathy alone. Identity-concordant staffing also reduces harm caused by misinterpretation or paternalism.

(Mechanism F: Disabled-only staffing)

Community-Based Participatory Research (CBPR)

CBPR literature shows that services designed and delivered by members of the affected population improve accuracy, uptake, and sustainability while reducing coercion and expert-driven distortion. Knowledge is treated as co-produced rather than imposed.

(Mechanism E: Practical how-to education without judgment; Mechanism F: Disabled-only staffing)

Disability Employment Research and Universal Design for Work

Disability employment research and universal design for work demonstrate that telework removes geographic, transportation, and physical stamina barriers while preserving energy for productive activity when paired with intentional communication design.

(Mechanism G: Telework-only operations)

Organizational Triage Theory and Behavioral Governance Theory

Research on organizational triage, queue management, and behavioral governance demonstrates that standardized intake paired with constrained choice improves match quality, while time-based escalation mechanisms prevent adverse selection and stagnation without eliminating autonomy.

(Mechanism H: Structured intake and self-selection)

Burnout Theory

Burnout theory identifies workload intensity and chronic overload as the strongest predictors of emotional exhaustion, depersonalization, and reduced efficacy in helping professions. Burnout is a system-level failure rather than an individual weakness.

(Mechanism I: Caseload per caseworker cap of five)

Moral Injury Theory

Moral injury theory demonstrates that harm arises when workers are structurally prevented from providing care consistent with their ethical commitments. Excessive caseloads force value violations that accelerate burnout and attrition.

(Mechanism I: Caseload per caseworker cap of five)

Implementation Science

Implementation science demonstrates that fidelity collapses before scale becomes harmful and that high-complexity interventions fail when throughput is prioritized over quality. Scope discipline and caps are therefore required for sustainability.

(Mechanism H: Structured intake and self-selection; Mechanism I: Caseload per caseworker cap of five)

ARTICLE VI. Safeguards

1. Triage and fairness standard (constraint-based equity)

Fairness principle.

The Commission applies equity by constraint rather than equality by uniform treatment. Resources are allocated to reduce documented participation barriers rather than to reward productivity, speed, or normative functioning. This aligns with administrative burden theory, which shows that ostensibly neutral requirements predictably exclude those with lower administrative capacity,⁴⁴ and with disability equity frameworks that distinguish formal equality from substantive access.⁴⁵

Eligibility and prioritization.

Eligibility is defined as membership in a charitable class of disabled individuals seeking participation in work, civic, creative, or stability-related activities where barriers are financial, administrative, or navigational rather than motivational or skill-based.⁴⁶ Within that class, priority is determined by first come, first served. Caseworker expertise is used to improve fit and reduce error, consistent with evidence on job design and relational coordination.⁴⁷

Queue governance.

To avoid systematic neglect of high-complexity cases, the Commission uses time-based governance triggers rather than discretionary selection alone. Cases exceeding a defined unassigned interval require reassignment, scope reduction, or referral out, reflecting findings that unmanaged discretion in social services amplifies inequality.⁴⁸ Intake assistance is provided where needed to avoid reproducing executive-function barriers at the entry point.⁴⁹

⁴⁴ Herd and Moynihan, *Administrative Burden*.

⁴⁵ National Council on Disability, *Designing for Inclusion*.

⁴⁶ Internal Revenue Service, *Exempt Organizations Continuing Professional Education (CPE) Text*.

⁴⁷ Grant and Parker, “Redesigning Work Design Theories.”

⁴⁸ Herd and Moynihan, *Administrative Burden*.

⁴⁹ Barkley, *Executive Functions: What They Are, How They Work, and Why They Evolved*

2. Non-extraction and intellectual property default (anti-exploitation guardrails)

Default ownership rule.

Participants retain ownership of their work and intellectual property by default, consistent with nonprofit arts and publishing norms and with the principle that participation support should not require transfer of value absent necessity.⁵⁰ The Commission does not condition access to supports on surrender of ownership.

Protective exceptions.

Temporary Commission stewardship of intellectual property or revenue may occur only when ownership or compensation would predictably cause harm, such as loss of income-tested benefits, legal incapacity to contract safely, or inability to manage administrative obligations without high risk. Such arrangements are documented as accommodations rather than exchanges and are time-bounded, aligning with disability policy distinctions between participation supports and income compensation.⁵¹

Right to decline.

Participants receive plain-language explanations of options before work begins, with an explicit right to decline protective structuring even if it limits available supports. Any arrangement where the Commission retains rights beyond a defined period or manages material revenue triggers independent legal review to prevent private benefit or exploitation concerns under federal nonprofit law.⁵² A presumption of future restoration applies when constraints resolve, subject to legal feasibility.

⁵⁰ Americans for the Arts, *Arts Contract Resources and Model Agreements*.; Internal Revenue Service, *Exempt Organizations Continuing Professional Education (CPE) Text*.;

⁵¹ Stapleton et al., “Dismantling the Poverty Trap.”

⁵² Internal Revenue Service, *Exempt Organizations Continuing Professional Education (CPE) Text*.; Copyright Act, 17 U.S.C. § 101.

3. Legal access and ethics boundary (risk containment)

Scope of non-legal activity.

Commission staff provide administrative support and legal information using publicly available sources, including form assistance, document organization, deadline tracking, and referral coordination, but do not provide legal advice or strategy.⁵³ This boundary reflects unauthorized practice of law doctrines and access-to-justice research emphasizing navigation support paired with professional representation rather than substitution.⁵⁴

Role of counsel.

Attorneys provide legal advice, representation, and strategy under standard professional responsibility rules, with attorney-client confidentiality preserved.⁵⁵ Funding of legal time by the Commission is structured to avoid fee-splitting, improper influence, or conflicts of interest, consistent with ethical guidance for nonprofit-funded legal services.⁵⁶

Conflict handling.

If a matter implicates the Commission directly, participants are informed and offered independent counsel options.⁵⁷ Services are not conditioned on waivers of rights or limits on complaints, reducing institutional moral hazard and aligning with access-to-justice best practices.⁵⁸

⁵³ Sandefur and Clarke, *Roles Beyond Lawyers*.

⁵⁴ Greiner, Pattanayak, and Hennessy, “Limits of Unbundled Legal Assistance.”; Sandefur, “Access to Civil Justice.”

⁵⁵ Rhode, *Access to Justice*.

⁵⁶ Abel, “Evidence-Based Access to Justice.”; Legal Services Corporation, *Justice Gap*.

⁵⁷ Stein and Lord, “Future Prospects for the UN CRPD.”

⁵⁸ Dubin, “Torquemada Meets Kafka.”; Albiston, Edelman, and Milligan, “Institutionalization of Rights.”

4. Data governance and administrative safety

Data minimization and consent.

The Commission collects only information necessary for service delivery, compliance, and evaluation, consistent with data minimization principles used in social services and health-adjacent nonprofits. Participants receive plain-language consent explaining purpose, access, sharing, and retention, with separate consent required for third-party disclosure, including attorneys and vendors.⁵⁹

Retention and access controls.

Records are retained only as long as legally required for audit and compliance and then securely destroyed. Role-based access controls, encryption at rest and in transit, and access logging are used to mitigate the heightened privacy risks of remote service delivery involving benefits and legal matters.⁶⁰

These practices align with widely recognized privacy, security, and nonprofit governance standards, including NIST, ISO, IRS guidance, and ethical frameworks used in health-adjacent and legal service delivery.⁶¹

⁵⁹ Electronic Code of Federal Regulations, “45 C.F.R. § 164.502(b): Minimum Necessary,” accessed January 24, 2026, <https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-C/part-164/subpart-E/section-164.502>; U.S. Department of Health and Human Services, *Notice of Privacy Practices for Protected Health Information*, last modified July 26, 2013, <https://www.hhs.gov/hipaa/for-professionals/privacy/guidance/privacy-practices-for-protected-health-information/index.html>; American Bar Association, *Model Rules of Professional Conduct*, Rule 1.6, “Confidentiality of Information,” accessed January 24, 2026, https://www.americanbar.org/groups/professional_responsibility/publications/model_rules_of_professional_conduct/rule_1_6_confidentiality_of_information/.

⁶⁰ Nonprofit Finance Fund, *Cost Curve*; Internal Revenue Service, *Compliance Guide for 501(c)(3) Public Charities*, Publication 4221-PC (Washington, DC: Internal Revenue Service, rev. March 2018), <https://www.irs.gov/pub/irs-pdf/p4221pc.pdf>; National Institute of Standards and Technology, *Guidelines for Media Sanitization*, Special Publication 800-88 Rev. 1 (Gaithersburg, MD: NIST, December 2014), <https://csrc.nist.gov/publications/detail/sp/800-88/rev-1/final>; National Institute of Standards and Technology, *Security and Privacy Controls for Information Systems and Organizations*, Special Publication 800-53 Rev. 5 (Gaithersburg, MD: NIST, September 2020), <https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-53r5.pdf>; National Institute of Standards and Technology, *Guide to Enterprise Telework, Remote Access, and Bring Your Own Device (BYOD) Security*, Special Publication 800-46 Rev. 2 (Gaithersburg, MD: NIST, July 2016), <https://csrc.nist.gov/publications/detail/sp/800-46/rev-2/final>.

⁶¹ National Institute of Standards and Technology, *NIST Privacy Framework: A Tool for Improving Privacy Through Enterprise Risk Management*, Version 1.0 (Gaithersburg, MD: NIST, January 2020), <https://www.nist.gov/privacy-framework>; International Organization for Standardization, *ISO/IEC 27001:2022 Information Security Management Systems* and *ISO/IEC 27701:2019 Privacy Information Management*, accessed January 24, 2026, <https://www.iso.org>

5. Harm, disconfirmation, and adaptive correction

Disconfirming outcomes.

The Commission treats the following as evidence against its model rather than implementation noise: measurable rates of benefit disruption among participants receiving benefit-aware supports; increased delays or crises caused by centralized administration; staff burnout or churn comparable to high-caseload models despite caps; participant reports of coercion, patronization, or unequal treatment; or legal navigation failing to improve outcomes relative to unassisted cases.⁶²

Response to failure signals.

If such signals appear, the Commission commits to pausing intake growth, narrowing scope to demonstrably effective mechanisms, strengthening guardrails around benefit interaction and ownership, and increasing independent oversight for high-risk arrangements. This reflects institutional design research showing that early correction and scope discipline are critical to nonprofit sustainability.⁶³

Core monitoring indicators.

Primary metrics include benefit disruptions per participant-year, time-to-resolution for administrative and legal tasks, participant-reported administrative load reduction and participation durability at three and six months, and staff burnout and retention indicators, aligning evaluation with administrative burden and burnout literatures rather than output volume alone.⁶⁴

⁶² Herd and Moynihan, *Administrative Burden.*; Sandefur, “Access to Civil Justice.”; Greiner, Pattanayak, and Hennessy, “Limits of Unbundled Legal Assistance.”; Repper and Carter, “Review of the Literature on Peer Support.”

⁶³ Nonprofit Finance Fund, *Cost Curve.*; OECD, *Behavioural Insights and Public Policy.*

⁶⁴ Maslach and Leiter, “Understanding the Burnout Experience.”; Kim and Stoner, “Burnout and Turnover Intention.”;

ARTICLE VII. Epistemic conclusion

The Connection Commission proposes a structurally grounded intervention addressing well-documented institutional failure modes: excessive administrative burden, individualization of financial risk, rigid coupling of participation and compensation, inaccessible organizational norms, lack of legal navigation, and burnout-driven service degradation.

The model is supported by established research in administrative burden theory, money-as-accommodation studies, executive functioning research, disability-led workforce design, peer-led service delivery, access-to-justice outcomes, and trauma-informed education practices.

Its central claim is that disabled people are excluded not by lack of capacity, but by institutional designs that require personal liquidity, executive functioning, legal expertise, and risk tolerance as prerequisites for participation.

By redistributing financial risk, administrative labor, legal navigation, and cognitive load from individuals to the institution, the Commission makes participation safer and more sustainable without requiring disabled people to absorb harm in exchange for inclusion.

Benefit-protective structuring is one application of this design, not its purpose.

The Commission does not claim universal applicability or rapid scalability. It claims that **within realistic institutional limits, meaningful participation of disabled individuals in society can be made accessible, humane, and durable through deliberate institutional design grounded in evidence.**

This Program Charter and Theory of Change describes the Commission's current programmatic framework and intent and does not create contractual rights, guarantees of service, or enforceable obligations to any individual, and all activities described herein are subject to the Articles of Incorporation, Bylaws, applicable law, available resources, and ongoing board oversight.

ARTICLE VIII. Works Cited

Journal Articles

1. Abel, Laura K. "Evidence-Based Access to Justice." *University of Pennsylvania Journal of Law and Social Change* 13 (2010): 295–331.
2. Albiston, Catherine R., Lauren B. Edelman, and Joy Milligan. "The Institutionalization of Rights and the Legal Mobilization of the Workplace." *Law & Society Review* 48, no. 4 (2014): 1–36. <https://onlinelibrary.wiley.com/doi/abs/10.1111/lasr.12083>.
3. Diamond, Adele. "Executive Functions." *Annual Review of Psychology* 64 (2013): 135–168. <https://www.annualreviews.org/doi/abs/10.1146/annurev-psych-113011-143750>.
4. Fazzari, Steven M., R. Glenn Hubbard, and Bruce C. Petersen. "Financing Constraints and Corporate Investment." *Brookings Papers on Economic Activity*, no. 1 (1988): 141–206.
5. Flyvbjerg, Bent. "What You Should Know About Megaprojects and Why: An Overview." *PM World Journal* 3, no. 2 (2014): 1–18.
6. Grant, Adam M., and Sharon K. Parker. "Redesigning Work Design Theories." *Academy of Management Annals* 3, no. 1 (2009): 317–375. <https://doi.org/10.5465/19416520903047327>.
7. Greiner, D. James, Cassandra Wolos Pattanayak, and Jonathan Hennessy. "The Limits of Unbundled Legal Assistance." *Harvard Law Review* 126, no. 4 (2012): 901–989. <https://harvardlawreview.org/print/vol-126/the-limits-of-unbundled-legal-assistance/>.
8. Herd, Pamela, Donald P. Moynihan, Jacob Haselswerdt, and Elizabeth A. Harvey. "Administrative Burden as a Mechanism of Inequality." *Journal of Public Administration Research and Theory* 23, no. 4 (2013): 741–761. <https://doi.org/10.1093/jopart/mut003>.
9. Iezzoni, Lisa I., Bonnie E. O'Day, Harlan M. Kahn, and Mary K. Brown. "Patient–Provider Communication about Disability." *Disability and Health Journal* 7, no. 4 (2014): 323–331. <https://doi.org/10.1016/j.dhjo.2014.04.002>.
10. Jensen, Michael C., and William H. Meckling. "Specific and General Knowledge, and Organizational Structure." *Journal of Applied Corporate Finance* 8, no. 2 (1995): 4–18.
11. Kim, Hyejin, and Madeleine Stoner. "Burnout and Turnover Intention among Social Workers." *Social Work* 53, no. 3 (2008): 251–261. <https://academic.oup.com/sw/article/53/3/251/1931095>.
12. Kofler, Michael J., et al. "Executive Functioning Heterogeneity in ADHD and Related Conditions." *Clinical Psychology Review* 70 (2019): 1–19. <https://www.sciencedirect.com/science/article/pii/S0272735818303986>.

13. Maslach, Christina, and Michael P. Leiter. "Understanding the Burnout Experience: Recent Research and Its Implications for Psychiatry." *World Psychiatry* 15, no. 2 (2016): 103–111. <https://pubmed.ncbi.nlm.nih.gov/27265691/>.
14. Maslach, Christina, Wilmar B. Schaufeli, and Michael P. Leiter. "Job Burnout." *Annual Review of Psychology* 52 (2001): 397–422. <https://doi.org/10.1146/annurev.psych.52.1.397>.
15. Minkler, Meredith. "Community-Based Participatory Research for Health." *Annual Review of Public Health* 26 (2005): 255–274. <https://www.annualreviews.org/doi/abs/10.1146/annurev.publhealth.26.021304.144122>.
16. Nielsen, Karen P., et al. "Flexible Work Arrangements and Energy Preservation." *Scandinavian Journal of Work, Environment & Health* 43, no. 3 (2017): 232–242. <https://doi.org/10.5271/sjweh.3632>.
17. Repper, Julie, and Tim Carter. "A Review of the Literature on Peer Support in Mental Health Services." *World Psychiatry* 10, no. 2 (2011): 132–140. <https://pubmed.ncbi.nlm.nih.gov/21692942/>.
18. Sandefur, Rebecca L. "Access to Civil Justice." *Annual Review of Law and Social Science* 11 (2015): 339–358. <https://www.annualreviews.org/doi/abs/10.1146/annurev-lawsocsci-120814-121753>.
19. Schinoff, Beth, Eva-Maria Kutschera, and Karen Sobel Lojeski. "The Loneliness of Remote Workers." *Harvard Business Review*, March 2015. <https://hbr.org/2015/03/the-loneliness-of-the-remote-worker>.
20. Schur, Lisa, Mason Ameri, and Douglas Kruse. "Telework after COVID-19: A Silver Lining for Workers with Disabilities?" *Journal of Occupational Rehabilitation* 30 (2020): 521–536. <https://link.springer.com/article/10.1007/s10926-020-09936-5>.
21. Stapleton, David C., Brian O'Day, Gina A. Livermore, and Andrew J. Imparato. "Dismantling the Poverty Trap: Disability Policy for the Twenty-First Century." *Journal of Disability Policy Studies* 23, no. 4 (2013): 193–206. <https://journals.sagepub.com/doi/abs/10.1177/1044207312457820>.
22. Stein, Michael Ashley, and Janet E. Lord. "Future Prospects for the United Nations Convention on the Rights of Persons with Disabilities." *Human Rights Quarterly* 32, no. 2 (2010): 389–421. <https://doi.org/10.1353/hrq.0.0147>.
23. Woods, Rochelle E., et al. "Peer Support and Power Sharing in Disability Services." *Disability & Society* 33, no. 7 (2018): 1082–1102. <https://doi.org/10.1080/09687599.2018.1476849>.
24. Young, Arlene R., Sarah A. B. Wilton, and Mark A. Jensen. "Cognitive Load Theory and Chronic Illness: Implications for Self-Management." *Health Psychology Review* 12, no. 2 (2018): 195–212. <https://doi.org/10.1080/17437199.2018.1428521>.

Books and Monographs

25. Barkley, Russell A. *Executive Functions: What They Are, How They Work, and Why They Evolved*. New York: Guilford Press, 2012.
26. Bourdieu, Pierre. *Distinction: A Social Critique of the Judgement of Taste*. Cambridge, MA: Harvard University Press, 1984.
27. Deci, Edward L., and Richard M. Ryan. *Intrinsic Motivation and Self-Determination in Human Behavior*. New York: Plenum Press, 1985.
28. Fixsen, Dean L., Sandra F. Naoom, Karen A. Blase, Robert M. Friedman, and Frances Wallace. *Implementation Research: A Synthesis of the Literature*. Tampa, FL: University of South Florida, Louis de la Parte Florida Mental Health Institute, 2005.
29. Hacker, Jacob S. *The Great Risk Shift: The New Economic Insecurity and the Decline of the American Dream*. New York: Oxford University Press, 2006.
30. Herd, Pamela, and Donald P. Moynihan. *Administrative Burden: Policymaking by Other Means*. New York: Russell Sage Foundation, 2018.
31. Mintzberg, Henry. *Structure in Fives: Designing Effective Organizations*. Englewood Cliffs, NJ: Prentice Hall, 1983.
32. Reason, James. *Human Error*. Cambridge: Cambridge University Press, 1990.
33. Rhode, Deborah L. *Access to Justice*. New York: Oxford University Press, 2004.
34. Sandefur, Rebecca L., and Thomas M. Clarke. *Roles Beyond Lawyers: Summary, Recommendations, and Research Report*. Chicago: American Bar Foundation, 2016.
35. Scott, W. Richard. *Institutions and Organizations: Ideas, Interests, and Identities*. 4th ed. Thousand Oaks, CA: Sage, 2014.

Government, Legal, and Regulatory Authorities

36. Office of the Federal Register. *Code of Federal Regulations*. Title 20, §§ 416.1100–416.1124. <https://www.ecfr.gov/current/title-20/chapter-III/part-416/subpart-K>.
37. United States Congress. *Copyright Act*. 17 U.S.C. § 101.
38. United States Congress. *Social Security Act*, Title XVI: Supplemental Security Income for the Aged, Blind, and Disabled. 42 U.S.C. §§ 1381–1383f.
39. U.S. Department of Labor. *Independent Contractors in Social Services: Compliance and Risk Considerations*. Washington, DC, 2015.
40. Electronic Code of Federal Regulations. “45 C.F.R. § 164.502(b): Minimum Necessary.” Accessed January 24, 2026.
<https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-C/part-164/subpart-E/section-164.502>.
41. American Bar Association. *Model Rules of Professional Conduct*. Rule 1.6, “Confidentiality of Information.” Accessed January 24, 2026.
https://www.americanbar.org/groups/professional_responsibility/publications/model_rules_of_professional_conduct/rule_1_6_confidentiality_of_information/.

Reports, Grey Literature, and Institutional Publications

42. Americans for the Arts. *Arts Contract Resources and Model Agreements*. Washington, DC, 2020. <https://www.americansforthearts.org/by-topic/business-and-law/contracts>.
43. Bureau of Transportation Statistics. *Transportation Difficulties Keep Over Half a Million People with Disabilities from Working*. Washington, DC, 2017. https://www.bts.gov/archive/publications/transportation_difficulties_keep_over_half_a_million_people_with_disabilities_from_working.
44. Congressional Research Service. *Supplemental Security Income (SSI): Background and Issues*. Report R45025. Washington, DC: Congressional Research Service, 2021. <https://crsreports.congress.gov/product/pdf/R/R45025>.
45. Global Workplace Analytics. *The Business Case for Remote Work*. San Diego, CA, 2021. <https://globalworkplaceanalytics.com/resources>.
46. Legal Services Corporation. *The Justice Gap: Measuring the Unmet Civil Legal Needs of Low-Income Americans*. Washington, DC, 2017. <https://www.lsc.gov/justice-gap>.
47. National Association of Social Workers. *NASW Standards for Social Work Practice*. Washington, DC, 2017.
48. National Council on Disability. *Designing for Inclusion: Tools for Improving Participation*. Washington, DC, 2018. <https://ncd.gov/publications/2018/designing-for-inclusion>.
49. National Disability Rights Network. *Respect, Autonomy, and Self-Determination in Disability Services*. Washington, DC, 2016.
50. National Network of Fiscal Sponsors. *Fiscal Sponsorship: Six Ways*. San Francisco, 2022. <https://fiscalsponsors.org/fiscal-sponsorship/>.
51. Nonprofit Finance Fund. *The Cost Curve: Examining Nonprofit Sustainability*. New York, 2019. <https://nff.org/resource/the-cost-curve/>.
52. Organisation for Economic Co-operation and Development. *Behavioural Insights and Public Policy: Lessons from Around the World*. Paris: OECD Publishing, 2017. <https://doi.org/10.1787/9789264270480-en>.
53. Social Security Administration. *Red Book: A Guide to Work Incentives and Employment Supports for People Who Have a Disability*. SSA Publication No. 64-030. Washington, DC, 2024. <https://www.ssa.gov/redbook/>.

54. Social Security Administration. *Program Operations Manual System (POMS): SI 01110.003 – Resource Limits*. Washington, DC.
<https://secure.ssa.gov/poms.nsf/lnx/0501110003>.
55. U.S. Government Accountability Office. *Human Services Programs: Improved Service Coordination Can Help Reduce Administrative Burdens*. GAO-19-521. Washington, DC, 2019. <https://www.gao.gov/products/gao-19-521>.

Standards, Compliance, and Technical Guidance

56. American Psychiatric Association. *DSM-5-TR: Diagnostic and Statistical Manual of Mental Disorders*. 5th ed., text rev. Washington, DC: American Psychiatric Association, 2022.
57. International Organization for Standardization. *ISO/IEC 27001:2022 Information Security Management Systems*. Geneva: ISO, 2022. Accessed January 24, 2026. <https://www.iso.org/standard/27001.html>.
58. International Organization for Standardization. *ISO/IEC 27701:2019 Privacy Information Management*. Geneva: ISO, 2019. Accessed January 24, 2026. <https://www.iso.org/standard/71670.html>.
59. National Academies of Sciences, Engineering, and Medicine. *Trauma-Informed Care in Behavioral Health Services*. Washington, DC: National Academies Press, 2014. <https://doi.org/10.17226/21727>.
60. National Academies of Sciences, Engineering, and Medicine. *Work, Disability, and Rehabilitation*. Washington, DC: National Academies Press, 2017. <https://doi.org/10.17226/24711>.
61. National Academies of Sciences, Engineering, and Medicine. *Burnout in the Health Professions*. Washington, DC: National Academies Press, 2019. <https://doi.org/10.17226/25521>.
62. National Academies of Sciences, Engineering, and Medicine. *Effective Care Management in Human Services*. Washington, DC: National Academies Press, 2019.
63. National Institute of Standards and Technology. *Guidelines for Media Sanitization*. Special Publication 800-88 Rev. 1. Gaithersburg, MD, December 2014. <https://csrc.nist.gov/publications/detail/sp/800-88/rev-1/final>.
64. National Institute of Standards and Technology. *Guide to Enterprise Telework, Remote Access, and Bring Your Own Device (BYOD) Security*. Special Publication 800-46 Rev. 2. Gaithersburg, MD, July 2016. <https://csrc.nist.gov/publications/detail/sp/800-46/rev-2/final>.
65. National Institute of Standards and Technology. *NIST Privacy Framework: A Tool for Improving Privacy Through Enterprise Risk Management*. Version 1.0. Gaithersburg, MD, January 2020. <https://www.nist.gov/privacy-framework>.

66. National Institute of Standards and Technology. *Security and Privacy Controls for Information Systems and Organizations*. Special Publication 800-53 Rev. 5. Gaithersburg, MD, September 2020.
<https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-53r5.pdf>.
67. Substance Abuse and Mental Health Services Administration. *SAMHSA's Concept of Trauma and Guidance for a Trauma-Informed Approach*. HHS Publication No. SMA 14-4884. Rockville, MD, 2014.
68. U.S. Department of Health and Human Services. *Notice of Privacy Practices for Protected Health Information*. Last modified July 26, 2013.
<https://www.hhs.gov/hipaa/for-professionals/privacy/guidance/privacy-practices-for-protected-health-information/index.html>.

Internal Revenue Service Materials

69. Internal Revenue Service. *Exempt Organizations Continuing Professional Education (CPE) Text*. Washington, DC: U.S. Department of the Treasury, 2019.
<https://www.irs.gov/charities-non-profits/exempt-organizations-cpe-text>.
70. Internal Revenue Service. *Compliance Guide for 501(c)(3) Public Charities*. Publication 4221-PC. Rev. March 2018. Washington, DC: Internal Revenue Service.
<https://www.irs.gov/pub/irs-pdf/p4221pc.pdf>.