

## **RespectAbility – Public Testimony Submission: The Department of Labor Advisory Committee on Increasing Competitive, Integrated Employment for Individuals with Disabilities**

From: Jennifer Laszlo Mizrahi and Philip Pauli, RespectAbility

To: Advisory Committee on Increasing Competitive Integrated Employment for Individuals with Disabilities (ACICIEID)

Honorable Committee,

As ever we want to thank you for the critical leadership that each of you brings to the vital challenge of aligning federal policy and expanding job opportunities for Americans with disabilities. Your commitment, your efforts, and your conversations are very much driving a policy dialogue that is rare and impactful. Thank you for your continuing leadership and thank you for your considerable efforts.

Over the course of the past several months, RespectAbility has been working on state level implementation of the Workforce Innovation and Opportunity Act (WIOA). Specifically, we have dedicated our efforts to reviewing and providing public comments on all of the state plans required by Section 102 of WIOA. We have read through and written specific recommendations on how each of the fifty states can better address the barriers to employment that cost far too many people with disabilities the chance to pursue the American Dream. Just to note, this effort was only possible due to the hard work of my team of Policy Fellows.

Although the Advisory Committee’s commission is to influence policy at the federal level in terms of expanding competitive integrated employment, it is vital that your committee consider state level implementation of WIOA. The State Plans that now rest in the hands of the Departments of Labor and Education have many gaps and critical omissions that will impact the ability of millions of Americans to access the workforce system and enter the labor market. As such, in our testimony, we are sharing our key findings from having reviewed and commented on the state plans. From our experience, there are several critical gaps, common mistakes, and missed opportunities throughout the WIOA state planning process. Consider the following:

- 1. Wildly inconsistent data points on the disability community in the states. [The worst example of missing data on disability in a State Plan was Oregon’s Unified State Plan.](#)**  
Despite having an entire section about “Workers with Disabilities”, the first draft of the Plan lacked actual statistics and had no specific numbers regarding the size of the disability community. [We found a similar mistake in the overall poor draft of California’s Unified State Plan which made no distinctions between working age people with disabilities and older Americans who age into disability.](#) Further, those few disability data points their State Plan did contain were not structured in a way useful to the workforce system nor did they include data on the Labor Force Participation Rate (LFPR) for people with disabilities.
- 2. [People with disabilities, especially information on their Labor Force Participation Rates \(LFPR\), are not being included in the performance metrics outlined in the state plans.](#)**  
What gets measured gets done and we have consistently found that the state plans are not

measuring the most important metrics in terms of employing and thus empowering people with disabilities. In each set of public comments, we have emphasized the critical importance of looking at the gap in Labor Force Participation Rates between people with and without disabilities as well as the employment rates. [Michigan's plan stands out for their inclusion of a chart showcasing the LFPR and employment rates for people with and without disabilities over time. Contrasting with this is Maryland's Unified State Plan.](#) Their State Plan actually commits to "people before performance" and will not be measuring performance metrics for two years. We understand the humanitarian sentiment but we are concerned about the lack of any metrics.

3. **Stigmas, Myths, and Misconceptions are not viewed as barriers to employment despite the critical role that attitudes play in keeping people out of the workforce.** The first stated purpose of the law was to "increase ... particularly those individuals with barriers to employment... access to and opportunities for the employment, education, training, and support services" needed to succeed. Research shows that attitudinal barriers are a critical impediment to the success of job seekers with disabilities. Employer engagement is a key responsibility of local boards under WIOA, yet most of the state plan we have reviewed do not have an employer engagement strategy for overcoming stigma. [A notable exception was South Dakota's Unified State Plan which extensively discusses their "Ability for Hire" Campaign as a key element of their overall employer engagement strategy.](#)
4. **Sector Strategies in State Plans do not include people with disabilities as an untapped labor resource that can meet existing or emerging talent needs.** All of the state plans we have reviewed have include the requisite information regarding the existing or emerging sectors of their state economies. However, very few of the state plans thought through ways to train people with disabilities for careers in those sectors. Several state plans talked about ensuring access to career pathways for youth with disabilities, but not ways to ensure a match between employer needs and people's talents. [The state plans for Alaska, Wisconsin, and Delaware are notable](#) for their efforts around transition services for youth with disabilities. We see immense opportunities for young people with developmental disabilities to engage in hospitality, health and elder care and other industries. For talented youth with Aspergers we see the need to take advantage of the "Autism Advantage" in STEM jobs, especially with federal contractors who have 503 requirements. This was all missing from many of the plans.
5. **Section 503 is a huge missed opportunity across almost all of the state plans.** Despite the billions of dollars every year that flow through federal contractors very few of the WIOA state plans actually reference Section 503 of the Rehabilitation Act. Even among plans that did very well with disability issues, federal contractors are often ignored as a career pathway for people with diverse talents. [Given the legacy of former Senator Harkin, it should be no surprise that the State of Iowa's Unified State Plan addressed many elements involved with disability employment.](#) However, the first draft of their state plan did not mention the 7% utilization goal created for companies doing business with the federal government. Colorado's Combined State Plan is another exception that included 503 as a key VR strategy.
6. **Among states that have Employment First policies, those efforts are not being integrated into the overall workforce system being overhauled through WIOA.** It was

particularly frustrating to review the WIOA plans of Employment First states. The reason why is that few of those states fully integrated their existing Employment First into the overall strategy outlined for WIOA. The worst offenders in this respect are [the state plans for Maine](#) and [Vermont both of which lack any textual references whatsoever](#) to Employment First. [Mississippi's state plan, which was the first plan submitted to DOL, similarly lacks references to Employment First.](#) [New York's State Plan discusses their Employment First Commission in a very off-hand way with two pages separate from the rest of the document.](#) We are concerned this will reinforce silos and fail to align systems to support people with disabilities.

**7. Many of the components of the overall workforce system are not applying the disability lens to their work despite new requirements around serving people with disabilities.**

One of the most important issues that we have emphasized in our public comments is the need to add the disability lens to the whole workforce system. Whether they know it or not the core programs of WIOA are already serving people with disabilities yet state plans do not have information regarding screening for disability or assessing support needs. Adult Education needs to think about learning differences just as the disability issues of people involved in the corrections system need to be better addressed. This is especially true as according to the Bureau of Justice Statistics 32% of people in prison and 40% of those in jail have disabilities.

**8. Despite innovative school to work transition programs, few state plans are investing in models of youth employment such as Project Search and Bridges from School to Work.**

One of the strongest elements of WIOA is the high priority placed on supporting, training, and empowering youth. As such, all of the plans discuss in one way or another how to expand training opportunities for youth. However, there is a great deal of inconsistency in terms of how the state plans address opportunities for youth with disabilities. For example, the state plans for Alaska, Colorado, Georgia, and Indiana are making key investments in career pathway programs for youth with disabilities. Likewise, Florida's state plan explicitly discusses how to combined academics with career training through "Collaborations such as High School High Tech, Project SEARCH, and Postsecondary Education programs." Surprisingly, even Michigan's state plan will be strategic investments in expanding Project Search. However, we highlight these states because they are the exceptions, not the rule. By contrast, the New York, California, and Illinois state plans set goals around youth with disabilities, but these are not matched up with specific strategies. Given that there are 1.2 million youth with disabilities and one quarter of them age out of school each year, we remain deeply concerned about whether states are doing enough.

**9. Additional points addressed in our public comments.**

- a. Common Assurances in the State Plans need to be matched to full implementation strategies.** The Common Assurances required by WIOA need to be more than just a checklist. Each assurance needs to be matched to a specific strategy.
- b. Avoid the Opportunity Costs of One-Stop Centers and focus on Programmatic Accessibility.** From our perspective, far too many of the state plans are focused on brick and mortar one-stops rather than prioritizing fully programmatic accessibility.

- c. **Common In-Take Forms are needed and the privacy issues of common workforce data systems need to be addressed.** Considerable thought needs to take place around the creation of a unified intake for the workforce system. Those shared databases must be fully accessible to people with disabilities and must have privacy protections.
- d. **State Plans need to ensure that Apprenticeship Programs are fully accessible to people with disabilities, especially youth.** Many states are expanding their apprenticeship programs yet VR staff are not connected to these critical programs.
- e. **The gap in post-secondary education between disability and career services needs to be solved.** The disconnect between disability supports and career development at the college level significantly impacts the job readiness of college students with disabilities.
- f. **“Nothing About Us Without Us” means that more self-advocates and community-organizations are needed on local workforce development boards.**
- g. **Transportation is often ignored as a crucial barrier to employment.**
- h. **The needs of Aging Workers and those with recently acquired disabilities need to be better addressed by the state plans.**
- i. **Developing Volunteering Programs as an alternative to expanding benefits.**

Moving forward, these issues need to be fully addressed so that millions more Americans who have barriers to work can be trained to succeed in the workforce. This process is critical for our nation’s employers who need great talent, and for U.S. taxpayers who should not have to pay for government benefits for people who would rather be working. **Attached to our testimony, you will find our full report on the consistent challenges that we have found in the state plans and that need to be addressed.**

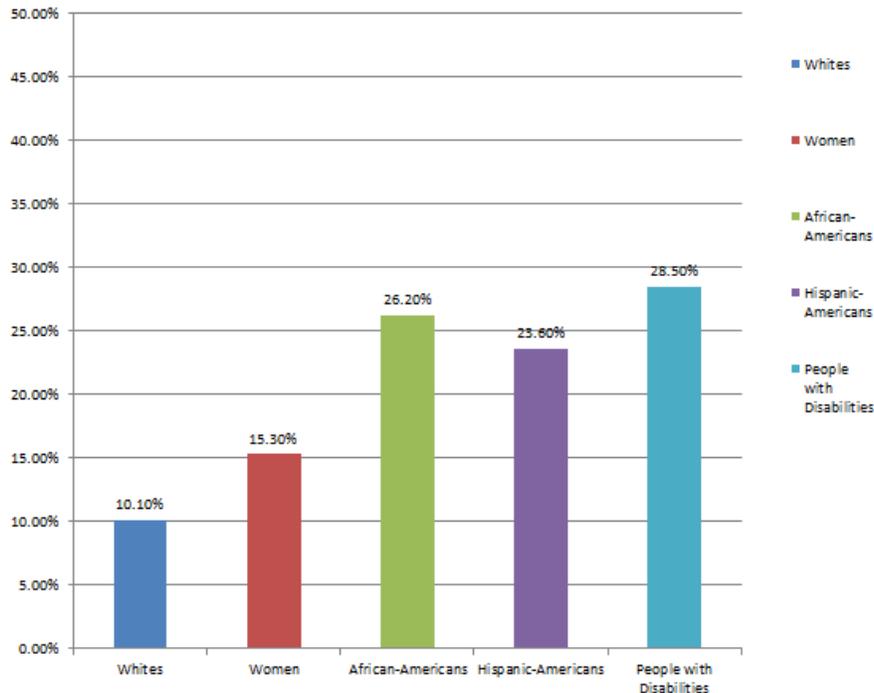
Once again, we thank you for your leadership on expanding competitive, integrated employment for people with disabilities and we thank you for the chance to share our testimony with you.

Sincerely,

Jennifer Mizrahi, President & CEO, RespectAbility  
Philip Pauli, Policy and Practices Director, RespectAbility

**1. It is vital to include the gaps in Labor Force Participation Rates (LFPRs) between people with and without disabilities and other key data in state plans and dashboards:**

**Figure 1.  
Poverty rate by race, ethnicity, gender, and disability, 2014**



Tracking unemployment information (which only account for people actively looking for jobs) and job placements (which only monitor people who interface directly with the workforce system) is necessary, but not sufficient to drive true performance metrics that will create success.

The majority of people with disabilities [want to work, just like anyone else](#). However, only 34 percent of working-age people with disabilities are employed compared to 74 percent of people without disabilities who are in the workforce. That means there is a 40-percentage point gap in the Labor Force Participation Rates (LFPR). In terms of outcomes for people with disabilities, there is huge variability between the states. For example, people with disabilities [are twice as likely to be employed](#) in some states as others. Meanwhile, fully 11 million working-age Americans with disabilities are living on government benefits. It is impossible to create the success needed without the right data and performance metrics.

**Figure 2.**  
**Disability Employment Rate by State, 2014**

	State	%		State	%		State	%		State	%		State	%
1	South Dakota	50.1	12	Montana	40.5	23	Oklahoma	36.4	34	California	33.3	45	Arkansas	29.2
2	North Dakota	49.9	13	Connecticut	40.2	24	Oregon	36.4	35	Arizona	32.8	46	South Carolina	29.0
3	Iowa	46.5	14	New Hampshire	40.0	25	Indiana	36.2	36	Missouri	32.8	47	Mississippi	27.4
4	Nebraska	46.0	15	Kansas	39.8	26	Vermont	36.2	37	Maine	32.5	48	Kentucky	27.3
5	Wyoming	45.2	16	Wisconsin	39.8	27	Illinois	35.7	38	Louisiana	32.1	49	Alabama	27.2
6	Minnesota	44.4	17	New Jersey	39.2	28	Delaware	35.6	39	North Carolina	31.3	50	West Virginia	25.6
7	Utah	44.0	18	Maryland	39.1	29	Massachusetts	35.5	40	New Mexico	30.4		Washington D.C.	30.3
8	Hawaii	42.4	19	Idaho	38.8	30	Ohio	34.6	41	Florida	30.1			
9	Colorado	41.6	20	Texas	38.0	31	Pennsylvania	34.5	42	Tennessee	29.9			
10	Nevada	40.9	21	Washington	37.7	32	Rhode Island	33.9	43	Georgia	29.6			
11	Alaska	40.8	22	Virginia	37.6	33	New York	33.6	44	Michigan	29.6		United States	34.4

Source: [Annual Disability Statistics Compendium](#)

**Figure 3.**  
**The Difference in the Employment Gap Between Disabled and Non Disabled Adults 2014**

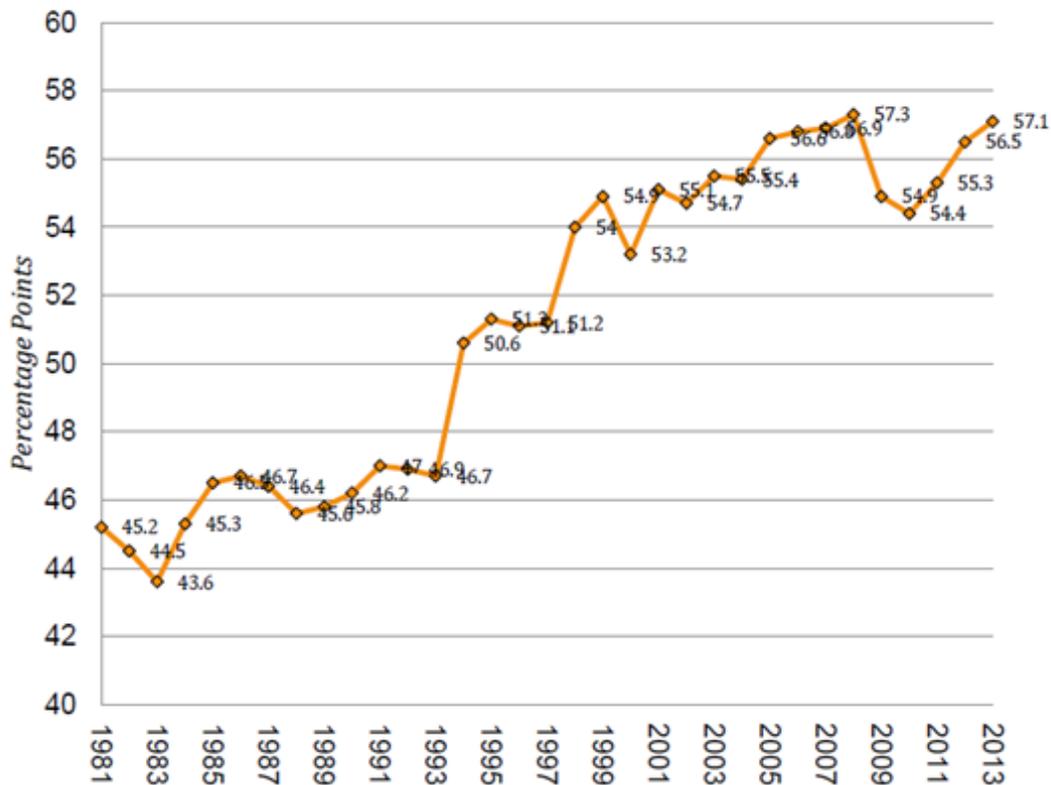
	State	%		State	%		State	%		State	%		State	%
50	Maine	47.4	39	Mass.	43.5	28	Delaware	40.7	17	Minnesota	38.5	6	Alaska	35.3
49	Kentucky	47.1	38	Georgia	43.5	27	New York	40.4	16	Washington	38.3	5	Hawaii	34.2
48	South Carolina	45	37	Florida	43.3	26	Louisiana	40.3	15	Nebraska	37.9	4	South Dakota	33.6
47	Michigan	45	36	Mississippi	43.1	25	Virginia	40	14	Connecticut	37.7	3	Utah	33.5
46	West Virginia	44.9	35	N. Carolina	43	24	Illinois	40	13	Colorado	37.4	2	Nevada	33.4
45	Arkansas	44.6	34	Ohio	42.5	23	Kansas	39.9	12	Texas	37.3	1	North Dakota	32.1
44	Tennessee	44.5	33	Pennsylvania	42	22	Arizona	39.7	11	New Jersey	37.3		Washington DC	45.2
43	Missouri	44.4	32	Wisconsin	41.4	21	Oklahoma	39.2	10	Montana	37.3			
42	Vermont	44.2	31	New Hampshire	41.3	20	Maryland	39.1	9	Idaho	37			
41	Alabama	44.1	30	New Mexico	40.8	19	California	38.9	8	Wyoming	35.9			
40	Rhode Island	43.8	29	Indiana	40.7	18	Oregon	38.5	7	Iowa	35.7		United States	34.4

Source: [Annual Disability Statistics Compendium](#)

Thankfully, in most states, the gap in labor force participation rate between men and women and people of different racial backgrounds is shrinking. **However, the opposite is true for the gap in the labor force participation between people with and without disabilities. The gap**

remains massive and, despite good intentions, is growing in many states. This has critical implications for the WIOA work being done in each state, and must be monitored carefully in terms of the performance metrics used by the states.

**Figure 4.**  
**The gap nationally in workforce participation rates between people with disabilities and their non-disabled peers.**



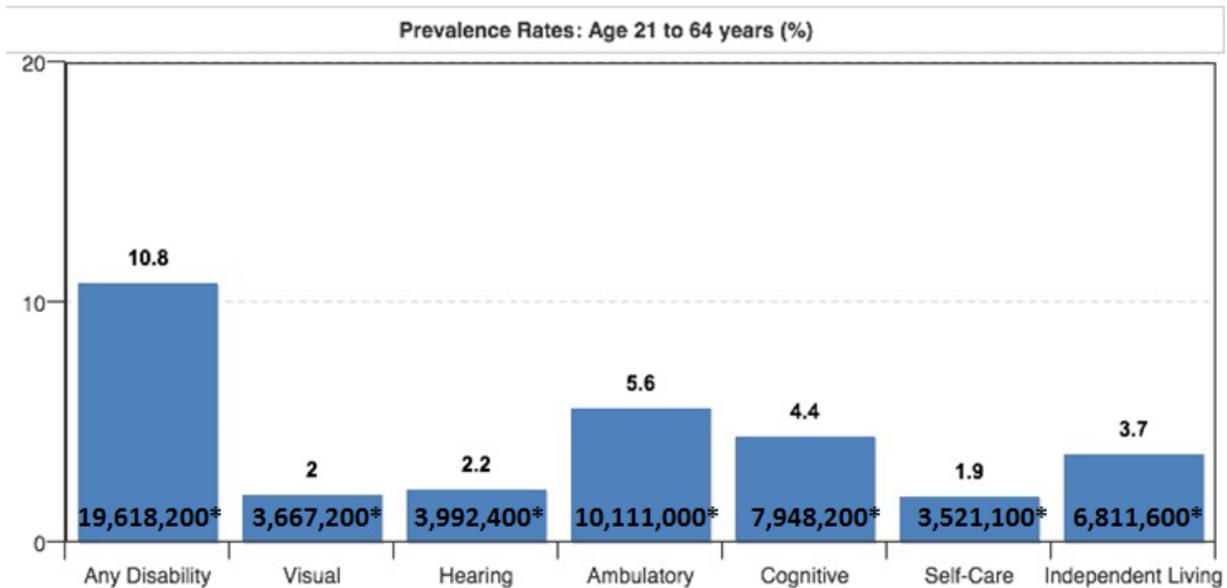
As women and minorities have been able to make significant strides in joining the workforce, the gap in labor force participation rates between those with and without disabilities has increased dramatically, as seen above. The gap in labor force participation in 1981 was 45.2 percent. In 2013 it had grown to 57.1 percent -- a roughly 12 percent increase in 32 years! Source: [the Annual Disability Statistics Compendium](#)

From our review of the state plans, we have consistently found that decision makers are missing key pieces of data. **Often times, the state plans will list the total number of people with disabilities without making any distinctions between youth with disabilities, working-age people with disabilities, and people who age into disability.** The lack of such distinctions impacts the approach that a state workforce system might take to address barriers to work. Most of the state plans have integrated some disability data from the American Community Survey.

However, more often than not, the data points included in the state plans are not structured in a way that that would be useful to the different elements of the workforce system. For example, it is valuable to look at the employment outcomes of those with disabilities who are working so states can know where workforce interventions will be most successful. Given these inconsistencies, we have included state specific data about the disability community with each of the comments we have submitted. **Below are several data points that should have been include in each state plan. We are showing the national numbers but a similar chart and data already exist for each state as well.**

a. Working-age people with disabilities (ages 21-64):

**Figure 5.  
Prevalence of Disability Among Non-Institutionalized People Ages 21 to 64 in U.S. in 2014**



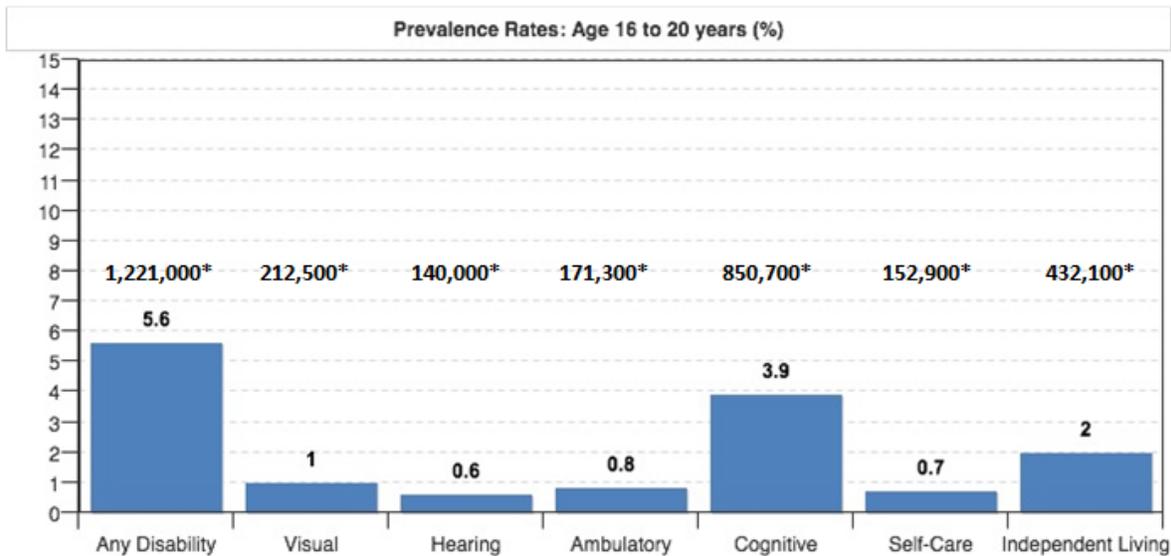
\*Total numbers reported

Source: [Cornell University](http://CornellUniversity)

**b. Those who are aging into the workforce (ages 16-20):**

If the system is to seriously deliver on the promise to improve transitions to work for youth, it is critical to know how many youth with disabilities will be aging into the workforce.

**Figure 6.**  
**Prevalence of Disability Among Non-Institutionalized People Ages 16 to 20 in U.S. in 2014**



\*Total numbers reported

Source: [Cornell University](#)

- c. **What disabilities youth who are transitioning into work are experiencing overall:**  
 This is important because youth with vision, mobility and hearing disabilities need specific types of tools and training, but may otherwise be ready for high skill, high wage jobs. Meanwhile, people with developmental disabilities who have cognitive differences may need significantly more training to get started. However, they too can be successful through programs like [Project Search](#).

**Figure 7.  
 Ages 6 to 21 IEPs by Category US**

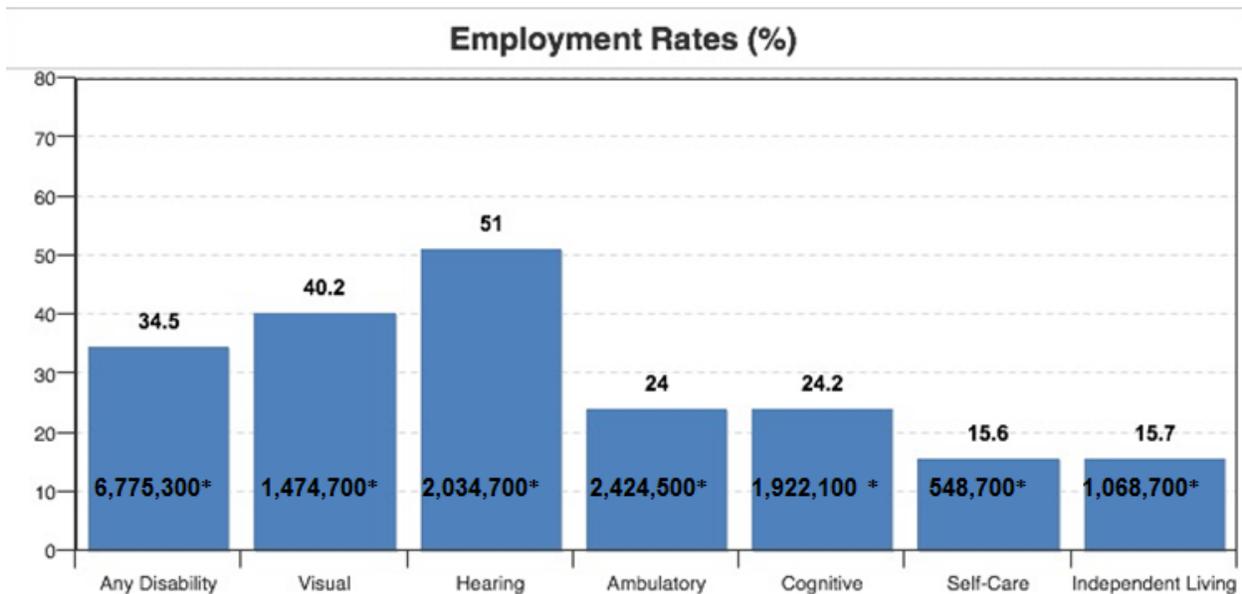
	2011	2012
<b>All Disabilities</b>	5,670,680	5,693,441
Specific Learning Disability	2,293,861	2,268,098
Speech or Language Impairment	1,043,781	1,032,729
Intellectual Disability	422,401	415,697
Emotional Disturbance	370,049	359,389
Multiple Disability	123,762	124,722
Hearing Impairment	68,494	68,069
Orthopedic Impairment	53,939	52,052
Other Health Impairment	722,993	757,904
Visual Impairment	24,811	24,987
Autism	404,544	440,592
Deaf Blindness	1,294	1,281
Traumatic Brain Injury	24,224	25,020
Developmental Delay	115,454	122,901

[Source: Annual Disability Statistics Compendium](#)

**d. The LFPRs broken down by type of disability:**

From the data, we often find that people who are blind or have vision loss are employed at higher rates than people with self-care or independent living disabilities. Similarly, we find that people with hearing differences also are employed at higher rates than people with intellectual or developmental disabilities.

**Figure 8.**  
**Employment of Non-Institutionalized Working-Age People**  
**(Ages 21 to 64) by Disability Status in U.S. in 2014**



\*Total numbers reported

Source: [Cornell University](#)

For people with cognitive differences, workforce solutions may take more time and resources. However, investments focused on youth with disabilities such as [Project Search](#) and [Bridges to Work](#) actually can save taxpayer money and achieve incredible returns on investment. Without this type of school-to-work transition training, people with Intellectual or Developmental Disabilities (I/DD) only have a 20 percent chance of an employment outcome nationally. However, with this type of training, it is possible to achieve a 70 percent employment outcome for a population that otherwise qualifies for a lifetime of benefits.

Each year fully 300,000 young people with disabilities age into what should be the workforce. Hundreds of thousands instead will go onto a lifetime of government benefits, despite the fact that most want to work. Several states such as Wisconsin, Florida and Georgia are making critical investments in these models and are finding an incredible return on taxpayer investment. Despite the successes that some states have achieved, many others are barely scratching the surface on this in their current plans.

All of the data we have cited above is readily available and some state plans reference it. However, far too many of the state plans include badly structured information, omit the LFPR for people with disabilities, or fail to make distinctions between working-age and retirement-age people with disabilities. Each state needs to have the right tools and training to fit their population and the labor demands of their employers. **As an example of the data that is needed, we have submitted with each set of comments, a copy of the presentation our organization has compiled about employment for people with disabilities in each state.**

We have provided this type of information to help the workforce system understand the composition of the disability community in their state and to understand that there are best practices that can support their work. Above all else, the most important best practice is focusing on supporting youth with disabilities to successfully transition from school to work. Some states are doing well on this issue. However, there is a considerable need for all states to invest in expanding the number, scope and diversity of such programs. We have more to say below on how to address disability as a part of the sector strategy process later in our public comments.

## **2. Busting stigmas, myths and misconceptions should be a key part of workforce strategy:**

Attitudinal barriers such as low expectations and misconceptions are critical obstacle to employment for people with disabilities. A [Princeton study](#) shows that while people with disabilities are seen as warm, they are not seen as competent. Similarly, a study published by [Cornell Hospitality Quarterly](#) found that companies share a concern that people with disabilities cannot adequately do the work required of their employees.

**As such, we recommend that state plans be amended to include a comprehensive, proactive communications/public relations strategy for reducing such stigmas.** The best way to fight stigmas is to let employers see the facts from other employers who already are succeeding by hiring people with disabilities. **In order to ensure that such efforts have the biggest possible impact, it needs to be supported by a serious, systematic and ongoing communications campaign that highlights the benefits of inclusive hiring.**

In terms of potential employer partners, we encourage state plans to look at the [Disability Equality Index](#) (DEI) that assesses the inclusion and hiring efforts of major employers. It was put together by the American Association of People with Disabilities (AAPD) and the United States Business Leadership Network (USBLN), which [operates a network of affiliates across the country](#) that can be an incredible resource for your work.

The implementation of a serious business-to-business public relations effort should be a component of state planning. The companies that scored 100 percent in the DEI can be a great resource. These are Ameren Corporation, AT&T, Booz Allen Hamilton Inc., Capital One Financial Corporation, Comcast, NBC Universal, Ernst & Young LLP, Florida Blue, Freddie Mac, Highmark Health, JPMorgan Chase & Co., Lockheed Martin Corporation, Northrop Grumman Corporation, Pacific Gas and Electric Company, PricewaterhouseCoopers LLP (PwC), Procter & Gamble, Qualcomm Incorporated, Sprint Corporation, Starbucks Coffee Company, and TD Bank N.A.

Polls and focus groups show that there are three types of messages and audiences that are needed to expand employment for people with disabilities. Serious communications campaigns are needed for all three:

- A. CEOs and business leaders need to understand the value proposition/business case for their specific company as to why they should focus on putting people with disabilities into their talent pipelines.** This is best done through business-to-business success stories. People with disabilities can work successfully in hotels and healthcare, tend our parks and facilities, assist aging seniors, and they can be super talents in developing computer software and engineering solutions. CEOs and business leaders need to know that people with disabilities can be the BEST people to get a job done.
  
- B. Human resources professionals and on-the-ground supervisors need to understand that hiring people with disabilities is generally easy and inexpensive, and that any costs incurred are more than offset from increased loyalty.** Hiring managers and supervisors are key players who can turn high-minded policy and business goals into action at the ground level. However, studies show that many are uninformed about people with disabilities. They are afraid of potential legal action, costs or other failures. They need support that will empower them to overcome their fears and to excel at recruiting, hiring, supervising or working with teammates who have disabilities. VR staff and community agencies can fully support human resources professionals and managers in dealing with their own specific fears and stigmas surrounding hiring people with disabilities, and should do so, given that they are one of the few states who have opted to go for a dual-customer approach at their program centers. Moreover, online and in-person training is readily available to help from a variety of sources. [RespectAbility](#) has online webinars, as [does ASKJAN.org](#), [USDOL and others](#). Partners like [the Poses Family Foundation Workplace Initiative](#) can provide training to the workforce staff and volunteers system-wide, as well as to community agencies in supporting companies through messaging efforts related to fear and stigma. [The National Organization on Disability](#) and [the U.S. Business Leadership Network](#) offer strong resources as well.
  
- C. People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectations must begin. States need a public relations campaign that will inspire people with disabilities to set their hopes high.** For example, Virgin Airways founder Sir Richard Branson and finance wizard Charles Schwab are also dyslexic. Scientist Stephen Hawking and multi-billionaire businessman Sheldon Adelson, like Gov. Greg Abbott of Texas and President Franklin D. Roosevelt before them, are wheelchair/mobility device users. The CEO of Wynn Casinos, Steve Wynn, is legally blind. Arthur Young, co-founder of the giant EY (formerly Ernst & Young) was deaf. Success sells success and that is something the workforce system should seriously utilize in order to motivate and inspire in an intentional manner.

As an example of the power and value of making the business care for hiring people with disabilities, we offer states the insights gained from our [#RespectTheAbility](#) campaign. The campaign focuses on how hiring people with disabilities can make organizations stronger and more successful. It highlights the benefits to employers that look beyond the disability and

imagine the possibility when hiring talented employees with disabilities. Our profiles are diverse – showcasing national employers such as [EY](#) and [AT&T](#), regional employer [Kwik Trip](#) and local employer [Em’s Coffee Company](#).

### **3. Strong Sector Strategies – The need for strategic alignment of workforce development and economic development to expand employment for people with disabilities:**

As required by WIOA Sec. 102(b)(1)(A), state plans must include a detailed analysis of the economic sectors of the state economy that are growing and are forecasted to grow in the future. The success of WIOA depends on being an employer driven paradigm shift. Expanding opportunities for people with barriers to employment such as disability requires strong partnerships with employers in those sectors that are rapidly expanding.

People with disabilities represent an untapped labor resource that can meet the diverse talent needs of our nation’s growing job sectors. The job gains in these sectors offer a great opportunity for focused sector strategies sustain and build on employment outcomes being achieved among people with disabilities.

#### **a. Health and Elder Care:**



**Project SEARCH intern Haley McCormick-Thompson lends an attentive ear to a resident at United Hebrew New Rochelle. (PHOTO CREDIT: POSITIVE EXPOSURE)**

The rapid emerging talent needs in health care represent both a challenge and an opportunity for the nation’s workforce system. It is challenge propelled by an aging population resulting in increasing demand for qualified workers ready to fill the talent needs of hospitals, assisted living centers and nursing homes. This presents an opportunity to channel the incredible talents of people with disabilities into the workforce. This is a topic that needs to be examined and has implications for people with disabilities who want to work.

**People with disabilities can and should be part of the solution to this critical demand in the labor market.** A 2014 report from the [Office of Disability Employment Policy](#) (ODEP) captured

this opportunity clearly, saying that “[people with disabilities] not only represent an untapped talent pool, but also offer significant value and insight” in the field of healthcare. It is important for healthcare institutions to reflect their customers, and people with disabilities interface more with the healthcare system. There are [numerous examples](#) of young people with disabilities doing incredible work in the fields of healthcare, [elder care and in assisted living](#). **Employers working in healthcare and elder care can greatly benefit from the loyalty, dedication and retention rates of employees with disabilities.**

**These examples all reflect how the Project Search model is well suited to meeting the growing talent needs in health care across the many states. As such, we recommend that Project Search be significantly expanded as they have done in Wisconsin, Florida and other states.** Nationally, each year approximately 2,700 such young people in 45 states do a nine-month, school-to-work program that takes place entirely at the workplace. This innovative, business-led model features total workplace immersion, which facilitates a seamless combination of classroom instruction, career exploration and worksite-based training and support. Nationally, Project Search sites overall have been achieving outstanding results for people with disabilities, employers and taxpayers alike. For example, [the first longitudinal study](#) of the program found “a 68 percent success rate in transitioning students from high school into competitive employment” and “Project SEARCH sites in Upstate New York that have an impressive 83 percent success rate overall.” The goal for each program participant is competitive employment. We suggest all states follow the example set by the state of Wisconsin where they started with three Project Search sites and are expanding to 27. The experiences of the dedicated state officials, VR counselors, workforce professionals and special educators who have increased Wisconsin’s Project Search programs offer profound insights in the steps necessary to make rapid expansion a reality. Thinking long-term, investments in Project Search and other such programs will save big money for taxpayers while also strengthening the talent pool for employers.

b. Science, Tech, Engineering and Mathematics (STEM) and The Autism Advantage:



Thorikil Sonne, CEO of Specialisterne and Gov. Jack Markell of Delaware speak with a young autistic man at the ceremony marking the launch of the Delaware-Specialisterne employment partnership.

(PHOTO CREDIT: Office of Gov. Jack Markell)

Exciting opportunities for improving employment outcomes for people with disabilities lay in the fields related to STEM jobs. **As has been documented in many cases, there can be an “Autism Advantage” in the STEM space. Indeed, some people on the Autism spectrum can have the very best skills in science, math and engineering.** [Microsoft](#), [SAP](#), and [Specialisterne](#) have committed themselves to “[provide employment opportunities](#) for people on the autism spectrum in roles such as software testers, programmers, system administrators, and data quality assurance specialists.” [The Israeli Defense Forces](#) recruits and trains their citizens on the Autism spectrum for work in their elite intelligence unit.

Delaware’s Gov. Jack Markell is partnering with companies to employ more people on the Autism spectrum in STEM jobs. Such examples need to be implemented by other states. This issue of STEM and access for student with disabilities is a natural point of partnership between the workforce system and the educational system. That work needs to start young, be matched with high expectations for success and designed to ensure people with disabilities have the chance to become future scientists, engineers, doctors and mathematicians.

**Ensuring the accessibility of Science, Technology, Engineering and Mathematics (STEM) programs and careers for people with disabilities, especially students with IEPs, is vital.** As Carol Glazer of the National Organization on Disabilities wrote in [Huffington Post](#), “America is already lagging when it comes to STEM-skilled workers. The U.S. will have more than 1.2 million job openings in STEM fields by 2018.” Governors in other states have looked at STEM needs and begun to develop solutions. For example, in New York State, Gov. Cuomo has ensured that magnet schools for STEM are located near IBM, a [major STEM employer](#) in their

state. Other states should be looking at ways to follow this model. Together, state workforce systems and educational systems can look to supported-employment programs such as Project Search, Specialisterne, and [the Marriot Foundation's Bridges to Work Program](#) as models for developing a systematic approach to providing the supports necessary for our students on the autism spectrum to excel in STEM.

c. **High Turnover Jobs: Hospitality/Accommodations, Food Service, Retail Trade:**



Project SEARCH intern Anthony Telesford is all smiles while working in the kitchen at Montefiore New Rochelle  
(PHOTO CREDIT: POSITIVE EXPOSURE)

Millions of dollars are lost each year due to employee turnover. For all jobs earning less than \$50,000 per year, the average [cost of replacing one employee](#) is between \$6,000 and \$20,000. Research shows that employees with disabilities, when their interests and abilities are aligned with the needs of employers, are more productive and loyal than their non-disabled peers. Company records show that even when the relatively more expensive accommodations were factored in, the overall costs of disability accommodations were far outweighed by the low turnover rates and better tenures of the employees with disabilities.

**A great example of an employment sector where employees with disabilities can be tremendously successful is the hospitality industry.** Accommodations and food service are extremely high turnover jobs and numerous studies show that people with disabilities can be outstanding in those fields and have significantly higher employer loyalty.

An outstanding example of the type of work needed is found in Missouri. As part of the Poses Family Foundation's Workplace Initiative, a coalition of employment service providers has launched a successful training and placement program with the hospitality sector in St. Louis. This training runs for up to 12 weeks, and takes place on site at the hotel; all participants are paid by the hotel for the duration of training. Since the summer of 2015, two cohorts of trainees have completed training at the Hyatt Regency. Trainees have gone on to permanent employment at the Hyatt and other hotel partners in a range of departments: culinary; auditing; and customer

service. This type of training and Poses' Workplace Initiative could easily be part of states' overall Sector Strategies.

Likewise, in other states, hotels and other hospitality employers have found Project SEARCH to be an amazing [source of talent](#). The work done by [Embassy Suites](#) and David Scott in Omaha, Nebraska offers [valuable lessons to states](#) as they look to improve employment outcomes for people with disabilities. State Boards, along with other components of the workforce system, should connect with employers in the hospitality sector to begin figuring out how to benefit from these models.



Former Project SEARCH intern and now New Rochelle City Hall employee Dalila Ochoa reorganizing files (PHOTO CREDIT: POSITIVE EXPOSURE).

**Another sector with high turnover and big potential is retail trade.** Many companies, including [UPS](#), [Wal-Mart](#), and [OfficeMax](#) have proven records of success. [Walgreens](#) has demonstrated that workers with disabilities in their distribution centers are as productive, safer and turn over less when compared to peers without disabilities. These efforts have taken the logistics sector by storm with [Lowe's](#), [OfficeMax](#), [Pepsi](#) and [P&G](#) all launching their own successful disability hiring initiatives. For example, [as reported by the National Organization on Disability](#), “Lowe’s hired more than 150 new workers with disabilities in the first year, and an additional 250 workers in the following 18-month period.”

People with disabilities can be outstanding employees in industries that suffer from high turnover rates and they are proven to have significantly higher retention rates. It is important to identify more specific opportunities with employers and to cite them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future.

**d. Jobs with state government and contracting also can be sources of opportunity:**

While the focus of our comments on the state plans are around aligning the workforce system to create opportunities for people with disabilities in the private sector, public sector employment should not be neglected. In the year ahead, the workforce of many state governments is likely to be impacted by the cresting wave of Baby Boomers retiring just as other sectors are being

shaken. As such, adopting affirmative actions to hire people with disabilities could be a solution to this coming challenge.

Other states have adopted such steps as an opportunity measure in their state hiring policies. This was first discussed in Gov. Markell's *Better Bottom Line* Initiative and later in RespectAbility's *Disability Employment First Planning* Toolkit. In [Gov. Markell's own words](#), "One key action is to set a state goal for hiring people with disabilities through an executive order and hold agencies accountable for achieving that goal."

More state governments should explore the feasibility of Affirmative Action hiring of people with disabilities for jobs in state government as well as expanding state contracting obligations similar to the model we see in Section 503 for federal contractors. [Gov. Jay Inslee in Washington State](#) and [Gov. Mark Dayton in Minnesota](#) have been working to implement such measures for people with disabilities through executive orders. Likewise, we also are seeing great success with governmental hiring of people with disabilities at the local level in [Montgomery County, Maryland](#). The untapped potential of people with disabilities is such that a full-spectrum, all-of-the-above-and-more approach is needed. While our priority is seeing the talents of people with disabilities channeled into the private sector, employment opportunities in the public sectors shouldn't be over looked as part of the state's overall workforce strategy.

**e. Agriculture:**

In those states where agriculture is a key industry, there is an opportunity to replicate the success of [TIAA-CREF's Fruits of Employment project](#) that provides internships and job training to workers with disabilities to prep them for careers in competitive agriculture. [Farmers in Georgia](#) already have had success with a program designed to reduce barriers that people with disability face in agricultural fields, and it can and should be incorporated into WIOA plans.

**4. Section 503 of the Rehabilitation Act and Federal Contractors offer states the chance to innovate, collaborate and expand opportunity:**

Almost all of the state plans that we have reviewed have neglected to mention important rules surrounding the Rehabilitation Act of 1973. Most state plans lack references to the employment opportunities and talent challenges created by the recently implemented Section 503 regulations regarding federal contractors and subcontractors. With very few exceptions (Florida for example), the state plans do not discuss at all the new 7 percent utilization goal set for companies to recruit, hire and retain qualified individuals with disabilities in all job categories.

States should respond to these newly enacted regulations by adopting a strategy focused on competitive advantage, not just compliance. These regulations and requirements entail far more than just new rules for businesses to play by. Section 503 is an opportunity that could potentially have a broad impact on the employer engagement work of the entire workforce system. The companies who must comply with Section 503 have an opportunity to teach companies not impacted by the regulations how to effectively employ, engage, and retain workers or customers with disabilities. As such, in our submitted comments, we have suggested that states direct their

employer engagement and VR outreach efforts to focus on federal contractors doing business in those states.

**5. Ensure that the Assurances in your WIOA checklist are matched up to a strategy that can be fully implemented and be successful:**

The Common Assurances required of the entire workforce system and the program specific Assurances outlined in the state plan are critical factors in the overall implementation and ultimate success of WIOA. As such, it is critical that each assurance is matched up with a strategy fitted to meeting and, if possible, exceeding the requirements of the law.

As a good example of the level of detail needed here, consider WIOA Section 188. The anti-discriminatory rules originally outlined under WIA need to be updated to reflect the steps needed towards making universal access a reality. For example, in seeking to meeting Common Assurance #7 listed in the state plan, we are directing states to consider the resources made available from ODEP. They have recently released [a guide](#) that digs deep into what universal accessibility will mean for the workforce system. Further, Common Assurance #10 affirms each state plan's commitment to meeting the requirement that "one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990." However, merely meeting legal requirements should not be the end of this process. Indeed, looking at physical and programmatic accessibility can be an opportunity to invest in a more proactive workforce system very actively committed to collaboration and partnerships.

However, if there is no plan that specifically identifies how the state is going to get to the commitment made in the assurance, the state is facing a serious problem.

**6. Avoid the opportunity costs of focusing too much on One-Stop centers. Programmatic and database accessibility and privacy is critically important:**

Public policy is about the allocation of scarce resources to meet infinite needs. It is vital to invest resources on those points where they can have the greatest effect. **One challenge that we have seen in many states' WIOA plans has been the prioritization of expensive bricks and mortar One-Stops as the primary access point for programs and services under WIOA.** Focusing exhaustively on One-Stop Centers, physical infrastructure and co-locating services comes at the opportunity cost of losing the chance to improve supports and increase outcomes.

**The workforce needs of state economies are evolving rapidly thanks to technology and globalization.** Investing excessive resources on physical locations at the expense of improving online delivery of workforce services and supports is an example of looking backward, not forward. Moreover, [the District of Columbia](#) and others have successfully moved much of their one-stop services to trained staff with laptops that go to schools, hospitals, and community organizations where they are better able to serve the public.

At the same time, considerable thought needs to take place around the creation of a unified intake system for the workforce system and government benefits programs. Those shared

databases must be fully accessible to people with disabilities who use screen readers or who need captions to understand videos that explain how to use the system. Thought also needs to go into privacy issues as private disability issues should not be shared where it is not needed and appropriate.

**7. Creating an affiliate chapter of the U.S. Business Leadership Network, and/or working very closely with an existing chapter, is a great tool for effectively engaging employers and reaching the right business audience:**

As we stated previously about communicating the business case for hiring people with disabilities, effective employer engagement is a necessary component of achieving improved employment outcomes. One of the most effective means of carrying that message forward is to have a network of engaged businesses whose bottom line has benefitted from the talents of employees with disabilities. Business to business communication can help tear down the misconceptions and stigmas that are barriers to employment.

For those states that do not have affiliate chapters of the U.S. Business Leadership Network (USBLN), we are recommending to them that they look at developing them. The lack of a chapter limits the flexibility and capability of states to engage employers around hiring people with disabilities. As such, we highly recommend that the appropriate staff both in the workforce system and VR work with the employer partners to formalize their intersections through the establishment of an affiliate chapter. Establishing a BLN Chapter would help to organize the “knowledge of community outreach, recruiting and interviewing, the accommodation process and barriers” needed to achieve improved outcomes. Currently, VR agencies often have a network of businesses they work closely with in order to place VR clients into jobs. These business partners would certainly benefit from tapping into the national structure of the USBLN and their resources.

In states where there already is an affiliate chapter, that BLN oftentimes is not at the WIOA table. As such, we are encouraging states to look at the successes achieved in Wyoming, which possesses one of the most effective, engaged and active affiliate chapters in the country. The Wyoming BLN, despite the challenges of a largely rural population and limited resources, has been achieving outstanding employment outcomes. We would be happy to provide WIOA teams an introduction to Lynn Kirkbride, the USBLN’s Director of Affiliate Relations. She is an incredible asset and has extensive experience around overcoming barriers to employment. Her email is [lynn@usbln.org](mailto:lynn@usbln.org) and she can be reached by phone at (307) 631-0894. Her efforts, and those of the Wyoming BLN, offer profound insights into how to effectively engage employers around the business case for hiring people with disabilities.

**8. Ensure that apprenticeship programs are fully accessible and actively recruiting young people with disabilities, especially with government contractors:**

As states look to improve these programs, we highly recommend that the workforce systems seriously look at ways to make apprenticeships accessible to people with disabilities. At the federal level, ODEP has worked hard to generate resources that can open up these exciting programs to “youth and young adults with a full range of disabilities.” The regulations related to

apprenticeship which have recently come out of the Department of Labor provide states the flexibility they need to refine and design training programs that maximally inclusive of people with diverse talents. **We encourage states to invest time and energy to understand the best practices contained in [ODEP's apprenticeship toolkit](#). Further, we also would highly recommend that VR staff connect and collaborate with the federal officer responsible for [apprenticeship programs](#) in each state or region.** Such innovative partnerships and improved accessibility are essential elements of realization the full promise of WIOA for people with disabilities.

Further, we would suggest that there is a critical opportunity to look at Section 503 and federal contractors as a partner in expanding apprenticeship programs. Funding to cover training costs could be a very attractive selling point for federal contractors looking to meet their 503 requirement. Further, we also would recommend looking at the intersection of apprenticeships and sector strategies. Not only can apprenticeships be set up in traditional fields such as construction, but they also can be incredibly useful in health care and computer jobs. Look at the successes achieved by Project SEARCH with a wide range of employers. As such, we recommend that the workforce system and the State Board investigate how to both open apprenticeship programs to people with disabilities and to create apprenticeship opportunities in new career fields as well.

#### **9. Overcome the gap between disability services and career services in post-secondary education:**

**There is a fundamental disconnect in most post-secondary education programs between disability services and careers.** This is not a new issue and it is one that other organizations have raised in the past. However, with the priorities put into place by the implementation of WIOA, there is a historic opportunity to bridge this gap and to improve career and technical education for young people with and without differences. As formulated by the [National Organization on Disability](#), “the career services office, which assists students in preparing for” the workforce, “lack a strong—or any—connection to the office of disabled student services, which ensures proper accessibility and accommodations on campus for students with disabilities.”

The result is a price we pay as a society twofold. First, it costs employers who are unable to find qualified job candidates. Second, it costs students with disabilities who may be able to graduate with a degree thanks to accommodations but will go on to struggle to succeed in the working world. Nationally, there are 1.3 million young Americans ages 16-20 with disabilities. They have high expectations to go into the workforce but currently [only 53 percent of college graduates with disabilities are employed](#) as opposed to 84 percent of graduates with no disability. In total, only about seven percent of people with disabilities will earn a college degree and less than half of the 2.3 million with a degree are employed.

Due to the mandate created by [Section 503 of the Rehabilitation Act](#), federal contractors now have a utilization goal to make sure that 7 percent of their employees across all job groups be qualified people with disabilities. This regulation actually is a huge opportunity, because companies are looking actively to hire recent graduates with disabilities. The first place for new

recruits is college and campus recruiting. States have the chance to demonstrate to businesses that college students with disabilities are on campuses and that they should be actively targeting those with disabilities just as they do all other diversity recruiting on college campuses.

While the statistics cited above are national ones, they have bearing on the work that needs to be done through each state's community college system. Beyond just WIOA, community colleges are uniquely positioned to innovate in order to expand opportunity. Community colleges are very closely connected to the working world and specific employer needs.

#### **10. Supporting pre-employment transition services through the development of public-private partnerships:**

We are encouraging states to follow the example set by Florida and Wisconsin by expanding their number of Project SEARCH sites. However, this is not the only paradigm that states should follow. The school system, vocational rehabilitation and local workforce boards can build creative, collaborative partnerships with companies that are leading in the disability space.

States would benefit greatly by looking at other models of innovation that are showing great potential to fundamentally improve employment outcomes. To begin with, we would highly recommend that state workforce systems examine how to support disability employment efforts through establishment of public/private partnerships in local communities. These types of partnerships could focus on the [“cluster” model](#), started by Poses Family Foundation that is having tremendous success in diverse states as Nevada, Georgia and Ohio. This model depends on “consortium of employers committed to implement or expand programs,” “a public/private partnership to coordinate services for job-seekers with disabilities, with a single point of contact for employers” and “connections among employers, public and private agencies, and schools to reach young adults with disabilities who are in transition from school to work.”

#### **11. Getting out the word on free and accessible services and resources:**

**There are many online and in-person resources to help employers and people with disabilities come together to build success.** However, all the stakeholders need to be educated to know that these resources exist, and that they are free and user-friendly. These resources also must all be accessible. We know that broadband access is a huge issue in rural states. However, it's important to ensure that online resources enhance the effort of states' workforce systems.

**Each state needs to make an effort to demonstrate to employers and prospective employees that these services exist. Doing so by coordinating it with the possible public relations campaign is one way to go about this. Also, states should be careful not to waste money trying to re-invent the wheel in creating online resources** as [ASKJAN.org](#), [the U.S. Department of Labor's ODEP](#), [RespectAbility](#) and others also offer [free toolkits](#), webinars and [training opportunities](#).

[Another resource is Understood.org](#). This is a comprehensive resource to help families and individuals with learning and attention issues build their educational future. It will be helpful to

collaborate with such groups to ensure that the best tools are created to fit the training and information needs on these issues.

## **12. Nothing About Us Without Us:**

**“Nothing About Us without Us” has long been a rallying cry for the one-in-five Americans who have a disability and it has implications for the workforce system.** Section 107 of WIOA dictates the establishment, criteria and membership for the Local Workforce Development Boards that are crucial implementers of each state’s overall workforce strategy.

**As such, we feel there is a critical need to ensure that people with disabilities are represented on such local boards and make their voices heard.** Section 107(b)(2)(A)(iii) of WIOA specifically states that “community-based organizations that have demonstrated experience and expertise in addressing the employment needs of individuals with barriers to employment” may be represented on the boards and this includes “organizations....that provide or support competitive integrated employment for individuals with disabilities.”

Even a non-voting, ex-officio member of a Workforce Investment Board (WIB) can bring critical perspectives that improve the WIB’s efforts overall. As such, we recommend that states look for ways to recruit local community organizations or self-advocates for inclusion on their local boards. Perhaps this could be a natural point of partnership for Independent Living Centers across the country that do crucial work supporting employment and independence for people with a wide range of disabilities.

## **13. Transportation is a vital component and it must be addressed directly:**

One significant reservation that we have regarding many of the state plans that we have reviewed has been the limited attention given to the issue of transportation. Lack of access to transportation impacts both people with disabilities and other low-income communities. Many people with disabilities do not drive. Others cannot afford private transportation. It is vital to work with public transportation to ensure that there are accessible bus routes to places where there are internships, apprenticeships and other work opportunities for people with disabilities.

People with disabilities need transportation solutions. Public transportation need not be the only solution. In places where it is not possible to coordinate a bus route, states could look at partnering with Uber, Lyft or other new transportation solutions. For people with disabilities who do drive, such companies also could provide a way to enter into the workforce with flexible hours, so a state also could look at developing partnerships with these sorts of companies. As states look at these partnerships, it is important to ensure that people of all abilities will have the same access and that individuals using a wheelchair will not be left out in a partnership that may not have the appropriate infrastructure.

Public sector employers and federal contractors who have Section 503 obligations are key places for apprenticeships and internships and onboarding of talent. It is important for them to play a key role in planning for public transportation as well.

#### **14. Aging workers and those with recently acquired disabilities must be addressed:**

**Attention should start BEFORE aging workers and those with recently acquired disabilities lose their job due to aging and/or a newly acquired disability. Many people who have been in the workforce for decades find that before full retirement age, they cannot keep up with the physical demands of their jobs. It is vital to start working with them BEFORE they lose their jobs.**

In Iowa, IVRS works with a major employer, Unity Point Health to “re-home” employees to other jobs within the same company when good workers can no longer do physical jobs and need a new assignment. They find that Emergency Room nurses, for example, come to a point where they can no longer keep up with the physical demands of that job. They have a department that works to “re-home” talented and valued employees who either age into a disability or acquire a disability through accident or illness.

Empowering youth with disabilities to enter the workforce should be states’ highest priority, but keeping aging workers in the workforce until retirement age also is important. This will take a specific strategy and effort so that states don’t have massive numbers of people going onto disability rolls and out of the workplace prematurely.

#### **15. Strategic engagement to build a mentor system for workforce system customers:**

**Government can’t and shouldn’t do everything. There is a massive role that can be played by volunteers who are willing to help people with barriers to work, including people with disabilities, find and keep jobs. There is a critical, cooperative role for nonprofits and faith-based organizations to play.** Local workforce development areas, for example, could be encouraged to recruit volunteers from local faith communities or local nonprofits. However, much more can and should be done to work with parents of teens and young adults with disabilities, and to create volunteer mentorships for people with disabilities who are looking for work or need supports to stay employed and/or grow their careers.

Faith-based organizations and many others can fill massive gaps. There is a terrific booklet, [Clearing Obstacles to Work](#), put out by the Philanthropy Roundtable that is rich with potential partners and proven programs. This is a huge missed opportunity, as you will see in the booklet we just mentioned above. It’s all about teaching people to fish (helping them get and keep a job) rather than just giving them fish. It also is important to note in terms of the SNAP and TANF programs that too many faith-based programs focus on giving out food without providing the volunteer support to help people sustain themselves through gainful employment. In looking to rethinking policies around SNAP funding, we suggest looking at the innovative efforts of [the Seattle Jobs Initiative \(SJI\)](#) to realign that funding into more productive employment outcomes.

#### **16. The disability issues of people involved in the corrections system must be addressed:**

**The lens of disability needs to be applied to the work being done with this population, whether through corrections education or reintegration support.** According to recently published data from [the Bureau of Justice Statistics \(BJS\)](#), “An estimated 32 percent of prisoners

and 40 percent of jail inmates reported having at least one disability.” This issue is a serious one and it needs to be addressed at the state level. Frequently people are involved in the criminal justice system because they have disability issues, including learning differences, ADHD, executive function and mental health issues that went undiagnosed and/or unaddressed through childhood and into the school years.

There are two related challenges here. First, there is a need to identify potential disability issues among inmates during the intake process and ensure their needs can be met. Ideally, this type of assessment could be done within the first thirty days of their sentence. Such identification could then feed into the work being done through educational programs in corrections. Second, are the issues related to preparing inmates for their release and reintegration into society. Whether it is mental health supports or learning accommodations, help ex-offenders to find employ when they are home is a critical workforce development challenge. It is a challenge that only grows more complicated when a disability remain unaddressed. The price paid for ignoring these issue are higher rates of recidivism and greater costs to society. Addressing these issues at the beginning and at the end of the corrections process will have downstream effects and hopefully will enable states to address the intersectionality of these workforce, disability, and justice issues.

### **Conclusion**

By addressing the concerns outlined in this memo, states will be able to use best practices in their WIOA implementation. By ending failed practices, and instead making strategic investments in best practices, many of our nation’s 21 million working-age people with disabilities and those aging into the workforce will have the ability to have the dignity, income, sense of community and respect that comes from a job and a career. This will dramatically reduce poverty and economic injustice for millions of Americans with disabilities. Implementing these steps will be win-win-win for people with disabilities, employers and taxpayers alike.