

Marketplace Dynamics Subcommittee Chapter

Overview

Marketplace Dynamics Subcommittee Members

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The Marketplace Dynamics Subcommittee is charged with exploring the demand-side perspective related to increasing competitive, integrated employment outcomes for individuals with intellectual or developmental disabilities (I/DD) and other significant disabilities, focusing primarily on the opportunities and issues as identified from the employer perspective. **In representing the demand-side perspective, the Marketplace Dynamics subcommittee seeks to address two fundamental questions:**

1. What do employers need to help them be successful in meeting their diversity goals and increase the hiring, onboarding, and retention of workers with significant disabilities; and
2. How can a different business model be supported that allows businesses to succeed with competitive integrated employment without relying on the subminimum wage certificates authorized by the Fair Labor Standards Act (FLSA) Section 14(c)?

The subcommittee's efforts to date have included exploring effective practices among diverse employers and federal contractors, hearing directly from business owners or representatives on critical business issues such as: training of employees, sustainable models that can lead to real culture change within an organization, pipeline issues, other systems change, and transportation and reviewed written public testimonies. Additionally, the Marketplace Dynamics Subcommittee is continuing to explore broader systems issues, including training on effective practices for successful employer engagement among professional staff within the One-Stop Career Centers

and Workforce Development Boards (WDBs). The subcommittee also received presentations and participated in an informational dialogue with representatives from the following entities: AbilityOne, the US Business Leadership Network, Ad Astra Business Solutions, the National Association of Workforce Boards, SourceAmerica, The National Council on Disability, Disability Rights Education and Defense Fund, and Association of Programs for Rural Independent Living. In addition, subcommittee members have acted as subject matter experts (SMEs), bringing their perspectives, professional experiences and knowledge to the forefront to further inform the exploratory work of the subcommittee specifically and the full Advisory Committee generally.

For this Interim Report, the subcommittee addresses the following primary topic areas:

1. Changing the Business Narrative
2. Creating a Sustainable Culture of Inclusion
3. Building Business Partnerships While Driving Systems Change
4. Addressing Training and Pipeline Issues
5. Transportation Impact on Business Recruitment of Talent
6. Preliminary Recommendations

Initial findings and conclusions are detailed for all topic areas, followed by preliminary recommendations as appropriate. Future topics to be explored and included in the final report include: OFCCP 503 Rules; state use programs; high growth industries (HGIs) such as technology, health care, and retail; more effective employer engagement with WDBs and Vocational Rehabilitation (VR); self-employment for people with I/DD and other significant disabilities; and IRS Tax Incentives for businesses in order to encourage the hiring of people with disabilities and remove architectural barrier. Additionally, ongoing research and further exploration continues for the topics covered in this Interim Report.

Changing the Business Narrative

Currently, the predominant business narrative for hiring individuals with disabilities in America is that it is simply “the right thing to do,” thus appearing to be a patriarchal appeal, rather than an identification of the opportunities and benefits associated with developing an inclusive workforce. Further, such a pervasive message can perpetuate negative perceptions and low expectations for employees with I/DD and other significant disabilities. The Subcommittee believes that pushing business to employ workers with disabilities out of a sense of duty or corporate social responsibility may unintentionally undermine the identities and worth of jobseekers with disabilities, and eclipse the reality that individuals with I/DD or other significant disabilities are essential, capable, and efficient members of the community workforce. **“Doing**

the right thing” runs contrary to why businesses hire employees in the first place – to fill a need and to support the company’s business model to enhance their bottom line.

The Marketplace Dynamics Subcommittee’s findings, conclusions, and recommendations focus on the critical need to **change this narrative and to help educate employers that hiring people with disabilities can be good for any business’s bottom line.** Businesses with workforces that include employees with I/DD or other significant disabilities consistently report that these employees’ performance equals or exceeds that of their coworkers without disabilities (Kessler, 2010). As such, hiring persons with disabilities must be recognized as a cost-effective way to build an inclusive workforce that is representative of the business’s customer base, and individuals with significant disabilities must be perceived and portrayed as an asset to the company, not a risk.

The Marketplace Dynamics Subcommittee recommends that the **business narrative move from one of corrective action to one of competitive advantage.** Business leaders must understand that hiring individuals with I/DD or other significant disabilities will allow them to increase revenue or better meet other targets specific to their business models. Business decision-making is based upon data. At the same time, research has shown that exposure to people with disabilities may be more effective at reducing employer discrimination than demonstrating substantial cost-benefits; thus, efforts to directly engage employers in an ongoing dialogue with prospective workers with disabilities also plays an important role in changing the business narrative (Office of Disability Employment Policy, 2015; Social Dynamics, LLC, 2014). As employers recognize that developing a more inclusive workforce results in competitive differentiation within their industry, they adopt this as a continuous, standard component of their human resource process.

To effectively change the current narrative, employers need evidence and examples that persons with significant disabilities both want to work and are qualified and dedicated employees.

Success stories from businesses that have strategically developed a more inclusive workforce model can be promoted to illustrate the benefits from a *business perspective*.

While the specific benefits may vary across businesses, results from these strategic initiatives point to a wide array of positive outcomes, from increased productivity to reduced turn-over and lower absenteeism rates (Matos & Galinsky, 2014; Matos, 2014; Kessler, 2010).

- In 2007, Walgreens launched an initiative to hire more individuals with disabilities in the first of a new generation of distribution centers. Emphasizing their theme of “Training versus Abilities” as a high priority, training facilities were embedded inside the distribution centers in South Carolina and Connecticut. Inside each distribution center, workstation computer screens were changed from text-based information data entry to touchscreens using icons, adjustable workstations were installed, and processes were simplified and centralized to

better support a diverse workforce. The results thus far have been powerful: the new distribution centers have increased efficiency by 20% overall. Investments to streamline the technology and processes paid off by improving the efficiency of all employees, not just those with disabilities. Walgreens reports that in the distribution centers, employees with disabilities perform as well or better than other employees as a whole (Pemberton, 2015). In 2012, Walgreens expanded this initiative into their retail stores through the Retail Employees with Disabilities Initiative (REDI). REDI provides in-store training to help people with disabilities develop the skills required for retail and customer service jobs and includes partnerships with local employment service agencies and state Vocational Rehabilitation agencies to provide the necessary funding and support. Externs trained in the 4-6 week program are evaluated, and those scoring high enough are recommended for hire and invited to apply for jobs. Of the 784 REDI externs who completed the training, 67% were recommended for hire, and 165 were hired by Walgreens. Those not hired by Walgreens received valuable skills training that can serve as the foundation for other community employment, though Walgreens does not track these outcomes.

- AMC's *Furthering Opportunities, Cultivating Untapped Strengths* (FOCUS) Program incorporates intentional outreach to recruit youth with significant disabilities for entry-level positions, with competitive pay and benefits. Changes to standard business practices in support of the FOCUS program included changing the interview process from "sit down" interview to "traveling" interviews, where managers walk through the theaters with potential employees; revision of training materials to make them more visual; and including parents or job coaches in performance feedback sessions where appropriate. In an effort to address the performance variability across job coaches, AMC created guidance and standards detailing the company's expectations for all job coaches working with AMC employees. AMC reports that employees with significant disabilities consistently perform as well as or better than their peers without disabilities and consistently exceed their *own* job performance expectations along with the expectations of their family members. As a result the changes made through the FOCUS program, AMC has improved policy and practices system-wide and positively impacted their corporate culture as a whole.
- Approximately 75% of the employees at Habitat International, Inc. (www.habitatinc.com), a Chattanooga-based supplier of artificial-grass and carpet products, experience a disability. Habitat cites an impressive list of business data, including: zero back orders in 24 years, a product defect rate of less than 1%, very low turn-over and absenteeism, a reduced number of supervisors, and lower administrative costs. These successes highlight the myriad of ways in which supporting a more inclusive workforce contributes to a better bottom line. Savings from developing a reliable workforce are profound and can be realized by assessing the costs of the vacancy including advertising, lost productivity, and training time for a new employee.

Many of the better-known business success stories come from large businesses with full-scale initiatives to include more people with disabilities within their workforce. Yet the vast majority of businesses in the U.S. are those employing fewer than 100 people, so small and medium-sized businesses must be part of the dialogue on how to improve competitive, integrated employment opportunities for workers with significant disabilities. Smaller businesses are less likely to have strategic plans targeting the recruitment of people with disabilities, including individuals with I/DD and other significant disabilities (Matos, 2014; Kessler 2010). **Positive impacts on the business bottom line can occur at businesses of all sizes and in all locations; however, evidence and examples from a variety of businesses and industries – small, mid-size, and large – are needed to advance the narrative and keep it relevant for a greater number of businesses throughout both rural and urban communities.**

Creating a Sustainable Culture of Inclusion

There has never been a greater need for creating a sustainable culture of inclusion within both public and private sector workplaces throughout the United States than there is today. For too long, the presumption that people with I/DD and other significant disabilities will not be able to meet the job requirements of competitive, integrated work environments has resulted in limited access to innovative training opportunities and very few individuals achieving economic self-sufficiency. Data from the 2013 SSI Annual Statistical report shows that of the almost 5 million individuals with disabilities between the ages of 18 and 64, less than 300,000 (5.9%) were working (SSI Annual Statistical Report, 2013). Monthly earnings averaged less than \$1400: not even \$17,000 per year. Employees with disabilities earn less on average, are more likely to work part-time or in temporary positions, and are less likely to work in technical or managerial positions than their peers without disabilities (Bureau of Labor Statistics, 2014; Shur et. al., 2009).

From the Marketplace Dynamics Subcommittee’s point of view, there are many companies that are proving that employees with significant disabilities are highly valued in their workforce, which dispels myths and stereotypes directed to this disability population. More needs to be accomplished, however. **Creating a sustainable culture of inclusion requires a dedicated effort, and companies, regardless of size, need a tactical, executable plan supported by middle management, executive leadership, and their Board of Directors in order to recruit, train, retain and promote individuals with I/DD and other significant disabilities into their workforce.**

Companies with targeted diversity plans are significantly more likely to hire individuals with disabilities, yet a large number of employers, particularly small employers, do not have either formal staffing or diversity plans (Matos, 2014; Kessler, 2010). **Public and private employment services staff should be prepared to help businesses develop targeted plans as**

the first step to increasing employment opportunities for individuals with I/DD or other significant disabilities. Plans must be both internally and externally focused, and predicated on the assumption that building an inclusive workforce results in a more flexible, responsive corporate culture that better meets the needs of all employees, not just those with disabilities. Workplace flexibility strategies are linked to enhanced performance, productivity, and retention company-wide, thus again ensuring a synergy to businesses' bottom line (Matos & Galinsky, 2014; Matos, 2014; Office of Disability Employment Policy, 2012).

Companies that prioritize diversity or disability are much more likely to employ individuals with disabilities, and yet the number of companies with disability plans in place declined between 1995 and 2010 (Kessler, 2010). Many applicants are reluctant to self-identify as a person with a disability for fear of discrimination. Indeed, research shows that employers are less likely to hire applicants who have self-identified as having a disability (Pearson et. al., 2003; Ravaud et. al, 1992).

However, it is important for individuals with disabilities to self-identify their disability to Federal contractors and subcontractors associated with the Office of Federal Contract Compliance Program (OFCCP) and the Section 503 Rules. These rules require Federal contractors and subcontractors subject to the Section 503 rules to establish a 7% utilization goal for the employment of people with disabilities, therefore creating important hiring opportunities for individuals with I/DD or other significant disabilities (41 CFR 60.741.45). **Businesses need access to support and guidance to develop more inclusive hiring practices, eliminate barriers, and encourage more individuals with significant disabilities to apply and self-identify.** The Disability Equality Index (DEI) may offer a starting point for community businesses. A collaborative initiative through the US Business Leadership Network (USBLN) and the American Association of People with Disabilities (AAPD), the DEI is an online tool that provides businesses with an objective assessment of their current disability inclusion practices and helps companies to identify opportunities for building a more inclusive company culture (www.disabilityequalityindex.org).

Effective recruitment requires targeted outreach to potential employees with I/DD and other significant disabilities, but **many companies may not know how to effectively find qualified candidates with disabilities** (Kessler, 2010). Developing accessible online recruitment announcements and applications and establishing relationships with employment service providers or public system services such as One-Stop Career Centers, now called America's Job Centers (AJCs), or Vocational Rehabilitation (VR) agencies can help connect employers with potential applicants (Office of Disability Employment Policy, 2012). As part of the FOCUS program, AMC Theaters revamped the online application process to make it more accessible for potential employees with disabilities. Through the Bridges to Business program, the National Organization on Disability (NOD) serves an intermediary between businesses and public and

private employment service agencies to address this gap (Katz et. al., 2012). The program has been so successful with one of its sites, Lowe's Home Improvement, that Lowe's ultimately created a position within its diversity team to fulfill the role previously performed by the NOD intermediary (Katz et. al., 2012).

Additionally, departmental silos that exist within larger corporate entities may present barriers to inclusive hiring. Department managers are frequently aware of job vacancies only within their purview and do not have a "bird's eye view" of all possible unmet needs within their organization that could lead to customized employment designs and better job matching. Mitigating strategies may include dedicating a position or part of a position to recruiting and hiring individuals with disabilities company-wide, working with an external consultant to identify unmet needs, and establishing public-private partnerships to identify and fill available positions. For example, the in-house position created by Lowe's following the success of the Bridges to Business project allows for enhanced coordination of potential employment opportunities for individuals with disabilities.

Employee Resource Groups (ERGs) enhance efforts to establish a sustainable culture of inclusion by providing a structured forum for employees with similar backgrounds to discuss common issues and provide feedback and recommendations to organizational management (Matos & Galinsky, 2014; Matos, 2014). Some corporate ERGs include any employee that is interested in a specific area such as family members, caregivers, employees with disabilities and others to come together to receive information and to discuss issues associated with work, accessibility, the community and resources available. Feedback and guidance from ERGs can enhance outreach and recruitment efforts, as well as ensure that the work culture remains flexible, accepting, and responsive to employees with disabilities.

Another reason companies cite as a reason for a lack of hiring individuals with disabilities is a lack of understanding and fear of the laws and policies around employing individuals with disabilities. Many companies express concerns about perceived risks that they may be subject to litigation for taking disciplinary action against or terminating employees with disabilities. Additionally, companies may be confused about what accommodations are required by ADA and the potential costs involved. **These concerns are most effectively alleviated not through the dissemination of written information, but through more direct conversation with employment professionals as part of broader employer engagement initiatives.** Employment services professionals must be prepared to work with companies one-on-one to provide the necessary supports as they transition to a more inclusive workforce.

Establishing business-to-business peer connections are critical to assisting companies in learning more about employing people with I/DD and other significant disabilities (US Business Leadership Network, 2012). Businesses can learn from the examples of other

companies and use them as a model when revising policies and practices. There is no “one size fits all” model, but incorporating practices that have already succeeded and adjusting to each company’s individual needs supports more efficient movement toward the development of a sustainable, inclusive work culture.

Building Business Partnerships While Driving Systems Change

The critical need to build effective partnerships with businesses in order to increase employment opportunities for individuals with intellectual, development, and other significant disabilities cannot be overstated. The success of Walgreens, AMC, Partners Continuing Care, and the businesses participating in the Bridges to Business project showcase the rich job training and employment outcomes possible through such partnerships. Businesses can clearly benefit from developing relationships with government, service providers, secondary and post-secondary educational institutions and other businesses within their local communities. However, **many businesses are either not aware of or do not use the supports and services already available through public resources such as the American Job Centers (AJC), state Vocational Rehabilitation (VR) agencies, or local service providers** (Katz et. al., 2012; Kessler, 2010). Outreach efforts must therefore be fluid and tailored for attracting employers, and public system personnel and nonprofit service providers must have the skills and experience to support businesses with the development of customized plans and strategies that address the unique needs and opportunities of each specific business.

AJCs, state VR agencies, and employment service provider agencies all provide an array of services designed to support individuals with I/DD and other significant disabilities to achieve competitive, integrated employment outcomes; however, **deficits continue to exist in these public and private systems with regard to business outreach and communication, particularly as it relates to the employment of people with significant disabilities** (Katz et. al., 2012).

Recent legislation affirms the importance of establishing partnerships between these public systems and the local business communities. The Workforce Innovation and Opportunities Act (WIOA) mandates that VR agencies collaborate with employers in order to maximize CIE opportunities for individuals, including those with the most significant disabilities and authorizes the use of funds to support work-based learning experiences, training for employees with disabilities, and delivering awareness building activities for the business community. Moreover, WIOA specifically requires that AJCs deliver effective business services to engage employers of all sizes within their local regions and cautions against “burdening employers, for example with multiple uncoordinated points of contact,” (80 Federal Register 73, 16 April 2015, pp. 20601).

Local WDBs provide oversight of AJCs. As such, workforce boards need to be educated about the employment of people with significant disabilities so they may act as advocates and support CIE within the AJCs. WIOA requires that a representative from Vocational Rehabilitation serve on WDBs, yet there is no requirement that boards include a representative specifically from the I/DD network.

WIOA requires that state and local WDBs use a standard set of performance metrics to review regularly how effective their programs are at serving job seekers. **Business leaders can provide expert advice to state and local WDBs on how to establish and use these performance metrics to improve the WDBs. Additionally, businesses can help develop performance metrics related to service expectations for employers to ensure that both job seekers and employers are effectively served by workforce development programs.** Performance standards under WIOA allow for performance adjustments based on a number of characteristics, including disability status, and include tracking participation in training programs, both of which can lead to more flexibility in the design and delivery of services for individuals with disabilities (WIOA 116.b).

Despite the pivotal need to expand and improve business partnerships, AJCs lack continuity in their outreach to companies and are inconsistent in the quality of services provided to businesses. AJCs are not using the same language as businesses, and as a result, are not as effective as they could be when connecting employers with individuals with disabilities (Katz et.al, 2012). AJC staff has questions about standards relating to provision of services (e.g., ADA Title II, Section 504), and standards relating to employment (e.g., ADA Title I, and specific parts of Section 504). Further, AJC staff appears to be confused on what they can legally communicate to businesses regarding candidates with disabilities who are seeking employment (National Collaborative on Workforce and Disability, 2004).

AJC staff and WDBs need ongoing education on “Disability Awareness” and how to provide quality services to people with I/DD and other significant disabilities. Under WIOA, AJCs are tasked with meeting the needs of both job-seekers and regional businesses. To do so requires staff to be equally adept at navigating both the supply-side and the demand-side of the employment equation, and a skills gap currently exists on both of these sides. Public system personnel who lack understanding of business acumen and needs are likely to approach businesses with a standard list of available services- a practice that is largely ineffective if businesses do not see a fit between the services offered and their own needs.

AJC and VR staff must have the requisite skills to help businesses explore and identify opportunities to address their unique workforce needs and to identify the best possible options available for meeting them. For example, Partners Healthcare located in Boston, MA, provides office space for a Vocational Rehabilitation counselor to spend 20 hours a week on-site.

This model allows the VR counselor to thoroughly learn about all the offices within the company, and identify and explore vacancies throughout the hospital to identify possible competitive, integrated employment opportunities for individuals with disabilities.

Outreach and innovation efforts directed to businesses must include the recognition and importance of developing relationships with businesses of all sizes. Of the 28 million small businesses in 2014, over 22 million of them were non-employer firms, with one person serving as the sole owner and operator (Small Business Administration, 2014). **Small business employed half of the nation's workforce, and these numbers tend to under-reflect the employment picture in rural communities where small business tends to play an even more significant role.** Moreover, creating flexible, customized job positions is often easier in small businesses, which tend to lack the formal job descriptions found in larger companies (Griffin et. al., 2007). Overlooking small business imposes artificial limits on the employment opportunities available to job seekers with I/DD and other significant disabilities (Griffin et. al., 2007). Despite the employment opportunities small businesses can provide, employer research surveys and studies to date have focused almost exclusively on medium- and large-sized businesses. It is critical to expand research efforts to include small businesses, including non-employer firms. One size does not fit all when it comes to employers and **public system staff need guidance and support on effective practices for bringing small businesses to the table and customizing initiatives to meet the needs of businesses of any size.**

Addressing Training and Pipeline Issues

Society's chronically low expectations of individuals with significant disabilities have contributed to a mindset that ignores, underserves, and undermines them across all areas of their lives. This mindset has also severely constricted the development of innovative, out-of-the-box training opportunities. **Current training options are often dictated by service professionals, not individual choice, and lead many people with disabilities down the path to a predictable and restricted array of sub-minimum wage or entry-level employment outcomes.**

Productivity analysis as conducted in segregated work centers trap many people with significant disabilities in a vicious cycle. Low productivity evaluations based on antiquated methodologies reinforce the perception of limited capability and close the door to more advanced training opportunities as evidenced by the fact that only approximately 5% of employees earning sub-minimum wages ever leave sheltered work for competitive integrated employment (General Accounting Office, 2001). However, access to better training and different job tasks is often the very thing needed to positively impact job performance.

The net impact of this is that few individuals with significant disabilities think about building careers and achieving economic self-sufficiency (Shur et. al, 2009). Given the limited opportunities for people with significant disabilities to receive quality education, access

innovative training, secure higher-level employment, and live in the communities of their choice, employers specifically and society as a whole may have a very limited view of what individuals with I/DD and other significant disabilities can contribute as employees. **Individuals with significant disabilities must receive innovative, out-of-the-box training along with all necessary accommodations in order to achieve higher-level, better paying, and more secure employment.**

Employers that want to hire individuals with disabilities identify challenges with finding qualified applicants as a major barrier (Kessler, 2010). When employers reach out to AJCs, staff may not know applicants who live in the area or who have the necessary skillset, and the conversation stops there. Follow-up with these businesses must be prioritized as they open the door to business partnerships and reveal critical industry information. Businesses want to have potential employees in their human resource pipeline. A lack of applicants with relevant skills in any demand area may create the foundation for work-based learning experiences or paid internships within regional businesses that both provide training opportunities for job-seekers in high-need area as well as help businesses build their potential employee base. Public and private employment systems personnel need training to establish business partnerships and to support employers to develop these initiatives (Katz et. al., 2012; Kessler, 2010). Additionally, standards must be established that give individuals with significant disabilities priority access to these training opportunities.

Businesses also need support from competent and professional employment service providers that understand how businesses work and can support them to identify and address employment needs. Doing so requires extensive knowledge of both the business needs and the job seeker's skill sets and capacities. More traditional vocational evaluations tend to be ineffective for individuals with IDD or other significant disabilities; Discovery and other person-centered assessment processes allow employment service providers to identify and showcase to businesses what potential employees with IDD or other significant disabilities can do (Griffin et. al., 2007). **Walgreens identified that many potential employees with disabilities are unprepared for interviews and may emphasize what they cannot do versus what they can do.** Employment services personnel require training and technical assistance on all aspects of creating the job match as well as on providing quality job coaching onsite. **AMC believes that the services provided by job coaches are so significant that they can "make or break" an employee's ability to succeed on the job yet** found such significant variation in the quality of the job coaches working with employees in the FOCUS program that it began requiring all job coaches to sign a standard performance agreement.

Students with I/DD and other significant disabilities can greatly benefit from internships and mentoring experiences as well in order to prepare them for employment. WIOA allows AJCs and state VR agencies to allocate funds to create pathways to employment within local businesses

through work-based learning experiences, paid internships, and on-the-job training. However, at the present time, youth and young adults with I/DD and other significant disabilities are less likely to be offered these opportunities and more likely to participate in a standard job sampling of lower-skilled entry-level positions such as wiping tables, stocking shelves, and processing clothing.

The importance of high-quality training opportunities focused on teaching higher-level skills cannot be overstated. A key part of Walgreen’s success came from the company’s decision to focus on “Training Not Abilities” and to teach supervisors to manage the work instead of the employee’s disability. Focusing on the worker as a whole and the job that needed to be done enabled supervisors to more accurately pinpoint and address training and accommodation needs that might otherwise have been misinterpreted as disability-related performance issues. Walgreens also took a proactive and unprecedented approach by embedding training facilities within their South Carolina and Connecticut distribution centers. The training facilities were designed to replicate the actual work environment so that new employees were better able to transfer the skills learned during training. While this strategy would not work for all businesses, it does showcase the dual-benefit of creating training programs that allow job seekers to build skills while simultaneously creating a pipeline of qualified applicants.

Transportation Impacts Business Recruitment of Talent

Businesses face limitations in recruiting talent with I/DD or other significant disabilities when potential employees cannot travel to a worksite because they do not drive, lack public accessible transportation, or must deal with long commutes or very complicated routes.

Urban areas tend to have more public and private transportation options available, yet may not offer accessible or affordable options. Paratransit transportation services are designed to supplement other fixed-route transportation services for people with disabilities, but the focus on pick-up time versus drop-off time creates challenges for businesses that require employees or potential employees to arrive at specific times for job interviews or work (National Council on Disability, 2015). Transportation barriers must be addressed as a part of comprehensive plans to increase employment options for individuals with disabilities, and sufficient resources must be allocated to develop and implement transportation initiatives.

The lack of accessible and affordable transportation restricts employment opportunities and limits access to integrated competitive employment for many people with significant disabilities. In addition to the more commonly cited issues, such as accessibility and limited routes or hours of operation, individuals with I/DD or other significant disabilities and their family members cite additional concerns related to safety and appropriate treatment and communication. Research documents the devastating reality that individuals with significant disabilities can be subject to abuse and mistreatment when using public and private

transportation, which underscores the legitimacy and validity of these concerns (The Telegraph, 2011; Davis, 2011).

As policies, regulations, and grassroots efforts drive supports and services away from segregated settings and into the community, safe, accessible, and reliable transportation must become a priority. Dedicated initiatives and funds to ensure transportation to other community locations, including competitive, integrated employment, must be seen as a critical part of all capacity-building plans or efforts to support individuals through this transition will be severely undermined. In 2001, the GAO found that 97% of the employers holding special wage certificates offered or helped to coordinate transportation for workshop employees (General Accountability Office, 2001). In fact, one of the greatest marketing points provided by nonprofits that administer sheltered workshops is the provision of door-to-door transportation. Family members highly value these services because safety and treatment are less of concern. **The reality remains that these programs provide a stability of transport that is not guaranteed in the public transportation systems, and any initiatives to increase access to transportation must include measures for meeting these concerns head-on.**

Although large cities such as New York City, Los Angeles, and Chicago have major initiatives to improve inclusive transportation, including accessible taxis, midsize and rural communities have far more limited options for individuals with significant disabilities needing transportation for work. **Consequently, rural areas within the United States have had to be creative in developing transportation models such as the transportation voucher models, where individuals receive vouchers to subsidize the cost of transportation services** (National Council on Disability, 2015). Project sites created new options for transportation, such as creating systems of volunteer drivers, as well as build upon existing systems, e.g., negotiating trip rates or available hours (Association of Programs for Rural Independent Living, 2004; National Rural Assembly, 2011). **Over the first three years of the project, 117 people in rural communities obtained employment, and 85% of the rides provided were for work** (Association of Programs for Rural Independent Living, 2004).

Changes to funding options reduced or ended many voucher programs because local government entities and services providers in rural areas had to decide where funds will be used when voucher funds were merged in with other options, reducing or eliminating transportation options for many (National Council on Disability, 2015).

Obtaining funding to create or maintain transportation in rural areas is complicated and time consuming. **The process for funding must be streamlined so that a faster process can occur for grant review and decision-making, particularly within government funding entities.** The funding issues are critical. The NCD Report 2015 stresses the extreme lack of public transit in most rural communities along with the inequitable allocation of resources between urban and

rural areas and recommends that Congress and federal agencies place heightened emphasis on planning and funding rural transit options (National Council on Disability, 2015).

For many individuals with I/DD or other significant disabilities, family members, neighbors, or friends provide transportation to and from work, but transportation systems available to the non-disabled population should also be readily available to people with significant disabilities.

Access to transportation not only supports greater employment options, but also promotes and enhances independence – a highly valued outcome in its own right.

Partnerships with businesses can play an important role in transportation initiatives as well. Walgreens, for example, petitioned to have bus stops located near their distribution centers so that employees with I/DD and significant disabilities can travel to work with less trepidation. Employers, particularly large employers, have power within smaller communities, and advocates should not be afraid to invite them to the table during transportation negotiations. The bus stops near Walgreens ultimately benefited all employees and the company as a whole. In other examples, local businesses have provided shuttle buses for transportation from train stations and from other venues, but very few of these shuttles are accessible. Employers must be considered an ally in the transportation conversation, as ensuring reliable, accessible transportation benefits is a key part of building a reliable, consistent workforce.

Marketplace Dynamics Subcommittee Preliminary Recommendations

Please note that the Marketplace Dynamics Subcommittee is continuing to address all topic areas and will develop additional recommendations to include in the Final Report.

Changing the Narrative

1. Conduct a National Educational Campaign across the US utilizing specifically designated funds to educate the public, the public workforce system and businesses on the types of jobs individuals with ID, DD and other significant disabilities hold in integrated competitive employment settings. The Campaign must include a business-to-business component where businesses share their experiences related to job performance and expectations and how their employees with significant disabilities have performed and exceeded expectations. At a minimum, the campaign should target Chambers of Commerce, human resource organizations, various industry trade organizations, healthcare institutions system-wide, hospitality, retail, and other industries to dispel the negative myths and stereotypes frequently directed to people with significant disabilities and to emphasize their abilities to perform within the integrated competitive workforce. The Campaign should include funding for the development of new business-based resources and materials as well as the dissemination of existing resources.

Creating a Sustainable Culture of Inclusion

2. Business-to-business communication should take the highest priority where businesses that have successful “Workforce Diversity” model initiatives and are inclusive of people with I/ DD and other significant disabilities collaborate with businesses that have not as yet begun. The business-to-business communication should include development and dissemination of marketing materials that highlight the competitive advantage that stems from building a more inclusive workforce and showcase examples of businesses that have successfully integrated individuals with I/DD or other significant disabilities into their company culture. Marketing materials should represent and target businesses of all sizes and include both written communication as well as short, promotional videos that may include videos or news releases that have already been developed.

Building Better Business Partnerships

3. The Department of Labor Employment and Training Administration should issue guidance to AJCs and Workforce Development Boards on developing partnerships with other key stakeholders and using WIOA funding to develop and implement innovative outreach and education on “Disability Awareness” and communication skills and techniques on how best to work with people with significant disabilities. This information should be provided in one online centralized location.
4. The Secretaries of Labor and Education in combination with business organizations should initiate and Congress should fund a nation-wide educational campaign to assist AJCs, VR, WDBs and service providers on how to communicate with businesses in order to provide quality services and address the customized needs of individual businesses of all sizes. This educational campaign should include information on the services provided by each agency within the public workforce systems in order to enhance cross-agency-communication and reduce service duplication.
5. The Department of Labor should issue guidance to AJCs and WDBs on how to partner with Centers for Independent Living (CILs) located in areas near AJCs. CILs that hold expertise in employment of individuals with I/ DD and significant disabilities can assist AJC staff on-site to reinforce education on “Disability Awareness” and appropriate communication with people with significant disabilities, and provide technical assistance on community supports and accommodations.
6. The Secretaries of Health and Human Services and Labor should issue a recommendation to WDBs and to Congress that representatives from DD networks are appointed to each WDB at the state and local levels across the United States.

Addressing Training and Pipeline Issues

7. DSPs that are employment specialists, job coaches and job developers and service providers must be held accountable for quality provision of services across the spectrum of employment supports, including identifying potential employees' skills and strengths, facilitating connections with potential employers, preparing potential employees for interviews, assisting employers to identify possible high-quality job matches, and providing the necessary training and coaching once jobs are secured in a career that the employee wants to pursue.
8. Businesses should develop an agreement with Job Coaches that reflect the ethical values and expectations of the business and require job coaches to sign in order to ensure job coaches understand what the training needs are as specified by the employer. Departments of Labor, Education, and Health and Human Services should include this best practice in technical assistance to service providers and vocational rehabilitation agencies.
9. The Secretary of Labor should implement national training requirements and performance standards for all DSPs including employment specialists, job coaches, and other workforce developers that establish an educational curriculum, ethical guidelines and details training and support expectations. Training requirements should also include specific business-related information including a general overview of different markets and industries as well as recommendations and guidance from businesses that have successfully included individuals with I/DD or other significant disabilities into their workforce.
10. Ensure that individuals with I/DD and other significant disabilities receive priority access to training and internship opportunities available through AJCs, state VR agencies, and the school system while utilizing all possible funding resources including Pell Grants to ensure training opportunities occur.
11. Establish performance standards to hold service providers, schools, and colleges accountable in order to ensure the preparation of individuals with I/DD and other significant disabilities are ready to enter integrated competitive work in their communities. Agencies who do not meet performance standards should face funding cuts and/or suspension, discontinuation of services.

Transportation

12. By 2024, the Department of Transportation and allied state programs ensure that public transportation systems planning in both urban and rural areas of the United States are funded and developed to meet the needs of individuals with significant disabilities. This includes providing resources for travel training, safety mandates, and training to transportation vendors on appropriate communication, treatment and respect to

individuals with significant disabilities. Businesses that offer their own transportation services or supports must ensure that their transportation vendors are included in all training and educational information opportunities.

13. Provide incentives to plan and implement collaborative and innovative approaches to resolve transportation deficits. Work with local governments, chambers of commerce business representatives and other organizations representing people with significant disabilities to create individualized transit options that identify specific needs of individual communities and their population of people with significant disabilities. Seek guidance from key stakeholders knowledgeable of transportation deficits within both urban and rural public transportation systems while including individuals with significant disabilities and family members in this planning and implementation process.
14. Require public transit systems of all types to meet the ADA accessibility requirements while ensuring the accessibility needs of rural transportation systems is addressed and resolved.
15. Develop para-transit systems and other transit system options throughout rural America. Incentivize building accessible all-rider public transportation systems to minimize rider expenses.
16. Develop plans and implement cross-jurisdictional transportation in larger geographic areas in rural America across the United States so that transportation for people with I/DD and other significant disabilities is seamless and uninterrupted.
17. Prioritize access to public transportation for people with significant disabilities that apply for or hold jobs in integrated competitive workplaces. Individuals with disabilities who use paratransit services may have to call to schedule transportation on a daily basis; priority access would include the opportunity to create a standing order for individuals with significant disabilities that travel to and from their worksites. Additionally, paratransit transportation providers should guarantee drop-off times within fifteen minutes of employment start times unless there are extenuating circumstances such as severe weather conditions or accidents.

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