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Judith Creed Homes for Adult Independence, Inc. (JCHAI), a Pennsylvania provider of independent living services for adults with intellectual disabilities and autism and RespectAbility, a national nonprofit focused on best practices on WIOA, respectfully submit these comments on the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan. Governor Wolf and the taskforce that has created this plan have clearly studied the issues surrounding workforce barriers for people with disabilities and done an admirable job in creating a vision and plan for helping to surmount these barriers. Our group offers these suggestions to help make Pennsylvania a leader in employment for those with disabilities.

We were heartened to see the Commonwealth's commitment to Employment First principles. Competitive, integrated employment for people with disabilities is an essential goal for Pennsylvania. When looking at the numbers of people in Pennsylvania with a disability, their employment rates, and their dependence on entitlement programs, it is easy to see why your work is so important. This chart lays out statistics that lead to the inescapable conclusion that expanding job opportunities for people with disabilities is a win-win-win for employers, taxpayers and people with disabilities alike. It is good for employers because the loyalty, talent, and skills of workers with disabilities contribute to the employers' bottom line. It is good for the workforce system because improving services and supports for job seeker with disabilities will benefit others with different barriers to employment. It is good for people with disabilities who want the dignity, pride, friendships, independence and income that work provides.

Figure 1.

### Pennsylvania Performance Metrics on Jobs for PWDs



Gov. Tom Wolf (D)

- ❖ 75.6% of persons without disabilities aged 18 to 64 are employed.<sup>3</sup>
- ❖ 33.9% of PwDs aged 18 to 64 are employed.<sup>3</sup>
- ❖ Pennsylvania ranks 30<sup>th</sup> in the nation in terms of jobs for PWDs.
- ❖ **There is a 41.7 point difference between the Labor Force Participation Rate (LFPR) of PWDs and those without disabilities. This is the most important performance metric to measure as this gap must be reduced.**
- ❖ 59,000 persons aged 16 to 20 have a disability.<sup>1</sup>
- ❖ 831,700 persons aged 21 to 64 have a disability.<sup>1</sup>
- ❖ 1,689,123 persons with disabilities live in PA.<sup>3</sup>
- ❖ The employment gap between PwDs and people without disabilities has decreased by 0.4% between 2010 and 2011.<sup>3</sup>
- ❖ 464,275 PwDs aged 18 to 64 received SSDI or SSI benefits in 2012.<sup>3</sup>
- ❖ In 2012, total expenditure on SSDI benefits for PwDs was \$6,032,160,000.<sup>3</sup>
- ❖ Voc. Rehab. received 23,729 applicants in PA in 2012.<sup>3</sup>
- ❖ Voc. Rehab. obtained 9,939 jobs for PwDs in PA in 2012.<sup>2</sup>

1. 2012 Disability Status Report: Pennsylvania, [disabilitystatistics.org](http://disabilitystatistics.org)  
2. StateCerts: The National Report on Employment Services and Outcomes, 2013  
3. [Annual Disability Statistics Compendium](http://AnnualDisabilityStatistics/Compendium)

The Plan from does well in focusing on certain key elements for improving employment for people with disabilities:

- Beginning training for people with disabilities at an early age, focusing on ages 14 and older (see, e.g., pp. 108 et seq.).
- Including people with disabilities on Citizen Advisory Committees (p. 110)
- Setting the tone for employment of people with disabilities in government agencies (p. 112)
- Focusing on Industry Partnerships and Sector Strategies (Appendix XIV).
- Including the Labor Force Participation Rates of people with disabilities in the “summary of Pennsylvania’s labor force for 2014” (p. 22)

However, Pennsylvania has a lot to accomplish to improve our ranking in the country for employment of people with disabilities. Pennsylvania ranks 30<sup>th</sup> in the percent of people with disabilities employed (and these statistics include those employed in sheltered workshops and/or only working part time) (See Civilians with Disabilities Ages 18 to 64 Years Living in the Community for the United States and States: 2013 from the Annual Disability Statistics Compendium). Pennsylvania ranks 34<sup>th</sup> by the employment gap between people with disabilities employed versus people without disabilities employed. See id; see also <http://disabilitycompendium.org/archives/2014-compendium-statistics/employment>

The following suggestions for improvement are grouped by overarching concepts that we believe will be helpful for achieving our goal of employment for people with disabilities.

**I. Consider and Outline More Specifically the Types of Jobs that Are the Goal for People with Disabilities**

Much of the emphasis in this plan is given to High Priority Occupations (HPOs) or entry-level occupations that lead to HPOs. See, e.g., p. 8. Furthermore, the HPOs are considered most desirable because they lead to family-sustaining wages. See, e.g., Section 1, Goal 1, p. 9.

For people with disabilities, especially cognitive disabilities, the goal of entry-level employment may be sufficient in some cases. In addition, seeking employment for people with disabilities that will be self-sustaining, but not necessarily family-sustaining, is an important goal, and the emphasis throughout this plan on HPOs and family-sustaining wages makes the goal of competitive, integrated, potentially self-sustaining employment seem less important in the prioritization for this Plan. We would not want funds through this Plan for people with disabilities to be lessened because it might be less likely that they will lead to HPOs and family-sustaining wages. See, e.g., p. 15.

Moreover, in the description of priority of categories for people with disabilities, the priority of categories to receive vocational rehabilitation services is ordered by severity of disability. See pp. 135-37. That the most funds will go to those with the most significant disabilities makes it much less likely that those funds will lead to HPOs and family-sustaining wages. Again, the Plan’s focus on HPOs and family-sustaining wages as the priority could lead

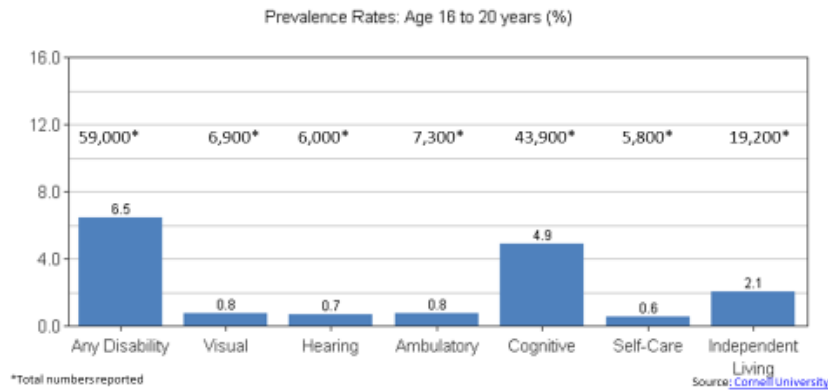
to fewer funds being distributed to the types of jobs that are likely to be appropriate for those with disabilities who are likely to be served under this Plan. See Section IV, Vocational Rehabilitation Programs, State Goals and Priorities, Goal ##1-3, pp. 135-36. Indeed, the state of Washington eliminated the use of priority of service and were able to eliminate a wait list of 14,000 people as a result.

Additionally, we suggest another consideration for the approach in the prioritization of those with disabilities who will be served under this Plan: a “Jackie Robinson” approach. As the first African-American to play major league baseball, Robinson tore down decades of discrimination and blazed a trail for other talented and diverse athletes to follow. Instead of focusing all the dollars in the Office of Vocational Rehabilitation (OVR)’s plan on people with the most significant disabilities who may have the biggest barriers to employment and may have the most difficult time overcoming them, focusing a larger share of dollars on people with less significant disabilities and therefore fewer barriers to employment may be more effective in terms of convincing the general public of the efficacy of competitive, integrated employment for people with disabilities. It also may result, as it did in Washington state, in larger numbers of people with disabilities from across the spectrum to achieve the goal of competitive, integrated employment.

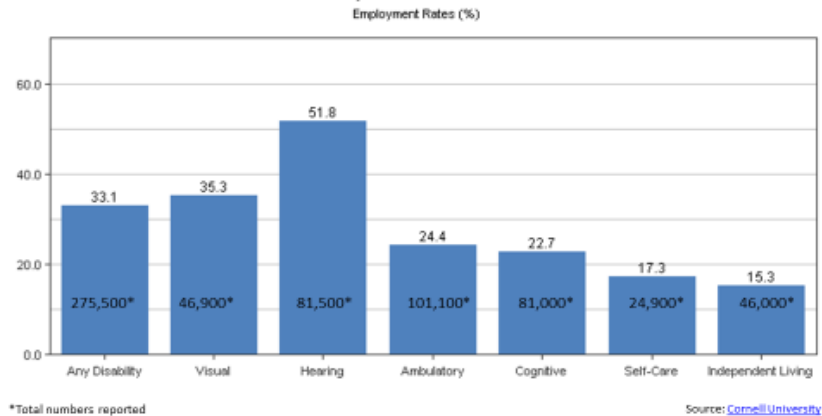
## **II. Monitor Youth with Disabilities by Disability to Better Analyze How to Increase Their Employment Rates**

A significant gap in the Plan data is that it fails to breakdown employment for people with disabilities by the type of disability they have. See, e.g., Section I, Economic Analysis; Section IV, Vocational Rehabilitation Programs, State’s Strategies, pp. 22-23; 145-57. Placing all people with disabilities into the same category to find methods of increasing employment for them will be ineffective. The tables below show examples of how diverse the population of people with disabilities in Pennsylvania is, and the differing impact their disabilities have on their employment potential:

**Figure 2.**  
**Prevalence of Disability Among Non-Institutionalized People Ages 16 to 20 in Pennsylvania in 2012**



**Figure 3.**  
**Employment of Non-Institutionalized Working-Age People (Ages 21 to 64) by Disability Status in Pennsylvania in 2012**



So, for instance, while 4.9% of people from the ages of 16-20 have a cognitive disability, by far the most common type of disability among that age group, as they get older, only 22.7% of those between ages 21-64 with a cognitive disability are employed. Therefore, it makes sense to focus efforts in determining how to increase employment among those with the most prevalent type of disability. Early training efforts, such as those mentioned in the plan throughout (see, e.g., pp. 15, 108-9, 115, 136-38), will yield the most results if they are tailored to address the issues for most of those with disabilities.

In fact, [Maryland’s WIOA Plan analyzes by region the correlation between people with disabilities and those who had Individualized Education Plans \(IEPs\)](#). Regionally, the data

showed that areas with a strong IEP system and more people who had IEPs in school, later had less dependence on entitlement benefits. In other words, early and strong education and vocational training will result in adults with disabilities who will be able to be more productive members of our community. Our Plan should include data that analyzes this correlation and seeks to ensure that the Department of Education is well-equipped to provide successful training. See Section II, Operational Planning Elements, Engagement with Educational Institutions and Leveraging Resources to Increase Educational Access, pp. 49-51; Section IV, Program Specific Requirements, Vocational Rehabilitation Programs, Coordination with Education Officials, pp. 116-9.

### **III. Ensure the best data points, including Labor Force Participation Rates of people with disabilities, are used as performance metrics.**

It is vital that the workforce system and the State Board include the labor force participation rates of people with disabilities on their state dashboards and performance metrics. Looking solely at unemployment information, decision makers are missing the bigger picture of those individuals with barriers to employment who are not actively seeking work. As an example of the data that is needed, we are including a link to, and a copy of, the presentation our organization has compiled about employment for Pennsylvanians with disabilities. This compilation contains information derived from the Census Bureau's American Community Survey that should be valuable to the WIOA work.

As mentioned in the opening section of our comments, one of these data points was included in the Combined State Plan. Specifically, the section providing "a summary of Pennsylvania's labor force for 2014 including data for veterans and persons with disabilities," includes the labor force participation rates. It is critical to ensure that these numbers are included in both the state dashboard and elsewhere in the WIOA Combined State Plan.

As stated in the opening sections of our comments, it is also critical to look at the employment gap between Pennsylvanians with and without disabilities. This is a critical metric and it is needed to ensure that barriers to employment are being overcome and positive outcomes are being achieved.

### **IV. Addressing Transportation Issues Is Critical to Improving Employment Outcomes**

The Plan recognizes how critical access to transportation is for improving employment outcomes for Pennsylvanians with barriers to employment. See, e.g., pp. 37, 103, 121, 146-47. But we cannot emphasize enough that employment outcomes for people with disabilities will not improve unless transportation access is improved.

[Paratransit is limited in its scope, the ability to drive or access to a car is limited for many people with disabilities, and walking safely or at all to a job may not be possible.](#) The Plan must set out a commitment to work with the Department of Transportation and the employers with whom they engage to determine innovative ways to help Pennsylvanians with disabilities

have reliable transportation for work. [In some case that might be mass transit or Paratransit. In other cases it might be new models with companies such as UBER. Indeed, UBER is also a potential form of self-employment for people with disabilities.](#)

#### V. Focus on Effective and Strategic Employer Engagements, Especially with Federal Contractors Around Section 503.

More emphasis is needed in the Plan around the employment opportunities and talent challenges created by the Section 503 regulations of the 1973 Rehabilitation Act and federal contractors. These regulations are only referred to in Section IV, Vocational Rehabilitation Programs, Evaluation and Reports of Progress: OVR and Supported Employment Goals (pp. 151, 155). We are pleased that Pennsylvania has already started to recognize the unprecedented opportunities surrounding the goal for federal contractors to have 7% of their workforce across each segment to be people with disabilities.

However, the Plan ought to address exactly which contractors will be targeted for training and other supports to help them reach this goal. In Pennsylvania, for example, the chart below shows employers who are the top federal contractors falling into the purview of the § 503 regulations:

**Which Employers in Your State Must Meet 503 Rules (Hire PwDs)?**

- ❖ Top contractors:
  - Bechtel Group INC.
  - The Boeing Company
  - Merck & Co INC.
  - Amerisourcebergen Corp.
  - Pfizer INC.

- Complete list → [fed spending website](#)  
[http://www.fedspending.org/feds/feds.php?stateCode=PA&sorter=&detail=-1&datatype=1&scriptures&database=feds&fiscal\\_year=2012&submit=GO](http://www.fedspending.org/feds/feds.php?stateCode=PA&sorter=&detail=-1&datatype=1&scriptures&database=feds&fiscal_year=2012&submit=GO)

- Complete federal lists of 2006-2013 → [Federal Procurement Data System website](#)  
[http://www.feds.gov/online\\_cms/index.php/en/reports/92-top-100-contractors-report13.html](http://www.feds.gov/online_cms/index.php/en/reports/92-top-100-contractors-report13.html)

- How to get started: Job Accommodation Network → <https://askjan.org/>  
US Business Leadership Network → <http://usbln.org/>

Section I, Goal 4 (p. 15); Section IV, Vocational Rehabilitation Programs, Coordination with Employers (p. 120), Section IV, Vocational Rehabilitation Programs, State’s Strategies, p. 140, and Appendix XIV are only a few places where focus should be spent on leveraging the § 503 mandates to achieve our goals.

## **VI. Do Not Leave People with Disabilities Out of STEM Goals**

The Plan acknowledges that one of the largest growth sectors in Pennsylvania is Healthcare See Section I, Economic Analysis, pp. 25, 27. More on that later as this is a key sector. Furthermore, goals of the plan in Section I, Goal 3, acknowledges in paragraph 3.9 that STEM training for out of school youth will be an effective way to increase employment outcomes under the Plan. However, people with disabilities are not discussed as being the target of STEM goals.

Given that many federal contractors as well as healthcare employers will need STEM trained employees, it is clear that many opportunities will exist for people with disabilities in these fields. Not targeting people with disabilities for STEM training opportunities will make them miss out on a large employment opportunity in Pennsylvania.

Partnerships should be created with federal contractors who have 503 requirements and talent shortages. The companies in the above table, as well as Lockheed Martin Corporation, and hospitals throughout the Commonwealth, will be prime candidates for these efforts. Through WIOA, Pennsylvania's workforce system should be leading the nation in terms of helping these dynamic businesses meet and exceed their Section 503 requirements.

At JCHAI, for example, we have begun a training program in building robots for those with intellectual disabilities and autism in our program in conjunction with the FIRST Robotics Competition and Lockheed Martin. Our first class taught rudimentary building skills as well as basic programming to our students. These skills are important to getting jobs in today's economy. People with disabilities should receive the same trainings as others in these fields.

## **VII. Focus on Sector Strategies to Get More People with Disabilities Employed**

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 which are rapidly expanding.

Section I, Economic Analysis (p. 20 et seq.) contains a detailed analysis of Pennsylvania's economy. The Plan states that "[g]rowth will be greatest in the Construction, Professional & Business Services, and Education & Health Services sectors." See p. 24.

Pennsylvania should (and does: see p. 15) place front and center proven training programs such as Project Search when helping those with disabilities get the training they need to be employed. Project Search has many sites in Pennsylvania that are primarily based in healthcare settings: one of the biggest areas of projected growth in Pennsylvania.

## PA Project SEARCH Sites

- ❖ Bryn Mawr Rehab Hospital, Malvern
- ❖ DeKa-East Penn Manufacturing Company, Inc., Lyon Station
- ❖ Good Shepherd Rehabilitation Network, Allentown
- ❖ Lancaster General Health, Lancaster
- ❖ Lankenau Hospital, Wynnewood
- ❖ Lehigh County, Allentown
- ❖ Phoenixville Hospital, Phoenixville
- ❖ UPMC Mercy Hospital, Pittsburgh
- ❖ UPMC NW, Seneca
- ❖ UPMC Passavant, Pittsburgh
- ❖ VA Medical Center (121), Lebanon
- ❖ WellSpan Health/York Hospital, York

Project SEARCH: [www.projectsearch.us](http://www.projectsearch.us)  
Contact Erin Riehle at [Erin.Riehle@cchmc.org](mailto:Erin.Riehle@cchmc.org)

JCHAI has successfully partnered with Project Search at its Lankenau site in Wynnewood to train several of our clients in employment skills that have resulted in their being employed long-term. We intend to continue this partnership and with more funding to Project Search, they would be able to expand their offerings into other growth industries in Pennsylvania.

The ARC of Pennsylvania has worked effectively with SAP and Specialisterne to pilot projects to promote the hiring of people with autism in technology fields. This program is a groundbreaking program that used human resource training, mentoring, and the hiring of small cohorts to promote the larger goal in ways that are being replicated throughout the country. See, e.g., <http://www.forbes.com/sites/robertszczerba/2016/01/19/this-visionary-may-completely-disrupt-the-tech-industry-as-we-know-it/#550e9200890e>. The program in the last year has been expanded to Towers Watson in Philadelphia as part of the Philadelphia Pilot Project. <http://www.paautism.org/phillyautismproject/Resources/Resource-Details/itemid/6103> Examples of these partnerships should be included in the Plan as well. See Section IV, Vocational Rehabilitation Programs, Coordination with Employers, pp. 120-21.

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 Governor Jack Markell is partnering with companies to employ more people on the autism spectrum in STEM jobs. Such examples need to be implemented by Pennsylvania



as well. 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 scientists, engineers, doctors and mathematicians.

### **VIII. Effective Employer Engagement Includes Involvement by the PABLN**

Our hope to see improving employment outcomes in Pennsylvania very much depends on being an employer-driven paradigm shift. Fundamentally, this law is about spurring innovation and expanding opportunity. There will be no outcomes in terms of employment for Pennsylvanians with disabilities without early, often, systematic, and aggressive business engagement.

Clearly, the Plan recognizes the importance of employer engagement. Throughout the Plan, sections reference the importance of employer involvement in developing pipelines of jobs. See, e.g., Section II, Coordination, Alignment and Provision of Services to Employers, pp. 49-50; Section IV, Vocational Rehabilitation Programs, Coordination with Employers, pp. 120-21.

Disturbingly, however, there are no references to one of the great resources in Pennsylvania, the Pennsylvania Business Leadership Network. In response to the business community's needs for a diverse set of qualified workers to fill its labor needs, meet its compliance requirements, and respond effectively to the needs of its diverse customers, AHEDD began coordinating a statewide business initiative, The Pennsylvania Business Leadership Network (PA BLN) in 2000. [The PA BLN is part of a national initiative that began in 1994 and that includes approximately 50 BLN affiliates throughout the country.](#) The national effort is now led by the USBLN (<http://usbln.org>), which has the support of a number of corporate partners. The PA BLN has piloted groundbreaking partnerships with Pennsylvania businesses, [including Hershey Resorts](#) and [Highmark, Inc.](#) Pennsylvania must utilize the depth of experience and knowledge that PA BLN has in onboarding Pennsylvania employers to the benefits and ease of increasing their disability diversity hiring practices.

### **IX. Busting Stigmas, Myths, and Misconceptions should be a key part of Pennsylvania's overall workforce strategy**

Low expectations and misconceptions are critical barriers 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.](#) We therefore recommend that the Pennsylvania's Combined State Plan be amended to include a comprehensive proactive communications/public relations

strategy for reducing such stigmas. Indeed, we know that other groups of Pennsylvanians with barriers to work also face stigmas, especially those leaving the corrections system. See, e.g., Section IV, Vocational Rehabilitation, State's Strategies, Goal #1: Increase Employment Opportunities for People with Disabilities, pp. 145-46 (could be added as #4 step for Goal #1).

The PA BLN has proven experience in successfully handling exactly these types of sensitive matters. They should be specifically referenced as a partner in achieving employment goals for Pennsylvanians with disabilities (pp. 120-21), even if utilizing them may not be in furtherance of the Single Point of Contact approach (p. 140). We are a large Commonwealth, with diverse employers and regions, and the Single Point of Contact approach may need to be modified to reach effectively the varied types of locations of employers in Pennsylvania.

While the approach needs to be adaptive, previous research 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/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. Hershey, Jefferson Hospital ([http://articles.philly.com/2014-11-29/news/56543664\\_1\\_speech-language-pathologist-disability-bosses](http://articles.philly.com/2014-11-29/news/56543664_1_speech-language-pathologist-disability-bosses)), Giant Eagle, and other Pennsylvania employers have seen that people with disabilities can be extremely capable and loyal workers. While there are few like Stephen Hawkings — with or without disabilities — people with disabilities can work highly successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and 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 implementers who can turn high minded policy and business goals into action at the ground level. However, studies show that many of them are afraid of what they do not know about people with disabilities. They are afraid of potential legal action, costs, or other failures. For them, they need supports that will empower to overcome their own fears and to excel at recruiting, hiring, supervising or working with teammates with disabilities. Pennsylvania's OVR 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. Moreover, online and in-person training is readily available to help from a variety of sources. RespectAbility has online webinars, as [does ASKJAN.org](http://www.askJAN.org), USDOL and others. Partners like [the Poses Family Foundation Workplace Initiative](http://www.theposesfamily.org) can provide training to the workforce staff and volunteers systems-wide as well as to community agencies in supporting companies through messaging efforts around related to fear and stigma. [The National](http://www.thenational.com)

[Organization on Disability](#) and the interested leadership of Former Governor Tom Ridge offer incredible resources and a powerful voice.

- C. People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectations must begin. It is vital to have Pennsylvania’s “Employment First” Policy supported by a PR campaign that will inspire Pennsylvanians with disabilities to reach for the stars.** For example, Virgin Airways founder Sir [Richard Branson](#) and finance wizard [Charles Schwab](#) are 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 an intentional manner moving forward.

**X. Ensure That All Programming Is Fully Accessible**

In several places throughout the Plan, various web-based outreach services are described as well as One-Stop Centers. See, e.g., Section III, Assessment of Programs and One-Stop Partners, pp. 57-59, Non-Discrimination and Accessibility, pp. 70-71, Section IV, Vocational Rehabilitation Programs, State’s Strategies, Goal #3: Increase community education and outreach, pp. 148-49. While physical accessibility is important and all physical locations should be fully accessible, ensuring that the workforce system is programmatically accessible will have a broader impact. As such, questions around closed captioning of training videos, website access for screen readers, and the availability of assistive technology for job seekers with disabilities are critical topics in need of close attention. There are signs that the collaboration needed to support assistive technology already exist. For example, on page 46, discuss how OVR in Pennsylvania collaborates with BWPO via PA CareerLink® centers to better assist veterans who have disabilities in obtaining assistive technology (AT) to remove barriers in locating and maintaining employment.” Further, page 71 of the Plan commits to a collaboration with the independent living movement to “evaluate the physical accessibility and information technology accessibility of all PA CareerLink® offices and services.” To do this well, it will be vital to be proactive, thoughtful, and use such a review as a chance to think about accessibility more deeply.

**XI. The Plan Appears to Target Efforts for People with Disabilities Solely Through OVR, Without Considering that Those with Disabilities Fall into Almost Every Other Group Addressed in the Plan.**

The Plan addresses boosting employment for what it appears to consider as distinct groups: Section I, Goal 3 seeks to “Increase Work-Based Learning Opportunities for Youth.”

See pp. 12-15. Although initiative 3.12 specifically addresses youth with disabilities, all the initiatives named in this section could be used for people with disabilities.

This same segregation of people with disabilities out of categories that apply to them as well occurs in considering programs for veterans, corrections education, and adult education. See pp. 67, 103, 229. Recognizing that goals may be achieved for people with disabilities across many programs will be essential to increasing employment opportunities for more people with disabilities.

## **XII. Facilitate Innovation in Vocational Services by Not Limiting Them to OVR Agencies or Particular Kinds of Credentialing**

The primary focus of the programs for people with disabilities under the Plan is through the Office of Vocational Rehabilitation. Section IV, Vocational Rehabilitation Programs (pp. 108-157). Although clearly the OVR has a great deal of experience in assisting Pennsylvanians with disabilities in finding and maintaining employment, other parts of the state government as well as other service providers have experience doing so. See, e.g., pp. 119, 120. To limit the development of innovative programming to change the employment landscape for people with disabilities to agencies that are already OVR contractors would be short-sighted.

Many providers work through the Department of Human Services to provide complementary services for people with disabilities and as a result, have experience in developing programming for gaining competitive, integrated employment for people with disabilities. Indeed, because the concept of Employment First is new in Pennsylvania, it may be that providers who are not already OVR contractors could have more ability to help increase competitive, integrated employment opportunities for Pennsylvanians with disabilities. Having onerous certification procedures could also be barriers to newer agencies becoming involved in our reaching our employment goals for Pennsylvania.

For example, at JCHAI, we have a 70% competitive, integrated employment rate for those of our clients who are interested in employment. We have been able to attain this rate because our staff uses varied approaches to helping our clients find and maintain their employment. However, our agency is not a contractor with OVR, but with the Office of Developmental Programs (ODP). Working hand in hand with other governmental agencies and private providers with relevant experience will help improve the chances of achieving higher rates of employment for Pennsylvanians with disabilities, while still ensuring quality provider involvement.

Furthermore, OVR's focus on particular credentials for those working to improve employment outcomes could be limiting and not necessarily promoting the most current techniques in vocational rehabilitation. The OVR Counselors, for example, must have a Master's Degree in Rehabilitation Counseling, Rehabilitation Administration, or Rehabilitation Education; or Certified Rehabilitation Counselor credentialing. See p. 126-27. There are other forms of training, including Discovery and Customized Employment trainings, that would be

more current to promote Employment First principles, and do not necessarily require the credentials called for in the Plan. Again, flexibility is key to promoting the innovation that is the hallmark of WIOA.

### **XIII. Finding Market Niches with High Turnover Jobs**

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 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 accommodations were far outweighed by the low turnover rates and better tenures of the employees with disabilities. Hospitals, elder care institutions, hotels, and distribution/supply chains including UPS, Walmart, and Walgreens have proven records of success. They can be outstanding partners for disability employment [as these industries suffer from high turnover rates](#) and [employees with disabilities are proven to have significantly higher retention rates](#). It is important to identify more specific opportunities with employers and to site them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future.

#### **a. Health and Elder Care – Challenges and Opportunities for People with disabilities**

Page 20 of Pennsylvania’s Combined State Plan, provides an overview of “Current State of the Pennsylvania Labor Market.” This section discusses in detail the challenge created by an aging population. “Simply stated, Pennsylvania’s population is growing older. The number of Pennsylvanians age 65 and over was 2.1 million in 2014. The state’s percentage of those aged 65 and over is the sixth highest in the nation (16.7 percent).”

This fact of an aging population creates both a challenge and an opportunity for Pennsylvania. As Baby Boomers age, the demand for healthcare will grow and with it, the talent needs of assisted living and elder care facilities. Training and preparing workers to meet those needs is a challenge, but one with a ready solution. We submit that people with disabilities are a natural labor resource that can be trained and prepared to meet this need. [There are numerous examples of young people with disabilities doing incredible work](#) in the fields of [healthcare, elderly care, and in assisted living](#). This is where the opportunity a serious, sustained expansion of Project SEARCH and other school to work transition programs can be beneficial to Pennsylvania’s economy and population. This is a natural opportunity that demands quick action and an investment in cost-effective programs.

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% success rate in transitioning students from high school into competitive employment” and “Project SEARCH sites in Upstate New York that have an impressive 83% success rate overall.”](#) The goal for each program participant is competitive employment.

**b. Logistics and Distribution Centers – Natural fit for people with differences.**

**Another sector with high turnover and big potential are distribution/supply chains.** 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](#), as well as [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.”](#) They can be outstanding partners for disability employment as these industries suffer from high turnover rates and PwDs 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. **Another great example is Starbucks.** Their [“Inclusion Academy”](#) has rapidly grown from just a pilot program in Carson Valley, NJ to a complete program at their largest roasting plant.

**c. Ensure that Apprenticeship Programs are Fully Accessible and Actively Recruiting Young People with Disabilities**

Registered apprenticeships, on-the-job training, and other training programs are critical examples of how to create a demand-drive talent pipeline through the workforce system. It is vital that such training programs be fully accessible to people with disabilities. At the federal level, the Office of Disability Employment Policy has worked hard to generate resources which 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 them need to refine and design training programs that maximally inclusive of people with diverse talents. [We encourage you to invest time and energy to understand the best practices contained in ODEP’s apprenticeship toolkit.](#)

Partnerships for apprenticeships and internship should be created with federal contractors who have 503 requirements and talent shortages. Pennsylvania should identify federal contractors with Section 503 requirements and have talent acquisition needs for partnership opportunities that can be win-win-win for employers, people with disabilities and taxpayers alike. Placing programs like the highly successful Project SEARCH program at Federal contractors can be worthwhile for non-STEM jobs as well.

**d. Hospitality and Hotels – An Great Opportunity for Expanding Project Search**

Employers working in this sector can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities. 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 have 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 the overall Sector Strategies for California.

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 that can enable Pennsylvania to improve employment outcomes for people with disabilities](#).

#### **XIV. Conclusion**

The undersigned organizations thank the taskforce that produced this Workforce Innovation and Opportunity Act Combined Plan for Pennsylvania. It starts a great roadmap to improving employment for all those who experiences barrier to productive employment. People with disabilities have been excluded from true employment opportunities for too long. But the bottom line is that expanding job opportunities for people with disabilities is win-win-win for employers, taxpayers and people with disabilities alike. It is good for employers because the loyalty, talent, and skills of workers with disabilities contribute to the employers’ bottom line. It is good for the workforce system because improving services and supports for job seekers with disabilities will benefit others with different barriers to employment. It is good for people with disabilities who want the dignity, pride, friendships, independence and income that work provides.

We are happy to answer any questions that you have and to help in any way that we can to turn the vision that we all hope to achieve into a reality.

Sincerely,

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