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Feb. 23, 2016

## RespectAbility – Public Comments – Alaska Combined State Plan

### Introduction:

RespectAbility is pleased to submit the following comments regarding the current draft of the State of Alaska's Combined State Plan as required under Section 102 of the Workforce Innovation and Opportunity Act (WIOA). We are pleased to have this opportunity to offer our comments, raise our questions, and provide our suggestions about the content of the state plan.

**Alaska ranks well above the national averages in terms of expanding competitive, integrated employment for people with disabilities.** According to the most recent publically available Census data, Alaska ranks 11<sup>th</sup> in the nation as measured by the employment rate of people with disabilities. **This is a reduction from the previous year. Fully 40.8% of the 44,674 working age people with disabilities are employed in Alaska. Currently there are 3,300 youth with disabilities between the ages of 16 and 21 living in Alaska. It is vital to have solid transition planning and programs in place so they have increasing chances to successfully transition into the world of work.**

Alaska has done substantial work done around improving employment opportunities for people with disabilities. However, while Alaska is seeing a dip in your employment numbers due to the evolving challenges of the energy sector, your state has consistently been working to improve outcomes. [Your state, along with others such as the Dakotas, Iowa, and Wyoming, has achieved relatively good results by the careful implementation of best practices and adoption of cost-effective models.](#) In other states we are also seeing pockets of excellence around innovative youth programs designed to address disability employment in [Georgia, Nevada, and Kentucky.](#)

The bottom line propelling your efforts is that expanding job opportunities for people with disabilities is a win-win-win for employers, taxpayers and people with disabilities alike. **To help the states succeed in this process we developed a resource called the Disability Employment First Planning Tool.** This document details best practices and effective models. Alaska is already implementing many of these models that are proven to work, be cost effective to implement, and be successful. [We have developed an extensive collection of data on disability and employment in Alaska.](#) That information is attached to our comments.

**The current draft of Alaska's Combined State Plan has many strong planning elements in it, on both the strategic and operational sides.** It creates a win-win-win strategy for vital improvements for Alaska's workforce system and its ability to serve people with barriers to work, employers and taxpayers alike. Further, it addresses the unique challenges created by vast geography and limited resources. **This draft plan will capitalize on the partnerships and collaborations necessary to empower transition age youth both with and without disabilities.** A fantastic example of the efforts discussed in the Combined State Plan is the "Alaska Youth Works" program. [This type of commitment to empowering youth with disabilities is exactly the type of best practices that we hope other states will emulate.](#)

We fully recognize that this draft has been written in the shadow cast by plummeting oil prices and the serious financial constraints this has created for Alaska's state government. However, markets are defined by cyclical patterns and the partnerships that shape Alaska's

workforce system are equipped to overcome ongoing challenges. For example, the growing talent needs of employers in the healthcare and social care supports remain a factor in need of a strong sector strategy. Additionally, in certain regions of the great state of Alaska, leisure and hospitality are key money makers.

Upon reviewing the current draft of the state plan there remain a few areas where improvements can be made to achieve the best results possible. **Our public comments on Alaska’s WIOA State Plan are structured around those points where greater clarity, precision, and data are needed to ensure that people with disabilities will be better equipped to pursue the American Dream.**

**1. Use the best data points, including the Labor Force Participation Rates of people with disabilities v. those without disabilities, as performance metrics:**

As we expressed in our introduction, Alaska’s employment rate for its citizens with disabilities is higher than the national average. **Alaska currently ranks 11<sup>th</sup> in the nation as measured by the employment rate of people with disabilities. Fully 40.8% of the 44,674 working age people with disabilities are employed in Alaska. However, when you look at the gap in the labor force participation rates (LFPR) between people with and without disabilities you find that Alaska ranks 6<sup>th</sup> in the country with only 35.3 point gap.**

However, despite those strong metrics, what data there is on Alaskans with disabilities is buried on page 85 of Part 2 which provides the Statewide Assessment and Annual Estimates of special populations with barriers to employment. While we are glad to see that the State Plan makes reference to 2014 data from American Community Survey, this information is not structured in a useful way. Greater precision is needed for the workforce system to evolve to tap into the labor resource that the disability community represents. While there are strong commitments around meeting the accessibility requirements under section 188 of WIOA, there are no statistics regarding the differing types of disabilities that Alaskans have. As such, there are several revisions that we would like to recommend.

As an initial step, we would recommend only expanding the data points included in the Statewide Assessment and Annual Estimates sections. **As such, we recommend that the State Plan be revised to reflect the different age groups that comprise the total number of Alaskans with disabilities. Instead of this single data point, this section need to distinguish between youth with disabilities between the ages of 16 and 20, working age people with disabilities between ages 21 and 64, and lastly aging American with disabilities over the age of 65.** Further, such information is needed in the Workforce Analysis section of the State Plan, not buried in the second half of the State Plan.

As we expressed in our introduction, Alaska already embodies many of the best practices that support higher employment rates for people with disabilities. However, sustaining future successes in terms of improve outcomes very much depends on making sure Alaska’s leaders have access to the right data. **It is vital that the workforce system and the State Board include the labor force participation rates of people with disabilities both in your state plan and on your system’s state dashboards.** While there are several references to the labor force participation rate in the current draft of Alaska’s Combined State Plan, this measure is not discussed in as much depth as in other state plans. On page 15 the State Plan does discuss the seasonal nature of labor force participation across much of the state. To quote that section “The labor force participation rates can be especially low in rural Alaska, during winter months, when

those actively seeking employment face seasonal variations in jobs, and commuting is not a viable option.” We recognize these challenges, however greater attention is needed.

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 Alaskans with disabilities.](#) This compilation contains information derived from the Census Bureau’s American Community Survey that should be valuable to the WIOA work being done in Alaska. **There remains a 35.3 point gap in between the labor force participation rates of people with and without disabilities in Alaska.** We have more to say on how this should be done later in our comments.

Additionally, because Alaska currently ranks 11<sup>th</sup> in the nation as measured by the employment rate of people with disabilities, it is highly illustrative to look at the experience of those with disabilities who are succeeding in the world of work. **From the 2013 data, we find that only 29.2 % of the 3,400 Alaskans who are blind or have vision loss are employed while 51% of the 9,400 with hearing differences are also employed. Given the progress with screen readers, Alaskans who are blind should have far better employment outcomes. Sadly, we also see that only 23.5% of Alaskans with intellectual or developmental disabilities are employed.** For this demographic, workforce solutions may take more time and resources. **However, there will be a considerable return on investment if Alaska workforce system expands successful school to work transition programs such as Project Search.** Alaska already has several such programs but there is a considerable need to expand the number, scope, and diversity of such sites. We have more to say on this point later in our public comments.

## **2. Busting Stigmas, Myths, and Misconceptions Should Be a Key Part of Alaska’s 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.](#)

**As such, we recommend that the Combined State Plan 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 are already 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 your state plan to look at [Disability Equality Index that assesses the inclusion and hiring efforts of major employers.](#) It was put together by 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.](#) However, it should be a component of Alaska planning and implementation of a serious business-to-business PR effort. The companies which scored 100% in the USBLN index 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/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, 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. A component of this type of outreach is the importance of celebrating good work done well. In the Vocational Rehabilitation section on page 70, the State Plan mentions “an award series recognizing Alaskan employers who, through their actions, policies and procedures, recognize the value employees with disabilities.” Such awards bring much needed media recognition and public visibility to key employer partners. We hope that this award series will continue in the years ahead.
- 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 supports that will empower them to overcome their own fears and to excel at recruiting, hiring, supervising, or working with teammates who have disabilities. Alaska’s 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](https://www.doesaskjan.org), USDOL and others. Partners like [the Poses Family Foundation Workplace Initiative](#) 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 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 expectation must begin. Alaska needs a public relations campaign that will inspire Alaskans with disabilities to set their hopes high, as low expectations and low self-esteem are a barrier to employment.** 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 moving forward.

As an example of the power and value of making the business care for hiring people with disabilities, we offer Alaska 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 of diverse employers such as EY, AT&T, and Kwik Trip offer insight in how to implement such a multilayered approach.

### **3. Strong Sector Strategies will be key to sustaining and improving employment outcomes for people with disabilities in Alaska:**

As required by WIOA Sec. 102(b)(1)(A), Alaska’s state plan must and does 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 which are rapidly expanding.

In terms of the planning elements of Alaska’s Combined State Plan, we would emphasize the critical importance of ensuring the people with disabilities are viewed as an untapped labor resource ready to be trained to meet Alaska’s growing talent needs. Those needs are best illustrated on page 9 in Table 1. Sample of Statewide Industry Sector Projections (2012-2022). In particular, this Table “illustrates significant growth in healthcare services and social care supports.” A plurality of the job growth in the next few years are concentrated in “Ambulatory Health Care Services”, “Health Care and Social Assistance”, “Hospitals.” These categories will account for 28.5%, 25.5%, and 20.1% of Alaskan job growth respectively.

The Combined State Plan goes on to discuss various ways the workforce development system can prepare workers for these fields. **However, the Plan does not take the next step and discuss how people with disabilities can be a pipeline of talent to meet this labor market need.** People with disabilities represent an untapped labor resource that can meet many of the diverse talent needs of Alaska’s growing job sectors. The jobs gains in these sectors offer a great opportunity for focused sector strategies sustain and to achieve improved employment outcomes for people with disabilities in Alaska.

#### **a. Health Care and Social Assistance can be a great careers for Alaskans with disabilities:**

The Labor Market Information presented during the public meetings held in Alaska back in November 2015 very succinctly and accurately show where Alaska is gaining jobs. [As reported on slide 7, looking at job growth by industry shows that Alaska will add over 11,000 healthcare jobs between now and 2022.](#)

**People with disabilities can and should be part of the solution to this critical demand in the labor market.** As stated in [a 2014 report from the Office of Disability Employment Policy \(ODEP\)](#), “[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 health and elder care can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities.**

Alaska already has several outstanding Project Search worksites that are creating successful pathways for students with intellectual and development disabilities to successfully transition into the workforce. [At the Providence Alaska Medical Center, Mat-Su Borough School and the Mat-Su Regional District, Project Search interns are learning critical skills and gaining needed experience for them to ultimately become successful](#). **These worksites all showcase how this model is well suited to meeting Alaska's growing talent needs in health care.**

**We recommend that Project Search be significantly expanded as they have done in Wisconsin, Florida and other states.** In the specific context of Alaska, there are two specific steps to be taken. **First, we encourage the Alaska to collaborate on recruiting additional hospitals as worksites for Project Search. Second, we also encourage VR and Special Education in Alaska to look beyond just hospital settings and consider the potential of placing Project Search interns in either elder care facilities or in hotels.**

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.

**We suggest that you look to follow the example set by the state of Wisconsin where they started with just three Project Search sites and are rapidly expanding to 27 worksites by the end of this year.** 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. Tourism and Hospitality as a sector for employees with disabilities to shine:**

Alaska is blessed with considerable natural beauty and because of that, tourism is a critical then that Tourism is a critical industry in several different regions. To quote page 16 of the Combined State Plan, "the Southeast, Gulf Coast, [and] Anchorage/Mat-Su" regions support "leisure and hospitality growth."

[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.

As such, we encourage Alaska's workforce system to look at ways to train people with disabilities to be successful in 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 your 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 for Alaska's workforce system.](#) Alaska's state workforce board, 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.

**c. In looking to support the oil, gas, mining, and maritime industries, don't neglect the Autism Advantage for STEM jobs:**

It is critical to look at the issue of preparing workers for careers in Science, Technology, Engineering and Mathematics (STEM). 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 Alaska 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 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.](#)" The need to fill STEM talent goes far beyond just federal contractors. [In New York State Governor Cuomo has ensured that magnet schools for STEM are located near IBM, a major STEM employer in their state.](#) Alaska could follow this model. Together, Alaska's workforce system and educational system 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.

**d. The school to work transition model and other job categories:**

As we emphasized before, retention and replacement are key cost drivers for many employers both in the lower 48 and in Alaska. For example, on page 11 in discussing Table 3. Projected Openings by Occupation (2012-2022), the Plan reports that over 6,000 project opening are “mostly due to lack of retention and replacement” of workers. In particular, the Table shows projections which include over 4,000 jobs as “Meat, Poultry, and Fish Cutters and Trimmers” and over 3,000 jobs for “Combined Food Preparation and Serving Workers.”

With the right alignment of job training, employment supports, and personal interest, some Alaskans with disabilities could be outstanding employees in these jobs. Recognize that many in the former category are seasonal, transitory jobs. Such jobs could be a source of early work experience for youth both with and without disabilities.

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

Alaska’s State Plan does not directly mention any of the opportunities created by the important rules surrounding the Rehabilitation Act of 1973. The State Plan omits the employment opportunities and talent challenges created by the recently implemented Section 503 regulations regarding federal contractors and subcontractors. Alaska plan does not discuss the new 7% utilization goal set for companies to recruit, hire, and retain qualified individuals with disabilities in all job categories.

This omission is particularly surprising given certain unique aspects of Alaska’s economy. As stated on page 5 of the Combined State Plan, “Alaska’s economy is heavily dependent on resource extraction industries – oil, gas and mining – **as well as federal government spending and jobs, which include a substantial number of military bases and installations.**” Given this fact, it is surprising to find that the only textual reference to Section 503 is buried in Part 2 of the State Plan on page 82. In that section, the Plan reports that “throughout the year, DVR staff participated in different continuing education, and web-based workshops, including... Sec 503 – Changing the Rules for Federal Contractors & Employers.” Section 503 might not be a huge source of opportunity for the scatter population of Alaskans with disabilities. However, Section 503 is a huge opportunity for Gulf Coast region of your state. As stated on page 16, this region “benefits from having a diversity of economic drivers: a large Coast Guard installation; missile defense facilities in Kodiak.” Surely, these installations have civilian sector supports and contractors. As such, Section 503 should be raised an opportunity for the regional planning in this area. Additionally, many of the biggest companies in Alaska are Native American owned and operated. These companies, due to a variety of factors, can easily meet and exceed their Section 503 requirements. However, the State Plan does not talk about this possibility.

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. Specific companies that should be included in your outreach efforts include Arctic Slope Regional Corporation, Tatitlek Corporation, Watterson Construction Company, Nana Regional Corporation INC., and Doyon Utilities LLC. [More detailed information regarding federal contracts in Alaska can be found here.](#)



**5. Standing up an affiliate chapter of the US Business Leadership Network could be a critical 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 which are barriers to employment.

Currently, Alaska does not have an affiliate chapter of the US Business Leadership Network (USBLN). This limits the flexibility and capability of Alaska 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 in Alaska would help to organize the “knowledge of community outreach, recruiting and interviewing, the accommodation process and barriers” needed to achieve improved outcomes. Currently, VR in Alaska has a network of businesses that 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.

Additionally, we would direct Alaska attention to 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 Iowa’s WIOA team with 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.

**6. Ensure that Apprenticeship Programs Are Fully Accessible and Actively Recruiting Young People with Disabilities:**

We are pleased that Alaska is strongly committed to expanding the vital opportunities that apprenticeship and on the job training can offer to young people. It is especially important that Alaska’s workforce system match that commitment with strong program design which will ensure full programmatic accessibility. As stated on page 26 of the State Plan, Alaska’s workforce system will work to “expand the use of registered apprenticeship...to help employers get the ready-for-work employees they need in high-demand entry-level jobs and give residents more opportunities to earn while they learn by following a career path to Alaska’s highest paying occupations in every region.”

An interesting example of the work being done around such efforts is the Alaska Transition Outreach Project (ATOP) overseen by DVR and EED. Your 3-5 day “camps” to help young people with disabilities get key information on transitioning from school to work are an innovative way to deal with rural challenges. We hope to learn more about that in the future.

We encourage your team to look at the resources available to open these dynamic training programs for Alaskans 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 they 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.](#) Lastly, in other states, we have found that no connections exist between state VR staff and the federal program officers responsible for the administration of apprenticeship resources. [As such, we highly recommend that the VR professionals in your state connect directly with the DOL ETA officers working on Apprenticeship in Alaska.](#) This is natural partnership that could easily align workforce needs and the talents of people with disabilities.

#### **7. 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 must also 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 your workforce system.

**Alaska 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, Alaska should be careful not to waste money trying to re-invent the wheel in creating online resources as [ASKJAN.org](#), [the US Department of Labor’s Office of Disability Employment](#) Policy, [our organization 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 and career plans. It will be helpful to collaborate with those groups however to ensure that the best tools are created to fit the training and information needs on these issues.

#### **8. Nothing About Us Without Us and a role for self-advocates in the workforce system:**

**Nothing About Us without Us” has long been a rallying cry for the one in five American who have a disability and it has implications for the workforce system.** Even a non-voting member of a WIB can bring critical perspectives that improve the WIB’s efforts. From our review of the text of the Unified State Plan, there is some flexibility in terms of membership on the State Workforce Investment Board (SWIB). **As such we recommend that your state plan look at adopting language which would include the placement of a representative from the disability community and a representative of your state’s VR system on your State Board.** Second, the State Plan could also direct local workforce boards to connect with local community organizations to recruit self-advocates to add their perspectives

#### **9. Strategic Engagement to Build a Mentor System for Customers of the Workforce System:**

**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 non-profits and faith-based organizations to play.** Local workforce development areas, for example, could be

encouraged to recruit volunteers from local faith communities or local non-profits. 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 is also important to note in terms of the SNAP and TANF programs that too many faith-based programs focus on giving out food without giving out 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.](#)

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

**There are several points where the current draft of Alaska Combined State Plan addresses the unique workforce challenges facing ex-offenders as they attempt to reenter society. However, these efforts need to be viewed through the lens of disability.** The reason why is simple. [According to recently published data from the Bureau of Justice Statistics, “An estimated 32% of prisoners and 40% 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. Given these statistics from the BJS, it is vital that your state identify how many of the individuals in the ex-offender pipeline have disabilities. Serving ex-offenders is a critical workforce development challenge and one that can only increase when disability is a factor and it is not addressed appropriately. The price paid for ignoring this issue are higher rates of recidivism and greater costs to society. Assessment tools are needed to identify disability issues as people enter the prison system. Doing so creates opportunities to address those issues productively. If people in the corrections system who will be released eventually are to be well served by Alaska's workforce system, then it is vital that disability issues be identified and addressed in a way that will help work successfully in the future.

#### **Conclusion:**

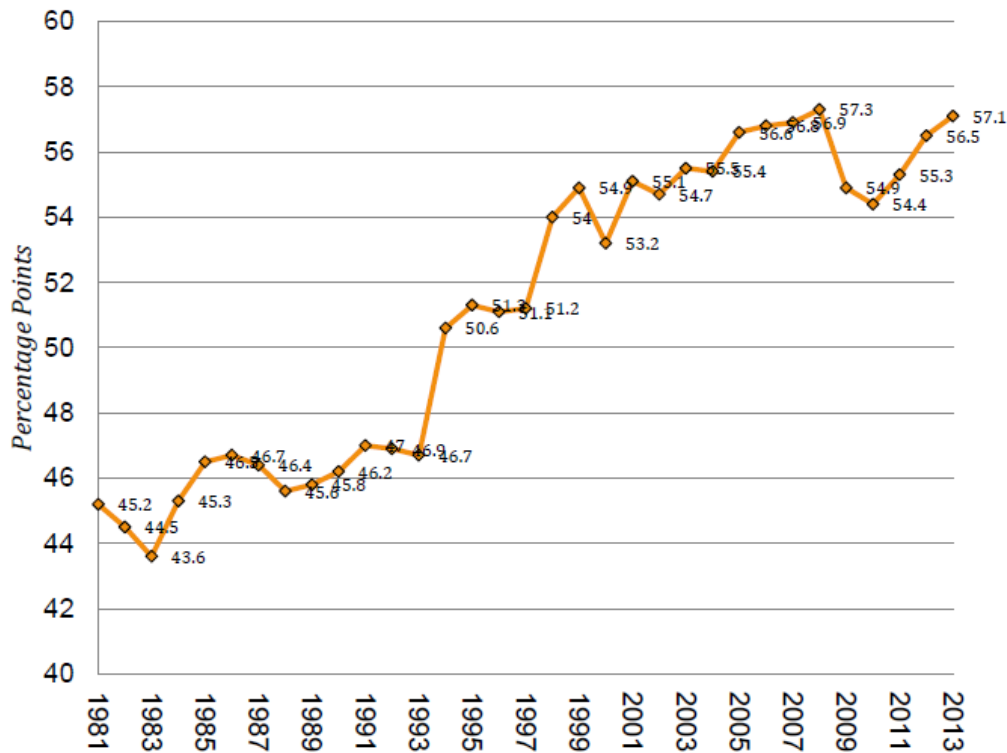
As we stated at the beginning of our Public Comments, we recognize that Alaska is facing significant economic shifts currently. Still, with strong work it has the opportunity to do an even better on jobs for people with disabilities. From the language of the Combined State Plan, there is a lot of innovative and dedicated work being done on workforce development. However, it is critical that these systems, supports, and services collaborate in order to train and prepare job seekers with disabilities to be the talent that employers need and become increasing successful members of society. Further, the challenges of the energy sector may be creating significant challenges at the moment, but, career pathways need ramps just as architecture does. The reason why this is imperative is simple. Alaskans with disabilities want to pursue the American Dream, just like everyone else.

Thanks to WIOA, Alaska has an opportunity to invest resources in successful models and implement best practices to expand job opportunities for people with disabilities. While we are concerned with some elements of the State Plan, we are also encouraged by the commitments made to serving youth with disabilities. Our public comments are focus on several critical factors that can help Alaska’s to sustain the employment outcomes you have achieve and move forward towards a better future.

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 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. We are happy to answer any questions you have and to help in any way.

We have included a chart below which looks at the gap in workforce participation between those with and without disabilities nationally over time. As seen in the chart, as women and minorities have been able to make significant strides in joining the workforce, people with disabilities have not. We know that by maximizing the potential of Alaska’s WIOA plan, all of this can continue to change for the better for the people of Alaska.

*Chart 1 – The gap nationally in workforce participation rates between people with disabilities and their non-disabled peers.*



Source for chart is the Disabilities Compendium.

Below are two data tables that provide detailed information ranking the states in terms of employment rates for people with disabilities as well as the employment gap between people with and without disabilities. This has been added to show you where Alaska ranks nationally and to showcase several of the data points needed in Alaska’s WIOA State Plan.

**Table 1 Ranking 50 States by Employment Rates and Employment Gap**

Data Source- Column 1: Table 2.1: Employment—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

Data Source-Column 2: Table 2.9: Employment Gap—Civilians Ages 18 to 64 Years Living in the Community for the United States and States, by Disability Status: 2013 from the Annual Disability Statistics Compendium

Link: <http://disabilitycompendium.org/compendium-statistics/employment>

<b>Column 1 Ranking of States by Employment Rate of People with Disabilities</b>			<b>Column 2 Ranking of States by the Employment Gap between People with disabilities and people without disabilities</b>				
<b>#</b>	<b>State</b>	<b>% of PWDs Employed</b>	<b>#</b>	<b>State</b>	<b>% of PWDs Employed</b>	<b>% of People without Disabilities Employed</b>	<b>Employment Gap as a %</b>
1	South Dakota	50.1	1	North Dakota	49.9	82.0	32.1
2	North Dakota	49.9	2	Nevada	40.9	74.3	33.4
3	Iowa	46.5	3	Utah	44.0	77.4	33.5
4	Nebraska	46.0	4	South Dakota	50.1	83.7	33.6
5	Wyoming	45.2	5	Hawaii	42.4	76.6	34.2
6	Minnesota	44.4	<b>6</b>	<b>Alaska</b>	<b>40.8</b>	<b>76.0</b>	<b>35.3</b>
7	Utah	44.0	7	Iowa	46.5	82.2	35.7
8	Hawaii	42.4	8	Wyoming	45.2	81.0	35.9
9	Colorado	41.6	9	Idaho	38.8	75.7	37.0
10	Nevada	40.9	10	Montana	40.5	77.7	37.3
<b>11</b>	<b>Alaska</b>	<b>40.8</b>	11	New Jersey	39.2	76.5	37.3
12	Montana	40.5	12	Texas	38.0	75.3	37.3

13	Connecticut	40.2	13	Colorado	41.6	79.1	37.4
14	New Hampshire	40.0	14	Connecticut	40.2	77.9	37.7
15	Kansas	39.8	15	Nebraska	46.0	83.9	37.9
16	Wisconsin	39.8	16	Washington	37.7	76.0	38.3
17	New Jersey	39.2	17	Minnesota	44.4	82.9	38.5
18	Maryland	39.1	18	Oregon	36.4	74.9	38.5
19	Idaho	38.8	19	California	33.3	72.2	38.9
20	Texas	38.0	20	Maryland	39.1	78.2	39.1
21	Washington	37.7	21	Oklahoma	36.4	75.6	39.2
22	Virginia	37.6	22	Arizona	32.8	72.5	39.7
23	Oklahoma	36.4	23	Kansas	39.8	79.7	39.9
24	Oregon	36.4	24	Illinois	35.7	75.7	40.0
25	Indiana	36.2	25	Virginia	37.6	77.6	40.0
26	Vermont	36.2	26	Louisiana	32.1	72.4	40.3
27	Illinois	35.7	27	New York	33.6	74.0	40.4
28	Delaware	35.6	28	Delaware	35.6	76.3	40.7
29	Massachusetts	35.5	29	Indiana	36.2	77.0	40.7
30	Ohio	34.6	30	New Mexico	30.4	71.2	40.8
31	Pennsylvania	34.5	31	New Hampshire	40.0	81.3	41.3
32	Rhode Island	33.9	32	Wisconsin	39.8	81.1	41.4
33	New York	33.6	33	Pennsylvania	34.5	76.5	42.0
34	California	33.3	34	Ohio	34.6	77.0	42.5
35	Arizona	32.8	35	North Carolina	31.3	74.3	43.0
36	Missouri	32.8	36	Mississippi	27.4	70.4	43.1
37	Maine	32.5	37	Florida	30.1	73.4	43.3
38	Louisiana	32.1	38	Georgia	29.6	73.1	43.5
39	North Carolina	31.3	39	Massachusetts	35.5	79.0	43.5

40	New Mexico	30.4	40	Rhode Island	33.9	77.7	43.8
41	Florida	30.1	41	Alabama	27.3	71.3	44.1
42	Tennessee	29.9	42	Vermont	36.2	80.4	44.2
43	Georgia	29.6	43	Missouri	32.8	77.2	44.4
44	Michigan	29.6	44	Tennessee	29.9	74.4	44.5
45	Arkansas	29.2	45	Arkansas	29.2	73.8	44.6
46	South Carolina	29.0	46	West Virginia	25.6	70.5	44.9
47	Mississippi	27.4	47	Michigan	29.6	74.6	45.0
48	Kentucky	27.3	48	South Carolina	29.0	74.0	45.0
49	Alabama	27.2	49	Kentucky	27.3	74.4	47.1
50	West Virginia	25.6	50	Maine	32.5	79.9	47.4

**Table 2**

From 2012 to 2013, the employment gap closed by one percentage point or more in 22 states.

The top four states with the greatest reductions (AK, RI, WY, and NH) were small states-- with working-age populations under one million persons. It is hard to make comments about small states, because these statistics are estimates based on state-level samples. Smaller states have smaller samples and thus have a higher degree of year-to-year variability. I am hesitant to read too much into reductions and expansions in the employment gap for small states.

Looking at large states-- with working-age populations over 5 million persons--Illinois (a 2.3 percentage point reduction) and New Jersey (a 1 percentage point reduction) stand out. These are two large industrial states

**All of the states that experienced reductions greater than one percentage point also experienced increases in employment rate of people with disabilities, so none of these reductions were due a reduction in the employment rate of people without disabilities.**

**The state that really stands out is South Carolina, with a 2.3 point reduction, while also having a 1.3 point increase in the employment rate of people without disabilities. The big question is whether we can attribute success, like the success in South Carolina to changes in policy or new innovative approaches to employing people with disabilities.**

Working-age population under 1 million
Working-age population over 5 million
Increase in no dis employment

State	2012			2013			Change in Gap		Pop in 2013			Increase in Dis. Emp.	Increase in Non-PWD Emp.
	Dis.	No Dis.	Gap	Dis.	No Dis.	Gap	Pct. Points	Rank	Number	Rank	Size		
AK	39.0	76.3	37.3	47.8	75.2	27.4	-9.9	50	459,776	47	Working-age pop. under 1 million	8.8	-1.1
RI	28.7	77.0	48.3	34.3	76.3	42.0	-6.3	49	668,448	43	Working-age pop. under 1 million	5.6	-0.7
WY	43.9	78.5	34.6	50.7	79.4	28.7	-5.9	48	358,526	50	Working-age pop. under 1 million	6.8	0.9
NH	37.9	80.5	42.6	41.8	80.3	38.5	-4.1	47	842,880	40	Working-age pop. under 1 million	3.9	-0.2
MN	42.1	81.6	39.6	46.0	82.1	36.1	-3.5	46	3,357,171	21		3.9	0.5
NV	35.5	72.2	36.7	39.2	73.1	33.9	-2.8	45	1,719,885	34		3.7	0.9
WI	37.6	79.5	41.9	40.9	80.1	39.2	-2.7	44	3,544,103	20		3.3	0.6
SC	<b>27.0</b>	<b>71.4</b>	<b>44.4</b>	<b>30.7</b>	<b>72.7</b>	<b>41.9</b>	<b>-2.5</b>	<b>42</b>	<b>2,893,842</b>	<b>24</b>		<b>3.7</b>	<b>1.3</b>
NM	33.1	70.4	37.3	35.3	70.1	34.8	-2.5	42	1,243,353	36		2.2	-0.3
<b>IL</b>	<b>33.4</b>	<b>74.6</b>	<b>41.2</b>	<b>36.1</b>	<b>75.0</b>	<b>38.9</b>	<b>-2.3</b>	<b>41</b>	<b>8,010,771</b>	<b>5</b>	<b>Working-age pop. over 5 million</b>	<b>2.7</b>	<b>0.4</b>
IA	42.0	81.4	39.5	44.8	82.1	37.2	-2.3	40	1,868,852	30		2.8	0.7
UT	41.1	77.2	36.1	42.5	76.6	34.1	-2.0	39	1,701,705	35		1.4	-0.6
DE	34.6	75.1	40.6	36.4	75.1	38.7	-1.9	38	565,138	45	Working-age population under 1 million	1.8	0
CO	40.3	77.1	36.8	42.3	77.3	35.0	-1.8	36	3,304,940	22		2.0	0.2
HI	37.3	75.6	38.3	39.1	75.7	36.5	-1.8	36	822,542	42	Working-age population under 1 million	1.8	0.1
NE	43.5	82.2	38.7	45.5	82.6	37.1	-1.6	35	1,125,425	38		2.0	0.4
ND	51.6	83.3	31.7	52.8	83.1	30.2	-1.5	34	451,304	48	Working-age population under 1 million	1.2	-0.2



KS	40.1	78.8	38.7	41.7	79.0	37.3	-1.4	33	1,730,369	33		1.6	0.2
MA	33.0	77.2	44.2	34.9	77.9	42.9	-1.3	31	4,272,843	14		1.9	0.7
OK	34.4	75.1	40.7	35.8	75.2	39.4	-1.3	31	2,295,734	28		1.4	0.1
TN	28.0	73.2	45.2	29.9	74.1	44.1	-1.1	30	3,983,560	16		1.9	0.9
<b>NJ</b>	<b>35.0</b>	<b>74.5</b>	<b>39.5</b>	<b>36.6</b>	<b>75.1</b>	<b>38.5</b>	<b>-1.0</b>	<b>29</b>	<b>5,528,837</b>	<b>11</b>	<b>Working-age pop. over 5 million</b>	<b>1.6</b>	<b>0.6</b>
TX	37.0	73.8	36.9	38.7	74.7	36.0	-0.9	28	#####	2	Working-age pop. over 5 million	1.7	0.9
FL	28.9	71.4	42.5	30.5	72.2	41.7	-0.8	27	#####	4	Working-age pop. over 5 million	1.6	0.8
NY	30.9	72.7	41.8	32.2	73.3	41.1	-0.7	26	#####	3	Working-age pop. over 5 million	1.3	0.6
AL	26.8	70.8	44.0	27.1	70.5	43.4	-0.6	25	2,945,466	23		0.3	-0.3
GA	30.3	70.8	40.5	31.5	71.5	40.0	-0.5	22	6,151,890	8	Working-age pop. over 5 million	1.2	0.7
CT	39.7	76.6	36.9	40.0	76.4	36.4	-0.5	22	2,235,695	29		0.3	-0.2
WV	24.3	70.1	45.8	25.3	70.6	45.3	-0.5	22	1,132,703	37		1.0	0.5
WA	35.7	74.3	38.7	36.4	74.7	38.3	-0.4	21	4,339,199	13		0.7	0.4
PA	33.0	75.1	42.1	33.9	75.6	41.7	-0.4	20	7,849,516	6	Working-age pop. over 5 million	0.9	0.5
MT	38.7	76.4	37.7	39.4	76.8	37.4	-0.3	19	616,125	44	Working-age pop. under 1 million	0.7	0.4
MI	27.9	71.7	43.8	29.9	73.4	43.5	-0.3	18	6,096,761	9	Working-age pop. over 5 million	2.0	1.7
MS	26.4	69.6	43.3	26.3	69.4	43.1	-0.2	17	1,790,746	31		-0.1	-0.2
CA	31.8	70.2	38.5	32.7	71.1	38.4	-0.1	15	#####	1	Working-age pop. over 5 million	0.9	0.9
VA	36.3	76.5	40.1	36.9	76.9	40.0	-0.1	15	5,112,923	12	Working-age pop. over 5 million	0.6	0.4
KY	26.2	72.9	46.7	26.9	73.7	46.8	0.1	14	2,687,179	26		0.7	0.8

OH	32.8	75.1	42.2	33.5	75.9	42.4	0.2	13	7,072,114	7	Working-age pop. over 5 million	0.7	0.8
MO	32.2	76.2	44.0	33.0	77.1	44.2	0.2	12	3,666,019	19		0.8	0.9
MD	39.5	77.4	37.9	40.0	78.3	38.2	0.3	11	3,722,201	18		0.5	0.9
IN	33.5	75.5	41.9	33.8	76.0	42.3	0.4	10	4,008,950	15		0.3	0.5
VT	34.3	79.8	45.5	33.3	79.6	46.3	0.8	9	397,726	49	Working-age pop under 1 million	-1.0	-0.2
AZ	34.2	71.0	36.8	33.6	71.3	37.7	0.9	8	3,900,900	17		-0.6	0.3
OR	34.3	72.1	37.8	35.2	73.9	38.8	1.0	7	2,440,752	27		0.9	1.8
NC	30.2	72.2	42.0	30.3	73.5	43.2	1.2	6	6,000,202	10	Working-age pop. over 5 million	0.1	1.3
ID	38.6	74.8	36.2	36.7	75.2	38.5	2.3	5	946,943	39	Working-age pop. under 1 million	-1.9	0.4
ME	33.2	78.1	44.8	31.2	78.8	47.6	2.8	4	825,507	41	Working-age pop. under 1 million	-2.0	0.7
LA	34.4	72.6	38.2	31.3	72.4	41.1	2.9	3	2,825,101	25		-3.1	-0.2
AR	31.4	72.7	41.3	28.2	72.7	44.5	3.2	2	1,759,900	32		-3.2	0
SD	52.0	81.8	29.8	48.1	83.0	34.9	5.1	1	501,769	46	Working-age pop. under 1 million	-3.9	1.2

##