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Jan. 15, 2016

## RespectAbility – Public Comments – California Unified State Plan

*There are more than 1.9 million working-age Californians with disabilities that can play a positive role in our workforce and contribute to the well-being of our state. In a time when employment is so vital, it is important for employers to realize the benefits of providing job opportunities to persons with disabilities.*

- [Governor Jerry Brown in his 2012 National Disability Awareness Month Proclamation](#)

### Introduction

RespectAbility is pleased to submit the following comments regarding the current draft of the State of California's Unified 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 California's state plan.

**California can and must do better in terms of competitive, integrated employment for people with disabilities.** Despite the Golden State's abundant resources and vast population, California only ranks 36<sup>th</sup> in the country in terms of their employment rate of people with disabilities. **Only 32.7% of the 1,793,900 working age Californians with disabilities are employed. Further, there are over 115,000 youth with disabilities and each year a quarter of them will age out of school into an uncertain future.**

Because California has the largest economy and largest population of any state in the Union, the rest of our nation looks to it for leadership. **Thanks to WIOA, California has the chance to lead by example in terms of investing resources in successful models and implement best practices to expand job opportunities for people with disabilities.** California has much to learn from other states that have worked hard to achieve improved employment outcomes. Other states have higher than 50% employment rates for their citizens with disabilities. [States like the Dakotas, Alaska, and Wyoming have achieved increase results by putting best practices into places.](#) The experience of these states shows ways that California can dramatically improve their outcomes with the right choices. **Likewise, we are also seeing pockets of excellence around innovative youth programs designed to address disability employment in Georgia, Nevada, and Kentucky.**

**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. This toolkit contains models that are proven to work, be cost effective to implement, and be successful. [Likewise, we have developed an extensive collection of data on disability and employment in California.](#) That information is attached to our comments.

Our public comments on California's WIOA State Plan focus on those areas where the State of California can better address the workforce needs of people with disabilities. **The Seven Policy Strategies outlined in California's Draft Unified State Plan need to be matched up to best practices, accurate data, and adequate resources to ensure that people with disabilities will be better equipped to pursue the American Dream.** From the accessibility of the workforce system to employer engagement to investing in transition programs for youth with disabilities, our comments are intended to help California push hard to see improved integrated

employment outcomes for Californians with disabilities. Whether Californians with disabilities, especially youth, successfully enter the workforce will be the ultimate test of California's efforts to implement WIOA.

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

Starting on page 29, California's Draft WIOA Unified State Plan discusses inequality in terms of race, ethnicity, and age. Yet disability status is not included in this analysis and is only discussed ten pages later in a separate section. **Currently, California ranks 36<sup>th</sup> in the nation in terms of jobs for people with disabilities and only 32.7% of 1,793,900 working age Californians with disabilities are employed. Moreover, there is a 38.4 point gap between the labor force participation rate of Californians with disabilities (32.7%) and those without disabilities (71.4%). These poor outcomes are the very definition of inequality and must be specifically monitored in your performance metrics.**

We are pleased there is a section that considers both the unemployment and labor force participation rates of Californians with disabilities in your draft. **However, the statistics cited by the California WIOA State Plan miss a critical distinction in terms of people with disabilities. The figure cited in the state plan, "2.9 million Californians with a disability", DOES NOT make any distinction between working age people with disabilities and older Americans who age into disability.** The figure below, taken from the extensive data we have prepared provides a quick snapshot of the challenge and opportunities currently facing the disability community in California.

Figure 1.  
California Performance Metrics on Jobs for PWDs



Gov. Jerry Brown (D)

- ❖ 71.1% of persons without disabilities aged 18 to 64 are employed.<sup>3</sup>
- ❖ **32.7% of PwDs aged 18 to 64 in CA are employed.<sup>3</sup>**
- ❖ **California is 36<sup>th</sup> in the country in terms of jobs for PWDs.<sup>3</sup>**
- ❖ **There is a 38.4 point gap 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.**
- ❖ 115,600 persons aged 16 to 20 have a disability.<sup>1</sup>
- ❖ 1,793,900 persons aged 21 to 64 have a disability.<sup>1</sup>
- ❖ 4,019,882 civilians in CA have a disability.<sup>3</sup>
- ❖ 807,945 people ages 18-64 received SSDI or SSI benefits in the year 2012.<sup>3</sup>
- ❖ In 2012, total expenditure on SSDI benefits in CA for PwDs was \$10,723,392,000.<sup>3</sup>
- ❖ Voc. Rehab. obtained 11,187 jobs for PwDs in CA in 2012.<sup>2</sup>
- ❖ Voc. Rehab. received 37,009 general applicants in CA in 2012.<sup>3</sup>

1. 2012 Disability Status Report: California, [disabilitystatistics.org](http://disabilitystatistics.org)

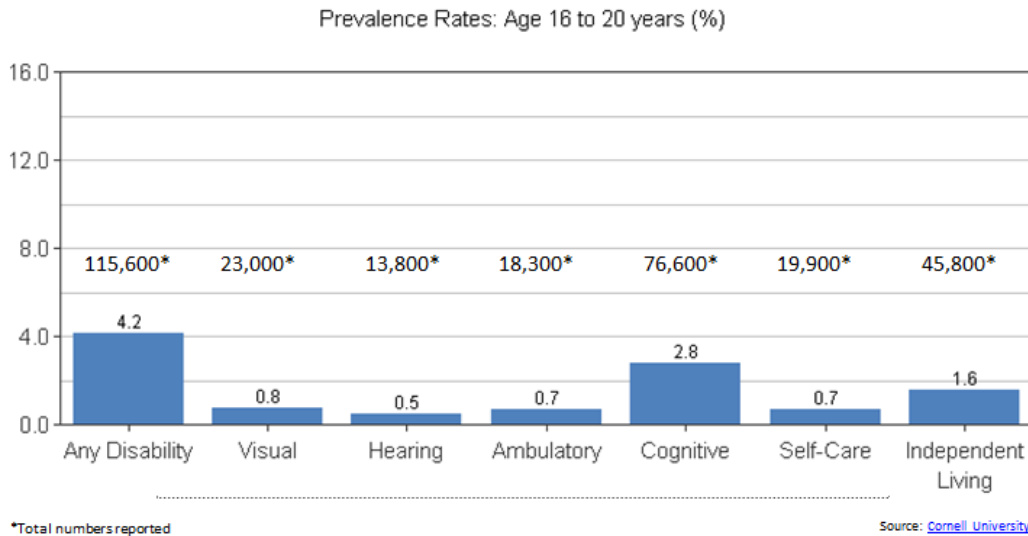
2. StateData: The National Report on Employment Services and Outcomes, 2013

3. [Annual Disability Statistics Compendium](#)

**Additionally, it is vital to monitor the employment rates of young people with disabilities by type of disability.** For example, because of dramatic breakthroughs in assistive technology, employment rates for people who are hearing and or sight impaired, should dramatically improve is California plans and executes well on helping them succeed.

To illustrate this point, we have attached the figure below which provides a breakdown of the type of disabilities among California’s approximately 115,000 youth with disabilities.

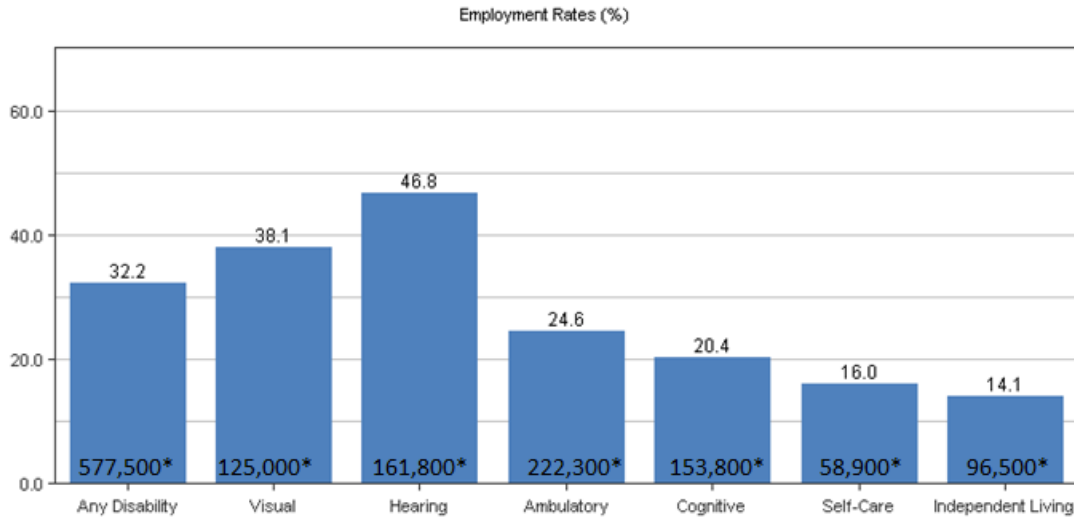
**Figure 2.**  
**Prevalence of Disability Among Non-Institutionalized People**  
**Ages 16 to 20 in California in 2012**



**This level of detail and data is critical if California’s workforce system is to be fully prepared to overcome the barriers that keep far too many job seekers with disabilities out of the workforce.** For example, thanks to assistive technology, the 23,000 young Californians with visual difference can enter the workforce in greater numbers than ever before. Likewise for the 13,800 young people with hearing disabilities, technological solutions such as speech to text software can easily integrate them into a work setting with their non-disabled peers.

**While California currently only ranks 36<sup>th</sup> in the nation in terms of the employment rate for people with disabilities, it is still critical to look at the experience of those with disabilities who are succeeding in the world of work.** The figure below provides an illustration of the current employment rates of working age Californians with disabilities by disability type. **From the data, we see that 38% of the 125,000 California who are blind or have vision loss are employed while 46% of people with hearing differences are also employed.** Given the flexibility and availability of assistive technology solutions, the employment rate for this subgroup should be much higher. People who are blind or deaf have incredible talents that can be unleashed by something as simple as a smartphone. **Sadly, we also see that only 20% of Californians 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 California’s workforce system invests in and expands successful school to work transition programs.** For example, serving this population, Project Search sites have been achieving a 70% employment outcome for people with these types of differences.

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



\*Total numbers reported

Source: [Cornell University](#)

To further underscore the intersectionality of inequality, poverty, and disability, we would also like to add the following chart. This graphic from our state data presentation about California shows the strong correlations between unemployment, disability status, poverty, smoking, and obesity. We hope that such data will better inform the decision making process.

**Figure 4.**  
**California Data on Poverty, Smoking, Obesity, & Employment**

		People with Disabilities (%)		People without Disabilities (%)	
		<b>2012</b>	<b>2013</b>	<b>2012</b>	<b>2013</b>
Poverty <sup>1</sup>	US	29.2	28.7	13.6	13.6
	CA	27.8	27.2	14.6	14.6
Smoking <sup>1</sup>	US	26.0	25.4	16.9	16.2
	CA	19.0	18.4	10.4	10.7
Obesity <sup>1</sup>	US	39.1	40.1	24.5	25.0
	CA	36.8	34.6	21.6	21.3
Employment <sup>1</sup>	US	32.7	33.9	73.6	74.2
	CA	31.8	32.7	70.2	71.1

1. [Annual Disability Statistics Compendium](#). Pg 53, 54, 72, 73, 29

Precision is needed when using statistics to advance policy proposals. We hope that these important details will be revised as California’s WIOA State Plan moves forward. It is also missing the GAP in the labor force participation rates between people with and without disabilities.

RespectAbility is pleased to see that there is some discussion of California's "labor force participation rate" in the analysis of "Unemployment and Labor Force Data Post-Recession." WIOA puts a great emphasis on performance metrics, data sharing, and accountability.

**However, if performance metrics are limited to things like unemployment statistics, then people who are not actively looking for work are being excluded from the plan's analysis of the state economy.** Fortunately, the current draft of California's WIOA State Plan considers labor -force participation rate which provides insight into the challenges facing people with barriers to employment. We hope that this discussion reflects the inclusion of such data on the state dashboards and metrics being used to assess WIOA in California. If not, [here is a link to the presentation our organization has compiled with the types of data needed to inform decision making around job opportunities for Californians with disabilities](#). This collection, which is also attached to our public comments, contains data derived from the Census Bureau.

The efforts of CDOR and their collaborations with other components of the workforce system in California need to be data-driven and focused on best practices. In terms of data, [there are multiple sources](#), from [universities](#) to [research foundations](#) to [the federal government](#) that provide in-depth data that is freely available and can be very useful. Further, [our organization has developed extensive data about disability, employment, workforce participation, and resources that can be used to empower more Californians with disabilities](#). We hope that CDOR and the other elements of the workforce system will make extensive use of these resources.

## **2. Busting the stigma, myths, and misconceptions should be part of California'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 Combined State Plan be amended to include a communications/public relations strategy for reducing such stigmas.**

[A great example of the business case for disability inclusion is provided by Walgreens who has demonstrated that workers with disabilities in their distribution centers are as productive, safer, and turn over less when compared to peers without disabilities](#). Several sections of the Plan talk about outreach to business with a focus on educating employers about how the workforce system can train job seekers to meet their labor needs. The unique talents and tremendous skills of employees with disabilities need to be a key part of that conversation.

This type of effort needs to begin at the highest levels of state government. In other states, **Governors have been incredible role models on this front – bringing media to best practices of inclusive employment**. Governors Jack Markell of Delaware, Jay Inslee of Washington, and Scott Walker of Wisconsin have all done this extensively. The media appearances made by these Governors have been vital in demonstrating the business case for hiring people with disabilities. **This type of systematic and ongoing communications campaign must continue if you want to maximize your success.**

It is also critical that California VR staff and community agencies be prepared to support companies in dealing with their specific fears and stigmas. **Partners like the Poses Family Foundation Workplace Initiative can provide training to CDOR staff as well as community agencies in supporting California companies through messaging efforts around related to fear and stigma.**

We live in a world where perceptions are shaped at lightning speed by social media, entertainment and news. Any campaign needs a multilayered approach in order to change the narrative around workers with disabilities so that they are seen for the abilities that they bring to the table. **Given this fact and the billions of dollars of revenue that Hollywood brings to the California economy every year, it is vital that we see more positive media portrayals of the lives of people with disabilities.**

Already, great things are happening in this space. Recently, A&E Network premiered a new original docu-series called “*Born This Way*,” following a group of seven young adults born with Down syndrome along with their family and friends in Southern California. This show was a landmark project for the simple fact that it showed above all else that people with disabilities, including those with Down syndrome, can work successfully and live relatively independently. The six-episode series from Bunim-Murray Productions has a million viewers and has already been renewed for a second season. **The viewership and renewal of A&E’s new reality television *Born this Way* proves that there a market and a hunger for positive media portrayals of the lives of people with disabilities and their families.**

The USC Annenberg Hollywood, Health & Society program (HH&S) which helps script writers get health and humanity issues right can be utilized to bring characters with disabilities into scripted television in a positive way. See <https://hollywoodhealthandsociety.org>. Since 2001, through a cooperative agreement with the CDC, HH&S has informed hundreds of aired storylines across dozens of network, cable and online streaming channels on topics like obesity, diabetes, cancer, HIV testing and more. **The state of California could grant funds for them to do specific work so that script writers also put people with disabilities (PwDs) into roles of responsibility and respect in the future.** It is vital for the public to get used to seeing PwDs as doctors, nurses, hospital attendees and much more.

### **3. Focus on Effective and Strategic Employer Engagements, Especially with Federal Contractors around Section 503**

More emphasis is needed in California’s Unified State Plan around the employment opportunities and talent challenges created by the Section 503 regulations and federal contractors. [California’s Plan as written contains only minimal references to the new 7% utilization goal set for companies to recruit, hire, and retain qualified individuals with disabilities in all job categories.](#) Given the priority placed on Sector Strategies by the Unified State Plan and the vast number of employers doing business with the Federal government, this is a huge opportunity to outcomes for people with disabilities.

**California needs to respond to the opportunity created by Section 503 with a strategy focused on competitive advantage, not just compliance.** For example, it is encouraging to see that California’s Department of Rehabilitation on page 54 of their section of the State Plan discusses the need to “identify and approach businesses that have public contracts with requirements for the hiring of individuals with disabilities.” **However, 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.

#### **4. Ensure the Accessibility of Science, Technology, Engineering and Mathematics (STEM) Programs and Careers for People with Disabilities, especially Students with IEPs.**

The current draft of the WIOA State Plan emphasizes that “the drivers of California’s economy have been in the high technology and information services subsectors (including social media), international trade, and in the recovering housing market.” Further, the largest number of job gains has been “occurring in the professional, scientific, and technical services subsector.”

The numbers outlined in Table 1 on page 19 of the State Plan make clear the fast growing numbers of jobs in these fields. As Carol Glazer said, writing earlier this year 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.”](#)

**Federal contractors and other employers have huge demands for STEM qualified talents. However, many schools place their best supports for students with disabilities in schools that do not have strong STEM training.** This is a huge loss as people on the Autism Spectrum, for example, 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.](#)” These experiences and partnerships offer insights into how to challenge employer perceptions, recruit diverse talent, and ultimately put people to work. Delaware’s Governor Jack Markell has led the way in partnering with companies to employ more people on the autism spectrum. Such examples need to be implemented by California. **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 work to ensure people with disabilities have the chance to become future scientists, engineers, and mathematicians.**

Partnerships should be created with federal contractors who have 503 requirements and talent shortages. **California is lucky to be home to some of the largest and most important Federal Contractors including Lockheed Martin Corporation, The Boeing Company, Northrop Grumman Corporation, Health Net, and General Atomic Technologies Corporation.** Through WIOA, California’s workforce system should be leading the nation in terms of helping these dynamic businesses meet and exceed their Section 503 requirements.

The California Department of Rehabilitation (CDOR) has a critical role to play in acting as that catalyst in the future. **At a minimum, the CDOR sections of the Unified State Plan should be amended to ensure that CDOR are fully trained in all 503 regulations.** In order to ensure that such knowledge does not get trapped in a silo, CDOR staff should be prepared to act as consultants to help businesses meet the 503 regulations while simultaneously building disability inclusion projects that are integrated into companies’ overall diversity strategies.

#### **5. Examine the Gap in Performance Metrics between California and other states like Alaska, the Dakotas, Wyoming, and Iowa.**

Other states facing a variety of challenges have higher than 50% employment rates for their citizens with disabilities. [States like the Dakotas, Alaska, and Wyoming have achieved incredible results by putting best practices into places.](#) Fully 52% of North Dakotans with disabilities are employed, as are 50% of Wyomingites with disabilities and 48% of South Dakotans with disabilities. These states show that California can dramatically improve their outcomes with the right choices. **Likewise, we are also seeing pockets of excellence around**

**innovative youth programs designed to address disability employment in [Georgia](#), [Nevada](#), and [Kentucky](#). 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. This toolkit contains models that are proven to work, be cost effective to implement, and be successful at employing people with disabilities.

## **6. Focus on Sector Strategies to Get More PWDs 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.

As required by WIOA Sec. 102(b)(1)(A), Chapter 1 of California's WIOA State Plan contains a detailed analysis of the Golden State's economy. It does much to catalog that damage done by the Great Recession and the continuing challenge of expanding the economy in the years that followed. On page 17, "four industry sectors" are identified as having "driven the expansion." Those sectors are: "professional and business services; educational and health services; leisure and hospitality; and construction." **We submit that most of these are job sectors where people with disabilities can excel and benefit their employer's bottom line.** As example of how California can do this, we would recommend that California look at disability employment programs that have helped hotels and resorts meet their talent needs in other states. **The draft of California's WIOA state plan indicates that "leisure and hospitality" is a key industry sector propelling the state's economic growth. 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 California to improve employment outcomes for people with disabilities.](#) The California State 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.

Further, job growth in the sector "leisure and hospitality" should also be considered to include "entertainment" since California is the leader in the entertainment industry. Billions of dollars of revenue flow through California to create, produce, and publish media for cultural markets across the globe. Employment for people with disabilities should be a factor in supporting the talent needs of the entertainment industry as should increasing positive media portrayals of people. See our previous comments on stigma reduction for more information.

The untapped potential of California's 1,793,900 working age people with disabilities is so vast that a full-spectrum, all-of-the-above-and-more approach is needed. **Not only should**



California be working to get more people with disabilities employed in hospitality and healthcare, the workforce system should also be looking to expanding disability employment programs in the supply chain and distribution sector. We recommend this given the incredible work we have seen by employer who are making employees with disabilities part of their efforts to become more efficient, productive, and competitive.

[A great example of the business case for disability inclusion is provided by Walgreens who 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](#) (just to name a few) 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."](#) 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. **Supply chain continues to be a sector that embraces disability inclusion, and the knowledge of the benefits to companies of inclusion are spreading to other industries.**

#### **7. Improve School to Work Transitions for YWDs – Including an disability employment programs in Hotels, Hospitals, and Elder Care Facilities**

**There is a significant need for the State of California to expand Project Search to train, prepare, and transition more young people with disabilities into the workforce.**

Nationally, each year approximately 2,700 such young people, spread out in 45 states, do a one-year, school-to-work program that takes place entirely at the workplace. This innovative, business-led model features total workplace immersion, which facilitates a seamless combination of classroom instruction, career exploration, and worksite-based training and support. The goal for each program participant is competitive employment.

Already, there are several successful Project Search sites that provide valuable examples of the skills and abilities young people with intellectual and developmental disabilities possess. [Several hospitals in the state of California have already benefitted from the pipeline of talent created by Project SEARCH's business model.](#) Youth who have gone through this innovative model have proven themselves to be incredible assets in settings such as the [Harbor Regional Center](#) and [Kaiser Permanente South Bay](#). **Remarkable work of this kind depends on collaboration and partnerships, both key tenants of the paradigm shift of WIOA.**

Project Search sites 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."](#)** These are the types of successful outcomes that California should be working hard to achieve.

#### **8. Avoid the Opportunity Costs of focusing exclusively One-Stop Centers / American Job Centers Should be Mobile and Online**

One of our most significant concerns with the current draft of the Unified State Plan is the prioritization of One-Stops as the primary access point for programs and services under WIOA in California. **Focusing exhaustively on One-Stop Centers, physical infrastructure, and co-locating services comes at the opportunity cost of losing the chance to improve**

**supports and increase outcomes.** Public policy is about the allocation of scarce resources to meet infinite needs. Especially in a state with as vast a population and complex an economy as California, it is vital to invest resources on those points where they can have the greatest effect.

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

## **9. Overcome the gap between disability services and career services in Secondary Education.**

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

The result is a price we pay as a society is twofold. First, it costs employers who are unable to find qualified job candidates. Second, it costs students with disabilities who may be able to graduate with a degree thanks to accommodations but will go on to struggle to succeed in the working world. Nationally, there are 1.3 million young Americans ages 16-20 with disabilities. [They have high expectations to go into the workforce but currently only 53% of college graduates with disabilities are employed](#) as opposed to 84% of graduates with no disability. In total, only about 7% of people with disabilities will earn a college degree and less than half of the 2.3 million with a degree are employed.

[Due to the mandate created by Section 503 of the Rehabilitation Act, federal contractors now have a utilization goal to make sure that 7% of their employees across all job groups be qualified people with disabilities.](#) **This regulation is actually a huge opportunity because companies are actively looking to hire recent graduates with disabilities.** The first place for new recruits is college and campus recruiting. **California must demonstrate to business that college students with disabilities are on campuses and that they should be actively targeting those with disabilities just as they do all other diversity recruiting on college campuses.**

While the statistics cited above are national ones, they have bearing on the work that needs to be done through the California community college system. **Beyond just WIOA, community colleges are uniquely positioned to innovate in order to expand opportunity.** Unlike four-year institutions, community colleges are more closely connected to the working world and the specific training requirements of employers. **This intersection should be of great interest to the work of the California State Workforce Development Board and the other components of California’s workforce system.** As the Golden State looks to triangulate

between employer needs, skills training, and recruiting workers; it will do well to remember the importance of getting students with disabilities connected to career services and prepared for the workplace.

#### **10. Ensure that Apprenticeship Programs in California are Fully Accessible and Actively Recruiting Young People with Disabilities**

The depth of work done in preparing the current draft of California's WIOA State Plan is the extensive cataloging of the strengths and weaknesses found in Chapter 2. Of note is the section on page 56 which discusses California's Department of Industrial Relation and the Division of Apprenticeship Standards. As stated early in the Plan, registered apprenticeships are to "a key facet and focus of the State Plan." Such training programs will be the critical link to reaching the ambitious goal of producing "a million "middle skill" industry valued credentials between 2016 and 2026."

**We strongly emphasize to the State Workforce Board to consider the vital opportunity that apprenticeship training and credentialing can offer to young people with disabilities in California.** 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 both the Board and the Division of Apprenticeship Standards to invest time and energy to understand the best practices contained in ODEP's apprenticeship toolkit.](#) From this section of the plan, the Division is already aware of the need to recruit people of diverse abilities and background into these types of programs. ODEP's toolkit is a key that can help unlock this puzzle.

#### **11. Prioritize pre-employment training, maximize Accelerator Fund Efforts, and expand partnerships with VR**

As much as we would encourage California to follow Wisconsin's example by working hard to expand the number of Project SEARCH sites, this is not the only paradigm that the Golden State should follow. **The school system, vocational rehabilitation, and local workforce boards should be encouraged to build creative, collaborative partnerships with companies that are leading in the disability space such as Amazon, UPS, and Pepsi.**

**A great example of the type of effort that California can follow comes from UPS in Louisville, Kentucky.** At one of the global logistics company's busiest facilities in a training program dedicated to preparing youth with disabilities to succeed. [The Transitional Learning Center is the result of a partnership between an employer, the school system, and vocational rehabilitation.](#) **Pre-training programs are great because they offer the opportunity to train youth with disabilities in the soft skills they need to succeed and provide them with a foundation of work experience.**

We are also particularly encouraged by the discussion of the Service Delivery Initiatives being financed through the Workforce Accelerator Fund. These resources have great potential to be used to fundamentally improve employment outcomes. **To begin with, we would highly recommend that the State Board examine how to support disability employment efforts through establishment of public/private partnerships in local communities.** For example, such partnerships could be a tremendous asset to the work of the local WIBs that will be doing so

much under the regional planning focus of California's Unified State Plan. **These types of partnerships could focus on the "cluster" model, started by Poses Family Foundation that is having tremendous success in diverse states as Nevada, Georgia, and Ohio.** [This model depends on "consortium of employers committed to implement or expand programs to employ individuals with disabilities", "a public/private partnership to coordinate services for job-seekers with disabilities, with a single point of contact for employers", and "Connections among employers, public and private agencies, and schools to reach young adults with disabilities who are in transition from school to work."](#) The Workforce Accelerator Fund could easily start the work necessary to make this happen.

**Further, the experiences of Georgia's vocational rehabilitation agency could inform that efforts of CDOR.** Prompted by WIOA, GVRA is designing a new service delivery model to serve young people with disabilities both in and out of school. The model, which is being developed in partnership with Georgia's Department of Education and Workforce Development division, will be piloted in five school districts in 2016, and then offered to every school in the state. **The model will build on the state's existing Career Pathways curriculum, directing students with disabilities into high-demand career pathways and comprehensive work-based learning experiences with employer partners in each school district.** Beyond this effort, GVRA sees WIOA as an opportunity to re-structure the agency to serve many more Georgians with disabilities and to increase its placement and retention rates. Poses Family Foundations has been working to meet GVRA's training needs and could easily provide similar support in California.

## **12. Effective employer engagement depends on the USBLN and focusing on the right business audience.**

**Our hope to see improving employment outcomes in California very much depends on being an employer driven paradigm shift.** Yes, there are new rules and regulations, but this law is fundamentally about spurring innovation and expanding opportunity. **There will be no outcomes in terms employment for Californians with disabilities without early, often, systematic, and aggressive business engagement.**

There are some signs that the Unified State Plan addresses these challenges. For example, one of the strategies discussed is the idea of offering businesses "a 'menu' of CDOR services...when conducting outreach to local business partners." Such outreach will only be effective if CDOR collaborates with the right partners, speaks the right language, and targets the right audience. **In terms of partnership, CDOR activities in this space really ought to be coordinated with the local boards.** Local WIBs, especially under California's unique State Plan, are vital partners in working to make the workforce system more accessible to people with disabilities. **Likewise, the two affiliate chapters of the United States Business Leadership network can and must be part of this process.** As stated by the USBLN itself, ["affiliates engage in networking discussions to increase their knowledge of community outreach, recruiting and interviewing, the accommodation process, and barriers to employment."](#) This is a natural collaboration that needs to happen.

We emphasize the business case for hiring people with disabilities again and again for a simple reason. **Government action alone--even through vocation rehabilitation -- is insufficient to improve employment outcomes for Californians with disabilities.** The necessary condition for achieving greater competitive, integrated employment for individuals with disabilities is engaging employers and meeting their talent needs.

**Our perspective as an organization is that engaging employers is very much a communication challenge that can be overcome by reaching the right audience with the right message.** In the case of disability employment, there are actually two audiences that have to be reached. **The first half is the CEOs or leaders with policy making authority. The second are the hiring managers and on-the-ground supervisors.** The right message for CEOs or other leaders of a company in the business case for their specific company around how to overcome stigma, alleviate fears, and integrate disability into the talent pipeline.

**To reach the leaders in an employer, they need support with understanding the business case for their specific company plus dealing with their fear/stigma at the top level.** Hiring managers and supervisors are the key implementers who will turn high minded policy into action at the ground level. 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.

### **13. Adopt a “Jackie Robinson” Strategy to Improve Outcomes for Youth with Barriers to Employment**

The catastrophic employment outcomes for youth discussed in the Youth Employment Trends section on page 39 suggest that radically improved policies, practices, and investments are needed in California. While we hope the WIOA will improve employment opportunities and training for all youth, it is especially critical for youth with disabilities that California abandoned the failed policies of the past. **In particular, we hope California’s workforce system will seriously consider that attitudinal barriers, stigma, myths, and misconceptions about people with disabilities are a critical obstacle in the push for improved employment outcomes.** [Our perspective as an organization is that the barriers created by stigma will be broken by using what we call a “Jackie Robinson Strategy.”](#) 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. **The Jackie Robinson strategy suggests that strategic triage is needed.** This perspective has significant consequences for the California Department of Rehabilitation which has been laboring under an Order of Selection for far too many years. While it is important to have pathways to success for people who have been long-term unemployed or in sheltered workshops, we also need to achieve early wins. The greatest focus and largest efforts need to be where there will be a serious return on investment for employers. **Helping young people with disabilities to successfully transition into the workforce will create a path for those who may have a greater need for employment supports to also succeed.** California can do this by focusing WIOA resources on what works best – [early interventions](#), paid internships, [academic internships](#), [connecting youth with apprenticeships](#), [job coaching](#), and other best practices.

**As we stated at the beginning of our public comments, there are over 115,000 youth with disabilities and each year a quarter of them will age out of school into an uncertain future.** This figure includes people with a wide range of different disabilities. For the sake of strategic planning in the workforce system, it is important to look closely at the different subpopulations with the disability community because one size does not fit all when it comes to employment opportunities. It is also worth noting that the solutions to these barriers to employment are rapidly evolving. **For example, ten years ago, it would have been very difficult for people with visual or hearing disabilities to be fully integrated in the workplace.** Now, thanks to assistive technology such as speech to text software or screen reader

software can easily accommodate visual or hearing differences. For the 23,000 young Californians who are blind or have limited vision, training to use JAWs or other screen reader software can give them the skills to enter the workplace. Likewise, for 13,800 young people with hearing disabilities between the ages of 16 and 20, speech to text software or smart phones can help them communicate with their nondisabled peers. These are simple solutions that can overcome significant barriers. As such, they are issues that are very focus under the prevue of California's workforce system. We raise these to showcase ways to employment barriers in a cost-effective and replicable manner.

The issue of adequate resources for CDOR is clear from the discussion in the Unified State Plan about California's Order of Selection. **In terms of accessing more resources, leaders in the workforce system in California should look at connecting with private-sector and philanthropic resources to complement public-sector funding with short-term pilots, innovative ideas, or evaluations and studies.** Successful models in Delaware, [Nevada](#), and [other states show how improved employment outcomes can be achieved through collaboration and cooperation](#) with philanthropy.

**The Poses Family Foundation's philanthropic efforts in workforce development and disability employment has been incredible at creating system in such diverse states as Ohio, Missouri, and Georgia.** The change they have helped to develop and sustained is doing remarkable, creative work. The models followed in these states offer significant hope for California to dramatically improve their outcomes.

#### **14. People with disabilities are can be ideal talent as California's population ages and Baby Boomers leave gaps in the workforce.**

Pages 21 through 23 of the draft of California's Unified State Plan contain very helpful information about projected job growth in the Golden State. As stated above, many of the sectors projected to undergo significant growth are the kinds of job sectors where people with disabilities, with appropriate training and early work experiences, can succeed. One factor fueling this growth will be the retirement and aging of Baby Boomers. **As demand for health care grows and more aging Americans exit the workforce, RespectAbility submits that people with disabilities are a natural labor resource that should be tapped to meet these economic trends.**

To quote 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.** There are numerous examples of young people with disabilities doing incredible work [in the fields of healthcare, elderly care, and in assisted living](#). Project Search sites in California generally today are in hospitals but there is great growth potential for them in nursing homes, senior living facilities and at hotels.

Likewise, the seven out of ten Californians with disabilities who want to work but are not yet working represent an untapped talent pool which should be channeled into the gaps created in the workforce by Baby Boomers. As such, we recommend that the Plan be amended to consider what role Californians with disabilities can play in the future workforce.

#### **15. 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](#), [Wal-Mart](#), 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.

#### **16. Regional Planning efforts need to include planning for disability employment efforts.**

The emphasis on regional organization and planning throughout the draft WIOA Unified State Plan creates unique challenges in the drive for improved employment outcomes for Californians with disabilities. **While regional differences needed to be accounted for, guiding this entire process needs to be a unifying vision and clear sense of what works.** The diversity of regions and economic opportunities in California create many challenges, but the solutions to those challenges can have common features. For example, [RespectAbility collaborated with a range of other organizations to develop a resource called the Disability Employment First Planning Tool](#). This document details best practices and effective models. This toolkit contains models that are proven to work, be cost effective to implement, and be successful at employing people with disabilities. These practices can be adapted and applied to meet the unique challenges created by the emphasis on regional organization in California's Draft State Plan.

**Given its' vast population, agriculture is a huge employment pathway that should be fully accessible to Californians with disabilities.** [There is a significant opportunity through WIOA to build on and expand on TIAA-CREF's Fruits of Employment project. This program provides internships and job training to workers with disabilities to prep them for careers in competitive agriculture.](#)

#### **17. Seeing is believing when it comes to jobs for people with disabilities.**

Pages 78 and 79 of the current draft of California's Unified State Plan discuss the work of the Policy, Legislation, and Research Branch and the Strategy, Innovation, and Regional Initiatives Branch respectively. We suggest that these Branches, in their work with regional partners, have an opportunity for leadership. As a specific, easy, first step, they have a chance to focus on one of the important best practices that encourage innovative thinking and engagement around jobs for people with disabilities. That step is to conduct site visits to successful disability employment programs and model systems. Touring a model employer who is capitalizing on the talents of employees with disabilities can be an eye opening experience. As such, it should be a priority to help regional partners to serve job seekers with disabilities.

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

Many people with disabilities do not drive. Others cannot afford private transportation. It is vital to work with public transportation to ensure that there are bus routes to places where there are internships, apprenticeships and other work opportunities. [In a place where that is not possible, California should look at partnering with UBER and other new transportation solutions. Indeed, for people with disabilities who do drive, such companies as UBER can also provide a way to enter into the workforce with flexible hours.](#)

**19. The disability issues of people involved in the corrections system must be addressed.**

**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 or unaddressed through childhood and into the school years. **Given these statistics from the BJS, it is vital that California identify how many of the individuals in the ex-offender pipeline have disabilities.** Serving ex-offender is a critical workforce development challenge and one that can only increase when disability is a factor as well. The price paid for ignoring this issue are higher rates of recidivism and greater costs to society. Can there be screening or assessment tools for identify disability as people either enter or exit the prison system? If people who have been in the corrections system are to be well served by California’s workforce system, then it is vital that disability issues be identified and addressed in a way that will help them develop their talents so they can be successful citizens and workers in the future.

**20. Educating the Public about Free, Accessible Services and Resources:**

California offers many online and in person resources to help employers and people with disabilities come together to build success. But 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. There is also no need 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.

**21. California’s leadership on jobs for people with disabilities is needed nationally.**

Chapter 2 of California’s draft WIOA State Plan, on page 43, begins by discussing the challenges facing California’s workforce system. “With over 38 million people, about 12 percent of the nation’s population” the Golden State’s system faces a greater task “than any other state.” The challenge is daunting but the opportunity is even greater. **California, due to its importance to the national economy, is in a unique position of leadership. Other states will follow California’s lead.** If California continues to invest in programs that have proven to fail time and time again, other states will follow suit. If, instead, California focuses on youth, expands opportunity, and invests in best practices, other states will follow and improved outcomes will result. That is why it is so important that California put forward and implements an excellent WIOA plan based on best practices – one that will be inclusive of the most integrated job opportunities that pay competitive wages for people with disabilities possible, while meeting the talent needs of employers.



**22. Make sure that California’s “Earn and Learn Strategies” maximize competitive, integrated employment for people with disabilities.**

As the very name of the law suggests, WIOA represents the chance to innovative and create new opportunities for preparing people to enter the workforce. **One of the most important ways that this can be done is by making smart investments and funding effective models for training workers to meet employer needs.** The right decisions in this space are fundamentally important for preparing people with barriers to employment such as disabilities to enter the workforce. As such, there are several critical issues impacting people with disabilities related to the policy strategy of “Utilizing Earn and Learn Strategies” that need to be discussed. Reflecting that importance, our comments below discuss the specific points of to ensure “Earn and Learn” benefits Californians with disabilities.

**Specific Recommendations on “Earn and Learn Strategies”:**

- **Once again, we would reiterate the critical role that California’s community college has to play in helping to create a pipeline of talent fitted to specific employer needs.** Page 96 of California’s Unified State Plan states that community colleges will be significant in the development and implementation of “Regional Sector Pathways” partnerships. We would reiterate the fact that these partnerships need to be inclusive of people with disabilities.
- Page 99 of the Unified State Plan discusses the intersection about local workforce plans and American Job Centers in California. **We would reiterate our previously stated concerns about the opportunity costs that might come from focusing exclusive on physical infrastructure at the expense of improving the delivery of employment services via online platforms.** To that, we would add that ensuring programmatic accessibility is vitally important and an effort to improve online services will have broad benefits for the workforce system as a whole.
- Page 13 of Appendix 1 of the California Unified State Plan offers specific guidance around the criteria that Local Boards use when determining where to invest grants for youth activities. **Pre-training programs are great because they offer the opportunity to train youth with disabilities in the soft skills they need to succeed and provide them with a foundation of work experience.** One of those specific criteria is to focus on “proven recruitment strategies of effective outreach, engagement, enrollment, and retention of out-of-school youth.” **To that, we would add the vital importance of pre-training programs like those found at UPS in Kentucky and the Hyatt in St. Louis.** Part of why those programs are so successful is because they offer local employers a pipeline of trained, work ready youth who can fill their talent needs. **As such, we would direct the Plan and the local boards in California to learn from these models.**
- Page 28 of the Unified State Plan discusses how the workforce system in California will better coordinate with the educational system. **The highest priority we would like to see address on this point in is making sure that early STEM educational programs are fully accessible to students with disabilities. This is challenge that can be solved by partnerships between the workforce system and the educational system.** Exposure to the dynamic world of STEM careers needs to start young, be matched with high expectations for success, and work to ensure people with disabilities have the chance to become future scientists, engineers, and mathematicians. Further, as reflected in our comments about having a “Jackie Robinson Strategy”, is that helping youth with

disabilities successfully transition directly from school to work is a critical window of opportunity to channel these young people into the workforce. **Integration in terms of skill development, learning opportunities, and work experiences can make the difference for youth with disabilities between spending their life on benefits and becoming independent through employment.** To do that, we highly recommend figuring out ways to integrate early work experiences directly in the Individual Educational Plans of students with disabilities in California. Next, high expectations are motivational factors that can support the ultimate entry of a student with disabilities into the workforce. For far too long people with disabilities have faced stigmas, myths, and misconceptions about their capacity to work, to become independent, and to pursue careers. Setting high expectations for success needs to begin in the schools and there are many examples of how this can be done successfully. The PROMISE Grant program is remarkable because it is designed to address exactly these points. CDOR, in its' role as "the lead coordinator for the grant in California", has insightful experiences and lessons learned to share across the workforce system. **As such, to build partnerships and break down siloes, we would encourage CDOR staff collaborate with their educational partners to offer site visits so that local workforce boards can see best practices in action.**

- Next, on page 52, CDOR sets several goals that are specific, measureable, and time limited. Specifically, "By June 30, 2017, provide 2,000 additional students with work experience placements with local employers at an average of 100 hours per student." It is a good start. **To that we would add the importance of ensuring the local employers where students will be working reflect those career pathways and growing sectors discussed at length in other sections of our public comments.** Also, a note of caution is justified. Specifically, the employer engagement strategies needed to make that goal achievable need to be efficient and strategic. Our comments have pointed to model employers across the country that showcase the competitive advantage of employing people with disabilities.
- Further, this section of the Unified State Plan goes into great detail about how "CDOR's Cooperative Programs Section, Contracts and Procurement Section, and the CDOR Districts will collaborate to add PETS into the TPP contracts." **As those written agreements are finalized, we would emphasize the need for a strong focus around having high expectations for success, addressing the need for soft skills that are so vital for employers, as well as clear information about accommodations.**
- Likewise, the Plan goes on to discussed how "CDOR will release approximately \$4.0 million dollars to LEAs for direct funding of work experience placements for eligible students." Our comments point to those types of school to work transition programs that have proven so fundamentally valuable in other states. **That funding can go to supporting the expansion of Project Search sites into hotels and nursing homes or to supporting the type of public-private partnerships started by Poses Family Foundation that are having tremendous success in diverse states as Nevada, Georgia, and Ohio. We also cannot recommend the Bridges from School Work model highly enough.**
- Beyond funding issues, we would also reiterate several issues concerning employer engagement especially in the section where the Unified State Plan directs CDOR to "establish business partnerships on a continual basis to provide opportunities for youth." **First, we would emphasize the natural opportunity created by Section 503.** Federal contractors should be a priority in terms of CDOR outreach. **Second, we would emphasize the vital importance of exposing youth, especially students with disabilities, to exciting**

**and dynamic careers in STEM fields. Third, we would also again emphasize the idea that such partnerships should prioritize growing job sectors in California's economy.** As a starting point for identifying potential business partnerships, we recommend the [Disability Equality Index that assesses the inclusion and hiring efforts of major employers.](#) It is 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.](#) There are two BLN affiliate chapters in California, one of which operates in the heart of Silicon Valley. [These affiliates have a critical role to play both in terms of employment opportunities and employer engagement.](#) As such, if they are not yet connected to the workforce system, they should be. [Meanwhile, 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. Your Combined State Plan should talk about these employers.

## **Conclusion**

As we stated at the beginning of our Public Comments, California can and must do better in terms of jobs for people with disabilities. With our nation's largest population and the largest economy of any state, the rest of the nation looks to the Golden State for leadership on the most important issues of our time. Despite abundant resources and vast population, California only ranks 36<sup>th</sup> in the country in terms of their employment rate of people with disabilities. Such poor outcomes are shameful. Failing to properly train and prepare job seekers with disabilities costs the California economy incredible talent and shatters the aspirations of so many Californians with disabilities who want to pursue the American Dream, just like everyone else.

However, thanks to WIOA, California has the chance to lead by example in terms of investing resources in successful models and implement best practices to expand job opportunities for people with disabilities. Making sure there are pathways for the talents of Californians with disabilities to meet employer talent needs is a win-win-win for people, taxpayers, and businesses alike. We remain concerned with some of what we have seen in California's plan. Our public comments discuss multiple ways that California can significantly improve outcomes and we hope see them implemented soon.

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.

Sincerely,

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