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## RespectAbility – Public Comments – Connecticut Unified State Plan

*“Hiring individuals with disabilities makes good business sense for employers and for our state. Not only is this a valuable pool of skilled workers offering talent, diversity and strong initiative, but employers report that employees with disabilities often have higher retention rates, which can reduce the high cost of turnover.”* – [Governor Dannel Malloy, Governor’s Committee on Employment of People with Disabilities \(GCEPD\) Announcement, October 8, 2014](#)

RespectAbility is pleased to submit the following comments regarding the current draft of the State of Connecticut’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 the state plan.

**Connecticut has a solid foundation to build on in terms of expanding competitive, integrated employment for people with disabilities.** According to Census data from 2013, Connecticut ranks 13<sup>th</sup> in the country as measured by the employment rate of people with disabilities. **Fully 40% of the 175,700 working age people with disabilities are employed in Connecticut. Further, there are approximately 13,700 youth with disabilities and each year a quarter of them will age out of school with high hopes for success.**

While this is better than many states, including the neighboring states of New York and Massachusetts, these outcomes are not as high as they could be. Connecticut 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 Connecticut can improve their outcomes. **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. [We have developed an extensive collection of data on disability and employment in Connecticut.](#) That information is attached to our comments

**Our public comments on Connecticut’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.** For example, there is a need for greater specificity in the performance metrics utilized by the workforce system, a greater focus on stigma as a barrier to employment, and precision around sector strategies. Fortunately, on the vocational rehabilitation side, there is no Order of Selection which gives Connecticut the flexibility to invest in expanding opportunities for youth with disabilities.

However, no state plan is perfect. While there is some good detail on what Department of Rehabilitation Services (DORS) will do, those efforts are not as fully integrated as they might be. Our comments below address those areas and issues where we feel improvements can be made. The Plan, once it is finalized, will guide the Constitution State’s workforce system for years to

come. Thousands of lives, as well as the growth of Connecticut's economy, depend on the success or failure of the final version of the WIOA Plan.

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

As required by WIOA Sec. 102(b)(1)(A) Connecticut'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.**

The current draft of the Unified State Plan does a good job of showcasing those industries that are propelling the recovery of the state economy. For example, on page 7, the Plan reports that "Four major industries have provided steady year-over-year growth throughout the recovery." Those industries are "Leisure and Hospitality" which "experienced the largest yearly average percentage increase", "Professional and Business Services", "Education and Health Services" as well as "Trade, Transportation and Utilities." **The jobs gains in these sectors offer a great opportunity for focused sector strategies improve employment outcomes among people with disabilities in Connecticut. We submit that these are job sectors where people with disabilities can excel and benefit their employer's bottom line.** People with disabilities represent an untapped labor resource that, with the right training and supports, can meet the diverse talent needs of Connecticut's growing job sectors. Below, we offer our specific ideas on how to implement such efforts:

**A. Leisure, Hospitality, and other high turnover job sectors:**

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

**This has vital implications for the "Service providing" jobs that make up 81% of "Connecticut's Projected 2016 Employment" in Figure 7 on page 11 of the State Plan.** Leisure, hospitality, and other, similar service jobs 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. Further, on page 15 the State Plan discusses how "Occupations with most openings – Retail Salespersons, Cashiers, Waiters/Waitresses, Food Preparation and Serving workers – are those with high replacement needs." These are occupations where the loyalty, productivity, and retention rates of people with disabilities can significantly contribute to employers' bottom lines.

To focus in on hospitality, Missouri offers an outstanding example of the type of work that is needed. **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 that can enable Connecticut to improve employment outcomes for people with disabilities](#). Connecticut’s workforce system should connect with employers in the hospitality sector to begin figuring out how to benefit from these models.

Another great example of a place where employees with disabilities are succeeding is the Prospector Theater. [This non-profit “provides meaningful employment to people with disabilities through the operation of a premium, first-run movie theater located in the heart of historic downtown Ridgefield, Connecticut.”](#) This offers a local model that addresses the wide range of service jobs that sustain so much of the state economy.

**Further, Connecticut already has some great examples of how individuals with disabilities can be incredible employees in a sector with high turnover rates. What we have in mind is the distribution/supply chain sector.** Nationally, many companies, including [UPS](#), [Wal-Mart](#), and [OfficeMax have proven records of success](#). **In Connecticut, greater partnerships and engaged leadership have already built incredible job opportunities for people with diverse disabilities at [the Lowe’s distribution center in Plainfield](#) and [the Walgreens distribution center in Windsor](#).** 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.”

These examples are critical for two reasons. First, the experiences of these companies offer valuable lessons in terms of program design and implement for working with other sectors to develop disability employment strategies. Second, they offer proven examples of success which will be critical to breaking down barriers, stigmas, myths, and misconceptions. We have much more to say on this second point later.

## **B. Health and Elder Care**

The largest growth sector of the Constitution State’s economy is a sector shaped by both challenge and opportunity. As stated in the Emerging Demand Industry Sectors and Occupations Section on page 13 of the Unified State Plan, “the largest sector, expected to add the most jobs over the next ten years, is Health Care.” This challenge is being propelled by “Connecticut’s rapidly aging population” and employment Health Care “is projected to grow by nearly 40,000 jobs by 2022.” This is a huge opportunity and one that has critical implications for people with disabilities living in Connecticut who want to work.

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. Indeed, 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.**

Digging further into the State Plan’s analysis shows where Health Care jobs are growing. The Plan says that most “of that growth is expected in Ambulatory Care settings” while “Home health care services are also expected to add employment” as are “Hospitals and Assisted Living Facilities.” There are numerous [examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living.](#)

**These examples all reflect how the Project Search model is well suited to meeting Connecticut’s growing talent needs in health care. As such, we recommend that Project Search be significantly expanded as they have done in Wisconsin, Florida and other states.** Nationally, each year approximately 2,700 such young people, spread out in 45 states, do a nine-month, school-to-work program that takes place entirely at the workplace. This innovative, business-led model features total workplace immersion, which facilitates a seamless combination of classroom instruction, career exploration, and worksite-based training and support. This model is currently only operating in one work site in Connecticut. [Located at Yale-New Haven Hospital, this project has just completed it’s second successful year and deserves to be mentioned in the Unified State Plan.](#)

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.** 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. The future expansion of Project Search in Connecticut should begin in health care settings such as hospitals and elder care before being expanded into other fields such as hospitality.

### **C. Science, Tech, Engineering and Mathematics (STEM), Accessibility, and The Autism Advantage**

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 Connecticut as well. This issue of STEM and access for student with disabilities is a natural point of partnership between the workforce system and the educational system. That work needs to start young, be matched with high expectations for success, and designed to ensure people with disabilities have the chance to become future scientists, engineers, doctors and mathematicians.

**The experiences of these companies and Governor Markell’s leadership have critical implications for Connecticut.** On page 15, the State Plan identifies the “Priority Industry Sectors” that have been the focus of the Malloy administration. This “core group of industry

sectors” are “expected to drive economic growth over the next decade.” This group includes: “aerospace and advanced manufacturing, bioscience/life-sciences, insurance/financial services, and several emerging industries including bio-medical research, digital media and entertainment, green/sustainable technology, medical device production and high-tech manufacturing.” Each of these sectors has critical needs for labor trained and prepared for careers in STEM. If the Constitution State wants to be proactive in collaborating with these second, and leading the nation in innovation, it would do well to factor disability into this equation here. **The “Next Generation Connecticut initiative” discussed on page 47 needs to ensure that to “the science, technology, engineering and mathematics (STEM) disciplines at the University of Connecticut” are fully accessible to students with disabilities.** Further, focusing on this area and the dynamic careers in STEM should be a pathway for meeting the Priority areas outlined in Goal 3 on page 146 of the Unified State Plan. Specifically, in order “To increase employment outcomes for individuals with disabilities”, especially for “young adults with disabilities” and “individuals with autism spectrum disorders”, STEM is the way forward.

**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.](#) Connecticut should follow this model. Together, Connecticut’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. Government Jobs**

While jobs in state or local government have dropped significantly in Connecticut, this is still a potential point for improving outcomes for people with disabilities. Connecticut’s government will likely be impacted by the cresting wave of Baby Boomers retiring just as other sectors are being shaken. As such, adopting affirmative actions to hire people with disabilities could be a solution to this coming challenge. Other states have adopted such steps as an opportunity measure in their state hiring policies. This was first discussed in Governor Markell’s *Better Bottom Line* Initiative and later in RespectAbility’s *Disability Employment First Planning Toolkit*. In Governor Markell’s own words, [“One key action is to set a state goal for hiring people with disabilities through an executive order and hold agencies accountable for achieving that goal.”](#)

Connecticut should explore the feasibility of Affirmative Action hiring of people with disabilities for jobs in state government plus expanding state contracting obligations around Section 503 for Federal contractors. [Governor Inslee in Washington State](#) and [Governor Dayton in Minnesota](#) have been working to implement such measures for people with disabilities through executive orders. [Likewise, we are also seeing great success with governmental hiring of people with disabilities at the local level in Montgomery County Maryland.](#) People with disabilities can be a successful solution, especially in high turnover jobs. Lastly, as shown by Delaware and Montgomery County, having a fast track or selective placement hiring system for people with disabilities can create more jobs.

## **E. Government Contractors**

[Connecticut's state plan should have specific references to the new 7% utilization goal set for federal contractors to recruit, hire, and retain qualified individuals with disabilities in all job categories.](#) Even if employers face challenges finding the talent they need, Section 503 is an opportunity to start thinking about ways to attracting the diverse talents that people with disabilities bring to the workplace. Thus, we suggest the current draft of Connecticut's WIOA draft be revised to include language around Section 503 and federal contractors. [There are multiple sources for information regarding what Connecticut based businesses hold federal contracts](#) and [what job sectors those contractors represent.](#)

**Connecticut should respond to the opportunity created by Section 503 with a strategy focused on competitive advantage, not just compliance.** Section 503 is an opportunity that could potentially have a broad impact on the employer engagement work of your 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.

**The untapped potential of Connecticut with disabilities is such that a full-spectrum, all-of-the-above-and-more approach is needed. Connecticut should be working to get more people with disabilities employed in high turnover occupations, leisure and hospitality, STEM fields, as well as health care and eldercare.** Further, Connecticut should capitalize on the great experiences of Lowe's and Walgreens in training and preparing employees with disabilities for jobs in their supply chains distribution centers. We recommend this given the incredible work we have seen by employers who are making employees with disabilities part of their talent acquisition strategy to become more efficient, productive, and competitive.

## **2. Busting stigmas, myths, and misconceptions should be a key part of our state'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 Connecticut's State Plan be amended to include a comprehensive proactive communications/public relations strategy for reducing such stigmas.** Indeed, we know that other groups of Connecticut with barriers to work also face stigmas, especially those leaving the corrections system.

We must admit, we are critically disappointed that Walgreens received only the most cursory of mentions in the current draft of the Unified State Plan. The only explicit reference to the incredible work done on disability employment is buried on page 158 of the Plan where it talks about the Bureau of Rehabilitation Services' (BRS) "Industry Specific Training and Placement Programs (ISTPPs)" contracts with Community Enterprises, Ability Beyond, and Walgreens Retail Stores. Walgreens is one of the most nationally visible examples of the business case for disability inclusion. [At the Distribution Center in Windsor, Walgreens has demonstrated that workers with disabilities are as productive, safer, and turn over less when compared to peers without disabilities.](#) Several sections of the Plan talk about outreach to business about how the workforce system can train job seekers to meet employer need.

**However, a serious, systematic and ongoing communications campaign that highlights the benefits of inclusive hiring must begin if Connecticut wants to maximize its success.**

**Indeed, 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 terms of potential employer partners, we encourage your state plan to look at the [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 much larger component of Connecticut's 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, NBCUniversal, 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.

Further, there is a critical omission and surprising gap in the current draft of Connecticut's Unified State Plan. The Plan contains no references whatsoever to the incredible work being done by Connecticut Business Leadership Network. [This "growing coalition of Connecticut employers that are working together to increase employment opportunities for people with disabilities" needs to have a place at the WIOA Table moving forward](#).

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. While there are few Stephen Hawking — with or without disabilities — people with disabilities can work highly successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and be super talents in developing computer software and engineering solutions. CEOs and business leaders need to know that people with disabilities can be the BEST people to get a job done.
- B. Human resources professionals and on-the-ground supervisors need to understand that hiring people with disabilities is generally easy and inexpensive, and that any costs incurred are more than offset from increased loyalty.** Hiring managers and supervisors are key implementers who can turn high minded policy and business goals into action at the ground level. However, studies show that many of them are afraid of what they don't know about people with disabilities. They are afraid of potential legal action, costs, or other failures. For them, they need supports that will empower to overcome their own fears and to excel at recruiting, hiring, supervising or working with teammates with disabilities. Connecticut'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. Moreover, online and in-person training is readily available to help from a variety of sources. RespectAbility has online webinars, as [does ASKJAN.org](#), USDOL and others. Partners like [the Poses Family Foundation Workplace Initiative](#) can provide training to the workforce staff and

volunteers 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.

- C. People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectations must begin. It is vital to have an “Employment First” Policy and PR campaign that will inspire Connecticut residents with disabilities to reach for the stars. [The Governor of Connecticut himself should be held up as an example of someone who has turned their experiences with disabilities into an advantage. His leadership is informed and empathetic because of his experiences](#) and he is in good company. 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 an intentional manner moving forward.**

We live in a world where perceptions are shaped at lightning speed by social media, entertainment and news. Much of that can be conflated into “info-tainment” where it is hard to distinguish fact from fiction. 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. As such, we are pleased that there is some discussion about the utility of social media on page 154 in Goal 2 of the section on (p) Evaluation and Reports of Progress: VR and Supported Employment Goals. This section mentions that “BRS added the use of Social Media as a form of communication to help consumers” and “formed a Social Media Committee.” These are critical first steps and we should be freely available to support that effort.

As example of the power and the value of making the business care for hiring people with disabilities, we offer Connecticut our insights gained from our #RespectTheAbility campaign. Our #RespectTheAbility, is a campaign focused on how hiring people with disabilities can make organizations stronger and more successful. The campaign 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. Use the best data points, including the Labor Force Participation Rates of people with disabilities v. those without disabilities, as performance metrics.**

On page 32 of the current draft of the Unified State Plan, there is an extensive exploration of the currently available data on the disability community in Connecticut. Drawn from the “American Community Survey (ACS) of the U.S. Census” this section states there are “76,791 persons with a disability employed in Connecticut in 2014, and 13,116 unemployed.” Further, this section goes on to discuss the disparity in median earnings of people with disabilities compared to their non-disabled peers. Lastly, there is also a data table that looks at the break down in employment among different people with different types of disabilities. **This level of detail is commendable and critical as Connecticut’s workforce system evolves to better serve people with disabilities.** That said, there are still several points to be made on the subject of data-driven decision making. **First, precision is needed when using statistics to advance**



**policy. As such, we would recommend that this section of the State Plan be revised to distinguish between working age people with disabilities and youth with disabilities. Fully 40% of the 175,700 working age people with disabilities are employed while there are approximately 13,700 youth with disabilities in Connecticut.** This distinction is needed in order to clarify where skills training, early work experiences, and successful school to work transition programs can be applied to improve outcomes.

**Second, it is absolutely critical that Connecticut’s workforce system include the labor force participation rates (LFPRs) of people with disabilities both in their performance metrics and on their state dashboards.** 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. These rates are the critical lens that is needed to bring clarity to the issue of employment for people with disabilities. There is a 36.4 point gap in the Labor Force Participation Rates between people with and without disabilities in Connecticut. Pushing hard to close this gap will require focused energy and effort. **As an example of how to expand the detail included on this subject, we are including both our state data presentation for Connecticut as well as the LFPR table drawn from Michigan’s WIOA Plan.**

For example, such data should very much be part of the conversation of the “WIOA transition interagency work group on Technology, Data and Outcomes” discussed on page 88. This group, which includes “six (6) core programs across three state agencies – Connecticut Department of Labor (CTDOL), Connecticut State Department of Education (CSDE), and the Department of Rehabilitation Services (DORS)”, needs to be guided by a clear view of the challenges facing people with barriers to employment such as disability. Further, final details remain to be worked in terms of Post-Program Success in the “final version of Plan for submission to USDOL.” We seriously hope that the Labor Force Participation Rate of people with disabilities be included in those final performance metrics.

While Connecticut currently ranks 13<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. **From the data, we see that 45.8% of the 10,900 Connecticuters who are blind or have vision loss are employed while 58.9% 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 32.1% of Connecticuters 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 Connecticut’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.

#### **4. Overcome the gap between disability services and career services in Post-Secondary Education:**

There is a fundamental disconnect in most post-secondary education programs between disability services and careers. This is not a new issue and it is one that other organizations have raised in the past. However, with the priorities put into place by the implementation of WIOA, there is a historic opportunity to bridge this gap and to improve career and technical education

for young people with and without differences. As formulated by the National Organization on Disability, 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. Connecticut has the chance to 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.

This issue falls firmly in the areas of operations and responsibilities of the Next Generation Connecticut initiative. **This effort, which “aims to transform UConn into an elite public research institution, fueling Connecticut’s economy with new technologies, training highly skilled graduates, creating new companies, patents, licenses and high-wage jobs”, must lead by example in terms of accessibility for students with disabilities.**

While the statistics cited above are national ones, they have bearing on the work that needs to be done through your community college system. Beyond just WIOA, community colleges are uniquely positioned to innovate in order to expand opportunity. Community colleges are very closely connected to the working world and the specific training requirements of employers. As you look to triangulate between employer needs, skills training, and recruiting workers; you will do well to remember the importance of getting students with disabilities connected to career services and prepared for the workplace early.

## **5. Ensure that Apprenticeship Programs are Fully Accessible and Actively Recruiting Young People with Disabilities, Especially with Government Contractors**

We are pleased that Connecticut is looking to expand the vital opportunity that apprenticeship training can offer to young people. These efforts are detailed on page 42 discuss the specific role of the Office of Apprenticeship Training at CTDOL, collaborations with “community college-based Advanced Manufacturing Centers” as well as the “Connecticut employers have taken advantage of the Manufacturing Apprenticeship Tax Credit.” These are all crucial steps in the continuing evolution of the state’s economy. However, as with many of the issues that we have raised in our comments, this is an issue that needs to be viewed through a disability lens.

**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. Further, we would also highly recommend that VR staff connect and collaborate with the Federal officer responsible for apprenticeship programs in Connecticut.](#) Such innovative partnerships and improved accessibility are essential elements of realization the full promise of WIOA for people with disabilities.

## **6. Prioritize pre-employment training and expand partnerships with VR**

**As you embark on your new collaborations, we encourage you to explore proven programs such as Amazon, UPS, and Pepsi.** The global logistics companies UPS, at one of their busiest facilities, there is a training program dedicated to preparing youth with disabilities to succeed. Taking place in Louisville, KY, [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.

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

## **7. Avoid the Opportunity Costs of Focusing Too Much on One-Stop Centers. Programmatic Accessibility is Critical Important**

There is a significant note of caution that we will like to add in terms of both the current draft of the Unified State Plan as well as the future of Connecticut's Workforce System. The State Plan should look to innovate beyond simply co-locating services and supports at the One-Stop Centers in Connecticut. **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. It is vital to invest resources on those points where they can have the greatest effect.

**We offer this caution because of the role envisioned for AJCs in Connecticut on page 63 of the State Plan. Specifically, under the section on “Implementing State Strategy – WIOA Core Program Strategies”, the Plan states that “American Job Centers will be hubs from which jobseekers can be referred to sector-focused programs in targeted sectors.”** Perhaps this is just an ambiguity of the draft but we are concerned this will limit the ability for resources to be provided to job seekers through online platforms.

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.](#)

Likewise, Section 188 of WIOA outlines the accessibility requirements that each state must meet as part of this paradigm shift. **While physical accessibility is important, ensuring that the workforce system is programmatically accessible is also critically important.** As such, questions around closed captioning of training videos, website access for screen readers, and the availability of assistive technology for job seekers with disabilities are in need of close attention. Devoting resources to improving online resources will be of significant benefit to job seekers with disabilities as well as people with other barriers to employment.

#### **8. Effective employer engagement depends on the BLN and others as you focus on the right business audience.**

Improving employment outcomes in Connecticut very much depends on being an employer driven paradigm shift. As we mentioned above, it is vital to 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 people with disabilities. The necessary condition for achieving greater competitive, integrated employment for individuals with disabilities is engaging employers and meeting their talent needs. [As we stated before, the Connecticut BLN should be critical partners in this process.](#)

#### **9. Transportation is a critical barrier to employment and it must be addressed directly:**

To quote page 34 of the Unified State Plan, “Accessing affordable efficient transportation to/from work is an obstacle to sustained, productive employability for many Connecticut workers.” The challenges are multi-faceted, given that in Connecticut “Public transportation services are inadequate for many workers – particularly low-wage workers from urban communities.” [This is a critical issue that limits the employment aspirations of far too many people with disabilities.](#) **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 places where that are not possible, Connecticut could look at partnering with UBER and other new transportation solutions. Indeed, for PwDs who do drive, such companies as UBER can also provide a way to enter into the workforce with flexible hours. Public sector employers and federal contractors who have 503 obligations are key places for apprenticeships and internships and onboarding of talent. It is important for them to play a key role in planning for public transportation.

#### **10. 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. Also, Connecticut 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.

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

**““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 for state groups such as the Connecticut Employment and Training Commission (CETC) discussed on page 83. **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.

### **12. Aging workers and those with recently acquired disabilities must be specifically addressed in the plan:**

Many people who have been in the workforce for decades find that before full retirement age they cannot keep up with the physical demands of their jobs. In Iowa, IVRS works with a major employer, Unity Point Hospital to “re-home” employees to other jobs within the same company when good workers can no longer do physical jobs and need a new assignment. They find that Emergency Room nurses, for example, come to a point where they can no longer keep up with the physical demands of that job. They have a department that works to “re-home” talented and valued employees who either age into a disability or acquire a disability through accident or illness. Empowering youth with disabilities to enter the workforce should be your highest priority, but keeping aging workers in the workforce until retirement age is also important. This will take a specific strategy and effort so that you don’t have massive numbers of people going onto disability rolls and out of the workplace prematurely.

### **13. Utilize a “Jackie Robinson Strategy”:**

The workforce system only gets one chance with new employers to make a good impression. By law, policy, and custom, the system looks to serve people with the most significant disabilities first. However, if the individual with a disability that is placed is not the right match for the employer, it will only undermine our long term goals of making that employer see the value of greatly expanding inclusive employment opportunities. Thus it is vital to also use a “Jackie Robinson Strategy” to make sure that the right talent gets into the right positions so it is win-win for the employer and worker alike. 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. He was the talent that his employer needed, and contributed to the bottom line. Because, stigma and misconception remain a critical obstacle and one that Connecticut’s workforce system needs to focus on, sometimes the best way to help people with more significant disabilities in the long term is to start with new employers by placing talent with fewer disabilities first. Once they understand accommodations and how to maximize the use of talent, they will be ready to more broadly open their employment “tents”.

#### **14. Strategic Engagement to Build a Buddy/Mentor System for People Customers of the Workforce System.**

**Government can't and shouldn't do everything. There is a massive role that can be played by trained and vetted volunteers who are willing to help people with barriers to work find and keep jobs.** 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.](#)

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

Pages 34 and 35 of the current draft of Connecticut's Unified State Plan scratch the surface in terms of the challenges facing people in the corrections system. To quote the Plan, "16,025 men and women were incarcerated in correctional facilities during 2015" and the "Connecticut Department of Correction (DOC) – reported serving 2,669 students in ABE, GED, ESL, and Vocational Education instruction." **Serving this population and rehabilitating them into society is a critical issue facing the workforce system and it needs to be viewed through the lens of disability. The reason 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 Connecticut'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**

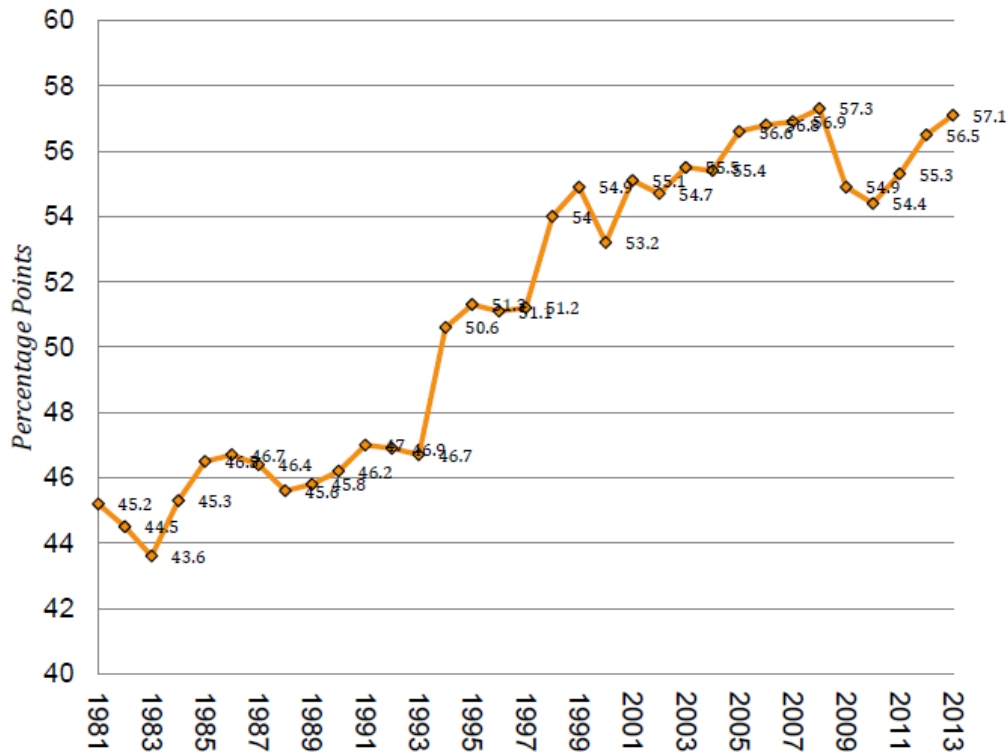
As stated at the beginning of our Public Comments, Connecticut has a solid foundation to build on in terms of jobs for people with disabilities. Connecticut has the chance to achieve even greater results because of WIOA and it must be addressed through the State Plan. Failing to properly train and prepare job seekers with disabilities costs our state's economy incredible talent and shatters the aspirations of so many people with disabilities who want to pursue the American Dream, just like everyone else.

However, we have 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. Our public comments discuss multiple ways that your state can significantly improve outcomes and we hope see them implemented soon.

The bottom line is that expanding job opportunities for people with disabilities is a win-win-win for employers, taxpayers and people with disabilities alike. It is good for employers because the loyalty, talent, and skills of workers with disabilities contribute to the employers' bottom line. It is good for the workforce system because improving services and supports for job seeker with disabilities will benefit others with different barriers to employment. It is good for people with disabilities who want the dignity, pride, friendships, independence and income that work provides. 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 Connecticut's WIOA plan's, all of this can change for the better for the people of the Constitution State.

*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 Connecticut ranks nationally and to showcase several of the data points needed in Connecticut'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	North Dakota	52.8	1	Alaska	47.8	75.2	27.4
2	Wyoming	50.7	2	Wyoming	50.7	79.4	28.7
3	South Dakota	48.1	3	North Dakota	52.8	83.1	30.3
4	Alaska	47.8	4	Nevada	39.2	73.1	33.9
5	Minnesota	46	5	Utah	42.5	76.6	34.1
6	Nebraska	45.5	6	New Mexico	35.3	70.1	34.8
7	Iowa	44.8	7	South Dakota	48.1	83	34.9
8	Utah	42.5	8	Colorado	42.3	77.3	35
9	Colorado	42.3	9	Texas	38.7	74.7	36
10	New Hampshire	41.8	10	Minnesota	46	82.1	36.1
11	Kansas	41.7	11	Connecticut	40	76.4	36.4
12	Wisconsin	40.9	12	Hawaii	39.1	75.7	36.6
13	Connecticut	40	13	Nebraska	45.5	82.6	37.1
<b>14</b>	<b>Maryland</b>	<b>40</b>	14	Iowa	44.8	82.1	37.3
15	Montana	39.4	15	Kansas	41.7	79	37.3
16	Nevada	39.2	16	Montana	39.4	76.8	37.4
17	Hawaii	39.1	17	Arizona	33.6	71.3	37.7

18	Texas	38.7	<b>18</b>	<b>Maryland</b>	<b>40</b>	<b>78.3</b>	<b>38.3</b>
19	Virginia	36.9	19	Washington	36.4	74.7	38.3
20	Idaho	36.7	20	California	32.7	71.1	38.4
21	New Jersey	36.6	21	Idaho	36.7	75.2	38.5
22	Delaware	36.4	22	New Hampshire	41.8	80.3	38.5
23	Washington	36.4	23	New Jersey	36.6	75.1	38.5
24	Illinois	36.1	24	Delaware	36.4	75.1	38.7
25	Oklahoma	35.8	25	Oregon	35.2	73.9	38.7
26	New Mexico	35.3	26	Illinois	36.1	75	38.9
27	Oregon	35.2	27	Wisconsin	40.9	80.1	39.2
28	Massachusetts	34.9	28	Oklahoma	35.8	75.2	39.4
29	Rhode Island	34.3	29	Georgia	31.5	71.5	40
30	Pennsylvania	33.9	30	Virginia	36.9	76.9	40
31	Indiana	33.8	31	Louisiana	31.3	72.4	41.1
32	Arizona	33.6	32	New York	32.2	73.3	41.1
33	Ohio	33.5	33	Florida	30.5	72.2	41.7
34	Vermont	33.3	34	Pennsylvania	33.9	75.6	41.7
35	Missouri	33	35	South Carolina	30.7	72.7	42
36	California	32.7	36	Rhode Island	34.3	76.3	42
37	New York	32.2	37	Indiana	33.8	76	42.2
38	Georgia	31.5	38	Ohio	33.5	75.9	42.4
39	Louisiana	31.3	39	Massachusetts	34.9	77.9	43
40	Maine	31.2	40	Mississippi	26.3	69.4	43.1
41	South Carolina	30.7	41	North Carolina	30.3	73.5	43.2
42	Florida	30.5	42	Alabama	27.1	70.5	43.4
43	North Carolina	30.3	43	Michigan	29.9	73.4	43.5
44	Michigan	29.9	44	Tennessee	29.9	74.1	44.2
45	Tennessee	29.9	45	Missouri	33	77.1	44.1
46	Arizona	28.2	46	Arkansas	28.2	72.7	44.5
47	Alabama	27.1	47	West Virginia	25.3	70.6	45.3

48	Kentucky	26.9	48	Vermont	33.3	79.6	46.3
49	Mississippi	26.3	49	Kentucky	26.9	73.7	46.8
50	West Virginia	25.3	50	Maine	31.2	78.8	47.6

**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 to 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	5.6	-0.7

WY	43.9	78.5	34.6	50.7	79.4	28.7	-5.9	48	358,526	50	-age pop. under 1 million 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	-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>Workin g-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 populati on 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 populati on 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 populati on 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

NJ	35.0	74.5	39.5	36.6	75.1	38.5	-1.0	29	5,528,837	11	Working-age pop. over 5 million	1.6	0.6
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
<b>OH</b>	<b>32.8</b>	<b>75.1</b>	<b>42.2</b>	<b>33.5</b>	<b>75.9</b>	<b>42.4</b>	<b>0.2</b>	<b>13</b>	<b>7,072,114</b>	<b>7</b>	<b>Working-age pop. over 5 million</b>	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