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Jan. 26, 2016

## RespectAbility – Public Comments

### Delaware’s Demand Driven Four Year Workforce Development Plan

*“The reality is that your disability is not the extent of your identity. People with disabilities have many interests and skills; they are an untapped source of ingenuity and productivity. As long as we’re leaving so many people with disabilities on the sidelines, we are not only denying them opportunity; we are undermining the competitiveness of our businesses and stifling economic growth. Working together, we can successfully take up this unfinished business, ensuring that America captures the talents of all our people.” – [Governor Jack Markell, op-ed in USA Today, October 27th, 2015](#)*

RespectAbility is pleased to have the opportunity to submit public comments regarding the current draft of Delaware’s Demand Driven Four Year Workforce Development Plan as required under Section 102 of the Workforce Innovation and Opportunity Act (WIOA).

**The First State’s WIOA State Plan is close to our hearts because of Governor Jack Markell of Delaware and the outstanding Delaware team. Governor Markell’s leadership as chair of the National Governors Association (NGA) and the [Better Bottom Line Initiative](#) set the stage for many of the innovations that WIOA is putting into place.** Many of the most important models and practices that we discuss in [our Disability Employment First Planning Tool](#) originate out of his leadership. In terms of geography and population Delaware may be a small state, but in terms of leaderships the First State has had a substantial impact nationally. We look forward to the additional progress that we know will be made possible by Governor Markell’s chairmanship of the Council on State Governments.

**As such, we are pleased to say that the Delaware WIOA draft is well done. It creates a win-win-win strategy for vital improvements for Delaware’s workforce system and its ability to serve people with barriers to work, employers and taxpayers alike.** This draft plan will break down silos and build thoughtful collaborations, especially for youth transitioning from school to work. It is to be strongly commended goes a long way to build success.

Looking at the historical statistics, the last publicly available data predates Governor Markell’s time as the chair of NGA, Delaware had a 36.4% labor force participation rate (LFPR) for people with disabilities (PwDs). **However, other states (North and South Dakota, Wyoming and Alaska) and Montgomery County, Maryland have all achieved approximately a 50% LFPR level for people with disabilities.** Likewise, we are also seeing pockets of excellence around innovative youth programs to address disability employment in [Georgia](#), [Nevada](#), and [Kentucky](#). **We believe that Delaware is poised to do the same as well. Under your new WIOA plan, with strong leadership and implementation, people with disabilities will be ever-increasingly contributing members of their communities in new and better ways.** This will strengthen the economy for all people in Delaware.

As Baby Boomers retire and Delaware’s economy evolves, the First State is starting to experience an increasing talent shortage. **There are 56,600 people with disabilities between the ages of 21 to 64 in Delaware. Many of those who are working are only working part time and/or are under-employed.** Our nation was founded on the principle that anyone who works hard should be able to get ahead in life. People with disabilities deserve to be able to work to achieve the American dream, just like anyone else. People with disabilities can provide a

solution to companies and other employers that want to succeed. The diverse skills, higher loyalty, and retention rates of people with disabilities are already starting to meet employer talent needs in increasing numbers. However, a growth opportunity exists for the future.

**We have had the honor of meeting on multiple occasions with Governor Markell and Secretary Rita Landgraf to discuss best practices as part of our national coalition with Paralyzed Veterans of America, the Independent Living movement, NACDD, Best Buddies and NOD.** We have learned a lot from them and Secretary Landgraf led a webinar for us on best practices which helped many other states. We are delighted to see so many of these best practices and others integrated into your plan. We know that the team in Delaware has worked successfully to improve outcomes and opportunities, especially for young Delawareans with disabilities and other barriers to work.

**Because of your good work, the 3,800 youth with disabilities between the ages of 16 and 21 living in Delaware have increasing chances to successfully transition into the world of work.** If this plan is further strengthened and implemented, we believe that Delaware too can join [the ranks of other states that have approximately a 50% LFPR rate for their citizens with disabilities](#). However, no plan is perfect. Upon reviewing the current draft of the state plan there remain a few areas where improvements can be made to achieve the best results possible.

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

As we expressed in our introduction, it is our view that Delaware is on the path towards achieving greater outcomes and higher employment rates for people with disabilities. Sustaining this success will very much depend on making sure Delaware's leaders have access to the right data. **It is vital that the workforce system and the State Board include the labor force participation rates of people with disabilities on their state dashboards and performance metrics.** Looking solely at unemployment information, decision makers are missing the bigger picture of those individuals with barriers to employment who are not actively seeking work. [As an example of the data that is needed, we are including a link to, and a copy of, the presentation our organization has compiled about employment for Delawareans with disabilities.](#) This compilation contains information derived from the Census Bureau's American Community Survey that should be valuable to the WIOA work being done in Delaware.

We do see on one of the most important data points that are needed in the assessment of the weaknesses that impact the great work being done by the Delaware Department of Labor Division of Vocational Rehabilitation (DVR) Weakness Assessment. **Specifically, on page 12, the State Plan discusses "The employment gap between Delawareans with and without disabilities is 38.7%." The gap between people with and without disabilities is one of the most important metrics needed to ensure that barriers to employment are being overcome and positive outcomes are being achieved. This fact is recognized in the State Plan where it says that "research suggests that a best practice to close this gap is Career Pathways focused counseling strategies, which DVR will be implementing."** We agree with this completely and how that bridging this gap will be done in the most collaborative, and demand driven manner possible.

**We would add, however, that further data points on Delawareans with disabilities are needed in the text of the state plan itself, rather than being buried in an appendix.** An infographic or data chart, summarizing the great information found in Appendix A Economic Analysis, could easily be added to section II.a Economic, Workforce, and Workforce

Development Activities Analysis. Below you will find several figures which reflect the types of data that should be added to enhance the current draft of Delaware’s WIOA State Plan.

**Figure 1.**

**Delaware Performance Metrics on Jobs for PWDs**

- ❖ 75.1% of persons without disabilities aged 18 to 64 are employed.<sup>3</sup>
- ❖ 36.4% of PwDs aged 18 to 64 are employed.<sup>3</sup>
- ❖ **There remains a 38.7 point gap between the Labor Force Participation Rates (LFPR) of Delawareans with and without disabilities.**
- ❖ 3,800 persons aged 16 to 20 have a disability.<sup>1</sup>
- ❖ 114,696 civilians with a disability live in Delaware.<sup>3</sup>
- ❖ 56,600 persons aged 21 to 64 have a disability.<sup>1</sup>
- ❖ The employment gap between PwDs and people without disabilities has decreased 1.9% between 2010 and 2011.<sup>3</sup>
- ❖ 30, 631 people ages 18-64 received SSDI or SSI benefits in the year 2012.<sup>3</sup>
- ❖ In 2012, DE’s total expenditure on SSDI benefits for PwDs was \$423,180,000.<sup>3</sup>
- ❖ Voc. Rehab. obtained 1,065 jobs for PwDs in DE in 2012.<sup>2</sup>
- ❖ Voc. Rehab. received 3,374 general rehab applicants and 80 blind applicants in DE in 2012.<sup>3</sup>



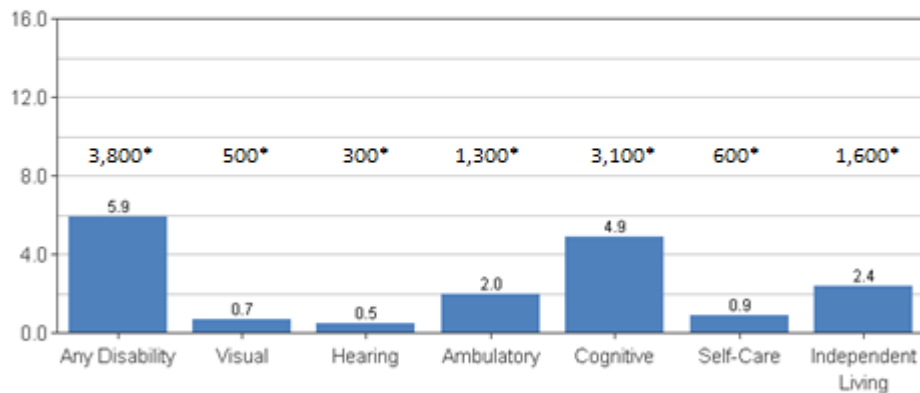
Gov. Markell with Lisa Derx (VP, Best Buddies) and Jennifer Laszlo Mizrahi (President, RespectAbility)

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

**Figure 2.**

**Prevalence of Disability Among Non-Institutionalized People Ages 16 to 20 in Delaware in 2012**

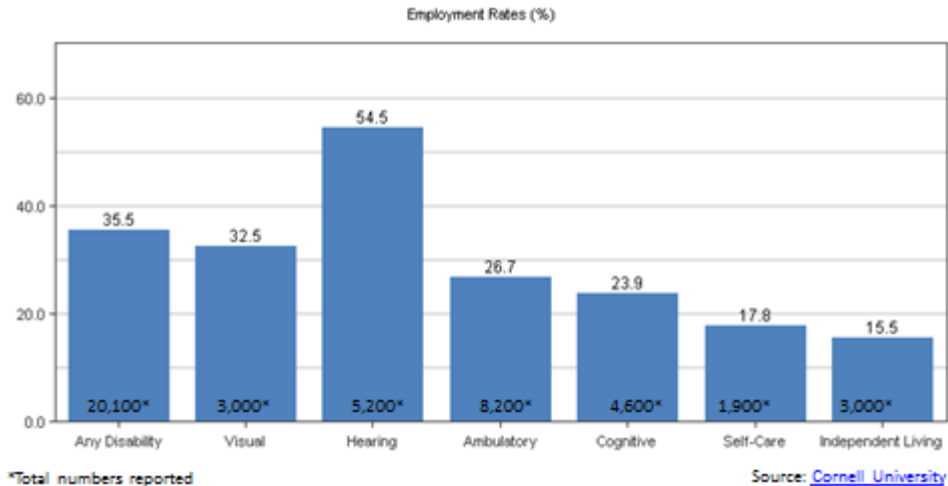
Prevalence Rates: Age 16 to 20 years (%)



\*Total numbers reported

Source: [Cornell University](#)

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



**Figure 4.**  
**Delaware Data on Poverty, Smoking, and Obesity**

		People with Disabilities (%)		People without Disabilities (%)	
		2012	2013	2012	2013
Poverty <sup>1</sup>	US	29.2	28.7	13.6	13.6
	DE	20.4	21.1	10.3	10.6
Smoking <sup>1</sup>	US	26.0	25.4	16.9	16.2
	DE	25.1	25.1	18.5	18.1
Obesity <sup>1</sup>	US	39.1	40.1	24.5	25.0
	DE	39.9	45.2	23.5	27.3
Employment <sup>1</sup>	US	32.7	33.9	73.6	74.2
	DE	34.6	36.4	75.1	75.1

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 Delaware's WIOA State Plan moves forward

## **2. Stigma Reduction and High Expectations need to be better address in the State Plan:**

**Stigma, 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.](#) What this means for the First State's workforce system is simple. A sustained effort to overcome stigma needs to be a critical part of the effort to empower people to overcome barriers to employment.

**Specifically, we recommend that your State Plan be amended to include a communications/public relations/education strategy for reducing such stigmas.** During his tenure as Governor of Delaware, Jack Markell has brought great energy and leadership to the issue of employment for people with disabilities. He has traveled the state and the country advocating for best practices and arguing that our nation needs to focus on the abilities that people possess. The conference he hosted in Delaware brought together employers, philanthropists, government and stakeholders for solid thinking. But more reinforcement is needed as sadly, his term is coming to end and this legacy of success needs to be institutionalized. **A great example how this might be done is [South Dakota's Ability for Hire](#) campaign.**

Governor Markell's leadership has left a great foundation to build on by continuing the effort to show case the business case for hiring people with disabilities. **Reducing stigma must begin by showcasing those Delaware based employers who best showcase the benefits of hiring people with disabilities and recruiting diverse talent to meet employer needs.** There are several points in your State Plan where the building blocks are in place for such an effort. For example, on page 156 of the Plan, the Division of Visually Impaired (DVI)'s "business champions" program is explicitly mentioned as being Performance Measure 1.4. This measure commits DVI to "highlight the successful partnerships established between the agency and local businesses." Moving on to later in the State Plan, on page 165, we find a complete list of Business Partnerships that DVI has developed. This is commendable work and each of these business partners should make their voices heard around the business benefits of hiring people with disabilities. Further, DVI should work to share their lessons with the other elements of Delaware's workforce system.

[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 about how the workforce system can train job seekers to meet employer need. Where is the messaging strategy and communications plan for showcasing the bottom line benefit of hiring people with disabilities? Are there any plans for highlighting those employer heroes who are capitalizing on the talents of people with disabilities? Governor Markell's media appearances and speeches to chambers of commerce and other groups have been vital in demonstrating the business case for hiring PWDs. A systematic and ongoing communications campaign must continue if you want to maximize your success. Message repetition is vital to getting people to change long entrenched behaviors that come from negative stigmas. **The best way to fight stigmas is to let employers see the facts from other employers who are already succeeding by hiring people with disabilities.**

In 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.](#) We know that Delaware has worked with the USBLN in the past, and it can help you in your 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.

**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. You know that Delaware employers have seen that people with disabilities can be extremely capable and loyal workers. While there are few Stephen Hawkings — with or without disabilities — people with disabilities can work highly successfully in hotels, healthcare, tend 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. They, like anyone else, will also need message repetition on this over time.
- 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. Delaware'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 available to help from a variety of sources. RespectAbility has webinars, as does ASKJAN.org, USDOL and others. Partners like the Poses Family Foundation can provide training to the workforce staff and volunteers as well as to community agencies. 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 Delawareans with disabilities to reach for the stars.** For example, Virgin Airways founder Sir [Richard Branson](#) and finance wizard [Charles Schwab](#) are dyslexic. Scientist Stephen Hawking and multi-billionaire businessman Sheldon Adelson, like Gov. Greg Abbott of Texas and

President Franklin D. Roosevelt before them, are wheelchair/mobility device users. The CEO of Wynn Casinos, Steve Wynn, is legally blind. Arthur Young, co-founder of the giant EY (formerly Ernst & Young) was deaf. Success sells success and that is something the workforce system should seriously utilize in an intentional manner moving forward.

**There are several examples in the text of Delaware’s WIOA plan which hint that such a paradigm is in motion.** For example, on page 88, the Plan discusses the continuing role of DVR “to develop and enhance established partnerships with employers to identify competitive integrated employment and career exploration opportunities.” The Plan then goes on to specific that this will involve such things as engaging “employers in activities as strategic partners”, “Use employers to help identify high demand industries and occupations”, “Utilize their expertise to develop career options and credentialed programs for individuals with disabilities,” and to “Promote and encourage their expertise in activities such as apprenticeships.” **We look forward to seeing how Delaware puts these commitments into action in the months and years ahead.**

**Governor Markell has already done so much on expanding employment opportunities for people with disabilities.** We hope that in his final few months in office, he will work to pass the baton to his successor and to carry the work forward by speaking to Chambers of Commerce and other employer groups. **Further, his office could look into hosting a specific summit talking about the legacy of the Better Bottom Line Initiative and how best practices will be critical to the continuing challenge of expanding disability employment.** We would be happy to assist and to offer any support we can to make the most of what has been accomplished and what is yet to be done.

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

The success of WIOA depends on being an employer driven paradigm shift. Delaware’s commitment to this success is clear from the formal title of the State Plan. 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), Appendix A of the State Plan contains a detailed analysis of the First State’s economy. **On page 23 of the Economic Analysis, the Appendix states that “Health Care and Social Assistance, the state’s top industry in terms of employment, is projected to add the most jobs over the next decade.”** This growing demand, totally nearly 10,000 new jobs, is twice as much as the project growth of Construction in Delaware. Further, page 45 offers Occupation Projections by Career Cluster. The “Hospitality & Tourism” is projected to have the largest number of job openings, “with 23,500 projected.” Looking at projected wages in the evolving economy of Delaware, we find that careers in “Science, Technology, Engineering & Mathematics (STEM)” have the highest wages.

We outlined these segments of Delaware’s economy in order to point the direction in which policy and investments are needed. With the right training and supports, people with disabilities can excel in any of the job sectors discussed above. As such, people with disabilities need to be a factor in the development and design of the sector strategies that Delaware adopts to create a pipeline of talent to meet the employer needs discussed above. **Below, we outline our specific ideas for how your workforce system can do that:**

#### **A. Expand Project Search to meet Health Care and Social Assistance talent needs:**

Page 84 of the State Plan discusses Delaware’s experiences implementing the Project Search model. This section describes the initial efforts in 2012 between “DVR and the Delaware

Department of Education” in collaboration “with Goodwill of Delaware, Christiana Care Network, and Red Clay School District.” Now, “Project SEARCH is now operating at or near capacity; a positive increase of service delivery to transition youth in two of the three counties in Delaware with an aspirational goal of expansion in 2016 to Sussex County.” While we are pleased with this aspirational goal, there is a critical need to rapidly and expand Project Search.

The rapid emerging talent needs in health care represent both a challenge and an opportunity for the nation’s workforce system. It is challenge propelled by an aging population resulting in increasing demand for qualified workers ready to fill the talent needs of hospitals, assisted living centers, and nursing home. It is opportunity to channel the incredible talents of people with disabilities into the workforce. This is a topic that needs to be examined closely and has implications for people with disabilities who want to work.

Adding over 10,000 new jobs to Delaware’s economy, “Health Care and Social Assistance” will continue to be the First State’s top industry for the rest of the decade. **The rapid emerging talent needs in health care represent both a challenge and an opportunity for the Delaware’s workforce system.** It is challenge propelled by an aging population resulting in increasing demand for qualified workers ready to fill the talent needs of hospitals, assisted living centers, and nursing home. **It is opportunity to channel the incredible talents of people with disabilities into the workforce.** This is a topic that needs to be examined closely and has implications for people with disabilities who want to work.

The extent of the talent need in this sector is such that rapid expansion of Project Search should be on your mind. We suggest that Delaware look to follow the example set by the state of Wisconsin where they started with three Project Search sites and are expanding to twenty-seven sites in a variety of different occupations. Project Search in Delaware has achieved great results and it is critical to now push for returns to scale.

**People with disabilities can and should be part of the solution to this demand in the labor market.** A 2014 report from the [Office of Disability Employment Policy](#) (ODEP) captured this opportunity clearly, saying that “[people with disabilities] not only represent an untapped talent pool, but also offer significant value and insight” in the field of healthcare. It is important for healthcare institutions to reflect their customers, and people with disabilities interface more with the healthcare system. 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.** **[Christiana Care Health System is a living example of how successful Project Search can be in training youth with disabilities for health care jobs.](#)** Further, Christiana can be a powerful voice in convincing other healthcare of the value of employees with disabilities.

#### **B. Tourism and Hospitality should also priority for expanding Project Search:**

As a model, Project Search is sectors beyond just health care. We also recommend that Delaware look at disability employment programs that have helped hotels and resorts meet their talent needs in other states. **The draft of Delaware WIOA state plan shows that the “Hospitality and Tourism” cluster is a key growth sector of the First State’s 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 Delaware.**

Likewise, in other states, [hotels and other hospitality employers have found Project SEARCH to be an amazing source of talent.](#) Delaware has lessons to learn from the [work done by Embassy Suites and David Scott in Omaha, Nebraska and their approach to training youth with disabilities for careers in Hospitality.](#) Moving forward, Delaware’s workforce system should connect with employers in the hospitality sector to begin figuring out how to benefit from these models.

Lastly, we will watch the work being done around the implementation of the Start on Success (SOS) program very closely. Discussed on page 115, “SOS provides employer-based training opportunities for youth in transition. Thus far, the SOS sites are in New Castle County, but DVR will explore the expansion into Kent and Sussex Counties.” We deeply appreciate Delaware’s continued focus on youth with disabilities. **Your state is truly embodying what we call the “Jackie Robinson Strategy” and continues to be a model for the nation.**

**C. Logistics and Distribution Centers should also be a priority youth with disabilities:**

Likewise, “The Transportation and Warehousing sector” in Delaware “continued its recent growth in Delaware, adding 1,250 jobs in 2014.” This is another sector where more Delawareans with disabilities can be employed and can benefit their employer’s bottom line. [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.**

**D. Translate Gov. Markell’s efforts on STEM into a legacy that will benefit Delawareans with disabilities for years to come:**

One missing item from the current draft of Delaware’s state plan is an issue that Governor Markell has actively championed. **During his time in office, Governor Markell has championed the importance of ensuring that opportunities in STEM are fully accessible to people with disabilities.** He has led the way in partnering with companies to employ more people on the autism spectrum. For example, [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.](#)” **This work is critical both at the state level and at the federal level. 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.** Delaware needs to address this need in your plan and to continue highlighting successes achieved in this space.

**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 Section 503 requirements and talent shortages. This includes the top contractors in Delaware such as: Glaxosmithkline PLC, Husky Energy INC, Great Lakes Dredge & Dock Corporation, Vigil Contracting INC, and Masley Enterprises INC.

**E. Delaware should significantly expand on Section 503 Opportunities:**

**More emphasis is needed in Delaware’s Plan around the employment opportunities and talent challenges created by the Section 503 regulations and federal contractors.**

Delaware’s plan does reference outreach to “Federal contractors and subcontractors” in the context of discussing the duties of “Local Veterans’ Employment Representatives (LVER)” on page 242 of the State Plan. **This is critically important work and we feel that it would be effective if do in collaboration with VR staff working on employment opportunities for Delawareans with disabilities.** Section 503 specifically sets a [new 7 percent utilization goal for companies to recruit, hire, and retain qualified individuals with disabilities](#) in all job categories. **The lack of references to Section 503 in your state plan is a significant missed opportunity.**

**Delaware needs to 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 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. The full list of federal contractors in Delaware can be found at [www.Fedspending.org](http://www.Fedspending.org).

**F. Don’t Neglect Agriculture as a potential source of opportunity:**

As agriculture is also an important industry in Delaware, [there is an opportunity to replicate the success of TIAA-CREF’s Fruits of Employment project that provides internships and job training to workers with disabilities to prep them for careers in competitive agriculture.](#)

#### **4. Public Education on Free and Accessible Services and Resources:**

Delaware offers many online and in person resources to help employers and people with disabilities come together to build success. [For example, the State Plan rightly speaks with pride about Delaware JobLink.](#) To quote page 5 of the Plan, “Our current greatest advantage is Delaware JobLink ([Joblink.delaware.gov](http://Joblink.delaware.gov)) with its retooled resume builder, career lattice project, and streamlined job order procedure.” These are incredible resources and it is essential that all stakeholders are educated to know that these resources exist, and that they are free and user-friendly. These resources must also all be accessible as you already know. Still, it should be written into the plan as this plan will be used by the next administration in your state.

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. At the same time, the online tools created for state hiring are very helpful for Delaware and set a model for the country.

#### **5. 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, Delaware should look at partnering with UBER, Lyft 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.](#) **While we are pleased to see that VR staff identified transportation as the #1 barrier to training and employment on page 99, in the last paragraph of Section B, your State Plan lacks a specific strategy to overcome this barrier. That is an area of concern and we hope you find a collaboration solution as WIOA implementation moves forward.** Public sector employers and federal contractors who have Section 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 as well.

#### **6. Aging workers and those who acquire disabilities must be specifically addressed:**

**The plan does talk about the aging of the Baby Boomer generation and how their retirements will lead to talent shortages. However, many people who have been in the workforce for decades find that before full retirement age they cannot keep up with the physical demands from their jobs.** In Iowa, IVRS works with Unity Point Hospital. They find that ER nurses, for example, come to a point where they can no longer keep up with the physical demands of the 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 workers in the workforce 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.

**7. Sustain Delaware’s Commitment to State Level Affirmative Action –hiring of people with disabilities for jobs in state government and state contracting obligations:**

As stated above, the continuing challenge of improving employment outcomes for people with disabilities requires a full spectrum approach. One of the best practices identified first in Governor Markell’s *Better Bottom Line* Initiative and later in RespectAbility’s *Disability Employment First Planning* Toolkit concerns hiring people with disabilities at the state level. Page 93 of the State Plan mentions how “The State of Delaware has a Selective Placement Program (pg 93, last paragraph) in which agencies can interview qualified individuals with disabilities without having to post a position.” This Program reflects one of the most important first steps taken by Governor Markell. Namely, the idea that, state government hiring and contracting can also be a source of opportunity for people with disabilities. In the Governor’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.”](#) **This is a model Program that should be sustained even after new leadership is elected this fall.**

**Next is the matter of contracting in state government.** As with Section 503, state government can also use contracting as a means to promote the hiring, retention and promotion of people with disabilities. Contracts with state may not be as vast or lucrative as federal contracting, but this is yet another place where innovative work can be done to improve employment outcomes for people with disabilities at the state level. Lastly, as shown by Delaware’s Selective Placement Program, having a fast track or selective placement hiring system for people with disabilities can create more jobs. We hope that the workforce system will consider how to sustain such efforts in the future. Should we mention something about Employment First here?

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

**There are several points where the current draft of Delaware’s State Plan addresses the unique workforce challenges facing ex-offenders as they attempt to reenter society.** For example, on page 23 of the State Plan, training programs commit to data sharing around “The educational attainment of reentering offenders.” In a later section, we see the depth of Delaware’s commitment to serving this population in Section III (2) (B) “Alignment with Activities outside the Plan.” Page 24 discusses how the workforce system interactions of “Reentering offenders involved in the Individual Assessment, Discharge And Planning Team (IADAPT)” will be tracked. Returning citizens who go through this process will “receive supports as allowed through Second Chance Grant funding.” Page 26 discusses these efforts in more detailed. This is critical work and we hope it will result in improved transitions back into society.

**However, the lens of disability needs to be applied to the work your state is doing to meet the requirements under Section 225 of WIOA** [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. There are two related challenges here. First, there is a need to identify potential disability issues among inmates during the intake process and ensure their needs can be met. Ideally, this type of assessment could be done within the first thirty days of their sentence. Such identification could

then feed into the work being done through educational programs in corrections. Second are the issues of release and regulation as inmates become returning citizens. Whether it is mental health supports or learning accommodations helping ex-offenders to find employment when they are home is a critical workforce development challenge. It is a challenge that only grows more complicated when a disability remains unaddressed. The price paid for ignoring these issues are higher rates of recidivism and greater costs to society. Addressing these issues at the beginning and at the end of the corrections process will have downstream effects and hopefully will enable states to address the intersectionality of these workforce, disability, and justice issues.

**Conclusion:**

In all of our work around WIOA, we have emphasized the fact that this new law represents the intersection of hope and history for people with disabilities. Delaware's State Plan is a great example of that hard work, dedicated effort, and specific policies needed to realize those hopes. People with disabilities want to pursue the American Dream, just like everyone. Making sure there are pathways for their talents to meet employer talent needs is a win-win-win for people, taxpayers, and businesses alike. We are encouraged by what we have seen from Delaware and we stand ready to assist in any way that we can. We know that this administration is firmly committed to these issues and want to ensure that things are prepared for future administrations as well.

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 each state ranks nationally.

## APPENDIX – Ranking 50 States by Employment Rates and Employment Gap

Data Source- Chart 1: Table 2.1: Employment—Civilians with Disabilities Ages 18 to 64 Years Living in the Community for the United States and States: 2014 from the Annual Disability Statistics Compendium

### Disability Employment Rate by State, 2014

	State	%		State	%		State	%		State	%			
1	South Dakota	50.1	12	Montana	40.5	23	Oklahoma	36.4	34	California	33.3	45	Arkansas	29.2
2	North Dakota	49.9	13	Connecticut	40.2	24	Oregon	36.4	35	Arizona	32.8	46	South Carolina	29.0
3	Iowa	46.5	14	New Hampshire	40.0	25	Indiana	36.2	36	Missouri	32.8	47	Mississippi	27.4
4	Nebraska	46.0	15	Kansas	39.8	26	Vermont	36.2	37	Maine	32.5	48	Kentucky	27.3
5	Wyoming	45.2	16	Wisconsin	39.8	27	Illinois	35.7	38	Louisiana	32.1	49	Alabama	27.2
6	Minnesota	44.4	17	New Jersey	39.2	28	Delaware	35.6	39	North Carolina	31.3	50	West Virginia	25.6
7	Utah	44.0	18	Maryland	39.1	29	Massachusetts	35.5	40	New Mexico	30.4		Washington D.C.	30.3
8	Hawaii	42.4	19	Idaho	38.8	30	Ohio	34.6	41	Florida	30.1			
9	Colorado	41.6	20	Texas	38.0	31	Pennsylvania	34.5	42	Tennessee	29.9			
10	Nevada	40.9	21	Washington	37.7	32	Rhode Island	33.9	43	Georgia	29.6			
11	Alaska	40.8	22	Virginia	37.6	33	New York	33.6	44	Michigan	29.6		United States	34.4

Data Source-Chart 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: 2014 Disability Statistics Compendium

### The Difference in the Employment Gap Between Disabled and Non Disabled Adults 2014

	State	Gap		State	Gap		State	Gap		State	Gap			
50	Maine	47.4	39	Mass.	43.5	28	Delaware	40.7	17	Minnesota	38.5	6	Alaska	35.3
49	Kentucky	47.1	38	Georgia	43.5	27	New York	40.4	16	Washington	38.3	5	Hawaii	34.2
48	South Carolina	45	37	Florida	43.3	26	Louisiana	40.3	15	Nebraska	37.9	4	South Dakota	33.6
47	Michigan	45	36	Mississippi	43.1	25	Virginia	40	14	Connecticut	37.7	3	Utah	33.5
46	West Virginia	44.9	35	N. Carolina	43	24	Illinois	40	13	Colorado	37.4	2	Nevada	33.4
45	Arkansas	44.6	34	Ohio	42.5	23	Kansas	39.9	12	Texas	37.3	1	North Dakota	32.1
44	Tennessee	44.5	33	Pennsylvania	42	22	Arizona	39.7	11	New Jersey	37.3		Washington DC	45.2
43	Missouri	44.4	32	Wisconsin	41.4	21	Oklahoma	39.2	10	Montana	37.3			
42	Vermont	44.2	31	New Hampshire	41.3	20	Maryland	39.1	9	Idaho	37			
41	Alabama	44.1	30	New Mexico	40.8	19	California	38.9	8	Wyoming	35.9			
40	Rhode Island	43.8	29	Indiana	40.7	18	Oregon	38.5	7	Iowa	35.7		USA	40.3