

Feb. 19, 2016

RespectAbility – Public Comments – Idaho Combined State Plan

“WHEREAS, it is in the public interest to promote employment opportunities for people with disabilities” – [Governor C.L. “Butch” Otter, Executive Order No. 2011-02](#)

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

While Idaho has made great strides in promoting employment opportunities for people with disabilities through the work of both the Division of Vocational Rehabilitation and the Commission for the Blind and Visually Impaired, the Gem State must do better in terms of competitive, integrated employment for people with disabilities living in Idaho.

Only 38.8% of working age Idahoans with disabilities are employed, compared to 75.7% of working age Idahoans without disabilities. While Idaho is above the national average and this gap has decreased by about 2% since 2014, it is still too large. As the labor force in Idaho experiences high job turnover, Idahoans with disabilities can be a valuable asset to help grow Idaho’s economy.

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’ve also included [a list of employment resources for people with disabilities](#) on our website that would prove to be very useful.

Many of the critical issues that we raise in our comments concern the need for a disability lens on the overall work of Idaho’s workforce system and the need to better align programs.

The Idaho WIOA State Plan has many strong points. It creates a good strategy for vital improvements for Idaho’s workforce system, improves the system’s ability to serve people with barriers to work as well as supporting employers meet their talent needs. This draft plan will capitalize on the partnerships and collaborations necessary to empower people with disabilities to gain employment. It is to be strongly commended. The high expectations, pre-employment pipeline, commitment to program assessment, and partnerships between government agencies will go a long way to sustaining success.

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. **Our public comments on Idaho’s WIOA State Plan are structured around those points where greater clarity, precision, and data are needed to ensure that people with disabilities will be better equipped to pursue the American Dream.**

1. Performance Metrics and Program Assessment: Ensure that the best data is included in Idaho's Combined State Plan and is used as performance metrics moving forward, including the Labor Force Participation Rates of people with disabilities v. those without disabilities

Achieving success, especially through the implementation of WIOA, will very much depend on having access to the right data to drive the decision making process. **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.**

While the “Assessment and Evaluation of Programs” section starting on page 78 of the Plan provides a great degree of detail and is well organized, it is sorely lacking on the disability front. This is not a small issue when there are close to 100,000 working age Idahoans with disabilities and only 38.8% of them are currently employed. As such, we offer a key suggestion that will strengthen Idaho's WIOA State Plan and provide the insights needed to improve outcomes.

We highly recommend that all program analysis and evaluation be amended to include specific detail on one of the most important data points about the economic situation of the disability community. **It is absolutely critical that Idaho'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 Employment Outcomes and Equal Access to Services as mentioned on page 83, people who are not actively looking for work are being excluded from the plan's analysis of the state economy. The LFPR is a critical lens that is needed to bring clarity to the issue of employment for people with disabilities. **There is a 36.9-point gap in the Labor Force Participation Rates between people with and without disabilities in Idaho. Pushing hard to close this gap will require focused energy and effort. We recommend that Idaho's workforce system set the gap in the labor force participation rate between Idahoans with and without disabilities as a key performance metric moving forward.** The good news is that thanks to Idaho's hard work, this gap has decreased by about 2% in Idaho since 2014. Let's keep moving in that direction.

[As an example of the data that is needed, we are including a link to the presentation our organization has compiled about employment for Idahoans 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 Idaho. This link is also provided at the end of this document in our Resources section.

2. Make busting stigmas, myths, and misconceptions a key part of Idaho's workforce strategy:

Low expectations and misconceptions are critical barriers to employment for people with disabilities. **[A Princeton study shows that while people with disabilities are seen as warm, they are not seen as competent.](#)** Similarly, **[a study published by Cornell Hospitality Quarterly found that companies share a concern that people with disabilities cannot adequately do the work required of their employees.](#)** **We therefore recommend that Idaho's Combined State Plan be amended to include a comprehensive proactive communications/public relations strategy for reducing such stigmas.** Indeed, we know that other groups of Idahoans with barriers to work also face stigmas, especially those leaving the corrections system. Page 9 of the Title IV-IDVR specific plan includes a section on VR Services, including promoting awareness of disability-

related obstacles. This is an excellent start, but it's important to recognize that those obstacles are not limited to the person's specific limitations created by their disability, but also includes the stereotypes and stigmas they face.

There are three types of messages and audiences that are needed to expand employment for people with disabilities and reduce the stigmatization and stereotyping they face. Serious communications campaigns are needed to target the following three areas.

- A. CEOs/business leaders need to understand the value proposition/business case for why they should focus on putting people with disabilities into their talent pipelines.** This is best done through business-to-business success stories. Those businesses need to share their success stories and to talk about how people with disabilities can be extremely capable and loyal workers. People with disabilities can work very successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and be highly talented in developing computer software and engineering solutions. CEOs and business leaders need to know that people with disabilities can be the some of the best people to get a job done.

We are impressed with the Work Opportunity Tax Credit mentioned on Page 9 of the Title IV-IDVR specific plan. Although we hope PR campaigns will push businesses to make necessary changes to promote employment for people with disabilities, financially incentivizing it is an excellent strategy and we commend you for that.

- 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 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 them to overcome their own fears and to excel at recruiting, hiring, supervising or working with colleagues with disabilities. Idaho'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 related to fear and stigma. The National Organization on Disability and the U.S. Business Leadership Network also offer strong resources.

- C. People with disabilities and their families need high expectations. From the time of diagnosis, setting high expectations is critical. Idaho's new workforce policies need to be supported by a PR campaign that will inspire Idahoans with disabilities to set high expectations for themselves and inform them that there are many opportunities out there.** 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 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.

This PR campaign effort needs to begin at the highest levels of state government. In other states, **governors have been incredible role models on this front – bringing media to best practices of inclusive employment.** Governors Jay Inslee of Washington and Scott Walker of Wisconsin have all done this extensively, for example. Their media appearances have been vital in demonstrating the business case for hiring people with disabilities. Governor Otter can and should do the same. **This type of systematic and ongoing communications campaign must start and continue if you want to maximize your success.**

We live in a world where perceptions are shaped at lightning speed by social media, entertainment and news. It can be 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. Social media certainly has a role to play in this effort.

As an example of the power and the value of making businesses care for hiring people with disabilities, we offer Idaho our insights gained from our [#RespectTheAbility campaign](#). #RespectTheAbility is a social media 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, which can be found on our website, offer insight in how to implement such a multilayered approach.

3. 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) Idaho'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 those with disabilities, requires strong partnerships with employers in those sectors that are rapidly expanding.** The strategic goals outlined in the State Plan make it clear that Idaho has taken that commitment seriously.

We know from page 3 of the current draft of the Combined State Plan that several sectors in Idaho's Top 5 Major Industrial Sectors from 2010-2014 are especially good sectors for people with disabilities to work. Those sectors are Health Care and Social Services (#1 on the list), Retail Trade (#2), Local Government (#3) and Accommodation and Food Services (#5). We also notice on page 5 that Retail Salespersons, Cashiers, Laborers and Movers, and other jobs that persons with disabilities can excel in are among Idaho's top 10 high-demand occupations based on job projections for the year 2022.

The current draft of the Combined State Plan does a very good job of assessing those industries that help drive Idaho's economy as well as the emerging career fields which will be critical in years to come. **The jobs gains in these sectors offer a great opportunity for focused sector strategies to improve employment outcomes among people with disabilities in Idaho. 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 Idaho’s major sectors and the sectors that are rapidly growing. Below, we offer our specific ideas on how to implement such efforts:

A. Health Care and Social Services

As noted on page 8 of the Combined State Plan, the Health Care and Social Assistance sector in Idaho is projected to see the largest net growth between 2012 and 2022. This trend is both a challenge and an opportunity. It is a challenge in that employers in the health care sector have talent needs that are only going to grow in the years ahead. It is an opportunity to train and prepare young people, especially those with disabilities, to go into a dynamic career field. **People with disabilities can and should be part of the solution to this critical demand in the labor market.** 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. We provide many examples on our website. **Employers working in health and elder care can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities.**

We would like Idaho to explore ways to expand Project SEARCH. In looking to meet the health care needs of Idaho, we were very surprised to see very little regarding Project SEARCH in the Combined State Plan and even in the Title IV specific plans. Nationally, each year approximately 2,700 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. Project SEARCH has been tremendously successful. For example, the first longitudinal study of the program, which was conducted in upstate New York, found “a 68% success rate in transitioning students from high school into competitive employment” and “Project SEARCH sites...have an impressive 83% success rate overall.”

Incorporating Project Search into the overall state plan will help employ people with disabilities and bolster the already strong and the rapidly growing industrial sectors in Idaho, including the Health Care and Social Services sector.

B. Science, Tech, Engineering and Mathematics (STEM) and The Autism Advantage

As has been documented in many cases, there can be an “Autism Advantage” in the STEM field. 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. As Carol Glazer said, writing earlier this year in *Huffington Post*, “America is already lagging when it comes to STEM-skilled workers. The U.S. will have more than 1.2 million job openings in STEM fields by 2018.”

Federal contractors and other employers have huge demands for STEM-qualified talents. However, many schools place their best supports for students with disabilities in

schools that do not have strong STEM training. This is a huge loss as people on the Autism Spectrum, for example, can have the very best skills in science, math and engineering. Governor Otter can use his excellent leadership to lead the partnerships with companies to employ more people on the autism spectrum. **This issue of STEM and access for students 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.** This will take partnerships with early childhood interventions, schools, community colleges and universities.

Partnerships should be created with federal contractors who have 503 requirements and talent shortages. This would be a great gateway for people with disabilities to enter the workforce.

C. **High Turnover Jobs: Accommodations/hotels, Distribution/Supply chain/Retail**

Millions of dollars are lost each year in the United States 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.](#) As stated on page 14, “The highest demand industries and occupations are clustered around health care, retail/trade, food service...considered high demand because high employee turnover...” These jobs also often require the least skill and education. This is good for people with disabilities, and good news for the state of Idaho’s workforce system. **Research shows that employees with disabilities, when their interests and abilities are aligned with the needs of employers, are even more productive and loyal (higher retention rates) 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.

A great example of an employment sector where employees with disabilities can be tremendously successful is the hospitality industry. Accommodations and food service are extremely high turnover jobs and numerous studies show that people with disabilities can be outstanding in those fields and have significantly higher employer loyalty.

An outstanding example of the type of work needed is found in Missouri. As part of the Poses Family Foundation’s Workplace Initiative, a coalition of employment service providers has launched a successful training and placement program with the hospitality sector in St. Louis. This training runs for up to 12 weeks, and takes place on site at the hotel; all participants are paid by the hotel for the duration of training. Since the summer of 2015, two cohorts of trainees have completed training at the Hyatt Regency. Trainees have gone on to permanent employment at the Hyatt and other hotel partners in a range of departments—culinary; auditing; and customer service. This type of training and Poses’ Workplace Initiative could easily be part of your overall Sector Strategies.

Likewise, in other states, hotels and other hospitality employers have found Project SEARCH to be an amazing source of talent. The work done by Embassy Suites and David Scott in Omaha, Nebraska offers valuable lessons that can enable Idaho to improve employment outcomes for people with disabilities. Idaho’s State Board, along with other components of the workforce system, should connect with employers in the hospitality sector to begin figuring out how to benefit from these models.

Another sector with high turnover and big potential are distribution/supply chains. Many companies, including UPS, Wal-Mart, and OfficeMax have proven records of success. Walgreens has demonstrated that workers with disabilities in their distribution centers are as productive, are safer, and have higher job retention rates when compared to peers without disabilities. These efforts have taken the logistics sector by storm with Lowe's, OfficeMax, Pepsi, P&G, and other companies all launching their own successful disability hiring initiatives. As reported by the National Organization on Disability, "Lowe's hired more than 150 new workers with disabilities in the first year, and an additional 250 workers in the following 18-month period." They can be outstanding partners for disability employment as these industries suffer from high turnover rates and people with disabilities are proven to have significantly higher retention rates. It is important to identify more specific opportunities with employers and to cite them in the plan, as well as the criteria by which to continue and to expand such partnerships in the future.

D. Jobs with state government and state contracting can also be sources of opportunity

While the focus of our comments on Idaho's Combined State Plan have been around aligning the workforce system to create opportunities for Idahoans with disabilities in the private sector, public sector employment should not be neglected. In the year ahead, the workforce of Idaho's state government is likely to 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."

Idaho should explore the feasibility of Affirmative Action hiring of people with disabilities for jobs in state government plus expanding state contracting obligations similar to the model we see in Section 503 for federal contractors. However, even if you do not use affirmative action you should ensure that all your job listings and professional development tools are accessible. Online job listings should be screen-reader friendly so they can be accessed by people with vision impairments. Videos should have captions for people with hearing impairments.

The untapped potential of Idahoans with disabilities is such that a full-spectrum, all-of-the-above-and-more approach is needed. While our priority is on seeing the talents of people with disabilities channeled into the private sector, employment opportunities in the public sectors shouldn't be overlooked as part of the state's overall workforce strategy.

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

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

should respond to these newly enacted regulations by adopting a strategy focused on competitive advantage, not just compliance.

Idaho companies doing business with the federal government represent a diverse range of sectors, each with their own unique talent needs. From conversations that we have had with Idaho VR staff, we know dedicated professionals have previously reached out to several important contractors with new Section 503 requirements.

These regulations and requirements entail far more than just new rules for businesses to play by. Section 503 is an opportunity that could potentially have a broad impact on the employer engagement work of the entire workforce system. The companies who must comply with Section 503 have an opportunity to teach companies not impacted by the regulations how to effectively employ, engage, and retain workers or customers with disabilities. Specific companies that should be included in your outreach efforts include Battelle Memorial Institute INC, Sunshine Minting INC, CH2M Hill Companies LTD, The Babcock & Wilcox Company, and Record Steel and Construction INC. [More detailed information regarding federal contracts in Idaho can be found here.](#)

5. Avoid the Opportunity Costs of Focusing Too Much on One-Stop Centers. Programmatic Accessibility is Critically Important

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. One challenge that we have seen in many states' WIOA plans has been the prioritization of expensive bricks and mortar One-Stops as the primary access point for programs and services under WIOA. 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.

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.

6. 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. **Idaho should be careful not to waste money creating online resources as ASKJAN.org, the US Department of Labor's Office of Disability Employment,** our organization and others offer free toolkits, webinars and training opportunities. We suggest that the state simply puts these resources out there. It's an easy way to make a significant impact at a minimal cost.

The Title III Specific Plan provides a very good outreach strategy on page 6, but we'd like to see it have a section that focuses the outreach strategy towards people with disabilities. It's an innovative initiative to provide farmers with their basic rights including their labor rights and the applicable labor laws. We think this would be an excellent initiative to apply to people with disabilities. Reach out to people with disabilities and provide them with the relevant labor laws and their labor rights.

7. Nothing About Us Without Us:

“Nothing About Us Without Us” has long been a rallying cry for the one-in-five Americans who have a disability and it has implications for the workforce system.

Specifically, we have two recommendations regarding the membership of Idaho’s State Board.

First, we recommend the placement of a representative of the disability community on the State Board.

Even in a non-voting capacity, having a self-advocate or community member speaking to the needs of Idahoans with disabilities would be a powerful addition to the State Board’s work. **Second, we recommend the placement of a representative of the disability community on the Idaho Workforce Development Council.** Their voices and perspectives will be critical to ensuring greater opportunities for Idahoans with disabilities, including assisting with the PR campaign we recommended to address stereotypes, stigmas, and other barriers.

8. Ensure that Apprenticeship Programs are Fully Accessible and Actively Recruiting Young People with Disabilities:

We are pleased that Idaho is looking to expand the vital opportunity that apprenticeship training can offer to young people. These efforts are detailed on page 42. 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.](#) Such innovative partnerships and improved accessibility are essential elements of realization the full promise of WIOA for people with disabilities.

9. Prioritize pre-employment training and expand partnerships with VR:

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

A great example of the type of effort that you can emulate comes from UPS in Louisville, Kentucky. At one of the global logistics company’s busiest facilities in a training program dedicated to preparing youth with disabilities to succeed. [The Transitional Learning Center is the result of a partnership between an employer, the school system, and vocational rehabilitation.](#)

Pre-training programs are great because they offer the opportunity to train youth with disabilities in the soft skills they need to succeed and provide them with a foundation of work experience.

10. Transportation is a vital component and it must be addressed directly:

One significant reservation that we have regarding Idaho’s Combined State Plan is the very limited attention given to the issue of transportation. This is of critical importance not only for Idahoans with disabilities but also other members of low-income communities.

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 for people with disabilities.

People with disabilities need transportation solutions. Public transportation need not be the only solution. In places where it is not possible to coordinate a bus route, Idaho could look at partnering with Uber, Lyft, or other new transportation solutions. For people with disabilities who do drive, such companies as Uber and Lyft can also provide a way to enter into the workforce with flexible hours, so Idaho could also look at developing partnerships with these sorts of companies.

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 as well.

11. Strategic Engagement to Build a Mentor System for Customers of the Workforce System.

Government can't and shouldn't do everything. This is especially true in a state with significantly limited resources such as Idaho. There is a massive role that can be played by volunteers who are willing to help people with barriers to work, including people with disabilities, find and keep jobs. There is a critical, cooperative role for non-profits and faith-based organizations to play. Local workforce development areas, for example, could be encouraged to recruit volunteers from local faith communities or local non-profits. However, much more can and should be done to work with parents of teens and young adults with disabilities, and to create volunteer mentorships for people with disabilities who are looking for work or need supports to stay employed and/or grow their careers.

12. Adult Education and Literacy programs are a great place to start adding the lens of disability issues to your state's workforce system:

Adult Education programs can offer critical support to people with disabilities as they look for ways to enhance their education and become better candidates for employment. We suggest the following additions to the State Plan:

First, your initiative on page 6 of the Title II specific plan to “align adult education and literacy activities with other core programs and one-stop partners” is excellent. This would be a perfect place to include people with disabilities. It will help them develop their career paths and broaden their access to employment.

Second, in your Technical Assistance section on page 8 of the Title II specific plan, make accessibility for people with disabilities a priority. Accessibility continues to be a huge issue. We love the new model “PTE Digital” being developed by the Division of Professional-Technical Education as described on page 64 of the Combined Plan. The idea of having a Digital Learning Academy is excellent. We'd like to see PTE Digital and Online Learning more accessible for people with disabilities. This would be a great way for people with disabilities to advance their education, knowledge, and qualifications for jobs while not costing an exorbitant amount.

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

[According to recently published data from the Bureau of Justice Statistics, “An estimated 32% of prisoners and 40% of jail inmates reported having at least one disability.” This issue is a serious one and it needs to be addressed at the state level.](#) Frequently people are involved in the

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

Conclusion:

The bottom line is that expanding job opportunities for people with disabilities is beneficial to all. 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 people 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. And it is good for taxpayers, because it reduces the amount of funding spent on SSDI and other disability programs in the long run.

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. Idaho's WIOA State Plan demonstrates some of the hard work, dedicated effort, and specific policies needed to realize those hopes. People with disabilities want to pursue the American Dream, just like everyone else. Making sure there are pathways for their talents to meet employer talent needs is a win-win-win for people with disabilities, taxpayers, and businesses alike. We are encouraged by what we have seen in Idaho's Plan and are excited to see the final product. We are happy to answer any questions you may have. Thank you for your time and consideration.

Resources

1. RespectAbilityUSA website
<http://respectabilityusa.com/>
2. The Disability Employment First Planning Tool, as referenced on page 1 of our comments
<http://respectabilityusa.com/Resources/Disability%20Employment%20First%20Planning.pdf>
3. The Employment Resources for People with Disabilities, as referenced on page 1
<http://respectabilityusa.com/resources/jobs/>
4. Our presentation about employment for Idahoans with disabilities, as mentioned on page 2
<http://respectabilityusa.com/Resources/By%20State/Idaho%20and%20Jobs%20for%20PwDs.pdf>
5. The Princeton University study referenced on page 2
<http://www.relationalcapitalgroup.com/warmth-competence-2007/>
6. The Cornell Hospitality Quarterly study referenced on page 2
<http://cqx.sagepub.com/content/53/1/40>
7. Our Respect The Ability Campaign, as referenced on page 4

<http://respectabilityusa.com/respecttheability/>

8. Employee Turnover Statistics, as referred to on pages 5 and 6

<http://alliantkeystone.com/cost-replacing-employee/>

9. 2014 Report from the Office of Disability Employment Policy, as referenced on page 5

<http://www.dol.gov/odep/alliances/nondallianceroundtablereport.pdf>

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>

Column 1 Ranking of States by Employment Rate of People with Disabilities			Column 2 Ranking of States by the Employment Gap between People with disabilities and people without disabilities				
#	State	% of PWDs Employed	#	State	% of PWDs Employed	% of People without Disabilities Employed	Employment Gap as a %
1	South Dakota	50.1	1	North Dakota	49.9	82.0	32.1
2	North Dakota	49.9	2	Nevada	40.9	74.3	33.4
3	Iowa	46.5	3	Utah	44.0	77.4	33.5
4	Nebraska	46.0	4	South Dakota	50.1	83.7	33.6
5	Wyoming	45.2	5	Hawaii	42.4	76.6	34.2
6	Minnesota	44.4	6	Alaska	40.8	76.0	35.3
7	Utah	44.0	7	Iowa	46.5	82.2	35.7
8	Hawaii	42.4	8	Wyoming	45.2	81.0	35.9
9	Colorado	41.6	9	Idaho	38.8	75.7	37.0
10	Nevada	40.9	10	Montana	44.4	82.9	38.5
11	Alaska	40.8	11	New Jersey	39.2	76.5	37.3
12	Montana	40.5	12	Texas	38.0	75.3	37.3
13	Connecticut	40.2	13	Colorado	41.6	79.1	37.4
14	New	40.0	14	Connecticut	40.2	77.9	37.7

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

39	North Carolina	31.3	39	Massachusetts	35.5	79.0	43.5
40	New Mexico	30.4	40	Rhode Island	33.9	77.7	43.8
41	Florida	30.1	41	Alabama	27.3	71.3	44.1
42	Tennessee	29.9	42	Vermont	36.2	80.4	44.2
43	Georgia	29.6	43	Missouri	32.8	77.2	44.4
44	Michigan	29.6	44	Tennessee	29.9	74.4	44.5
45	Arkansas	29.2	45	Arizona	32.8	72.5	39.7
46	South Carolina	29.0	46	West Virginia	25.6	70.5	44.9
47	Mississippi	27.4	47	Michigan	29.6	74.6	45.0
48	Kentucky	27.3	48	South Carolina	29.0	74.0	45.0
49	Alabama	27.2	49	Kentucky	27.3	74.4	47.1
50	West Virginia	25.6	50	Maine	32.5	79.9	47.4

Table 2

From 2012 to 2013, the employment gap closed by one percentage point or more in 22 states. The top four states with the greatest reductions (AK, RI, WY, and NH) were small states-- with working-age populations under one million persons. It is hard to make comments about small states, because these statistics are estimates based on state-level samples. Smaller states have smaller samples and thus have a higher degree of year-to-year variability. I am hesitant to read too much into reductions and expansions in the employment gap for small states. Looking at large states-- with working-age populations over 5 million persons--Illinois (a 2.3 percentage point reduction) and New Jersey (a 1 percentage point reduction) stand out. These are two large industrial states

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

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

Working-age population under 1 million
Working-age population

over 5 million
Increase in no dis
employment

State	2012			2013			Change in Gap		Pop in 2013			Increase in Dis. Emp.	Increase in Non-PWD Emp.
	Dis.	No Dis.	Gap	Dis.	No Dis.	Gap	Pct. Points	Rank	Number	Rank	Size		
AK	39.0	76.3	37.3	47.8	75.2	27.4	-9.9	50	459,776	47	Working-age pop. under 1 million	8.8	-1.1
RI	28.7	77.0	48.3	34.3	76.3	42.0	-6.3	49	668,448	43	Working-age pop. under 1 million	5.6	-0.7
WY	43.9	78.5	34.6	50.7	79.4	28.7	-5.9	48	358,526	50	Working-age pop. under 1 million	6.8	0.9
NH	37.9	80.5	42.6	41.8	80.3	38.5	-4.1	47	842,880	40	Working-age pop. under 1 million	3.9	-0.2
MN	42.1	81.6	39.6	46.0	82.1	36.1	-3.5	46	3,357,171	21		3.9	0.5
NV	35.5	72.2	36.7	39.2	73.1	33.9	-2.8	45	1,719,885	34		3.7	0.9
WI	37.6	79.5	41.9	40.9	80.1	39.2	-2.7	44	3,544,103	20		3.3	0.6
SC	27.0	71.4	44.4	30.7	72.7	41.9	-2.5	42	2,893,842	24		3.7	1.3
NM	33.1	70.4	37.3	35.3	70.1	34.8	-2.5	42	1,243,353	36		2.2	-0.3
IL	33.4	74.6	41.2	36.1	75.0	38.9	-2.3	41	8,010,771	5	Working-age pop. over 5 million	2.7	0.4
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.	75.	40.	36.	75.	38.	-1.9	38	565,138	45	Working-	1.8	0

	6	1	6	4	1	7					age population under 1 million		
CO	40.3	77.1	36.8	42.3	77.3	35.0	-1.8	36	3,304,940	22		2.0	0.2
HI	37.3	75.6	38.3	39.1	75.7	36.5	-1.8	36	822,542	42	Working-age population under 1 million	1.8	0.1
NE	43.5	82.2	38.7	45.5	82.6	37.1	-1.6	35	1,125,425	38		2.0	0.4
ND	51.6	83.3	31.7	52.8	83.1	30.2	-1.5	34	451,304	48	Working-age population under 1 million	1.2	-0.2
KS	40.1	78.8	38.7	41.7	79.0	37.3	-1.4	33	1,730,369	33		1.6	0.2
MA	33.0	77.2	44.2	34.9	77.9	42.9	-1.3	31	4,272,843	14		1.9	0.7
OK	34.4	75.1	40.7	35.8	75.2	39.4	-1.3	31	2,295,734	28		1.4	0.1
TN	28.0	73.2	45.2	29.9	74.1	44.1	-1.1	30	3,983,560	16		1.9	0.9
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.	1.2	0.7

											over 5 million		
CT	39.7	76.6	36.9	40.0	76.4	36.4	-0.5	22	2,235,695	29		0.3	-0.2
WV	24.3	70.1	45.8	25.3	70.6	45.3	-0.5	22	1,132,703	37		1.0	0.5
WA	35.7	74.3	38.7	36.4	74.7	38.3	-0.4	21	4,339,199	13		0.7	0.4
PA	33.0	75.1	42.1	33.9	75.6	41.7	-0.4	20	7,849,516	6	Working-age pop. over 5 million	0.9	0.5
MT	38.7	76.4	37.7	39.4	76.8	37.4	-0.3	19	616,125	44	Working-age pop. under 1 million	0.7	0.4
MI	27.9	71.7	43.8	29.9	73.4	43.5	-0.3	18	6,096,761	9	Working-age pop. over 5 million	2.0	1.7
MS	26.4	69.6	43.3	26.3	69.4	43.1	-0.2	17	1,790,746	31		-0.1	-0.2
CA	31.8	70.2	38.5	32.7	71.1	38.4	-0.1	15	#####	1	Working-age pop. over 5 million	0.9	0.9
VA	36.3	76.5	40.1	36.9	76.9	40.0	-0.1	15	5,112,923	12	Working-age pop. over 5 million	0.6	0.4
KY	26.2	72.9	46.7	26.9	73.7	46.8	0.1	14	2,687,179	26		0.7	0.8
OH	32.8	75.1	42.2	33.5	75.9	42.4	0.2	13	7,072,114	7	Working-age pop. over 5 million	0.7	0.8
MO	32.2	76.2	44.0	33.0	77.1	44.2	0.2	12	3,666,019	19		0.8	0.9
MD	39.5	77.4	37.9	40.0	78.3	38.2	0.3	11	3,722,201	18		0.5	0.9
IN	33.5	75.5	41.9	33.8	76.0	42.3	0.4	10	4,008,950	15		0.3	0.5
VT	34.3	79.8	45.5	33.3	79.6	46.3	0.8	9	397,726	49	Working-age pop under 1 million	-1.0	-0.2

AZ	34. 2	71. 0	36. 8	33. 6	71. 3	37. 7	0.9	8	3,900,90 0	17		-0.6	0.3
OR	34. 3	72. 1	37. 8	35. 2	73. 9	38. 8	1.0	7	2,440,75 2	27		0.9	1.8
NC	30. 2	72. 2	42. 0	30. 3	73. 5	43. 2	1.2	6	6,000,20 2	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	2,825,10 1	25		-3.1	-0.2
AR	31. 4	72. 7	41. 3	28. 2	72. 7	44. 5	3.2	2	1,759,90 0	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

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