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RespectAbility – Public Comments – Illinois Unified State Plan

“Whereas, the Illinois Employment First Act (20 ILCS 40 et. Seq) requires that State agencies follow and implement the State’s policy of competitive and integrated employment as the first option when serving persons with disabilities of working age, regardless of disability, (The “Employment First Policy”) and

Whereas, the Employment First Policy applies to State-Funded and/or operated programs and services that provide supports to help persons with disabilities obtain private employment; and

Whereas, the Illinois Employment First Act requires all State agencies that provide such services to follow the Employment First Policy and ensure that it is effectively implemented in their programs/services; and

Whereas, access to education and training opportunities that lead to gainful employment in demand occupations within the business community is key to economic and community progress”

- [Governor Bruce Rauner, Illinois Employment First Executive Order, June 3rd, 2014.](#)

Introduction:

RespectAbility is pleased to submit the following comments regarding the current draft of the State of Illinois’s Unified 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.

[The Chicago Community Trust, the Independent Living Movement and others in Illinois](#) have done some important strategic work on employment for people with disabilities. We recognize that there are significant budgetary challenges facing Governor Bruce Rauner and the people of Illinois. Illinois can and must do much better in terms of competitive, integrated employment for people with disabilities. Empowering people through employment can save money for taxpayers as well.

Only 35.7% of the 674,067 working age Illinoisans with disabilities are employed and huge numbers are living on government benefits. Further, there are over 96,045 Illinois youth with disabilities between the ages of 16 and 20. Each year a quarter of them will age out of school into an uncertain future. [Fortunately, the Prairie State has begun to move in the right direction by prioritizing employment opportunities for people with disabilities through such efforts as the Illinois Employment First Act.](#) These efforts, combined with the strategic opportunities offered by WIOA, mean that Illinois can invest heavily into improving the competitive, integrated employment outcomes for its citizens with disabilities. **After all, there remains a staggering 40 percentage point gap in the labor force participation rates (LFPR) between people with and without disabilities.** This gap will not be closed unless resources are committed to best practices and cost-effective models.

Other states with limited resources and significant economic challenges have had success in employing upwards of 50% of their citizens with disabilities. [The Dakotas, Alaska, and Wyoming have achieved increased results by putting best practices into places.](#) The experience of these states shows ways that Illinois can dramatically improve their outcomes. **Likewise, we are also seeing pockets of excellence around innovative youth programs designed to address disability employment in [Georgia, Nevada, and Kentucky.](#)**

To help the states succeed in this [process we developed the Disability Employment First Planning Tool](#). This document details best practices and effective models. This toolkit contains models that are proven to work, be cost effective to implement, and be successful. [We have developed an extensive collection of data on disability and employment in Illinois](#). That information is also attached to our comments.

There are many elements of the Unified State Plan as written that address the essential challenges impacting economic opportunities to empower Illinoisans with disabilities. Good work is being done around the Disability Employment Initiative (DEI) grant, adopting a career pathways model, and partnerships to develop a common intake system. However, at the same time, there remain many issues where the disability lens is needed on the overall work of Illinois' workforce system. **There is a risk that the task force structure referenced throughout the Unified State Plan might reinforce siloes rather than breaking them down. Everything should look holistic, and not feel like the different sections have been stapled together.** You do not want to sign off on assurances in sections in the absence of a realistic and well thought out plan to achieve the results you are promising. **Further, while there are some data points on disability included in the State Plan, detail is lacking in terms of what performance metrics will be used to evaluate program success.** As such, we have prepared the comments below to address these challenges and suggest ways Illinois can improve employment outcomes.

1. PERFORMANCE METRICS: Ensure that the great data included in Illinois's Unified State Plan are used as performance metrics moving forward:

As we expressed in our introduction, Illinois can and must do better in terms of jobs for people with disabilities. The state ranks 27th in country in terms of the employment rate of people with disabilities and it ranks 24th when you look in terms of the gap in labor force participation rate between those with and without disabilities.

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. Also, it is critical that this data point drive the design of your state's performance metrics. Looking at unemployment information or job placements alone is not enough. 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 Illinoisans with disabilities.**

From our review of the current draft of the Unified State Plan, it is clear that good data on labor force participation rates are available to the workforce system in Illinois and that the issue is being properly framed. To quote page 21 and the section on *Individuals with disabilities*, "Unemployment among individuals with disabilities is a national epidemic, and Illinois is no exception." We are very glad to see that the Labor Force Participation Rate is mentioned for both people with and without disabilities. We are also encourage that this section of the Unified State Plan makes the logical connection that solutions will be found through "better service alignment between the partner programs" and "multilevel partnerships between the workforce, secondary and post-secondary systems to provide career pathway programs to youth with disabilities."

The next critical step that needs to be taken by Illinois is to use the labor force participation rate of people with disabilities and those without, are included as a

performance metric used by your state. What gets measured gets done – and the draft plan as written does not clarify what metrics will be used to measure WIOA successes in Illinois.

Given the priority placed on youth in WIOA, there is a need for clear distinctions and information regarding the composition of Illinois’s disability community. **As we stated above, there are 674,067 working age Illinoisans with disabilities and only around a third are employed. Further, there are over 96,045 youth with disabilities between the ages of 16 and 20.** Including distinctions based on age groups is important to ensure that the workforce system has actionable data on job seekers with barriers to employment such as disability.

We make this recommendation to ensure that Illinois has a clear view of the challenge. Given the priority of resources and services for youth in WIOA, Illinois needs to look at expanding school to work transition programs and align systems to channel these youth into the workforce. The system needs to know how many youth with disabilities are leaving the school system in order to ensure they don’t end up spending their lifetimes trapped by the benefits system.

Additionally, while Illinois may only rank 27th in the nation in terms of the employment rate for people with disabilities, it is highly illustrative to look at the experience of those with disabilities who are succeeding in the world of work. **From the data, we find that only 43.6% of the 125,537 Illinoisans who are blind or have vision loss are employed while 51.4% of the 127,679 with hearing differences are also employed. Sadly, we also see that only 25.5% of Illinoisans with intellectual or developmental disabilities are employed.** For this demographic, workforce solutions may take more time and resources in the short term, but it will be well worth it. **There will be a considerable financial and human return on investment if Illinois’s workforce system expands successful school to work transition programs such as Project Search.** Illinois already has several such programs but there is a considerable need to expand the number, scope, and diversity of such sites. We have more to say on this point later in our public comments.

2. Busting stigmas, myths, and misconceptions must be a key part of Illinois’s overall workforce strategy:

Low expectations and misconceptions are critical barriers to employment for people with disabilities. [A Princeton study shows that while people with disabilities are seen as warm, they are not seen as competent.](#) Similarly, [a study published by Cornell Hospitality Quarterly found that companies share a concern that people with disabilities cannot adequately do the work required of their employees.](#)

As such, we were pleased to see paragraph 2 on page 11 of Appendix 4, detailing a program “through the Institute of Community Inclusion...[highlighting] disability awareness, workplace accommodations and benefits of hiring individuals with disabilities.” This type of strategic business engagement is an essential best practice and one that has been a key success driver in other states with higher employment outcomes. Further, these efforts have a critical implication for Illinois’ Unified State Plan.

There is a need for a sustained, comprehensive, proactive communications/public relations strategy for reducing the stigmas and barriers identified by DRS. We recommend that Illinois’s Unified State Plan should be amended to include a comprehensive public relations campaign that educates public and employers about people with disabilities and communicate to people the benefits of hiring those with disabilities. Indeed, we know that

other groups of Illinoisans with barriers to work also face stigmas, especially those leaving the corrections system.

Indeed, the best way to fight stigmas is to let employers see the facts from other employers who are already succeeding by hiring people with disabilities. In terms of potential employer partners, we encourage your state plan to look at the [Disability Equality Index that assesses the inclusion and hiring efforts of major employers](#). It was put together by the United States Business Leadership Network (USBLN) which operates [a network of affiliates across the country that can be an incredible resource for your work](#). The companies which scored 100% in the USBLN index can be a great resource. These are Ameren Corporation, AT&T, Booz Allen Hamilton Inc., Capital One Financial Corporation, Comcast, NBC Universal, Ernst & Young LLP, Florida Blue, Freddie Mac, Highmark Health, JPMorgan Chase & Co., Lockheed Martin Corporation, Northrop Grumman Corporation, Pacific Gas and Electric Company, PricewaterhouseCoopers LLP (PwC), Procter & Gamble, Qualcomm Incorporated, Sprint Corporation, Starbucks Coffee Company, and TD Bank N.A.

Polls and focus groups show that there are three types of messages and audiences that are needed to expand employment for people with disabilities. Serious communications campaigns are needed for all three:

- A. CEOs/business leaders need to understand the value proposition/business case for their specific company as to why they should focus on putting people with disabilities into their talent pipelines.** This is best done through business-to-business success stories. Those businesses need to share their success stories and to talk about how 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 our parks and facilities, assist aging seniors, and be super talents in developing computer software and engineering solutions. CEOs and business leaders need to know that people with disabilities can be the BEST people to get a job done. [You already have a Business Leadership Network in Illinois that can and should play a leadership role in this. Additionally, another incredible resource in your state in the Chicago office of the Bridges from School to Work program.](#) This effort, which empowers youth with disabilities through the transformative power of a job, does incredible work with employers in the Chicago metropolitan area. Their experiences with these youth with disabilities could make them powerful voices and champions for change. In terms of large employers who could be great resources, we would encourage your employer engagement teams to connect with General Dynamics and [Sodexo](#). Additionally, the Chicago Community Trust has wonderful contacts on this front, as does the new Business Leadership Network in Illinois.
- 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. Illinois's VR staff and community agencies can fully

support human resources professionals and managers in dealing with their own specific fears and stigmas surrounding hiring people with disabilities. Moreover, online and in-person training is readily available to help from a variety of sources. RespectAbility has online webinars, as [does ASKJAN.org](#), USDOL and others. Partners like [the Poses Family Foundation Workplace Initiative](#) can provide training to the workforce staff and volunteers systems-wide as well as to community agencies in supporting companies through messaging efforts around related to fear and stigma. [The National Organization on Disability](#) and [the U.S. Business Leadership Network](#) offer strong resources.

- C. People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectations must begin. Illinois's efforts need to be supported by a PR campaign that will inspire Illinoisans 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.

As example of the power and the value of making the business care for hiring people with disabilities, we offer Illinois our insights gained from our #RespectTheAbility campaign. [Our #RespectTheAbility, is a social media effort focused on how hiring people with disabilities can make organizations stronger and more successful.](#) The campaign highlights the benefits to employers that look beyond the disability and imagine the possibility when hiring talented employees with disabilities. Our profiles of diverse employers such as [EY](#), [AT&T](#), and [Kwik Trip](#) offer insight in how to implement such a multilayered approach.

3. 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), Illinois's state plan must and does include a detailed analysis of the economic sectors of the state economy that are growing and are forecasted to grow in the future. The success of WIOA depends on being an employer driven paradigm shift. Expanding opportunities for people with barriers to employment such as disability requires strong partnerships with employers in those sectors which are rapidly expanding.

In terms of prospective employment needs, we suggest focusing on the economic forecasts and projected field growth listed in Tables 4 and 5 on pages 8 and 9 respectively. These charts, which show Illinois's Emerging/Long-Term In-Demand Industries, offer a great starting point for improving outcomes. **Specifically, it is important to train and prepare Illinoisans with disabilities to pursue careers in the fields listed, as they are most likely to grow in the immediate future and will likely have the greatest chance at success.** This can be accomplished by developing sector specific strategies. **The sectors of Healthcare & social assistance, leisure and hospitality, and retail trade 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 Illinois’s growing job sectors. The jobs gains in these sectors offer a great opportunity for focused sector strategies sustain and build on employment outcomes being achieved among people with disabilities.

A. Health and Elder Care:

The State Plan projects extensive job growth in the fields of “Health Care & Social Assistance.” This sector is projected to have a 15.7% increase in growth with a projected 107,596 jobs added by 2022, the second largest projected increase of any sector in Illinois. **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. 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.**

While it is briefly mentioned on page 29 of Appendix 4, we suggest that Illinois indeed continue with increasing the number of Project Search sites as they have done in Wisconsin, Florida and other states. The polling conducted by DRS and mentioned on pages 23 and 24 of Appendix 4 shows that Project Search enjoys the highest levels of support and warrants “ongoing support through DRS VR funds” (Appendix 4 page 29). Nationally, each year approximately 2,700 such young people, spread out in 45 states, do a nine month, school-to-work program that takes place entirely at the workplace. This innovative, business-led model features total workplace immersion, which facilitates a seamless combination of classroom instruction, career exploration, and worksite-based training and support.

Nationally, Project Search sites overall have been achieving outstanding results for people with disabilities, employers, and taxpayers alike. For example, [the first longitudinal study of the program found “a 68% success rate in transitioning students from high school into competitive employment” and “Project SEARCH sites in Upstate New York that have an impressive 83% success rate overall.”](#) The goal for each program participant is competitive employment. We suggest that you look to follow the example set by the state of Wisconsin where they started with three Project Search sites and are expanding to 27. The experiences of the dedicated state officials, VR counselors, workforce professionals, and special educators who have increased Wisconsin’s Project Search programs offer profound insights in the steps necessary to make rapid expansion a reality. Thinking long-term, investments in Project Search and other such programs will save big money for taxpayers while also strengthening the talent pool for employers.

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

Exciting opportunities for improving employment outcomes for people with disabilities lay in the fields related to STEM jobs. As the State Plan shows in Tables 4,5 on pages 8,9, the sectors projected to grow; many require high levels of one or more STEM (Science, Technology, Engineering and Math) fields.

As has been documented in many cases, there can be an “Autism Advantage” in the STEM space. Indeed, some people on the Autism spectrum can have the very best skills in science, math and engineering. [Microsoft](#), [SAP](#), and [Specialisterne](#) have committed themselves to “[provide employment opportunities for people on the autism spectrum in roles such as software testers, programmers, system administrators, and data quality assurance specialists.](#)” [The Israeli Defense Forces recruits and trains their citizens on the Autism spectrum for work in their elite intelligence unit.](#)

Delaware’s Governor Jack Markell is partnering with companies to employ more people on the Autism spectrum in STEM jobs. Such examples need to be implemented by Illinois as well. This issue of STEM and access for student with disabilities is a natural point of partnership between the workforce system and the educational system. That work needs to start young, be matched with high expectations for success, and designed to ensure people with disabilities have the chance to become future scientists, engineers, doctors and mathematicians.

Ensuring the Accessibility of Science, Technology, Engineering and Mathematics (STEM) Programs and Careers for People with Disabilities, especially Students with IEPs, is vital. As Carol Glazer of the National Organization on Disabilities wrote in *Huffington Post*, “[America is already lagging when it comes to STEM-skilled workers. The U.S. will have more than 1.2 million job openings in STEM fields by 2018.](#)” Governors in other states have looked at STEM needs and begun to develop solutions. For example, [in New York State Governor Cuomo has ensured that magnet schools for STEM are located near IBM, a major STEM employer in their state.](#) Illinois should follow this model. Together, Illinois’s workforce system and educational system can look to supported-employment programs such as Project Search, Specialisterne, and [the Marriot Foundation’s Bridges to Work Program](#) as models for developing a systematic approach to providing the supports necessary for our students on the autism spectrum to excel in STEM. In addition, the Illinois Pathways program, mentioned on page 48, focusing on STEM career pathways could coordinate with VR toward greater inclusion of Persons with Disabilities.

C. High Turnover Jobs: Hospitality, Food Service, Retail Trade:

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

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 Illinois to improve employment outcomes for people with disabilities](#). Illinois’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 is retail trade. Many companies, including [UPS](#), [Wal-Mart](#), and [OfficeMax have proven records of success](#).

D. TDL- Transportation, Distribution, & Logistics:

Sitting beside the Mississippi and astride the interstate highway system, logistics is a sector of growing importance to Illinois’ economy. The “Skills Gaps Analysis” of the State Plan states on page 20 that “Chicago metro area creates more than 5,000 of these middle-skill jobs in TDL each year.” In the following section on “Targeted Populations” the Plan discuss how people with barriers to work “will require more targeted initiatives.”

As you embark on such initiatives and collaborations, we encourage you to explore proven programs such as Amazon, UPS, and Pepsi. The global logistics companies UPS, at one of their busiest facilities, there is a training program dedicated to preparing youth with disabilities to succeed. Taking place in Louisville, KY, [The Transitional Learning Center is the result of a partnership between an employer, the school system, and vocational rehabilitation](#). Pre-training programs are great because they offer the opportunity to train youth with disabilities in the soft skills they need to succeed and provide them with a foundation of work experience.

[We also know that your state has honored the Walgreens Distribution Center in Mount Vernon for their efforts to recruit, hire, and retain employees with disabilities. Walgreens has demonstrated that workers with disabilities in their distribution centers are as productive, safer, and turn over less when compared to peers without disabilities.](#) However, your State Plan makes no mention of this company as model employer.

These efforts have taken the logistics sector by storm with [Lowe's](#), [OfficeMax](#), [Pepsi](#), as well as [P&G](#) are 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.”](#) They can be outstanding partners for disability employment as these industries suffer from high turnover rates and PwDs are proven to have significantly higher retention rates. It is important to identify more specific opportunities with employers and to site them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future.

E. Jobs with state government and state contracting can also be opportunities:

While the focus of our comments on Illinois’s Unified State Plan are around aligning the workforce system to create opportunities for Illinoisans with disabilities in the private sector, public sector employment should not be neglected. In the year ahead, the workforce of Illinois’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.](#)"

Illinois 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. [Governor Inslee in Washington State](#) and [Governor Dayton in Minnesota](#) have been working to implement such measures for people with disabilities through executive orders. [Likewise, we are also seeing great success with governmental hiring of people with disabilities at the local level in Montgomery County Maryland.](#) Within Illinois, the Department of Healthcare and Family Services (HFS) has already implemented a similar program (Appendix 4, page 11, Interagency Cooperation Section), and other state agencies should look to their example of inclusive hiring. The untapped potential of Illinoisans 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 over looked as part of the state's overall workforce strategy.

4. Effective employer engagement depends on the BLN and others as you focus on the right business audience:

Improving employment outcomes in Illinois very much depends on being an employer driven paradigm shift. As we mentioned above, it is vital to emphasize the business case for hiring people with disabilities again and again for a simple reason. Government action alone-- even through vocation rehabilitation -- is insufficient to improve employment outcomes for people with disabilities. The necessary condition for achieving greater competitive, integrated employment for individuals with disabilities is engaging employers and meeting their needs.

As such we are disappointed to see the only limited attention given to one of the most important assets that Illinois has in terms of making the business case for hiring people with disabilities. [The Chicagoland Business Leadership Network is a new affiliate chapter of the national BLN and we are disappointed to see that it is not yet at the WIOA table.](#) To quote the affiliate chapter's Mission Statement, the CBLN exists to the "educate, engage and inform businesses on critical disability issues. A non-profit, non-partisan business-to-business network that raises awareness and works to advance, improve and expand employment outcomes for people with disabilities in the Chicagoland area."

A state BLN is one of most important building blocks needed for improve outcomes. As such, we hope that the workforce system will increasingly engage the BLN by bringing together inclusive employers whose bottom lines have benefits from employees with disabilities.

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

Illinois's State Plan fails 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. Illinois'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.

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

6. Ensure that the Assurances in Your WIOA Checklist are matched up to a strategy to fully implement them and be successful:

The Common Assurances required of the entire workforce system and the program specific Assurances outlined in the State Plan are critical factors in the overall implementation and ultimate success of WIOA. As such, it is critical that each assurance is matched up with a strategy fitted to meeting and, if possible, exceeding the requirements of the law.

As a good example of the level of detail needed here, consider WIOA Section 188. The anti-discriminatory rules originally outlined under WIA are being updated to reflect the steps needed towards making universal access a reality. On this particular point and Chapter 10 Assurance #5 on page 64 listed on page 64 of the State Plan, we would direct Illinois to consider the resources made available from the Office of Disability Employment Policy (ODEP.) [They have recently released a guide that digs deep into what universal accessibility will mean for the workforce system.](#) Further, Chapter 10 Assurance #6 on page 64 affirms Illinois's satisfaction of the requirement that "certification policy that ensures physical and programmatic access to all Comprehensive One-Stop Centers in accordance with the Americans with Disabilities Act of 1990." However, merely meeting legal requirements should not be the end of this process. Indeed, looking at physical and programmatic accessibility can be an opportunity to invest in a more proactive workforce system very actively committed to collaboration and partnerships.

However, if there is no plan that specific identifies how the state is going to get to the commitment made in the assurance; the state is facing a serious problem. As such, we hope that the Assurances made on pages 64 and 65 of the Unified Plan, and pages 45-48 of Appendix 4 are matched with a strategy focused on improving the competitive, integrated employment outcomes of Illinoisans with disabilities. For example, are state intake databases fully accessible to screen readers? Do all your videos have captions? Is there a privacy policy in place for confidential data of people with disabilities when it is merged with other data from other agencies?

7. 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 plan 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. Illinois's focus on this aspect, as well as its decision to create further training and informational

services could be detrimental to the allocation of its budget, as many other resources which aid people with disabilities already exist.

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.](#)

8. Transportation is a critical barrier to employment for many Illinoisans, especially those with disabilities:

Public Transportation and accessibility to methods of transportation for people with disabilities is an issue that needs to be prioritized in Illinois's state plan. It is troubling that the VR surveys conducted did not inquire about access to transportation despite the overwhelming evidence showing transportation identified as one of the most critical needs for people with disabilities. Illinois's lack of depth in public transportation in cities and the absence of it in rural areas is a massive barrier to employment for people with disabilities. This should be one of Illinois's priorities in its state plan. 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 transportation routes to places where there are work opportunities. In places where that are not possible, Illinois could look at partnering with UBER, Lyft, and other new transportation solutions. People with disabilities who drive can also provide a way to enter into the workforce with flexible hours.

Public sector employers and federal contractors who have 503 obligations are key places for apprenticeships and internships and onboarding of talent. It is important for them to play a key role in planning for public transportation. This priority would not only benefit those with disabilities, but also to the large amount of migrant workers in rural communities, as they commonly do not possess reliable forms of transportation.

9. Nothing About Us, Without Us:

“Nothing About Us without Us” has long been a rallying cry for the one in five American who have a disability and it has implications for the workforce system. Even a non-voting member of a WIB can bring critical perspectives that improve the WIB's efforts. **As such we recommend that your state plan look at adopting language which would include the placement of a representative from the disability community and a representative of your state's VR system on your State Board.** Second, the State Plan could also direct local workforce boards to connect with local community organizations to recruit self-advocates to add their perspectives. Specifically, we would encourage you to look at adding such a voice to the Education, Workforce and Economic Development Leadership Team in Illinois.

10. Aging Workers with Acquired Disabilities Not Addressed

Many older people who have been in the workforce a long time may acquire disabilities before they reach retirement age. Some believe that this is simply the process of aging, and they reach a point where they cannot keep up with the physical demands of their jobs. In Iowa, IVRS works with a major employer, Unity Point Hospital to “re-home” employees to

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

11. Expand More on Disability Issues of People Involved in the Corrections System:

There are several points where the current draft of Illinois’s Unified State Plan addresses the unique workforce challenges facing ex-offenders as they attempt to reenter society. For example, on page 25, the State Plan references the work being done through [the Second Chance Act Program](#). This effort “allows governments and communities to coordinate reentry efforts, enhance existing housing and support services, engage in evidence-based practices and create innovative strategies.” **This shows that Illinois’s workforce system is aligning to improve outcomes for people transitioning out of prison and back into society. However, these efforts need to be viewed through the lens of disability.**

[According to recently published data from the Bureau of Justice Statistics, “An estimated 32% of prisoners and 40% of jail inmates reported having at least one disability.” This issue is a serious one and it needs to be addressed at the state level.](#) Frequently people are involved in the criminal justice system because they have disability issues, including learning differences, ADHD, executive function, and mental health issues that went undiagnosed and/or unaddressed through childhood and into the school years. Given these statistics from the BJS, it is vital that your state identify how many of the individuals in the ex-offender pipeline have disabilities. Serving ex-offenders is a critical workforce development challenge and one that can only increase when disability is a factor and it is not addressed appropriately. The price paid for ignoring this issue are higher rates of recidivism and greater costs to society. Assessment tools are needed to identify disability issues as people enter the prison system. Doing so creates opportunities to address those issues productively. If people in the corrections system who will be released eventually are to be well served by Illinois’ workforce system, then it is vital that disability issues be identified and addressed successfully in the future.

Conclusion:

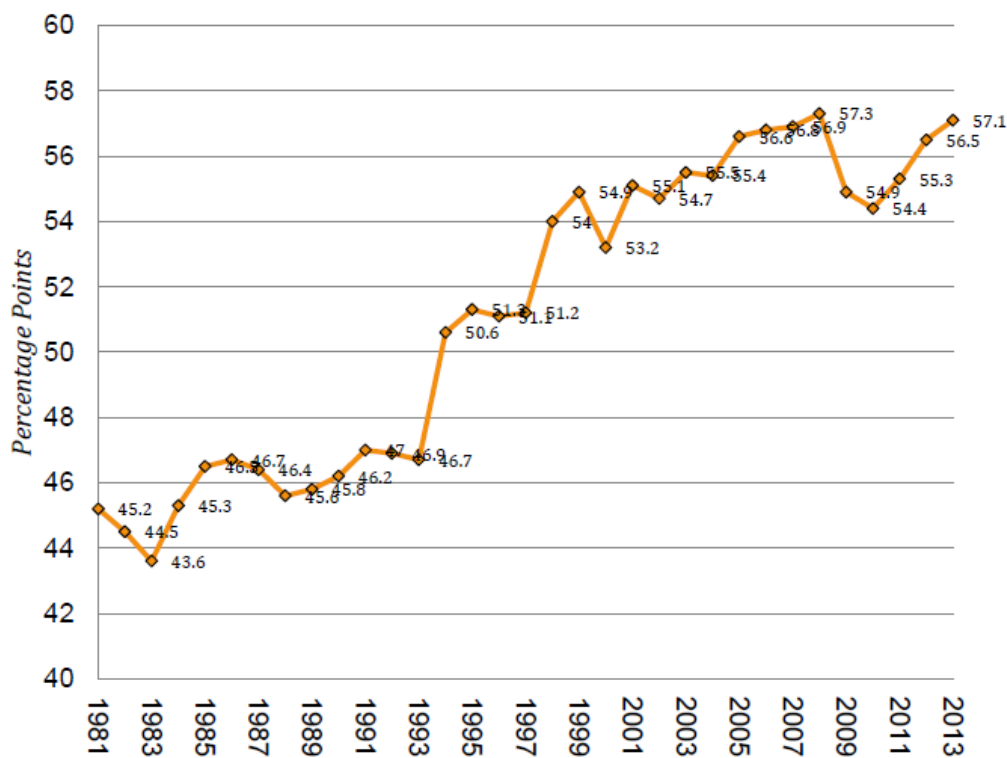
As we stated at the beginning of our Public Comments, Illinois has the opportunity to do much better on jobs for people with disabilities. From the language of the Unified State Plan, there is a lot of innovative and dedicated work being done on workforce development in Illinois. Thanks to WIOA, Illinois has an opportunity to invest resources in successful models and implement best practices to expand job opportunities for people with disabilities. We remain concerned with the lack of detail and coordination we have found in certain sections of Illinois state plan. Our public comments are focus on several critical factors that can help Illinois to significantly improve outcomes and we hope see them implemented soon.

The bottom line is that expanding job opportunities for people with disabilities is win-win-win for employers, taxpayers and people with disabilities alike. It is good for employers because the loyalty, talent, and skills of workers with disabilities contribute to the employers’

bottom line. It is good for the workforce system because improving services and supports for job seeker with disabilities will benefit others with different barriers to employment. It is good for people with disabilities who want the dignity, pride, friendships, independence and income that work provides. We are happy to answer any questions you have and to help in any way.

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

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



Source for chart is the Disabilities Compendium.

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

Table 1 Ranking 50 States by Employment Rates and Employment Gap

Data Source- Column 1: Table 2.1: Employment—Civilians with Disabilities Ages 18 to 64 Years Living in the Community for the United States and States: 2013 from the Annual Disability Statistics Compendium

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

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

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	40.5	77.7	37.3
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 Hampshire	40.0	14	Connecticut	40.2	77.9	37.7

15	Kansas	39.8	15	Nebraska	46.0	83.9	37.9
16	Wisconsin	39.8	16	Washington	37.7	76.0	38.3
17	New Jersey	39.2	17	Minnesota	44.4	82.9	38.5
18	Maryland	39.1	18	Oregon	36.4	74.9	38.5
19	Idaho	38.8	19	California	33.3	72.2	38.9
20	Texas	38.0	20	Maryland	39.1	78.2	39.1
21	Washington	37.7	21	Oklahoma	36.4	75.6	39.2
22	Virginia	37.6	22	Arizona	32.8	72.5	39.7
23	Oklahoma	36.4	23	Kansas	39.8	79.7	39.9
24	Oregon	36.4	24	Illinois	35.7	75.7	40.0
25	Indiana	36.2	25	Virginia	37.6	77.6	40.0
26	Vermont	36.2	26	Louisiana	32.1	72.4	40.3
27	Illinois	35.7	27	New York	33.6	74.0	40.4
28	Delaware	35.6	28	Delaware	35.6	76.3	40.7
29	Massachusetts	35.5	29	Indiana	36.2	77.0	40.7
30	Ohio	34.6	30	New Mexico	30.4	71.2	40.8
31	Pennsylvania	34.5	31	New Hampshire	40.0	81.3	41.3
32	Rhode Island	33.9	32	Wisconsin	39.8	81.1	41.4
33	New York	33.6	33	Pennsylvania	34.5	76.5	42.0
34	California	33.3	34	Ohio	34.6	77.0	42.5
35	Arizona	32.8	35	North Carolina	31.3	74.3	43.0
36	Missouri	32.8	36	Mississippi	27.4	70.4	43.1
37	Maine	32.5	37	Florida	30.1	73.4	43.3
38	Louisiana	32.1	38	Georgia	29.6	73.1	43.5
39	North Carolina	31.3	39	Massachusetts	35.5	79.0	43.5
40	New Mexico	30.4	40	Rhode Island	33.9	77.7	43.8

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

Table 2

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

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

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

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

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

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

State	2012			2013			Change in Gap		Pop in 2013			Increase in Dis. Emp.	Increase in Non-PWD Emp.
	Dis.	No Dis.	Gap	Dis.	No Dis.	Gap	Pct. Points	Rank	Number	Rank	Size		
AK	39.0	76.3	37.3	47.8	75.2	27.4	-9.9	50	459,776	47	Working-age pop. under 1 million	8.8	-1.1
RI	28.7	77.0	48.3	34.3	76.3	42.0	-6.3	49	668,448	43	Working-age pop. under 1 million	5.6	-0.7
WY	43.9	78.5	34.6	50.7	79.4	28.7	-5.9	48	358,526	50	Working-age pop. under 1 million	6.8	0.9
NH	37.9	80.5	42.6	41.8	80.3	38.5	-4.1	47	842,880	40	Working-age pop. under 1 million	3.9	-0.2
MN	42.1	81.6	39.6	46.0	82.1	36.1	-3.5	46	3,357,171	21		3.9	0.5
NV	35.5	72.2	36.7	39.2	73.1	33.9	-2.8	45	1,719,885	34		3.7	0.9
WI	37.6	79.5	41.9	40.9	80.1	39.2	-2.7	44	3,544,103	20		3.3	0.6
SC	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	34.6	75.1	40.6	36.4	75.1	38.7	-1.9	38	565,138	45	Working-age population under 1 million	1.8	0
CO	40.3	77.1	36.8	42.3	77.3	35.0	-1.8	36	3,304,940	22		2.0	0.2
HI	37.3	75.6	38.3	39.1	75.7	36.5	-1.8	36	822,542	42	Working-age population under 1 million	1.8	0.1
NE	43.5	82.2	38.7	45.5	82.6	37.1	-1.6	35	1,125,425	38		2.0	0.4
ND	51.6	83.3	31.7	52.8	83.1	30.2	-1.5	34	451,304	48	Working-age population	1.2	-0.2

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

											age pop. over 5 million		
KY	26.2	72.9	46.7	26.9	73.7	46.8	0.1	14	2,687,179	26		0.7	0.8
OH	32.8	75.1	42.2	33.5	75.9	42.4	0.2	13	7,072,114	7	Working- age pop. over 5 million	0.7	0.8
MO	32.2	76.2	44.0	33.0	77.1	44.2	0.2	12	3,666,019	19		0.8	0.9
MD	39.5	77.4	37.9	40.0	78.3	38.2	0.3	11	3,722,201	18		0.5	0.9
IN	33.5	75.5	41.9	33.8	76.0	42.3	0.4	10	4,008,950	15		0.3	0.5
VT	34.3	79.8	45.5	33.3	79.6	46.3	0.8	9	397,726	49	Working- age pop under 1 million	-1.0	-0.2
AZ	34.2	71.0	36.8	33.6	71.3	37.7	0.9	8	3,900,900	17		-0.6	0.3
OR	34.3	72.1	37.8	35.2	73.9	38.8	1.0	7	2,440,752	27		0.9	1.8
NC	30.2	72.2	42.0	30.3	73.5	43.2	1.2	6	6,000,202	10	Working- age pop. over 5 million	0.1	1.3
ID	38.6	74.8	36.2	36.7	75.2	38.5	2.3	5	946,943	39	Working- age pop. under 1 million	-1.9	0.4
ME	33.2	78.1	44.8	31.2	78.8	47.6	2.8	4	825,507	41	Working- age pop. under 1 million	-2.0	0.7
LA	34.4	72.6	38.2	31.3	72.4	41.1	2.9	3	2,825,101	25		-3.1	-0.2
AR	31.4	72.7	41.3	28.2	72.7	44.5	3.2	2	1,759,900	32		-3.2	0
SD	52.0	81.8	29.8	48.1	83.0	34.9	5.1	1	501,769	46	Working- age pop. under 1 million	-3.9	1.2

##