

BOARD OF DIRECTORS

Jennifer Laszlo Mizrahi, CEO
Shelley Cohen
Evelyn Kelley
Thomas M. Sweltzer
Donn Weinberg

BOARD OF ADVISORS

Donna Meltzer
Steven James Tingus
Debra Ruh
Dana Marlowe
Linda Burger

Feb. 22, 2016

RespectAbility – Public Comments – Massachusetts Combined State Plan

*“Whereas There are currently 56 million people in the United States living with a disability; and
Whereas Americans with disabilities play a critical role in forming our nation’s identity; and
Whereas Employment offers people with disabilities greater personal freedom and opportunity to socialize in professional work environments; and
Whereas Employment enables people with disabilities to obtain financial stability, affordable and accessible housing, transportation, and health care; and
Whereas Through public awareness, the Commonwealth of Massachusetts seeks to continue its support for employers in the public and private sector to ensure that all disabled persons receive adequate and appropriate employment opportunities,”* – [Governor Charles D. Baker, Disability Employment Awareness Month, October, 2015.](#)

Introduction:

RespectAbility is pleased to submit the following comments regarding the current draft of the Commonwealth of Massachusetts’ 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 your state has done some important strategic work on employment for people with disabilities and has made some gains, under the leadership of Governor Charles Baker, Massachusetts can and must do better in terms of competitive, integrated employment for people with disabilities. **Of the 399,206 working age people with disabilities in Massachusetts, only 35.5% of them are employed. Further, there are approximately 29,000 youths 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 Commonwealth has already taken significant steps to end the policies which left far too many people trapped in sheltered workshops.](#) These efforts, combined the strategic opportunities offered by WIOA, mean that Massachusetts can invest heavily into improving the competitive, integrated employment outcomes for its citizens with disabilities. **After all, there remains a staggering 42.9 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 significantly fewer resources than Massachusetts 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 Massachusetts 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 a resource called the Disability Employment First Planning Tool. This document details best practices and effective models. This toolkit contains models that are proven to work, be cost effective to implement, and

be successful. [We have developed an extensive collection of data on disability and employment in Massachusetts.](#) That information is also attached to our comments.

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

As we expressed in our introduction, Massachusetts can and must do better in terms of jobs for people with disabilities. Despite the fact that Massachusetts has some of the best schools, universities, employers and leaders in the country, **the Commonwealth ranks only 29th in country in terms of the employment rate of people with disabilities and it ranks 39th when you look at the gap in labor force participation rate between those with and without disabilities.** We know that Massachusetts has taken steps to bridge this gap and to get more people with disabilities into the workforce. [The Commonwealth has been an Employment First state since 2010](#) and [has even endeavored to become a model employer by encouraging the hiring of more people with disabilities for jobs in state government.](#) However, while these are important first steps and framing tools, we need to look to the future in order to press for better outcomes. Achieving improved outcomes in terms of jobs for people with disabilities very much depends on having the right performance metrics in place.

It is vital that the workforce system and the State Board include the labor force participation rates (LFPR) of people with disabilities on their state dashboards and 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 Massachusetts with disabilities.**

From our review of the current draft of the Combined State Plan, it is clear that good data on labor force participation rates are available to the workforce system in Massachusetts. After all, there is an extensive discussion on page 16 of the State Plan about how “estimates indicate participation in the labor force has been declining with some increases in residents who are not now seeking a job but would like a job.” Further the State Plan also reports that “In November 2015, the labor force participation rate was at 64.5, the lowest level in the data series that goes back to 1976.” The current draft goes on to address labor force participation rates in terms of the demographics of different age groups on page 21.

This type of data brings clarity to understanding the complexity of the labor force in Massachusetts. **As such, it is essential that the labor force participation rate of people with disabilities both be included in the state plan and it is included in the performance metrics used by the Commonwealth.** As such, we have several recommendations to make.

First, while we are glad to see that the State Plan makes reference to the American Community Survey and the “most recent information specific to individuals with disabilities”, this information is not structured in a useful way. Greater precision is needed for the workforce system to evolve to tap into the labor resource that the disability community represents. We hope that this section on page 20 be amended to include more specific details about Bay Staters with disabilities. Specifically, we would like to see this section list the different age groups that comprise the disability community in Massachusetts. **As we reported at the beginning of our public comments, there are 399,206 working age people with disabilities and approximately 29,000 youth with disabilities in Massachusetts.** If the workforce system is to seriously deliver on the promise to improve transitions for youth in Massachusetts, it is critical for the system to

know how many youth have disabilities. **This section need to distinguish between youth with disabilities between the ages of 16 and 20, working age people with disabilities between ages 21 and 64, and lastly aging Americans with disabilities over the age of 65. After all, seniors should not be the focus of your workforce strategy as there are high expectations for youth employment in WIOA.**

From the State Plan and the Chronic Unemployment Task Force, it is clear that Massachusetts is committed to aligning systems to improve outcomes. We know that you are working hard to expand school to work transition programs, align systems to channel youth into the workforce, and provide better supports to people at risk of dropping of our the labor market. There is a staggering 42.9 point gap in the Labor Force Participation Rates between people with and without disabilities in Massachusetts. This gap has critical implications for the WIOA work being done in your state. **Not only does this data need to be included directly in the Workforce Analysis sections of the State Plan, but such data also needs to propel the design of your performance metrics.**

Additionally, while Massachusetts ranks 39th 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 35.8% of the 18,200 Bay Staters who are blind or have vision loss are employed while 53.1% of the 37,400 with hearing differences are also employed. Sadly, we also see that only 23.8% of people with intellectual or developmental disabilities are employed in Massachusetts.** For this demographic, workforce solutions may take more time and resources. **However, there will be a considerable return on investment if Massachusetts workforce system expands successful school to work transition programs.** Massachusetts 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 how to address disability as a part of the sector strategy process later in our public comments.

2. Busting Stigmas, Myths, and Misconceptions Should Be a Key Part of Massachusetts' 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.](#)

Fortunately, we do find that the issue of stigma as a barrier to employment has been raised as a part of the WIOA process. Stigma is explicitly identified on page 329, in the "Summary of Barriers" included in ATTACHMENT B from the Task Force on Persons Facing Chronically High Rates of Unemployment. This is a critical insight and it should guide strategic planning across the Commonwealth rather than being buried in the latter half of the Combined State Plan. [The Task Force shows that the leadership of Massachusetts is engaged and committed to this issue of barriers to employment.](#) The composition of that Task Force cuts across the major stakeholder groups where barriers to employment limit the aspirations and ambitions of far too many of Massachusetts' citizens. [Engaged organizations such as the Ruderman Family Foundation and the Association of Developmental Disabilities \(ADDP\) have developed resources which show how those barriers can be overcome.](#) However, such efforts need to be done in a systematic way and with strategic leadership from the Governor's office on down.

As such, we recommend that the Combined State Plan be amended to include a comprehensive, proactive communications/public relations strategy for reducing such stigmas. The best way to fight stigmas is to let employers see the facts from other employers who are already succeeding by hiring people with disabilities. **In order to ensure that such efforts have the biggest possible impact, it needs to be supported by a serious, systematic and ongoing communications campaign that highlights the benefits of inclusive hiring.** In terms of potential employer partners, we encourage your state plan to look at [Disability Equality Index that assesses the inclusion and hiring efforts of major employers](#). It was put together by the United States Business Leadership Network (USBLN) which operates [a network of affiliates across the country that can be an incredible resource for your work](#). However, it should be a much larger component of Massachusetts' planning and implementation of a serious business-to-business PR effort. The companies which scored 100% in the USBLN index can be a great resource. These are Ameren Corporation, AT&T, Booz Allen Hamilton Inc., Capital One Financial Corporation, Comcast, NBCUniversal, Ernst & Young LLP, Florida Blue, Freddie Mac, Highmark Health, JPMorgan Chase & Co., Lockheed Martin Corporation, Northrop Grumman Corporation, Pacific Gas and Electric Company, PricewaterhouseCoopers LLP (PwC), Procter & Gamble, Qualcomm Incorporated, Sprint Corporation, Starbucks Coffee Company, and TD Bank N.A.

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. People with disabilities can work successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and be super talents in developing computer software and engineering solutions. CEOs and business leaders need to know that people with disabilities can be the BEST people to get a job done.
- B. Human resources professionals and on-the-ground supervisors need to understand that hiring people with disabilities is generally easy and inexpensive, and that any costs incurred are more than offset from increased loyalty.** Hiring managers and supervisors are key players who can turn high minded policy and business goals into action at the ground level. However, studies show that many are uninformed about people with disabilities. They are afraid of potential legal action, costs, or other failures. They need supports that will empower them to overcome their own fears and to excel at recruiting, hiring, supervising, or working with teammates who have disabilities. Massachusetts'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, and should do so, given that they are one of the few states who have opted to go for a dual-customer approach at their program centers. 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 as well.

- C. People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectation must begin. Massachusetts's needs a public relations campaign that will inspire Bay Staters with disabilities to set their hopes high, as low expectations and low self-esteem are a barrier to employment.** For example, Virgin Airways founder Sir Richard Branson and finance wizard Charles Schwab are also dyslexic. Scientist Stephen Hawking and multi-billionaire businessman Sheldon Adelson, like Gov. Greg Abbott of Texas and President Franklin D. Roosevelt before them, are wheelchair/mobility device users. The CEO of Wynn Casinos, Steve Wynn, is legally blind. Arthur Young, co-founder of the giant EY (formerly Ernst & Young) was deaf. Success sells success and that is something the workforce system should seriously utilize in order to motivate and inspire in an intentional manner moving forward.

As an example of the power and value of making the business case for hiring people with disabilities, we offer Massachusetts the insights gained from our [#RespectTheAbility](#) campaign. The campaign focuses on how hiring people with disabilities can make organizations stronger and more successful. It 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

As required by WIOA Sec. 102(b)(1)(A), Massachusetts'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 Chart 7 on page 13. This chart, which shows Massachusetts's Emerging/Long-Term In-Demand Industries, offers a great starting point for improving outcomes. **Specifically, it is important to train and prepare Bay Staters 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, Accommodation & Food service, Science, Tech, Engineering and Mathematics (STEM), and retail trade are job sectors projected to grow 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 Massachusetts'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 in Massachusetts.

A. Health Care and Social Assistance

The State Plan projects extensive job growth in the fields of "Health Care & Social Assistance." This sector is projected to have an increase of 120,000 jobs added by 2022, the

largest projected increase of any sector in Massachusetts. **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.**

Massachusetts already has several outstanding Project Search worksites that are creating successful pathways for students with intellectual and development disabilities to successfully transition into the workforce. At the Milford Regional Medical Center, Newton-Wellesley Hospital (NWH), and Spaulding Rehabilitation Hospital Cape Cod, Project Search interns are learning critical skills and gaining needed experience for them to ultimately become successful. **These worksites all showcase how the Project Search model is well suited to meeting Massachusetts’ growing talent needs in health care.** We are pleased to see Project Search referenced in the “Report of Progress” section found on page 251 of the Combined State Plan. This section discusses Massachusetts’ commitment to “the development of increased training opportunities for transition-age consumers who are not going to college continues to be a major focus area.” The report goes on to discuss how “MCB has chosen two providers: the Carroll Center for the Blind and the Polus Center for Social and Economic Development” and that they had been “able to recruit two large hospitals as worksites.” We congratulate MCB on this work and look forward to see the employment successes achieved at these worksites. However, we would recommend that Massachusetts follow this commitment with greater ambition and effort. **We recommend that Project Search be significantly expanded as they have done in Wisconsin, Florida and other states.** In the specific context of Massachusetts, there are two specific steps to be taken. **First, we encourage the Commonwealth to collaborate on recruiting additional hospitals as worksites for Project Search. Second, we also encourage MCB to look beyond just hospital settings and consider the potential of placing Project Search interns in either elder care facilities or in hotels.**

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 just three Project Search sites and are rapidly expanding to 27 worksites by the end of this year. 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

When talking employment opportunities for people with disabilities, careers in the Science, Technology, Engineering and Mathematics (STEM) fields may not immediately come to mind. However, there are significant and exciting opportunities to ensure that people with difference can succeed in this dynamic career field. Indeed, ensuring the accessibility of STEM careers offers Massachusetts a significant opportunity to innovate and lead. As the State Plan shows in Chart 7, over 85,000 jobs are projected to be added in fields relating to STEM. We recommend Massachusetts look at ways to better train people with disabilities to fill these roles, given that there will be a possible STEM shortage in the coming years, as listed on page 14.

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 Massachusetts 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.](#) Massachusetts should follow this model. Together, Massachusetts’ 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.

C. High Turnover Jobs: Accommodation, 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, and food service 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 Massachusetts to improve employment outcomes for people with disabilities](#). Massachusetts 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. [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](#). 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 people with disabilities are proven to have significantly higher retention rates. It is important to identify more specific opportunities with employers and to site them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future.

D. Revisit Massachusetts' Model Employer Initiative and Support the on-going work of the Supplier Diversity Program:

While the focus of our comments on Massachusetts's Combined State Plan are around aligning the workforce system to create opportunities for Bay Staters with disabilities in the private sector, public sector employment should not be neglected.

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."](#)

Fortunately for Massachusetts, several past initiatives have address public sector employment and making state government a model employer for people with disabilities. [Back in 2009, the Model Employer Initiative developed a "Strategic Plan for Massachusetts as a Model Employer for People with disabilities."](#) Many of the insights and ideas developed from this strategic plan remain vital and valuable despite the years that have passed since it was written. As such, we would encourage Massachusetts' government to revisit these efforts and

consider what steps could be taken to recruit, hire, and retain employees with disabilities in state government.

[Lastly, we want to congratulate the Commonwealth for its Supplier Diversity Program \(SDP\).](#) This is a unique opportunity and a great example of Massachusetts leading the nation in terms of innovative effort to expand opportunities for people with disabilities. As David D’Arcangelo, Director of the Massachusetts Office on Disability stated in the press release which accompanied the program’s launch: this is “an important first step towards creating and supporting increased opportunities for persons with disabilities.” However, this one limitation here. As stated on page 179 of the State Plan, “the Massachusetts Supplier Diversity Program does not specifically include businesses owned by persons with disabilities.” Who hope that this omission will addressed both through the SDP’s efforts and through Massachusetts’ overall workforce strategy.

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

Massachusetts’ State Plan completely omits any mention of the important rules and opportunities created by Section 503 of the Rehabilitation Act of 1973. The plan lacks any references to the employment opportunities and talent challenges created by the recently implemented Section 503 regulations regarding federal contractors and subcontractors. Massachusetts’ 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.

Massachusetts 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.

5. The Massachusetts Business Leadership Network (MassBLN) should a key partner for Massachusetts’

Improving employment outcomes in Massachusetts 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 vocational rehabilitation -- is insufficient to improve employment outcomes for people with disabilities. The necessary condition for achieving greater competitive, integrated employment for individuals with disabilities is engaging employers and meeting their talent needs.

As such we are disappointed to see that no attention was given to one of the Commonwealth’s most important assets that Massachusetts has in terms of making the business case for hiring people with disabilities. [The Massachusetts Business Leadership Network \(MassBLN\) is an 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 statement of Purpose, “MassBLN is an association of Massachusetts companies committed to a diverse marketplace that includes people with disabilities as both customers and employees.” Their guiding vision is that “every employer in Massachusetts exemplifies, as a best business practice, the inclusion of people with disabilities

in their product, service, employment, and community outreach planning”. The MassBLN should be a critical partner to the overall employer engagement efforts. They can persuasively make the business-to-business case for hiring employees with disabilities. As such, moving forward, we hope your workforce system will take fully advantage of this potential partnership.

6. Order of Selection, Chronic Unemployment, and the importance of investment in youth transitions a.k.a the importance employing a “Jackie Robinson Strategy” in Massachusetts:

It is mentioned on page 170 of the plan that the state government does not have, and does not plan to implement any sort of order of selection unless the state undergoes budget alterations. We are glad to hear this and several points to make regarding the investment of resources through the WIOA process.

We know from the sections detailing the efforts of the Massachusetts Rehabilitation Commission and the Massachusetts Commission for the Blind (MCB), improving transitions services is a high priority for the Commonwealth. We are encouraged to hear this because of our perspective on the issue of supporting successful transitions for youth with disabilities as the necessary condition for improving outcomes overall.

VR and the workforce system only have one chance with new employers to make a good impression. It is our perspective that those individuals with disabilities who go into employment need to succeed and that if they are not the right match for the employer, it will undermine the larger, longer term goals of improving outcomes overall. We recommend you use a “Jackie Robinson Strategy” to make sure that the right talent gets into the right positions so it is a beneficial opportunity for workers and employers alike. As the first African-American to play major league baseball, Robinson reduced extensive amounts of discrimination and led the way for other talented and diverse athletes to follow. He was the talent that his employer needed, and contributed to the bottom line. The workforce system should keep such a strategy in mind when looking to place job seekers with disabilities into jobs at potential employees. Stigma and misconceptions still exist for people with disabilities in Massachusetts. Helping youth with disabilities to succeed will blaze the trail for people with more significant disabilities to become successfully integrated into the workforce. Once employers understand accommodations and how to maximize the use of talent, they will be more willing to hire those with more specific needs.

7. Ensure that Apprenticeship Programs Are Fully Accessible and Actively Recruiting Young People with Disabilities, Especially with Government Contractors

We are pleased that Massachusetts is looking to expand the vital opportunity that apprenticeship and on the job training can offer to young people with disabilities. 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.](#) Lastly, in other states, we have found that no connections exist between state VR staff and the federal program officers responsible for the administration of apprenticeship resources. [As such, we highly recommend that the VR professional in the Commonwealth connect directly with the](#)

[DOL ETA officers working on Apprenticeship in Massachusetts.](#) This is natural partnership that could easily align workforce needs and the talents of people with disabilities.

8. Overcome the gap between disability services and career services in Post-Secondary Education:

Whether it is the Ivy League or the state university system, the Commonwealth of Massachusetts is home to some of the finest post-secondary education institutions in the world. While this is a point of pride for the Commonwealth, there is a critical gap that needs to be addressed. It is a gap that directly relates to employment for people with disabilities and the evolving workforce system. It is a gap that costs both the state and national economy great talent.

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

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

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

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

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

We are delighted with the commitments detailed on page 171 that discuss how the Massachusetts Rehabilitation Commission has partnered with organizations such as CVS and Advance Auto Parts to further pre-employment training. We also encourage your state to follow Florida and Wisconsin's example by working hard to expand the number of Project SEARCH sites, but this is not the only paradigm that you should follow. The school system, vocational rehabilitation, and local workforce boards can build creative, collaborative partnerships with companies that are leading in the disability space.

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

10. 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.

11. 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. Massachusetts needs to make an effort to demonstrate to employers and prospective employees that these services exist. Doing so by coordinating it with the possible public relations campaign is one way to go about this. Currently, only 8% of businesses in Massachusetts are aware of/use the career centers and the unawareness of these centers is listed as a barrier to employment for prospective employees. Also, Massachusetts should be careful not to waste money trying to re-invent the wheel in creating online resources as [ASKJAN.org](#), [the US Department of Labor's Office of Disability Employment Policy](#), [our organization and others also offer free toolkits, webinars and training opportunities](#). [Another resource is Understood.org](#). This is a comprehensive resource to help families and individuals with learning and attention issues build their educational and career plans. It will be helpful to collaborate with those groups however to ensure that the best tools are created to fit the training and information needs on these issues.

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

Public Transportation and accessibility to methods of transportation for people with disabilities is an issue that needs to be prioritized in Massachusetts's state plan. As stated on page 215, 36% of VR consumers identified transportation as a critical need and a barrier to employment. This should be one of Massachusetts' 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, Massachusetts 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.

13. Avoid the Opportunity Costs of Focusing Too Much on One-Stop Centers.

Programmatic Accessibility is Critical 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.** This is evident in Massachusetts' plan. 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. **We recommend that Massachusetts aim to improve service, delivery, and awareness of its online resources from career centers in order to gain more usage from those with disabilities.** 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.](#)

14. 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

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

There are several points where the current draft of Massachusetts' Combined State Plan addresses the unique workforce challenges facing ex-offenders as they attempt to reenter society. For example, page 325 discusses the "Reintegration of Ex-Offenders Program" and how it aims to help those with criminal records attain employment. **This shows that Massachusetts' 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.** The reason why is simple.

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

Conclusion:

As we stated at the beginning of our Public Comments, Massachusetts can and must do better in terms of jobs for people with disabilities. The Commonwealth has been at the forefront of many our nation's greatest progressive challenges in terms of inclusion, opportunity, and diversity. Massachusetts gave this nation such great leaders as the late Senator Ted Kennedy. It is home to outstanding researchers and committed advocates. However, the Commonwealth has not yet fully achieved the high outcomes and improved employment opportunities that its citizens with disabilities want and need. After all, Massachusetts only ranks 29th in the nation in terms of the employment rate of people with disabilities and 39th in the country on the gap in labor force participations rates. Such poor outcomes cause a needless school to prison and/or poverty pipeline.

Failing to properly train and prepare job seekers with disabilities costs the Commonwealth's economy incredible talent and shatters the aspirations of so many Bay Staters with disabilities who want to pursue the American Dream, just like everyone else. However, thanks to WIOA, Massachusetts has the chance to lead by example in terms of investing resources in successful models and implement best practices to expand job opportunities for people with disabilities. Making sure there are pathways for the talents of people with disabilities to meet employer talent needs is a win-win-win for people, taxpayers, and businesses alike. We remain concerned with some of what we have seen in the Combined State Plan. Our public

comments discuss multiple ways that Massachusetts can significantly improve outcomes and we hope see them implemented soon. The bottom line is that expanding job opportunities for people with disabilities is win-win-win for employers, taxpayers and people with disabilities alike. It is good for employers because the loyalty, talent, and skills of workers with disabilities contribute to a better bottom line. It is good for the workforce system because improving services and supports for job seekers 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 might have and to help however possible. Thank you for your hard work.

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

VA	36.3	76.5	40.1	36.9	76.9	40.0	-0.1	15	5,112,923	12	Working-age pop. over 5 million	0.6	0.4
KY	26.2	72.9	46.7	26.9	73.7	46.8	0.1	14	2,687,179	26		0.7	0.8
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

##