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RespectAbility – Public Comments – Montana Combined State Plan

Introduction:

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

While your state has made strides with the leadership of Governor Steve Bullock, Montana can still do even better in terms of competitive, integrated employment for people with disabilities. While 40.5% of the 68,927 working age Montanans with disabilities are employed, other states have had success in employing upwards to 50% of persons with disabilities. Further, there are over 6,736 youth with disabilities between the ages of 16-20. Each year a quarter of them will age out of school into an uncertain future. As the looming worker shortage begins to present in Montana, Montanans with disabilities can offer valued and needed talent that can help grow the state's economy overall. As such, Montana can look at innovative ways to close the 37.3 percentage point gap in the labor force participation rates (LFPR) between people with and without disabilities.

Thanks to WIOA, Montana has the opportunity to improve outcomes in terms of competitive, integrated employment for people with disabilities. While Montana's outcomes are better than the national average, it still can learn from other states that have worked hard to achieve improved employment outcomes. Other states have higher than 50% employment rates for their citizens with disabilities. [The Dakotas, Alaska, and Wyoming have achieved increased results by putting best practices into places.](#) The experience of these states shows ways that Montana 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 Montana.](#) That information is also attached to our comments.

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

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

As we expressed in our introduction, Montana can and must do better in terms of jobs for people with disabilities. The state ranks 12th in country in terms of the employment rate of people with disabilities and it ranks 10th when you look in terms of the gap in labor force participation rate between those with and without disabilities. What gets measured gets done – and you are not currently measuring the most important performance metric.

It is vital that the workforce system and the State Board include the labor force participation rates of people with disabilities on their state dashboards and performance metrics. Looking 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 Montanans with disabilities.**

There is a 37.3 point gap in the Labor Force Participation Rates between people with and without disabilities in Montana. 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.**

It is clear that information around the LFPR has had a positive impact on the development of Montana's Combined State Plan. For example, on page 22, the Plan reports that "American Indians have lower labor force participation rates than all Montanans" and that "Disabled Montanans...also have lower labor force participation rates than the Montana average." Further, this section also identifies the challenge, saying that "these populations can be targeted with additional efforts to bring them into the labor force." Such acknowledgement needs to be backed up with specific metrics and strategic actions.

As such, we have several recommendations on improving the alignment of data and ensure the workforce system is better tracking people with disabilities. Starting on page 6, in the section on "Montana Job Growth Continues at Strong Pace", the State Plan discusses the overall "labor force participation trends" seen in the state's economy. This section and the ones following go on to talk about the impact of an aging population creating gaps in the workforce and the extremely low unemployment rates the state will soon show. Likewise, on page 22 in figure 15 which showcase "2014 Montana Labor Force Status by Demographics." People with disabilities are included in these figures.

While we are glad to see disability included in the demographic data on page 22 of the State Plan, greater precision is needed for the workforce system to evolve to tap into this labor resources. This data point shows the scope of the challenge, but it does not define the challenge in such a way that the workforce system can create solutions. **As such, we recommend that the State Plan be revised to reflect the different age groups that comprise this number. Instead of this single data point, 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 American with disabilities over the age of 65. After all, seniors should not be the focus of your workforce strategy, and there are high expectations for youth employment in WIOA.**

For example, the workforce system needs to accurately engage around serving the approximately 6,736 youth with disabilities ages 16-20 living in Montana. We make this recommendation to ensure that Montana has a clear view of the challenge. Given the priority of resources and services for youth in WIOA, Montana needs to look at expanding school to work transition programs and align systems to channel these youths into the workforce. The system needs to know how many youths with disabilities are leaving the school system in order to ensure they don't end up spending their lifetimes trapped by the benefits system.

Looking at unemployment information in isolation means that decision makers might miss the bigger picture of those individuals with barriers to employment who are not actively seeking work. Additionally, while it is important to see when and if a person who approaches the workforce system gets a job, it is even better when systems can be created that enable people to get jobs and careers on their own.

Additionally, while Montana may rank 12th 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 44.7% of the 11,237 Montanans who are blind or have vision loss are employed while 57.2% of the 18,418 with hearing differences are also employed. Sadly, we also see that only 28.6% of Montanans with intellectual or developmental disabilities are employed.** For this demographic, workforce solutions may take more time and resources. **However, there will be a considerable return on investment if Montana's workforce system expands successful school to work transition programs.** Montana 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 Montana'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.](#)

There is a need for a sustained, comprehensive, proactive communications/public relations strategy for reducing the stigmas and barriers identified by VRBS. We recommend that Montana's Combined 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 Montanans with barriers to work also face stigmas, especially those leaving the corrections system.

There are some signs that these issues have been raised as part of the WIOA implementation process. For example, in the section about "Vision" on page 81, the State Plan talks about how "Youth and adults with disabilities face many barriers to employment." This section goes on to discuss how "Vocational Rehabilitation and Blind Services eliminates employment barriers through the belief that disability is natural, that society should maintain high expectations" in order to "build upon the civil rights of citizens with disabilities" and that

the “locus of control rests with the individual.” This is an important framing of VR’s responsibility to its clients, but it does not offer solutions the barrier affecting those clients.

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.
- 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. Montana’s VRBS 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. Montana’s efforts need to be supported by a PR campaign that will inspire Montanans 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 Montana our insights gained from our #RespectTheAbility campaign. Our #RespectTheAbility campaign 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), Montana’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 Figure 9 on page 13. This chart, which shows Montana’s Emerging/Long-Term In-Demand Industries, offers a great starting point for improving outcomes. Specifically, it is important to train and prepare Montanans 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 specific challenges and talent needs of employers in the Healthcare can be well met with the skills of people with disabilities and with the right training or supports, people with diverse abilities can succeed in “Professional and technical services.” People with disabilities represent an untapped labor resource that can meet the diverse talent needs of Montana’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 Montana.

A. Health and Elder Care:

The State Plan projects continued job growth in the fields of “Education and Health Care.” This sector **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.**

We recommend you look into implementing Project Search sites in Montana.

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. Montana has been losing STEM jobs, and this could be a way to strengthen them. As the State Plan shows in Figure 9 on page 13, 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 Montana 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.](#) Montana could look into following this model. Together, Montana’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.

C. High Turnover Jobs: Hospitality/Accommodations, 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 Montana to improve employment outcomes for people with disabilities.](#) Montana’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. 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 cite them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future.

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

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

Montana 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.](#) The untapped potential of Montanans 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.

E. Agriculture:

As agriculture is such a key industry within Montana, [there is an opportunity to replicate the success of TIAA-CREF's Fruits of Employment project that provides internships and job training to workers with disabilities to prep them for careers in competitive agriculture.](#) As Montana heads into a labor shortage and looks for all unutilized sources of personnel, the 37.3% gap between employment levels of those with disability and those without should be a large focus. Montana needs to be laying the groundwork for persons with disability to participate in agriculture more effectively and at greater rates now, so that the state can continue to grow as baby boomers age out of the system and Montana finds itself in the midst of a labor shortage. [Farmers in Georgia have already had success with a program designed to reduce barriers persons with disability face in agricultural fields and it can and should be incorporated into Montana's WIOA plans.](#)

4. Standing up an affiliate chapter of the US Business Leadership Network could be a critical tool for effectively engaging employers and reaching the right business audience:

As we stated previously about communicating the business case for hiring people with disabilities, effective employer engagement is a necessary component of achieving improved

employment outcomes. One of the most effective means of carrying that message forward is to have a network of engaged businesses whose bottom line has benefitted from the talents of employees with disabilities. Business to business communication can help tear down the misconceptions and stigmas which are barriers to employment.

Currently, Montana does not have an affiliate chapter of the US Business Leadership Network (USBLN). This limits the flexibility and capability of Montana to engage employers around hiring people with disabilities. As such, we highly recommend that the appropriate staff both in the workforce system and VR work with the employer partners to formalize their intersections through the establishment of an affiliate chapter. Establishing a BLN Chapter in Montana would help to organize the “knowledge of community outreach, recruiting and interviewing, the accommodation process and barriers” needed to achieve improved outcomes. Currently, VRBS in Montana has a network of businesses their work closely with in order to place VR clients into jobs. These business partners would certainly benefit from tapping into the national structure of the USBLN and their resources.

Further, Montana borders Wyoming, which possesses one of the most effective, engaged, and active affiliate chapters in the country. The Wyoming BLN, despite the challenges of a largely rural population and limited resources, has been achieving outstanding employment outcomes. We would be happy to provide Montana’s WIOA team with an introduction to Lynn Kirkbride the USBLN’s Director of Affiliate Relations. She is an incredible asset and has extensive experience around overcoming barriers to employment. Her email is lynn@usbln.org and she can be reached by phone at (307) 631-0894. Her efforts, and those of the Wyoming BLN, offer profound insights into how to effectively engage employers around the business case for hiring people with disabilities.

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

Montana’s State Plan fails to mention important rules surrounding the Rehabilitation Act of 1973. The State Plan lacks any references to the employment opportunities and talent challenges created by the recently implemented Section 503 regulations regarding federal contractors and subcontractors. Montana’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. Montana 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. Specific companies that should be included in your outreach efforts include S&K Aerospace LLC, PRI-ER JV, Bestassets INC, S & K Global Solutions LLC, and Neptune Aviation Services INC. [More detailed information regarding federal contracts in Montana can be found here.](#)

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 need to be updated to reflect the steps needed towards making universal access a reality. On this particular point and Common Assurance #7 listed on page 149 of the State Plan, we would direct Montana 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, Common Assurance #10 affirms Montana’s satisfaction of the requirement that “one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers 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 specifically 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 149-151 are matched with a strategy focused on improving the competitive, integrated employment outcomes of Montanans with disabilities. (There do appear to be strategies in place to meet Section 188, for example such as on page 137,138, but these may not be specific enough)

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. Montana’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. Montana seems to make extensive use of CRPs, does this count as diversifying, or is that just another type of focus on the wrong thing?)

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. Ensure that Montana benefits from having a “Jackie Robinson Strategy”:

Montana is currently under an Order of Selection, and has been since March of 2014. Despite the budgetary reasons for doing so (page 116), Montana should be careful of the opportunity costs involved with an Order of Selection and the impact of such policies on employment opportunities in Montana. Our perspective as an organization is that it is critical to support youth with disabilities to succeed in employment and blaze a trail for people with more significant disabilities. **We recommend using 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. Employers should adopt the same strategy with potential employees.

Stigma and misconceptions still exist for people with disabilities in Montana, so a probable way to best go about implementing this strategy would be to try getting those with less significant disabilities hired first. Once employers understand accommodations and how to maximize the use of diverse talent, they will be more willing to hire those with more significant disabilities.

9. Transportation is a critical barrier to employment for many Montanans, 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 Montana’s state plan. As stated on page 108, transportation is identified as one of the most critical needs for people with disabilities. Montana’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 Montana’s top 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, Montana 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.

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.**

11. 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

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

It is imperative that more resources and data are contributed in order to further address this problem, as it is a massive barrier to employment for many trying to enter the workforce. There are various instances where the Montana’s state plan addresses the unique challenges facing ex-offenders as they attempt to reenter society and the workforce, for example through the adult education program on page 75, so it is evident that the state government is taking strides to further combat this issue. Despite this, there is not enough clarity in the state plan about how they are going to address helping people with disabilities and a criminal background reach employment. [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 adulthood. Judging by the lack of data regarding this topic, it is critical that Montana gather more statistics to determine just how many former offenders have disabilities. This is an issue that must be prioritized higher, as roughly a third of the former offender demographic have extensive difficulty finding work.

Conclusion:

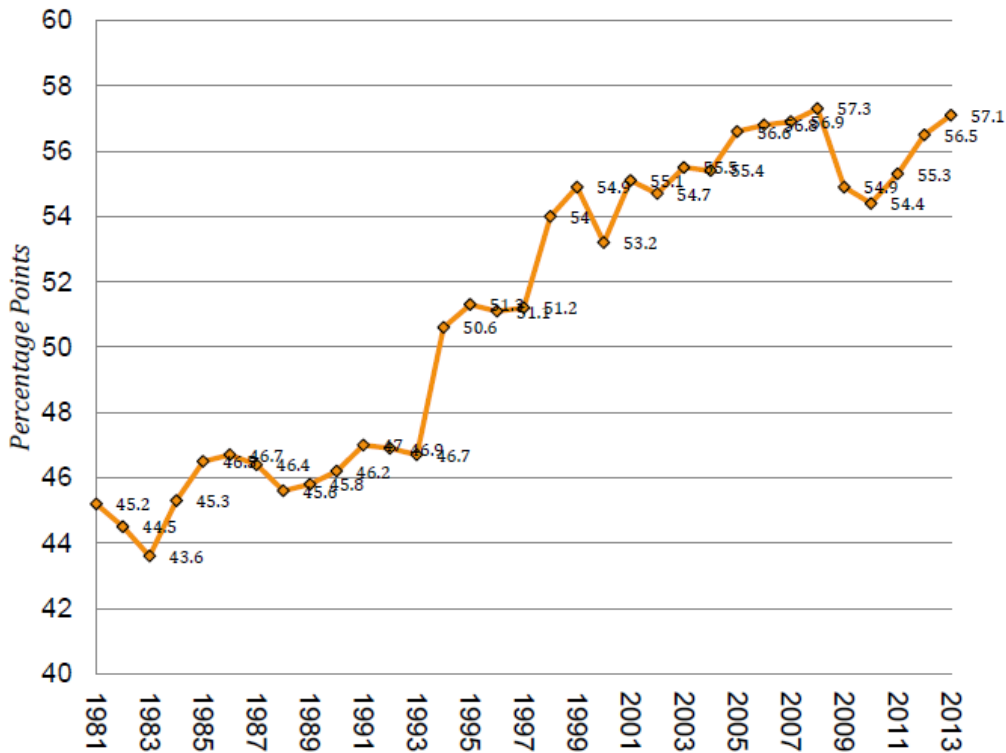
As we stated at the beginning of our Public Comments, while Montana is above the national average, it still has the opportunity to do much better on and immediately benefit from jobs for people with disabilities. From the language of the Combined State Plan, there is a lot of innovative and dedicated work being done on workforce development in Montana. Thanks to WIOA, Montana 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 Montana state plan. However, there is some good as well. Our public comments are focus on several critical factors that can help Montana 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 Montana’s WIOA plan, all of this can continue to change for the better for the people of Montana.

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 Montana ranks nationally and to showcase several of the data points needed in Montana’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 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.	75.	42.1	33.	75.	41.7	-0.4	20	7,849,51	6	Working-	0.9	0.5

	0	1		9	6				6		age pop. over 5 million		
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

##