

#### 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. 8, 2016

## RespectAbility – Public Comments – North Dakota Unified State Plan

*“WHEREAS, workplaces that welcome the talents of all people, including people with disabilities, are a critical part of efforts to build an inclusive community & strong economy &; WHEREAS, according to U.S. Census Bureau estimates, about 35,000 working age North Dakotans have some type of disability, including hidden disabilities; and WHEREAS, while North Dakota is a leader in the employment of people with disabilities with a 52.3 percent employment rate for working age adults with disabilities, there are North Dakotans with disabilities who are ready to learn new skills and who want an opportunity to join the workforce and show they are up to the task.” – [Governor Jack Dalrymple, Proclamation-Disability Employment Awareness Month, October 2015.](#)*

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

**North Dakota is already leading the nation in terms of expanding competitive, integrated employment for people with disabilities.** According to the most recently, publically available Census data, North Dakota ranks 2<sup>nd</sup> in the nation as measured by the employment rate of people with disabilities. **Fully 49.9% of the 38,037 working age people with disabilities are employed in North Dakota. Because of your good work, the 2,100 youth with disabilities between the ages of 16 and 21 living in North Dakota have increasing chances to successfully transition into the world of work.**

While North Dakota may be seeing a dip in their employment number due to the evolving challenges of the energy, the state has worked hard to achieve improved outcomes. Outside observers might discuss the case study of North Dakota as being a small state with a tiny population who got lucky with a booming energy sector with little relevance to disability policy. However, we would disagree that view. **[States like the Dakotas, Alaska, and Wyoming have achieved increase results in terms of jobs for people with disabilities by putting best practices into places.](#)** North Dakota has been blessed with the dedicated leadership of Governor Dalrymple who has been focused on creating a positive business climate and committed to tapping into the talents offered by individual with disabilities. **As in North Dakota, we are also seeing pockets of excellence around innovative youth programs designed to address disability employment in [Georgia](#), [Nevada](#), and [Kentucky](#).**

The bottom line propelling these efforts is that expanding job opportunities for people with disabilities is a win-win-win for employers, taxpayers and people with disabilities alike. **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. North Dakota is already implementing many of these 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 North Dakota.** That information is attached to our comments.

The North Dakota WIOA draft is very well done. It creates a win-win-win strategy and system for vital improvements for North Dakota's workforce system and its ability to serve people with barriers to work, employers and taxpayers alike. This draft plan will capitalize on the partnerships and collaborations necessary to empower youth transitioning from school to work. It is to be strongly commended. The high expectations, pre-employment pipeline, commitment to metrics, and partnership between government agencies will go a long way to sustaining success. We are pleased to report that the current draft of North Dakota's Unified State Plan is significantly better than many of the other WIOA state plans that we have reviewed.

However, no plan is perfect. Upon reviewing the current draft of the state plan there remain a few areas where improvements can be made to achieve the best results possible. **Our public comments on North Dakota's WIOA State Plan are structured around those points where greater clarity, precision, and data are needed to ensure that people with disabilities will be better equipped to pursue the American Dream.**

**1. 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) North Dakota'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.**

The current draft of the Unified State Plan does a good job of assessing those industries which are the real drivers of North Dakota's economy as well as those emerging career fields which will be critical in years to come. To quote the Governor on page 15 of the Plan, the industries which are the focus of many efforts are: "advanced manufacturing, value-added agriculture, energy, technology-based business and tourism." The focus on these sectors will inform state policy from the Governor's Office on down to the work being carried out at the customer-service level at AJCs across North Dakota.

Further the Plan also details current trends in the job market by tracking online job openings. Such tracking reveals several increases in specific job categories and decreases in others. Specifically, the Plan states that "Three of the top five occupations in terms of increase from 2014 to 2015 were in the Healthcare Practitioners and Technical occupation group." There has also been an "increase in the Food Preparation and Serving Related occupational group" as discussed on page 6 of the Plan.

**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 North Dakota. We submit that these are job sectors where people with disabilities can excel and benefit their employer's bottom line.** People with disabilities represent an untapped labor resource that, with the right training and supports, can meet the diverse talent needs of North Dakota's growing job sectors. Below, we offer our specific ideas on how to implement such efforts:

**A. Leisure, Hospitality, and other high turnover job sectors:**

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.

**This has vital implications for the “Tourism” sector that is among the Governor’s targeted industries as well as the continued grow of the Service sectors jobs such as Food Preparation.** Tourism, and other, similar service jobs 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. The loyalty, productivity, and retention rates of people with disabilities can significantly contribute to employers’ bottom lines.

To focus in on hospitality, Missouri offers an outstanding example of the type of work that is needed. **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 North Dakota to improve employment outcomes for people with disabilities](#). North Dakota’s workforce system should connect with employers in the tourism sector to begin figuring out how to benefit from these models. Further programs like “the state funded Operation Intern program” could easily collaborate with VR and special education to attract business partners to the Project Search model.

## **B. Health and Elder Care**

The State Plan commits North Dakota to focusing “On preparing or retraining individuals for in-demand occupations in the Governor’s target industries” as well as “support industries, such as transportation and health care.” This is a huge opportunity and one that has critical implications for people with disabilities living in North Dakota who want to work.

To quote [a 2014 report from the Office of Disability Employment Policy \(ODEP\)](#), “[people with disabilities] not only represent an untapped talent pool, but also offer significant value and insight” in the field of healthcare. Indeed, it is important for healthcare institutions to reflect their customers, and people with disabilities interface more with the healthcare system. There are [numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living](#). **Employers working in health and elder care can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities.** There are numerous [examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living](#).

**These examples all reflect how the Project Search model is well suited to meeting North Dakota’s growing talent needs in health care. As such, we recommend that Project Search be significantly expanded as they have done in Wisconsin, Florida and other states.**

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. The future expansion of Project Search in North Dakota should be in hospitals, hotels and elder care.

### **C. Science, Tech, Engineering and Mathematics (STEM), Accessibility, and The Autism Advantage**

The Governor is right to identify technology-based business as a key target for North Dakota. Diversity and competitiveness in a state economy very much depends on evolving and anticipating future market needs. 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 North Dakota 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.”](#) The need to fill STEM talent goes far beyond just federal contractors. [In New York State Governor Cuomo has ensured that magnet schools for STEM are located near IBM, a major STEM employer in their state.](#) North Dakota should follow this model. Together, North Dakota’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.

#### **D. Government Jobs**

While North Dakota is right to prioritize creating a positive business climate in the state, it is still worthwhile for the public sector to look at recruiting people with disabilities for jobs in state or local government. North Dakota's government will likely be impacted by the cresting wave of Baby Boomers retiring just as other sectors are being shaken. As such, adopting affirmative actions to hire loyal and talented 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.](#)"

North Dakota should explore the feasibility of Affirmative Action hiring of people with disabilities for jobs in state government plus expanding state contracting obligations around 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.](#) People with disabilities can be a successful solution, especially in high turnover jobs. Lastly, as shown by Delaware and Montgomery County, having a fast track or selective placement hiring system for people with disabilities can create more jobs.

#### **E. Government Contractors**

[North Dakota's state plan should have specific references to the new 7% utilization goal set for federal contractors to recruit, hire, and retain qualified individuals with disabilities in all job categories.](#) Even if employers face challenges finding the talent they need, Section 503 is an opportunity to start thinking about ways to attracting the diverse talents that people with disabilities bring to the workplace. Thus, we suggest the current draft of North Dakota's WIOA draft be revised to include language around Section 503 and federal contractors. There are multiple sources for information regarding what North Dakota based businesses hold federal contracts and what job sectors those contractors represent.

North Dakota **should respond to the opportunity created by Section 503 with a strategy focused on competitive advantage, not just compliance.** Section 503 is an opportunity that could potentially have a broad impact on the employer engagement work of your entire workforce system. The companies who must comply with Section 503 have an opportunity to teach companies not impacted by the regulations how to effectively employ, engage, and retain workers or customers with disabilities.

**The untapped potential of North Dakotans with disabilities is such that a full-spectrum, all-of-the-above-and-more approach is needed. North Dakota should be working to get more people with disabilities employed in high turnover occupations, leisure and hospitality, STEM fields, as well as health care and eldercare.**

## **2. Busting stigmas, myths, and misconceptions should be a key part of our state'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.](#) **We therefore recommend that North Dakota’s State Plan be amended to include a comprehensive proactive communications/public relations strategy for reducing such stigmas.** Indeed, we know that other groups of North Dakotans with barriers to work also face stigmas, especially those leaving the corrections system. **Having a serious, systematic and ongoing communications campaign that highlights the benefits of inclusive hiring must begin if North Dakota wants to maximize its success.**

**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.](#) However, it should be a much larger component of North Dakota’s 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. While there are few Stephen Hawking’s — 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. North Dakota’s VR staff and community agencies can fully support human resources professionals and managers in dealing with their own specific fears and stigmas surrounding hiring people with disabilities. Moreover, online and in-

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

- C. People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectations must begin. It is vital to have an PR campaign that will inspire North Dakotans with disabilities to reach for the stars.** 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 an intentional manner moving forward.

We live in a world where perceptions are shaped at lightning speed by social media, entertainment and news. Much of that can be conflated into “info-tainment” where it is hard to distinguish fact from fiction. Any campaign needs a multilayered approach in order to change the narrative around workers with disabilities so that they are seen for the abilities that they bring to the table. Social media certainly has a role to play in this effort. For example, in discussing how the state disseminates information regarding assistive technology, page 139 mentions that “IPAT maintains an active presence through social media to include Facebook.” This is a critical first step and we should be freely available to support that effort.

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

### **3. Use the best data points, including the Labor Force Participation Rates of people with disabilities v. those without disabilities, as performance metrics.**

As we expressed in our introduction, it is our view that North Dakota is already a model for the nation in terms of adopting best practices, achieving greater outcomes and higher employment rates for people with disabilities. Sustaining this success will very much depend on making sure North Dakota’s leaders have access to the right data. **It is vital that the workforce system and the State Board include the labor force participation rates of people with disabilities on their state dashboards and performance metrics.** Looking solely at unemployment information, decision makers are missing the bigger picture of those individuals with barriers to employment who are not actively seeking work. As an example of the data that is needed, we are including a link to, and a copy of, the presentation our organization has compiled about employment for North Dakotans with disabilities. This compilation contains information

derived from the Census Bureau’s American Community Survey that should be valuable to the WIOA work being done in North Dakota.

It is clear from several sections of the Unified State Plan, that leadership in North Dakota is commitment to empowering populations with barriers to employment. For example, on page 12 and 18, it states that the state is focusing on the “untapped labor pools such as Native Americans, New Americans, Individuals with Disabilities and workers pursuing a second career.” Further, in discussing the State's strategies to achieve its strategic vision and goals, the Plan reports that there is “a strong collaboration among state workforce partners to increase the employment of North Dakotan’s with disabilities.” These are all key ingredients for success.

However, in order for those ingredients to come together, the right data must guide the partners in their effort. **It is absolutely critical that North Dakota’s workforce system include the labor force participation rates (LFPRs) of people with disabilities both in their performance metrics and on their state dashboards.** Such data needs to be integrated into the overall document itself and [not buried in a supporting document](#).

If performance metrics are limited to things like unemployment statistics, then people who are not actively looking for work are being excluded from the plan’s analysis of the state economy. These rates are the critical lens that is needed to bring clarity to the issue of employment for people with disabilities. There is only a 30.4 point gap in the Labor Force Participation Rates between people with and without disabilities in North Dakota. Pushing hard to close this gap will require focused energy and effort. **As an example of how to expand the detail included on this subject, we are including both our state data presentation for North Dakota as well as the LFPR table drawn from Michigan’s WIOA Plan.**

North Dakota has worked hard to earn its high national ranking in terms of the employment rate for people with disabilities. However, it is still critical to look at the experience of those with disabilities who are succeeding in the world of work. **From the data, we see that 67.2% of the 4,500 North Dakotans who are blind or have vision loss are employed while a remarkable 69.9% of people with hearing differences are also employed.** Such high numbers should be cause for both pride and reflection. Clearly the usability, flexibility, and availability of assistive technology solutions have helped to spur the employment rate for this subgroup. People who are blind or deaf have incredible talents that can be unleashed by something as simple as a smartphone. **However, we also see that 44.9% of North Dakotans 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 North Dakota’s workforce system invests in and expands successful school to work transition programs.** For example, serving this population, Project Search sites have been achieving a 70% employment outcome for people with these types of differences.

#### **4. Overcome the gap between disability services and career services in Post-Secondary Education:**

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. **This issue falls firmly in the areas of operations and responsibilities of the North Dakota Commission on Education Improvement.**

[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. North Dakota has the chance to demonstrate to business 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.

##### **5. Ensure that Apprenticeship Programs are Fully Accessible and Actively Recruiting Young People with Disabilities, Especially with Government Contractors**

We are pleased to see the commitment made on page 12 of the Unified State Plan which discusses “Strengthening the use and availability of registered apprenticeships with co-enrollments by all core and required partners” These are all crucial steps in the continuing evolution of the state’s economy. However, as with many of the issues that we have raised in our comments, this is an issue that needs to be viewed through a disability lens.

**At the federal level, the Office of Disability Employment Policy has worked hard to generate resources which can open up these exciting programs to “youth and young adults with a full range of disabilities.”** The regulations related to apprenticeship which have recently come out of the Department of Labor provide states the flexibility they need to refine and design training programs that maximally inclusive of people with diverse talents. [We encourage you to invest time and energy to understand the best practices contained in ODEP’s apprenticeship toolkit. Further, we would also highly recommend that VR staff connect and collaborate with the Federal officer responsible for apprenticeship programs in North Dakota.](#) Such innovative partnerships and improved accessibility are essential elements of realization the full promise of WIOA for people with disabilities.

## **6. Prioritize pre-employment training and expand partnerships with VR**

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

North Dakota 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 North Dakota 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.”](#)

## **7. Avoid the Opportunity Costs of Focusing Too Much on One-Stop Centers. Programmatic Accessibility is Critical Important**

There is a significant note of caution that we will like to add in terms of both the current draft of the Unified State Plan as well as the future of North Dakota Workforce System. The State Plan should look to innovate beyond simply co-locating services and supports at the One-Stop Centers. **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.** 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.

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](#).

Likewise, Section 188 of WIOA outlines the accessibility requirements that each state must meet as part of this paradigm shift. **While physical accessibility is important, ensuring that the workforce system is programmatically accessible is also critically important.** As such, questions around closed captioning of training videos, website access for screen readers, and the availability of assistive technology for job seekers with disabilities are in need of close attention. Devoting resources to improving online resources will be of significant benefit to job seekers with disabilities as well as people with other barriers to employment.

## **8. Effective employer engagement depends on the BLN and others as you focus on the right business audience.**

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

**9. Transportation is a critical barrier to employment and it must be addressed directly:**

**Transportation is a critical issue that limits the employment aspirations of far too many people with disabilities.** Many people with disabilities do not drive. Others cannot afford private transportation. It is vital to work with public transportation to ensure that there are bus routes to places where there are internships, apprenticeships and other work opportunities. In places where that are not possible, North Dakota could look at partnering with UBER and other new transportation solutions. Indeed, for PwDs who do drive, such companies as UBER 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.

**10. 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. Also, North Dakota should be careful not to waste money trying to re-invent the wheel in creating online resources as [ASKJAN.org](http://ASKJAN.org), [the US Department of Labor's Office of Disability Employment Policy](http://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](http://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.

**11. 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. From our review of the text of the Combined State Plan, there is some flexibility in terms of membership on the State Workforce Investment Board (SWIB). **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.

**12. Aging workers and those with recently acquired disabilities must be specifically addressed in the plan:**

Many people who have been in the workforce for decades find that before full retirement age they cannot keep up with the physical demands of their jobs. In Iowa, for example, 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.

### **13. Utilize a “Jackie Robinson Strategy”:**

The workforce system only gets one chance with new employers to make a good impression. By law, policy, and custom, the system looks to serve people with the most significant disabilities first. However, if the individual with a disability that is placed is not the right match for the employer, it will only undermine our long term goals of making that employer see the value of greatly expanding inclusive employment opportunities. Thus it is vital to also use a “Jackie Robinson Strategy” to make sure that the right talent gets into the right positions so it is win-win for the employer and worker alike. As the first African-American to play major league baseball, Robinson tore down decades of discrimination and blazed a trail for other talented and diverse athletes to follow. He was the talent that his employer needed, and contributed to the bottom line. Because, stigma and misconception remain a critical obstacle and one that North Dakota workforce system needs to focus on, sometimes the best way to help people with more significant disabilities in the long term is to start with new employers by placing talent with fewer disabilities first. We are pleased to report that commitments made around serving youth throughout North Dakota’s Unified State Plan put this perspective into action. For example, we are incredibly excited to see the work being done through the “state funded Operation Intern program” As the state plan itself says on page 27, “Internships provide employees in a tight labor market and build connections between young people and North Dakota employers.” We look forward to seeking continuing, positive results in the future.

### **14. Strategic Engagement to Build a Buddy/Mentor System for People Customers of the Workforce System.**

**Government can’t and shouldn’t do everything. There is a massive role that can be played by trained and vetted volunteers who are willing to help people with barriers to work find and keep jobs.** Faith-based organizations and many others can fill massive gaps. [There is a terrific booklet, Clearing Obstacles to Work, put out by the Philanthropy Roundtable that is rich with potential partners and proven programs.](#) This is a huge missed opportunity as you will see in the booklet we just mentioned above. It’s all about teaching people to fish (helping them get and keep a job) rather than just giving them fish.

It is also important to note in terms of the SNAP and TANF programs that too many faith-based programs focus on giving out food without giving out the volunteer support to help people sustain themselves through gainful employment. [In looking to rethinking policies around SNAP funding, we suggest looking at the innovative efforts of the Seattle Jobs Initiative \(SJI\) to realign that funding into more productive, employment outcomes.](#)

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

Several sections of the current draft of North Dakota’s Unified State Plan scratch the surface in terms of the challenges facing people in the corrections system. To quote the Plan, North Dakota Department of Public Instruction “allocates federal and state funds to the Department of Corrections and Rehabilitation (DOCR).” Further, on page 104, the Plan describes the strategy it will use to reach people who will soon be transitioning out of the penal system. Specifically, “DOCR shall give priority to serving individuals who will be released within a period of five years. DOCR staff include highly qualified strategist/special education teacher for both adult and juvenile populations.” This is critical work and we applaud the plan for including raising these issues.

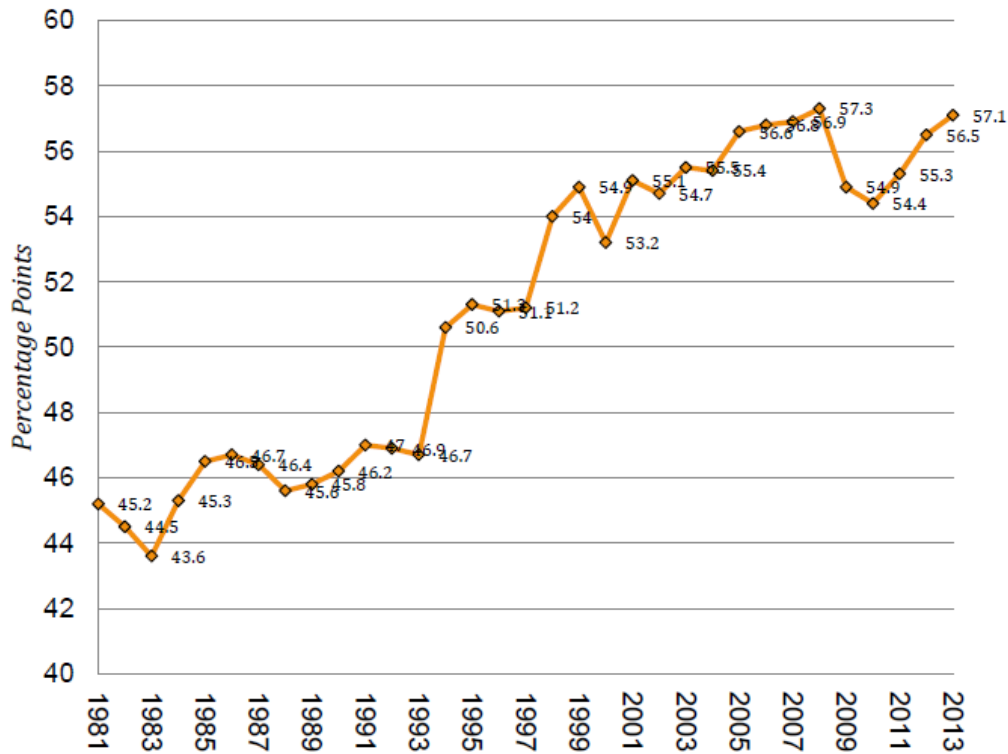
**However, serving this population and rehabilitating them into society is a critical issue facing the workforce system and it needs to be viewed through the lens of disability. The reason is simple. [According to recently published data from the Bureau of Justice Statistics, “An estimated 32% of prisoners 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 North Dakota’s 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**

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

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 North Dakota’s WIOA plan’s, all of this can change for the better for the people of North Dakota.

*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 North Dakota ranks nationally and to showcase several of the data points needed in North Dakota’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>

<b>Column 1 Ranking of States by Employment Rate of People with Disabilities</b>			<b>Column 2 Ranking of States by the Employment Gap between People with disabilities and people without disabilities</b>				
<b>#</b>	<b>State</b>	<b>% of PWDs Employed</b>	<b>#</b>	<b>State</b>	<b>% of PWDs Employed</b>	<b>% of People without Disabilities Employed</b>	<b>Employment Gap as a %</b>
<b>1</b>	<b>North Dakota</b>	<b>52.8</b>	1	Alaska	47.8	75.2	27.4
2	Wyoming	50.7	2	Wyoming	50.7	79.4	28.7
3	South Dakota	48.1	<b>3</b>	<b>North Dakota</b>	<b>52.8</b>	<b>83.1</b>	<b>30.3</b>
4	Alaska	47.8	4	Nevada	39.2	73.1	33.9
5	Minnesota	46	5	Utah	42.5	76.6	34.1
6	Nebraska	45.5	6	New Mexico	35.3	70.1	34.8
7	Iowa	44.8	7	South Dakota	48.1	83	34.9
8	Utah	42.5	8	Colorado	42.3	77.3	35
9	Colorado	42.3	9	Texas	38.7	74.7	36
10	New Hampshire	41.8	10	Minnesota	46	82.1	36.1
11	Kansas	41.7	11	Connecticut	40	76.4	36.4
12	Wisconsin	40.9	12	Hawaii	39.1	75.7	36.6
13	Connecticut	40	13	Nebraska	45.5	82.6	37.1
14	Maryland	40	14	Iowa	44.8	82.1	37.3
15	Montana	39.4	15	Kansas	41.7	79	37.3
16	Nevada	39.2	16	Montana	39.4	76.8	37.4
17	Hawaii	39.1	17	Arizona	33.6	71.3	37.7

18	Texas	38.7	18	Maryland	40	78.3	38.3
19	Virginia	36.9	19	Washington	36.4	74.7	38.3
20	Idaho	36.7	20	California	32.7	71.1	38.4
21	New Jersey	36.6	21	Idaho	36.7	75.2	38.5
22	Delaware	36.4	22	New Hampshire	41.8	80.3	38.5
23	Washington	36.4	23	New Jersey	36.6	75.1	38.5
24	Illinois	36.1	24	Delaware	36.4	75.1	38.7
25	Oklahoma	35.8	25	Oregon	35.2	73.9	38.7
26	New Mexico	35.3	26	Illinois	36.1	75	38.9
27	Oregon	35.2	27	Wisconsin	40.9	80.1	39.2
28	Massachusetts	34.9	28	Oklahoma	35.8	75.2	39.4
29	Rhode Island	34.3	29	Georgia	31.5	71.5	40
30	Pennsylvania	33.9	30	Virginia	36.9	76.9	40
31	Indiana	33.8	31	Louisiana	31.3	72.4	41.1
32	Arizona	33.6	32	New York	32.2	73.3	41.1
33	Ohio	33.5	33	Florida	30.5	72.2	41.7
34	Vermont	33.3	34	Pennsylvania	33.9	75.6	41.7
35	Missouri	33	35	South Carolina	30.7	72.7	42
36	California	32.7	36	Rhode Island	34.3	76.3	42
37	New York	32.2	37	Indiana	33.8	76	42.2
38	Georgia	31.5	38	Ohio	33.5	75.9	42.4
39	Louisiana	31.3	39	Massachusetts	34.9	77.9	43
40	Maine	31.2	40	Mississippi	26.3	69.4	43.1
41	South Carolina	30.7	41	North Carolina	30.3	73.5	43.2
42	Florida	30.5	42	Alabama	27.1	70.5	43.4
43	North Carolina	30.3	43	Michigan	29.9	73.4	43.5
44	Michigan	29.9	44	Tennessee	29.9	74.1	44.2
45	Tennessee	29.9	45	Missouri	33	77.1	44.1
46	Arizona	28.2	46	Arkansas	28.2	72.7	44.5
47	Alabama	27.1	47	West Virginia	25.3	70.6	45.3



48	Kentucky	26.9	48	Vermont	33.3	79.6	46.3
49	Mississippi	26.3	49	Kentucky	26.9	73.7	46.8
50	West Virginia	25.3	50	Maine	31.2	78.8	47.6

**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 to 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	5.6	-0.7

WY	43.9	78.5	34.6	50.7	79.4	28.7	-5.9	48	358,526	50	-age pop. under 1 million 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	-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	<b>27.0</b>	<b>71.4</b>	<b>44.4</b>	<b>30.7</b>	<b>72.7</b>	<b>41.9</b>	<b>-2.5</b>	<b>42</b>	<b>2,893,842</b>	<b>24</b>		<b>3.7</b>	<b>1.3</b>
NM	33.1	70.4	37.3	35.3	70.1	34.8	-2.5	42	1,243,353	36		2.2	-0.3
<b>IL</b>	<b>33.4</b>	<b>74.6</b>	<b>41.2</b>	<b>36.1</b>	<b>75.0</b>	<b>38.9</b>	<b>-2.3</b>	<b>41</b>	<b>8,010,771</b>	<b>5</b>	<b>Workin g-age pop. over 5 million</b>	<b>2.7</b>	<b>0.4</b>
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
<b>OH</b>	<b>32.8</b>	<b>75.1</b>	<b>42.2</b>	<b>33.5</b>	<b>75.9</b>	<b>42.4</b>	<b>0.2</b>	<b>13</b>	<b>7,072,114</b>	<b>7</b>	<b>Working-age pop. over 5 million</b>	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