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Feb. 9, 2016

RespectAbility – Public Comments – Ohio Combined State Plan

*“WHEREAS, maximizing the skills and talents of all Ohioans is essential to our state’s success and the skills that individuals with disabilities bring to our workforce, in both the public and private sectors, are vitally important; and
WHEREAS, Ohio’s workforce is enhanced when individuals with disabilities are employed and Ohio is fully committed to working with individuals to utilize their education, qualifications, talents and experiences to help them achieve employment; and
WHEREAS, family members, friends and members of the community can play a central role in enhancing the lives of individuals with disabilities, especially when the family and community are provided with necessary support services, and public and private employers are aware of the capabilities of people with disabilities to be engaged in competitive integrated employment; and
WHEREAS, through Opportunities for Ohioans with Disabilities, Ohio is striving to become a model for the employment of individuals with disabilities and Ohio is setting the standard for bringing business leaders and disability stakeholders together to reduce barriers faced by those seeking employment.” – [Governor John Kasich, Disability Employment Awareness Month Proclamation, October 1st, 2015.](#)*

RespectAbility is pleased to submit the following comments regarding the current draft of the State of Ohio’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 Ohio has made great strides in terms of Employment First and with the leadership of Governor John Kasich, the Buckeye State must do better in terms of competitive, integrated employment for people with disabilities. Only 34.6% of the 840,550 working age Ohioans with disabilities are employed. Further, there are over 50,300 youth with disabilities and each year a quarter of them will age out of school into an uncertain future. As the labor force in Ohio is starting to experience talent shortages, Ohioans with disabilities can offer valued and needed talent that can help grow Ohio’s economy overall.

Ohio, thanks Employment First, Gov. Kasich and WIOA, now has the opportunity to work hard to improve outcomes in terms of competitive, integrated employment for people with disabilities. The Buckeye State has much to 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. [States like the Dakotas, Alaska, and Wyoming have achieved increase results by putting best practices into places.](#) The experience of these states shows ways that Ohio 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 Ohio.](#)** That information is 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 Ohio's workforce system and the need to better align programs. For example, it is our perspective that there could be greater emphasis on better integrating SNAP, TANF, and Medicaid/Medicare beyond just summer internships. Ohio should be looking for other options to blend and braid resources as well as better data points in its anti-poverty programs. Additionally, Adult Education and programs for people involved in the justice system need to figure out ways to integrate screening tools to assess for learning disabilities in their program participants.

We commend the state for working hard to develop a common intake procedure for job seekers. However, questions remain regarding the accessibility of this system and how well it addresses privacy concerns. There is a fantastic level of detail in the Combined State Plan regarding labor force participation rates, demographic changes, and the talent pipeline. However, such data is not yet being used for performance metrics – and it should.

While the Combined State Plan does reference the opportunities created by Section 503 of the Rehabilitation Act, it is not fully developed as a strategy and coordinated with other elements of the workforce system. Another oversight is the lack of any discussions or references to Project Search. Project Search, which is one of the most effective school-to-work transition programs out there, originated at the Cincinnati Children's Hospital and has grown to successfully recruit, train and place thousands of people with disabilities into jobs in 43 states across the country.

Further, we have several critical concerns around the branding and communications strategy used by Ohio's workforce system. The focus of the energy and effort seems to be on the main site, www.OhioMeansJobs.com and not www.Ohiomeansaccessibility.com or www.Ohiomeansveteransjobs.com. Having a single portal that is fully accessible might be more beneficial to the system as a whole. There are several discussions around the critical work being done by the Poses Family Foundation in the Combined State Plan. However, that should just be a starting point for non-profit engagement and not the end of it.

The Combined State Plan goes into great detail about the professional qualifications and requirements needed by VR professionals. We would recommend that similar attention be given to the recruitment, training, and management of business liaison professionals dedicating to building partnerships with Ohio businesses. Having a common point of contact has been critical in Iowa and Wisconsin in terms of employer engagement, yet this is not something that we see included in the Combined State Plan. While the Plan mentions self-employment, it does not really engage with how entrepreneurship can be a solution for people with barriers to employment.

Next, we have a great many ideas to share around the issue of sector strategies. Whether it is health care or technology, people with disabilities can be incredibly successful employees if they receive the right training and supports. Indeed, Ohioans with disabilities represent an untapped labor resource that meet the talent needs of employers in diverse sectors. As such, in our comments, we recommend the need for sector strategies as a solution for job seekers with barriers to employment. Further, the Combined State Plan emphasizes how nearly half of the jobs in Ohio come from small employers. In terms of people with disabilities, it is our perspective that larger employers with a more robust HR / legal infrastructure tend to have better results. There is significant need for Ohio to integrate Section 503, apprenticeship efforts, and

expanding on Project Search into the overall workforce strategy. Transportation and other issues also need to be addressed. Lastly, the overall efforts of the Ohio workforce system needs a dedicated communications both to market the resources of the system and the particular talents of Ohioans with disabilities.

Our public comments on Ohio’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. From the accessibility of the workforce system to employer engagement to investing in transition programs for youth with disabilities, our comments are intended to help the Buckeye State push hard to see improved integrated employment outcomes for Ohioans with disabilities.

1. Ensuring the accessibility of Ohio’s new integrated case management and common assessment procedures:

One of the encouraging signs that Ohio is working hard to create a 21st century workforce system is the new integrated, state-wide case management system with common intake and assessment procedures. Having a common system provides a critical starting point for the disparate elements of the Buckeye State’s system to coordinate and collaborate. In particular, the Comprehensive Case Management and Employment Program (CCMEP) will be vital tool for helping to empower youth with barriers to employment such as disabilities, to successful transition into the world of work.

However, there are several critical questions that need to be raised. First and foremost, how accessible is this new program? Was it designed to meet the needs of clients with a broad spectrum of differences? Are the online components of this process full accessible to people with visual differences? Are their plain language summaries for explaining the program to people with intellectual or developmental disabilities? Have members of Ohio’s disability community been consulted in the design and development of this program? Further, privacy is a critical issue, especially when it comes to applying for services and encouraging self-identification. What processes are in place to ensure privacy protections for clients with disabilities?

As we stated in the opening section of our public comments, the disability lens is needed to assess many different parts of the workforce system in Ohio. A good example of what we mean by this involves ABLE, Title I Employment and Training, and Perkins Act programs. On page 18, the Combined State Plan discusses how “requiring a common application for Ohio’s three largest workforce programs will provide consistency, streamline co-enrollment and referrals, and reduce the wait time for service delivery.” We fully agree. However, there is a need for screening or assessment tools to identify previously hidden disabilities. **For example, if an Adult Education client in Ohio has a learning disability, does the program they are enrolled in have the resources to mitigate the effects of that difference?** We raise these questions because we want to see the entire workforce system in Ohio prepared and ready to fully serve people across the wide range of difference in abilities, talents, and skills.

Further, on page 19, the Combined State Plan talks about the process moving forward. In terms of “the necessary data elements that must be collected”, we highly recommend that disability status and type of disability is included in those elements.

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

Achieving success, especially through the implementation of WIOA, will very much depend on having access to the right data to drive the decision making process. **It is vital that the workforce system and the State Board include the labor force participation rates of people with disabilities on their state dashboards and performance metrics.** Looking at unemployment information in isolation causes decision makers to miss the bigger picture of those individuals with barriers to employment who are not actively seeking work. Additionally, while it is very 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. **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 Ohioans 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 Ohio.

Fortunately, it is clear from our review of Ohio's Combined State Plan, that the system is starting to look at the right metrics. For example, on page 11 of the Plan, the Labor Force Participation Projection by Age Group in Figure 6 provides a clear view of the workforce challenges across different age segments of the economy. These types of statistics are essential to the success of WIOA implementation in Ohio. Further, on page 12, the Combined State Plan discusses what percentage of Ohioans has a disability and how many are out of workforce. This shows that the Ohio workforce system is attuned to the challenges facing this population.

However, all of this data and detail is useless, unless it is matched up with strong metrics. We recommend that Ohio's workforce system set the gap in the labor force participation rate between Ohioans with and without disabilities as a key performance metric moving forward. The figures mention above show that the right data is available to leaders of Ohio's workforce system. However, such metrics need to be codified in the context of the State Plan. **For example, we would recommend that the Combined State Plan be amended to direct the Office of Workforce Transformation to compile and track data on disability through the online platform of measures.workforce.ohio.gov.** Another example of a place that could be revised to track the labor force participation rate of Ohioans with disabilities is found on page 22 in context of implementing Comprehensive Case Management and Employment Program (CCMEP). **Specifically, the Plan says that "adopting common performance metrics" will be crucial to successful implementation. Labor force participation rates are needed here.**

Further, while Ohio currently ranks 33rd in the nation in terms of the employment rate for people with disabilities, 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 find that only 36% of the 43,700 Ohioans who are blind or have vision loss are employed while 50.1% of the 77,400 with hearing differences are also employed.** Given the flexibility and availability of assistive technology solutions, the employment rate for this subgroup should be much higher. Many people who are blind or deaf have incredible talent potential that can be unleashed by something as simple as a smartphone. **Sadly, we also see that only 24.2% of Ohioans 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 Ohio's workforce system expands successful school to work transition programs.** Ohio already has some outstanding Project Search sites creating career pathways for youth with

disabilities. However, 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.

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

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

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

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

- A. CEOs/business leaders need to understand the value proposition/business case for their specific company as to why they should focus on putting people with disabilities into their talent pipelines.** This is best done through business-to-business success stories. Those businesses need to share their success stories and to talk about how people with disabilities can be extremely capable and loyal workers. While there are few Stephen Hawkings — with or without disabilities — people with disabilities can work highly successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and be super talents in developing computer software and engineering solutions. CEOs and business leaders need to know that people with disabilities can be the BEST people to get a job done.
- 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. Ohio'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. Ohio's new Employment First policy needs to be supported by a PR campaign that will inspire Ohioans 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.

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

It is also critical that Ohio VR staff and community agencies be prepared to support companies in dealing with their specific fears and stigmas. **Partners like the Poses Family Foundation Workplace Initiative can provide training to Ohio VR staff as well as community agencies in supporting Ohio companies through messaging efforts around related to fear and stigma.**

4. Strong Sector Strategies- The need for strategic alignment of workforce development and economic development to expand employment for people with disabilities:

Fundamentally, the success of the Workforce Innovation and Opportunity Act depends on being an employer driven paradigm shift. The strategic goals outlined in the Executive Summary of the Combined State Plan make it clear that Ohio has taken that commitment seriously.

However, expanding opportunities for people with barriers to employment such as disability requires strong partnerships with employers in those sectors which are rapidly expanding. For example, we know from page 11 of the current draft of the Combined State Plan that several sectors are projected to expand rapidly in the next few years. Specifically, “the top five industries expected to have the largest growth include construction (23.0 percent), health

care and social assistance (22.2 percent), professional and technical services (18.9 percent), educational services (15.6 percent) and wholesale trade (10.4 percent).”

Looking closer at these sectors, the State Plan shows that “the demand for several occupations to grow at a rate much higher than the overall growth rate for Ohio.” Those occupations are “Health care support occupations (24.1 percent), Health care practitioners and technical occupations (16.8 percent); Construction and extraction occupations (16.0 percent); Computer and mathematical occupations (14.7 percent); and Community and social service occupations (13.7 percent).”

The jobs gains in these sectors offer a great opportunity for focused sector strategies improve employment outcomes among people with disabilities in Ohio. 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 Ohio’s growing job sectors. Below, we offer our specific ideas on how to implement such efforts:

A. Health and Elder Care

One of the critical factors propelling the growth of healthcare in Ohio is an aging population. As Baby Boomers age, their health care needs increase, propelling the demand for jobs in “Health care support occupations”, “Health care practitioners and technical occupations”, and “Community and social service occupations.” This trend is both a challenge and an opportunity. It is a challenge in that employers in the health care sector have talent needs that are only going to grow in the years ahead. It is an opportunity to train and prepare young people, especially those with disabilities, to go into a dynamic career field. **People with disabilities can and should be part of the solution to this critical demand in the labor market.** To quote [a 2014 report from the Office of Disability Employment Policy \(ODEP\)](#), “[people with disabilities] not only represent an untapped talent pool, but also offer significant value and insight” in the field of healthcare. Indeed, it is important for healthcare institutions to reflect their customers, and people with disabilities interface more with the healthcare system. There are [numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living](#). **Employers working in health and elder care can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities.**

Fortunately for Ohio, the Buckeye State is home to one of the most important, innovative school to work transition programs for young people with disabilities. **Specifically, Project Search has its origins at the Cincinnati Children's Hospital Medical Center. In looking to meet the health care needs of Ohio, we are very surprised to see no mentions or references whatsoever to Project Search in the Combined State Plan.** 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. To name a few select locations, Project Search has been tremendously successful at [Cincinnati Children’s Hospital](#), [Columbus City Schools](#), and [Parma Community General Hospital](#). These sites overall have been achieving outstanding results for people with disabilities, employers, and taxpayers alike. For example, [the first longitudinal study of the program, which was conducted in upstate New York,](#)

[found “a 68% success rate in transitioning students from high school into competitive employment” and “Project SEARCH sites...have an impressive 83% success rate overall.”](#)

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

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

Federal contractors and other employers have huge demands for STEM qualified talents. However, many schools place their best supports for students with disabilities in schools that do not have strong STEM training. This is a huge loss as people on the Autism Spectrum, for example, can have the very best skills in science, math and engineering. [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.](#)” These experiences and partnerships offer insights into how to challenge employer perceptions, recruit diverse talent, and ultimately put peoples to work. Delaware’s Governor Jack Markell has led the way in partnering with companies to employ more people on the autism spectrum. Such examples need to be implemented by Ohio. **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 work to ensure people with disabilities have the chance to become future scientists, engineers, and mathematicians.** This will take partnerships with early childhood interventions, schools, community colleges and universities.

Partnerships should be created with federal contractors who have 503 requirements and talent shortages. **Ohio is lucky to be home to some of the largest and most important Federal Contractors including General Electric Company, Cardinal Health INC, Fluor-B&W Portsmouth LLC, The Procter & Gamble Company, and Battelle Memorial Institute, INC.** Through WIOA, Ohio’s workforce system should be leading the nation in terms of helping these dynamic businesses meet and exceed their Section 503 requirements.

The staff at Opportunities for Ohioans with Disabilities has a critical role to play in acting as that catalyst in the future. **At a minimum, the VR sections of the Combined State Plan should be amended to ensure that Ohio VR is fully trained in all 503 regulations.** In order to ensure that such knowledge does not get trapped in a silo, Ohio VR staff should be prepared to act as consultants to help businesses meet the 503 regulations while simultaneously building disability inclusion projects that are integrated into companies’ overall diversity strategies.

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

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 even 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 Ohio to improve employment outcomes for people with disabilities](#). Ohio's State Board, along with other components of the workforce system, should connect with employers in the hospitality sector to begin figuring out how to benefit from these models.

Another sector with high turnover and big potential are distribution/supply chains. Many companies, including UPS, Wal-Mart, and OfficeMax have proven records of success. Walgreens has demonstrated that workers with disabilities in their distribution centers are as productive, 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 PwDs are proven to have significantly higher retention rates. It is important to identify more specific opportunities with employers and to site them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future. **Another great example is Starbucks.** Their "[Inclusion Academy](#)" has rapidly grown from just a pilot program in Carson Valley, NJ to a complete program at their largest roasting plant.

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

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

Ohio 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 Ohioans 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.

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

While there is a great deal of data and detail in the current draft of Ohio's Combined State Plan, there is also an omission. **While the Combined State Plan does reference the opportunities created by Section 503 of the Rehabilitation Act, it is not fully developed as a strategy and coordinated with other elements of the workforce system.** [The new 7% utilization goal set for companies to recruit, hire, and retain qualified individuals with disabilities in all job categories is a huge opportunity to innovate.](#)

Ohio needs to respond to the opportunity created by Section 503 with 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.

Ohio is fortunate to be hope to the operations of several massive businesses with extensive federal contracts. For example, General Electric Company, Cardinal Health INC, Fluor-B&W Portsmouth LLC, The Procter & Gamble Company, and Battelle Memorial Institute, INC. all do business with the federal government from within Ohio. Each of these companies is looking for solutions to the Section 503 challenge and this is an opportunity that should not be missed. Apprenticeship and internship opportunities should be forged with large federal contractors who are looking for talent. It will also be vital to have transportation solutions for workers with disabilities who are ready to work for federal contractors and other employers.

6. 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.

[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. Ohio 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.

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

One of the often neglected opportunities for people with disabilities are the training opportunities offered by apprenticeship programs. We are pleased to see that Ohio is very seriously working to improve apprenticeship programs through “a multi-pronged approach to ensure that registered apprentices are concurrently awarded college and apprenticeship credit” as discussed on page 36 of the Combined State Plan. Further, on page 77, the State Plan talks about apprenticeship as “a part of the array of strategies and services available to employer sponsors and individuals” and how “Ohio Department of Higher Education is working to leverage these programs into college degree pathways.” This is critical work and it is work that needs to be viewed through the lens of disability.

As Ohio looks to improve these programs, we highly recommend that the workforce system seriously look at ways to make apprenticeships accessible to people with disabilities. At the federal level, the Office of Disability Employment Policy has worked hard to generate resources which can open up these exciting programs to “youth and young adults with a full range of disabilities.” The regulations related to apprenticeship which have recently come out of the Department of Labor provide states the flexibility they need to refine and design training programs that maximally inclusive of people with diverse talents. [We encourage you to invest time and energy to understand the best practices contained in ODEP’s apprenticeship](#)

toolkit. Further, we would also highly recommend that VR staff connect and collaborate with the Federal officer responsible for apprenticeship programs in Ohio. Such innovative partnerships and improved accessibility are essential elements of realization the full promise of WIOA for people with disabilities.

Further, we would suggest that there is a critical opportunity to look at Section 503 and federal contractors as a partner in expanding apprenticeship programs. Funding to cover training costs could be a very attractive selling point for federal contractors looking to meet their 503 requirement. Further, we would also recommend looking at the intersection of apprenticeships and sector strategies. Not only can apprenticeships be set up in traditional fields such as construction, but they can also be incredibly useful in health care and computer jobs. Look at the successes achieved by Project Search at a wide range of Ohio employers. As such, we recommend that the workforce system and the State Board investigate how to both open apprenticeship programs to people with disabilities and to create apprenticeship opportunities in new career fields as well.

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

We are very pleased to see the increasing collaboration of agencies on youth transition issues. As much as we would encourage your state to follow Florida and Wisconsin's example by working hard to expand the number of Project SEARCH sites, this is not the only paradigm that you should follow. The school system, vocational rehabilitation, and local workforce boards can build creative, collaborative partnerships with companies that are leading on disability.

As you embark on your new strong 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. Ohio 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 Ohio build on its partnerships with non-profit organizations such as the Poses Family Foundation. We stated at the beginning of our comments, the innovative work done in Ohio by Poses should be a starting point for non-profit engagement and not the end of it

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

Public policy is about the allocation of scarce resources to meet infinite needs. It is vital to invest resources on those points where they can have the greatest effect. One challenge that we have seen in many states WIOA plan has been the prioritization of expensive bricks and mortar One-Stops as the primary access point for programs and services under WIOA. 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. **We are delighted that you have closed some physical offices in lieu of effective mobile community solutions. Can more of that be done?**

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.](#)

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, Ohio should be careful not to waste money trying to re-invent the wheel in creating online resources as [ASKJAN.org](#), [the US Department of Labor's Office of Disability Employment](#) Policy, [our organization and others also offer free toolkits, webinars and training opportunities](#). [Another resource is Understood.org](#).** This is a comprehensive resource to help families and individuals with learning and attention issues build their educational and career plans. It will be helpful to collaborate with those groups however to ensure that the best tools are created to fit the training and information needs on these issues.

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. Specifically, we have two recommendations regarding the membership of Ohio’s State Board. **First, we recommend the placement of a representative of the disability community on the State Board.** Even in a non-voting capacity, having a self-advocate or community member speaking to the needs of Ohioans with disabilities would be a powerful addition to the State Board’s work. Second, Ohio is lucky to possess an outstanding and innovative Business Leadership Network. **As such, we recommend that a representative of the Ohio BLN be appointed to the Ohio State Board.** Their voices and perspective will be critical to ensuring greater opportunities for Ohioans with disabilities.

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

One significant reservation that we have regarding Ohio’s Combined State Plan is the very limited attention given to the issue of transportation. This is a critical oversight not only for Ohioans with disabilities but other members of low-income communities. **Many people with disabilities do not drive. Others cannot afford private transportation. It is vital to work with public transportation to ensure that there are bus routes to places where there are internships, apprenticeships and other work opportunities.**

As reported on page 244, the Senior Community Service Employment Program “will continue to coordinate with the Ohio Department of Transportation.” That is important work no doubt. However, people with disabilities need transportation solutions as well. We highly recommend that the Combined State Plan be revised to direct OOD to engage with the Ohio Department of Transportation to study this issue and develop cost-effective solutions. Public transportation need not be the only solution. In places where it is not possible to coordinate a bus route, Ohio could look at partnering with UBER, Lyft and other new transportation solutions. Indeed, for PwDs who do drive, such companies as UBER and Lyft can also provide a way to enter into the workforce with flexible hours.

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

Your plan has a section on seniors who are outside of the workforce. However, attention should start BEFORE they lose their job due to aging and/or a newly acquired disability. 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. It is vital to start working with them BEFORE they lose 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.

14. Strategic Engagement to Build a Buddy/Mentor System for 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. For example, on page 84, the Combined State Plan talks about how “CCMEP takes a coordinated, holistic approach to stabilizing individuals and families by addressing the myriad of factors that may be contributing to poverty and unemployment, including health, housing, education, transportation, and child care.” There is a critical, cooperative role for non-profits and faith-based organizations to play. Local workforce development areas, for example, could be encouraged to recruit volunteers from local faith communities or local non-profits to help implement this “coordinated, holistic approach” and “addressing the myriad of factors.” However, much more can and should be done to work with parents of teens and young adults with disabilities, and to create volunteer mentorships for people with disabilities who are looking for work or need supports to stay employed and/or grow their careers.

While we would emphasize volunteers as being a way to supplement the efforts of local elements of the workforce, we also commend the State Plan for discussing the positive role that volunteering has on employment outcomes. On page 241, the Plan mentions research which shows “evidence of a relationship between volunteering and finding employment.” Given this insight, we would recommend that Ohio look for ways to encourage volunteering and early work experiences as a part of the IEPs for students with disabilities.

Further, we are very excited to see the work being done through the GIVEback, GOforward program. We fully agree with the Combined State Plan where it encourages “young people” to connect with “one of the state’s most vast and valuable resources – Ohio’s elders.” While this is a pilot program in need of thorough review, we are excited about the implications it has for people with disabilities. Further [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 booklet talks about this opportunity and emphasizes the important of 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:

There are several points where the current draft of Ohio's Combined State Plan addresses the unique workforce challenges facing ex-offenders as they attempt to reenter society. As reported on page 12 of the Plan, "an estimated two million citizens (or about 17 percent) have a felony or misdemeanor conviction." Further, the Plan also states that approximately "400,000 individuals have come through the prison system alone since the mid-1980s." Later on, the Combined State Plan discusses how "ABLE programs will partner with correctional facilities, when applicable, to offer adult education and literacy activities for criminal offenders who are likely to leave the institution within five years." This is all critical work and serving this population is a critical challenge facing the workforce system in Ohio.

However, there are several points that we would like to add to this discuss. The work being done with this population needs to be viewed through the 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 Ohio 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 and supports are needed as they exit the system back into society. Doing so would create opportunities for Ohio to address those issues productively and proactively.**

Conclusion

As we stated at the beginning of our Public Comments, Ohio can and must do better in terms of jobs for people with disabilities. You have the leadership will from your Governor and other parties. However, despite a growing state economy, Ohio only ranks 33rd in the country in terms of their employment rate of people with disabilities. Such poor outcomes can be turned around. Failing to properly train and prepare job seekers with disabilities costs the Ohio economy incredible talent and shatters the aspirations of so many Ohioans with disabilities who want to pursue the American Dream, just like everyone else.

However, thanks to WIOA, Ohio has the chance to lead by example in terms of investing resources in successful models and implementing best practices to expand job opportunities for people with disabilities.

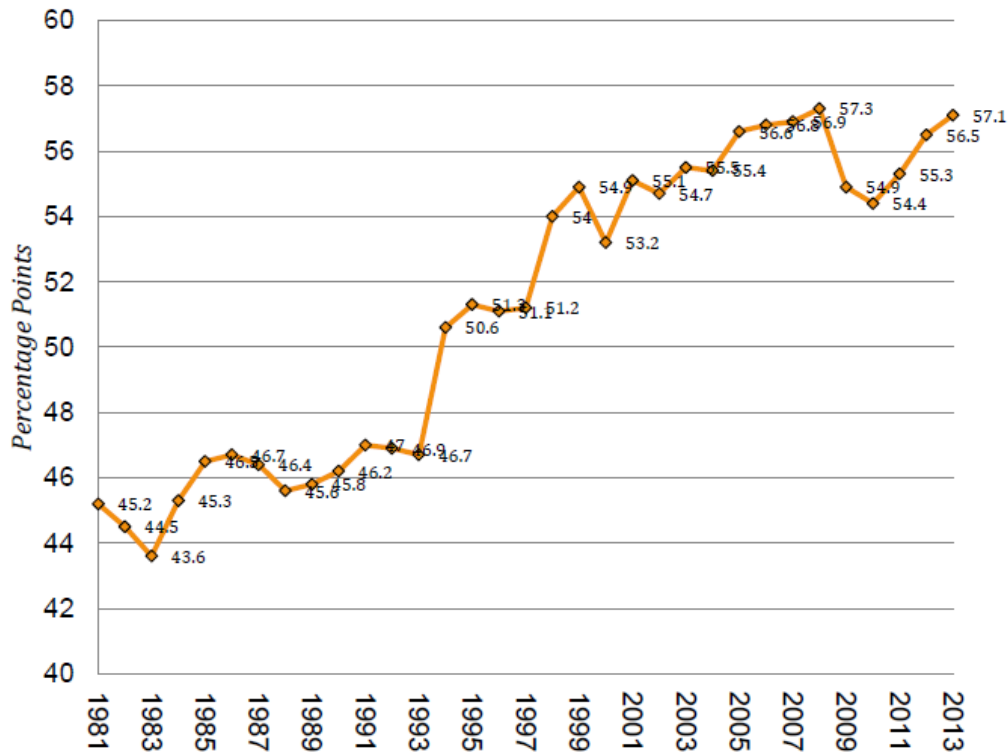
The bottom line is that expanding job opportunities for people with disabilities is win-win-win for employers, taxpayers and people with disabilities alike. It is good for employers

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. Thank you for your consideration!

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 Ohio's WIOA that all of this can change for the better for the people of our state.

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 Ohio ranks nationally and to showcase several of the data points needed in Ohio'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	North Dakota	52.8	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	3	North Dakota	52.8	83.1	30.3
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	S. 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	N. 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	W. 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-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	Workin g-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 populati on 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 populati on 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 populati on 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	Workin g-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	1.7	0.9

FL	28.9	71.4	42.5	30.5	72.2	41.7	-0.8	27	#####	4	million Working -age pop. over 5 million	1.6	0.8
NY	30.9	72.7	41.8	32.2	73.3	41.1	-0.7	26	#####	3	Working -age pop. over 5 million	1.3	0.6
AL	26.8	70.8	44.0	27.1	70.5	43.4	-0.6	25	2,945,466	23		0.3	-0.3
GA	30.3	70.8	40.5	31.5	71.5	40.0	-0.5	22	6,151,890	8	Working -age pop. over 5 million	1.2	0.7
CT	39.7	76.6	36.9	40.0	76.4	36.4	-0.5	22	2,235,695	29		0.3	-0.2
WV	24.3	70.1	45.8	25.3	70.6	45.3	-0.5	22	1,132,703	37		1.0	0.5
WA	35.7	74.3	38.7	36.4	74.7	38.3	-0.4	21	4,339,199	13		0.7	0.4
PA	33.0	75.1	42.1	33.9	75.6	41.7	-0.4	20	7,849,516	6	Working -age pop. over 5 million	0.9	0.5
MT	38.7	76.4	37.7	39.4	76.8	37.4	-0.3	19	616,125	44	Working -age pop. under 1 million	0.7	0.4
MI	27.9	71.7	43.8	29.9	73.4	43.5	-0.3	18	6,096,761	9	Working -age pop. over 5 million	2.0	1.7
MS	26.4	69.6	43.3	26.3	69.4	43.1	-0.2	17	1,790,746	31		-0.1	-0.2
CA	31.8	70.2	38.5	32.7	71.1	38.4	-0.1	15	#####	1	Working -age pop. over 5 million	0.9	0.9
VA	36.3	76.5	40.1	36.9	76.9	40.0	-0.1	15	5,112,923	12	Working -age pop. over 5 million	0.6	0.4
KY	26.2	72.9	46.7	26.9	73.7	46.8	0.1	14	2,687,179	26		0.7	0.8
OH	32.8	75.1	42.2	33.5	75.9	42.4	0.2	13	7,072,114	7	Workin g-age pop.	0.7	0.8

											over 5 million		
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

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