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Mar. 14, 2016

RespectAbility – Public Comments – Virginia Combined State Plan

“WHEREAS, Virginians with disabilities, including veterans, have the ability and desire to seek employment and to achieve economic self-sufficiency as equal members of the workforce; and WHEREAS, individuals with disabilities are an untapped resource; employers can enhance their businesses and workplaces by creating a common ground of career opportunities and hiring qualified individuals with disabilities; and WHEREAS, all Virginians should be given the opportunity to participate fully and equally in the social and economic life of the Commonwealth, and the opportunity to engage in remunerative employment;.” – [Gov. McAuliffe, 2015 Disability Employment Awareness Proclamation.](#)

RespectAbility is pleased to submit the following comments regarding the current draft of Virginia’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.

Today Virginia has the opportunity to work hard to improve outcomes in terms of competitive, integrated employment for people with disabilities. Currently, the Commonwealth ranks 22nd in the country in terms of their employment rate of people with disabilities. **Only 37.6% of the approximate 482,793 working age Virginians with disabilities are employed. Further, there are over 556,200 youth ages 16-20 with disabilities, and each year a quarter of them will age out of school into an uncertain future.**

Virginia has many of the ingredients essential to sustained success. Key state leaders from the Governor’s office on down recognize the critical importance of addressing disability employment and the need to align the workforce system to overcome barriers to employment. **Through WIOA, Virginia has the chance to invest resources in successful models and implement best practices to expand job opportunities for people with disabilities.** The Old Dominion has the opportunity to mirror the efforts of 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 increased results by putting best practices into places.](#) **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, cost effective to implement, and successful. [We are included a collection of data on disability and employment in our comments.](#)

Our public comments on Virginia’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 your state push hard to see improved integrated employment outcomes for Virginians with disabilities.

1. Ensure that the best data points, including the Labor Force Participation Rates of people with disabilities v. those without disabilities, are used as performance metrics:

Tracking unemployment information (which only reflects people actively looking for jobs) and job placements (which only monitors people who interface directly with the workforce system) is necessary, but not sufficient to drive true performance metrics that will create success.

We were incredibly pleased to see that that your Combined State Plan already included many of the key data points missing in other states' WIOA Plans. Your plan provides great detail on the diverse composition of the Old Dominion's disability community, employment experiences by disability type, poverty data, and information on insurance converge.

The current of draft of Virginia's Combined State Plan includes many important statistics regarding people with disabilities starting on pages 253-263. The experience of disability is diverse and includes a wide range of differences both visible and invisible. As such, we are pleased that this section of the State Plan identifies that among "all Virginians, 4.9% had a cognitive disability, 4.9% had ambulatory disability, 4.9% had self-care disability, 4.9% had independent living disabilities 4.6% had a vision disability and 4.3% had a hearing disability.(page 254)" This data is critical if Virginia's workforce system is to evolve to serve people with disabilities.

The Combined State Plan accurately reports on page 254 that only 37.6% of working age people with disabilities are in the workforce, compared to 77.6% of people without disabilities who are in the workforce. That means there is a 40 percentage point gap in the Labor Force Participation Rates (LFPR) of Virginians with disabilities. Closing this gap will require the focused energy and effort of your workforce system. [Good examples of the efforts that are needed in the Commonwealth are listed in our recent report about the best and worst states for people with disabilities.](#) We encourage Virginia to look to these other states to see what has worked, what hasn't, and how to expand employment opportunities for people with disabilities.

The critical next step for Virginia to take is to translate these data points on disability and translate them into performance metrics that will guide the workforce system moving forward. Labor Force Participations Rates are the critical lens that is needed to bring clarity to the issue of employment for people with disabilities.

Figure 1.

Virginia Performance Metrics on Jobs for PWDs



Gov. Terry McAuliffe (D)

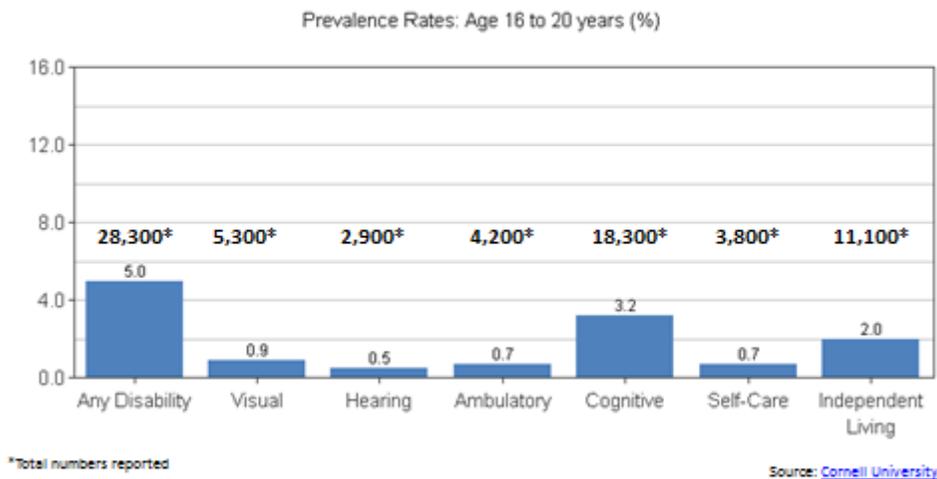
- ❖ 77.6% of persons w/o disabilities aged 18 to 64 are employed.³
- ❖ 37.7% of PwDs aged 18 to 64 are employed.³
- ❖ Virginia ranks 22nd in the nation for labor force participation rate for peoples with disabilities.³
- ❖ **There is a 39.7 % gap between employment of peoples with disabilities and those without.**³
- ❖ 28,300 persons aged 16 to 20 have a disability.¹
- ❖ 420,100 persons aged 21 to 64 have a disability.¹
- ❖ 482,793 civilians in VA have a disability.³
- ❖ The employment gap between PwDs and people without disabilities has decrease 0.1 percentage points between 2012 and 2013.³
- ❖ 243,085 people ages 18-64 received SSDI or SSI in 2014.³
- ❖ In 2014, total expenditure on SSDI benefits for PwDs was \$271,938,000.³
- ❖ Voc. Rehab. obtained 3,141 jobs for PwDs in VA in 2013.³
- ❖ Voc. Rehab. received 9,906 general applicants and 439 blind applicants in VA 2013.³

1. 2012 Disability Status Report Virginia, disabilitystatistics.org
2. StateData: The National Report on Employment Services and Outcomes, 2012
3. [American Revolution: Statistical Chronology](#)

No plan is perfect however. Even though your Combined State Plan includes many more data points than other state plans, there are still several pieces of information that are needed. Below are several additional data points that will make for a stronger draft Plan:

- a. **This information will be needed by policy makers to make policies to close the pay gap. Data on youth with disabilities, ages 16 to 20, who are aging into the workforce.** Virginia is doing well in that its Combined State Plan contains the number of working age peoples with disabilities 18-64 that are working. We are very pleased to see that Virginia includes this information as it is critical for lawmakers to come to the best competitive employment. However, it does not include more specific information about youth with disabilities. From page 263, in the section detailing the discussion between DARS and the SRC, we know that Virginia is committed to “Enhancing services to students and youth with disabilities. “ From page 275, We know that DARS is deeply focused on expanding through proven methods such as expanding “Project SEARCH sites throughout Virginia”, fully implementing the “DARS Autism Program”, and that “PERT and Life Skills Programs at WWRC.” However, these efforts will be enhanced by including more detail information on youth with disabilities in your Combined State Plan.

Figure 2.
Prevalence of Disability Among Non-Institutionalized People Ages 16 to 20 in Virginia in 2013



- b. **Data on what disabilities youth who are transitioning into work are experiencing.** This is important because youth with vision, mobility and hearing disabilities need specific types of tools and training, but may otherwise be ready for high skill, high wage jobs. Meanwhile, people with developmental disabilities who have cognitive differences may need significantly more training to get started. But they too can be hugely successful through programs like Project Search.

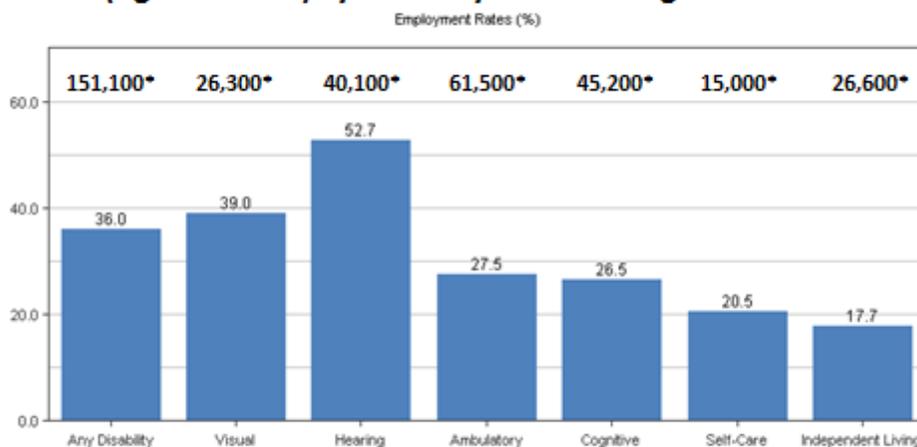
Figure 3.
Virginians Ages 6 to 21 Served Under IDEA

	2012	2013
All Disabilities	144,887	144,760
Specific Learning Disability	54,739	54,094
Speech or Language Impairment	19,965	19,135
Intellectual Disability	9,261	9,071
Emotional Disturbance	9,432	9,140
Multiple Disability	3,221	3,166
Hearing Impairment	1,239	1,212
Orthopedic Impairment	703	673
Other Health Impairment	29,951	30,780
Visual Impairment	533	542
Autism	13,347	14,441
Deaf Blindness	28	28
Traumatic Brain Injury	370	395
Developmental Delay	2,098	2,083

Source: [Annual Disability Statistics Compendium](#)

c. **The LFPRs broken down by type of disability.** . Virginia’s Combined State Plan deserves credit for including some of the most critically needed data points about the economic status of people with disabilities of any state plan that we have reviewed. We were pleased to discover that page 254 of the State Plan included a breakdown of employment rates by disability like that shown in the chart below.

Figure 4.
Employment of Non-Institutionalized Working-Age People (Ages 21 to 64) by Disability Status in Virginia in 2013



*Total numbers reported

Source: [Cornell University](#)

The level of detail on disability in Virginia’s Combined State Plan is impressive and we appreciate your hard work at including it. As such, the critical next step is to ensure that such

information informs the design and development of the right performance metrics. There is also an additional caution we would like to add. As we said previously, unemployment statistics only include people who are actively seeking work. Counter intuitive though it may be, a minor uptick in the unemployment rate could be a sign that more people with disabilities are trying to get into the workforce.

Further, it is important to share the data above and the data from Page 254 throughout Virginia's workforce system. The types of reasonable accommodations and workplace supports someone with a vision different needs to succeed are different from those needed by someone with developmental delays. Virginia has a great deal of information about the demographics both ethnic and economic for peoples with disabilities. However, there is room in the state plan to include employment rates for specific types of disabilities such as intellectual or developmental disabilities. This data should be included for section, "Employment for Virginians with Disabilities" on page 254. This section already contains fantastic information about the specific disabilities groups that make up the disability workforce of Virginia: Policy makers must understand the impact of their policies for different disability communities. Demographically driven workforce solutions, such as adding a significant number of additional Project Search programs to meet the needs of young people with developmental disabilities and employers who need reliable workers in high turnover jobs, may take slightly more time and resources in the short term. However, they actually save much more money for taxpayers than any other kind of investment as without this training there are 20% employment outcomes, and with the training there are 70% employment outcomes for a population that otherwise qualifies for a lifetime of government benefits.

There are several proven best practices for different disability populations to transition from school to work. However, there is a considerable need to expand the number, scope, and diversity of such sites in Virginia. We have more to say on these issues in the comments below.

2. 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), State Plans must 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.

Beginning on page 12, the Combined State Plan describes "Current and Forecast Employment by Industry" throughout Virginia. The Commonwealth's economy mirrors our national economy in terms of existing and emerging job sectors. To quote the State Plan, "As in the nation, the health care and social assistance sector employs the largest number of workers in Virginia." As the same time, Virginia's geographic proximity to the nation's capital also means that "the third largest sector in the state is professional, scientific, and technical services."

Page 15 of the Combined State Plan puts the challenge into perspective "The three largest industry sectors in Virginia (health care and social assistance; retail trade; and professional, scientific, and technical services) currently employ 34% of the state's workers." Projections only show considerable growth in the years ahead: "those three sectors are expected to add 194,034 employees over the next ten years or 65.7% of the total expansion in the state."

Those numbers speak to the significant challenges facing Virginia's workforce system. From our perspective, these challenges represent a chance for Virginia to significantly expand employment opportunities for people with disabilities. As Gov. McAuliffe said in his

proclamation for Disability Employment Awareness Month last year “individuals with disabilities are an untapped resource.” With the right supports and training, Virginians with disabilities can meet the diverse talent needs of Virginia’s growing job sectors. The job gains in these sectors offer a great opportunity for focused sector strategies sustain and build on employment outcomes being achieved among people with disabilities.

a. Talent needs in healthcare and social assistance can be met by training youth with disabilities to succeed:

The Combined State Plan clearly and accurately states that healthcare and social assistance will only grow more important for Virginia’s economy in the immediate future. As stated on page 9, “health care and social assistance is expected to be the fastest growing sector in the nation, due in part, to the aging Baby Boom generation.” Further, the State Plan clearly states that this is a rapid growth sector and one that needs quick action by the workforce system. To quote page 14 of the State Plan, “The health care and social assistance sector is expected to be the fastest growing sector in the state with average annual growth of 1.8% per year.”

From our perspective, this is both a challenge and an opportunity for the nation’s workforce system. It is challenge propelled by an aging population resulting in increasing demand for qualified workers ready to fill the talent needs of hospitals, assisted living centers, and nursing home. It is opportunity to channel the incredible talents of people with disabilities into the workforce. This is a topic that needs to be examined closely and has implications for people with disabilities who want to work.

People with disabilities can and should be part of the solution to this demand in the labor market. A 2014 report from the [Office of Disability Employment Policy](#) (ODEP) captured this opportunity clearly, saying that “[people with disabilities] not only represent an untapped talent pool, but also offer significant value and insight” in the field of healthcare. It is important for healthcare institutions to reflect their customers, and people with disabilities interface more with the healthcare system. There are [numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living](#). **Employers working in health and elder care can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities.**

These examples all reflect how the Project Search model is well suited to meeting the growing talent needs in health care across the many states. As such, we recommend that Project Search be significantly expanded in Virginia 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 are glad to see that the Commonwealth’s WIOA Plan discusses the development of new Project Search sites. Specifically, on page 269, the Plan states that “Planned new sites will be in Loudoun County and Lynchburg” and will be focused on “the employment of transition age youth with Autism.” This is critically important work and we are glad to see that it is being

done. However, the rapid growth of healthcare and social assistance as a sector of Virginia's economy means that action and ambition is need. 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 twenty seven sites in total. 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. Long term investments in Project SEARCH and other such programs will save big money for taxpayers while also strengthening the talent pool for employers.

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

We know that Gov. McAuliffe is deeply committed to creating more pathways for careers in the fields of Science, Technology, Engineering, and Mathematics (STEM). For example, we are incredibly excited about the "Governor's STEM Academies" which are programs focused on helping students "acquire STEM (Science, Technology, Engineering and Mathematics) literacy and other critical skills, knowledge and credentials." This is critical work.

However, we are deeply concerned that students with disabilities might be excluded or schools focused on STEM might not have the supports needed to ensure a twice exceptional student with disabilities could acquire these skills. We offer these specific points based on our organization's experience reviewing Maryland's WIOA Plan and the lack of supports for student with disabilities in Montgomery County, Maryland.

Montgomery County has the largest number of Maryland students on the Autism Spectrum, as well as students who are "twice-exceptional" (highly gifted plus have disabilities). Their program overall, which serves more than 1200 students, is outstanding. Despite the overall excellence of educational services and supports for students on the autism spectrum in Montgomery County, these supports often do not allow for the inclusion of diploma-bound students on the spectrum in STEM academic programs. Montgomery County schools offer a range of college and career-readiness programs that would suit the specialized skills of autistic students. The nationally-known Science, Mathematics, and Computer Science magnet programs at Montgomery Blair and Poolesville High Schools, as well as the Information Technology career program at Thomas Edison High School of Technology, are two programs that could help students on the spectrum maximize their —autism advantage. **Unfortunately, a lack of integrated supports to accommodate autistic students' special needs prevents all but a very few of them from enrolling in these programs. High school students on the autism spectrum are often segregated into special education programs, with little opportunity to pursue their natural talents within the public education system. We fear that these experiences are not unique to Maryland but are reflected in other states.**

Given the immense talent needs of Northrop Grumman Corp, SAIC INC, Booz Allen Hamilton Holding Corp, CACI International INC, Hewlett-Packard Company Virginia's educational system should develop mechanisms for aligning the talents of students on the autism spectrum with increased inclusive supports in STEM high school programs.

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 other states. This issue of STEM and access for student with disabilities is a natural point of partnership between the workforce system and the educational system. That work needs to start young, be matched with high expectations for success, and designed to ensure people with disabilities have the chance to become future scientists, engineers, doctors and mathematicians.

Ensuring the Accessibility of Science, Technology, Engineering and Mathematics (STEM) Programs and Careers for People with Disabilities, especially Students with IEPs, is vital. As Carol Glazer of the National Organization on Disabilities wrote in *Huffington Post*, "[America is already lagging when it comes to STEM-skilled workers. The U.S. will have more than 1.2 million job openings in STEM fields by 2018.](#)" Governors in other states have looked at STEM needs and begun to develop solutions. For example, [in New York State Governor Cuomo has ensured that magnet schools for STEM are located near IBM, a major STEM employer in their state.](#) **Virginia should be looking at ways to follow this model.**

Fortunately, we do see some signs that Virginia, through DARS, is endeavoring to support qualified individuals with disabilities as they pursue STEM careers. For example, on page 278, the State Plan reports that "New initiatives were started this year and will continue with businesses needing qualified candidates in the IT industry. This year a business provider trained 10 of DARS clients with Autism in IT and 7 were successfully place in Capital One Bank in IT positions." This is outstanding and we hope to see many more such efforts in the immediate future.

Together, state workforce system and educational system can look to supported-employment programs such as Project Search, Specialisterne, and [the Marriot Foundation's Bridges to Work Program](#) as models for developing a systematic approach to providing the supports necessary for our students on the autism spectrum to excel in STEM.

c. High Turnover Jobs: Hospitality/Accommodations, Food Service, Retail Trade:

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

A great example of an employment sector where employees with disabilities can be tremendously successful is the hospitality industry. Accommodations and food service are extremely high turnover jobs and numerous studies show that people with disabilities can be outstanding in those fields and have significantly higher employer loyalty.

An outstanding example of the type of work needed is found in Missouri. As part of the Poses Family Foundation's Workplace Initiative, a coalition of employment service providers has launched a successful training and placement program with the hospitality sector in St. Louis. This training runs for up to 12 weeks, and takes place on site at the hotel; all participants are paid by the hotel for the duration of training. Since the summer of 2015, two cohorts of trainees have completed training at the Hyatt Regency. Trainees have gone on to permanent employment at the Hyatt and other hotel partners in a range of departments—culinary; auditing; and customer service. This type of training and Poses' Workplace Initiative could easily be part of your overall Sector Strategies. Likewise, in other states, [hotels and other hospitality employers](#)

[have found Project SEARCH to be an amazing source of talent.](#) [The work done by Embassy Suites and David Scott](#) in Omaha, Nebraska offers [valuable lessons states as they look to improve employment outcomes for people with disabilities.](#) State Boards, along with other components of the workforce system, should connect with employers in the hospitality sector to begin figuring out how to benefit from these models.

Another sector with high turnover and big potential is retail trade. Many companies, including [UPS](#), [Wal-Mart](#), and [OfficeMax](#) have proven records of success. [Walgreens has demonstrated that workers with disabilities in their distribution centers are as productive, safer, and turn over less when compared to peers without disabilities.](#) These efforts have taken the logistics sector by storm with [Lowe's](#), [OfficeMax](#), [Pepsi](#), as well as [P&G](#) are all launching their own successful disability hiring initiatives. For example, [as reported by the National Organization on Disability](#), [“Lowe’s hired more than 150 new workers with disabilities in the first year, and an additional 250 workers in the following 18-month period.”](#) They can be outstanding partners for disability employment as these industries suffer from high turnover rates and people with disabilities are proven to have significantly higher retention rates. It is important to identify more specific opportunities with employers and to cite them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future.

d. State government and state contracting can also be sources of opportunity:

While the focus of our comments on the State Plans are around aligning the workforce system to create opportunities for people with disabilities in the private sector, public sector employment should not be neglected. As such, we commend Governor McAuliffe for his efforts to “emphasize the recruitment of qualified minorities” including “disabled persons..to serve at all levels of state government.. The importance of such hiring efforts was first discussed in Governor Markell’s *Better Bottom Line* Initiative. 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.”](#)

A further step that could be taken to expand such opportunities would be to look at state contracting as another potential avenue of opportunity. For example, we would encourage Virginia to learn from the experiences of Nevada and Massachusetts. [The Bay State recently launched an interesting Supplier Diversity Program \(SDP\).](#) This is a rare example where Massachusetts is actually leading the nation in terms of innovative efforts to expand opportunities for people with disabilities rather than simply relying on the perception of success. Likewise, in Nevada, [“the Preferred Purchase Program”](#) allows “agencies to bypass the competitive bid process and purchase goods and services from registered community training centers which employ people with disabilities.” Both efforts could be replicated in Virginia.

The untapped potential of people with disabilities is such that a full-spectrum, all-of-the-above-and-more approach is needed. We are pleased to see that Virginians has made a serious commitment to expanding public sector opportunities for people with disabilities.

3. Busting Stigmas and Misconceptions Should Be a Key Part of Workforce Strategy:

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

As such, we recommend that State Plans be amended to include a comprehensive, proactive communications/public relations strategy for reducing such stigmas. The best way to fight stigmas is to let employers see the facts from other employers who are already succeeding by hiring people with disabilities. **In order to ensure that such efforts have the biggest possible impact, it needs to be supported by a serious, systematic and ongoing communications campaign that highlights the benefits of inclusive hiring.**

In terms of potential employer partners, we encourage your state plan to look at [Disability Equality Index that assesses the inclusion and hiring efforts of major employers](#). It was put together by the United States Business Leadership Network (USBLN) which operates [a network of affiliates across the country that can be an incredible resource for your work](#). However, it should be a component of Virginia 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, 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. People with disabilities can work successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and they can be super talents in developing computer software and engineering solutions. CEOs and business leaders need to know that people with disabilities can be the BEST people to get a job done.
- B. Human resources professionals and on-the-ground supervisors need to understand that hiring people with disabilities is generally easy and inexpensive, and that any costs incurred are more than offset from increased loyalty.** Hiring managers and supervisors are key players who can turn high minded policy and business goals into action at the ground level. However, studies show that many are uninformed about people with disabilities. They are afraid of potential legal action, costs, or other failures. They need supports that will empower them to overcome their own fears and to excel at recruiting, hiring, supervising, or working with teammates who have disabilities. VR staff and community agencies can fully support human resources professionals and managers in dealing with their own specific fears and stigmas surrounding hiring people with disabilities, and should do so, given that they are one of the few states who have opted to go for a dual-customer approach at their program centers. Moreover, online and in-person training is readily available to help from a variety of sources. RespectAbility has online webinars, as [does ASKJAN.org](#), USDOL and others. Partners like [the Poses Family Foundation Workplace Initiative](#) can provide training to the workforce staff and volunteers systems-wide as well as to community agencies in supporting companies through messaging efforts around related to fear and stigma. [The National Organization on Disability](#) and [the U.S. Business Leadership Network](#) offer strong resources as well.

C. People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectation must begin. Virginia needs a public relations campaign that will inspire Virginians with disabilities to set their hopes high, as low expectations and low self-esteem are a barrier to employment. For example, Virgin Airways founder Sir Richard Branson and finance wizard Charles Schwab are also dyslexic. Scientist Stephen Hawking and multi-billionaire businessman Sheldon Adelson, like Gov. Greg Abbott of Texas and President Franklin D. Roosevelt before them, are wheelchair/mobility device users. The CEO of Wynn Casinos, Steve Wynn, is legally blind. Arthur Young, co-founder of the giant EY (formerly Ernst & Young) was deaf. A great example comes from the Department of Aging and Rehabilitative Services' own leaders. Dr. Joe Ashley, whose fingerprints are all over this Combined State Plan, could be named as role model for others to follow. Success sells success and that is something the workforce system should seriously utilize in order to motivate and inspire in an intentional manner moving forward.

This type of effort needs to begin at the highest levels of state government. **We deeply appreciate Gov. McAuliffe's effort to bring media attention** to the issue of disability employment **and to celebrate** model employers. Just last year, the Governor honored several employers for their "outstanding commitment to hiring and supporting people with disabilities in the workplace." As the Governor said, "Virginia prospers when all of its workers have a chance to contribute and that the "real reward for these businesses is a productive, capable, vigorous workforce committed to high-quality products and services and a stronger economy that benefits everyone." [Honored at this event were several businesses that we feel could be the starting point for a communications campaign.](#) Honorees included: the Amazon Fulfillment Center, Chesterfield County, The Hershey Co., Stuarts Draft Skookum Contract Services, U.S. Fish and Wildlife Service, the Defense Commissary Agency (DeCA) in Norfolk, and the Walmart Supercenter, Stuart. We hope to see more of this type of work in the future because it is **crucial to fighting stigma and expanding opportunity.**

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

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

Virginia is perhaps the best equipped state to take advantage of section 503 of the Rehabilitation Act. According to the Unified State Plan on page 10 the amount of federal spending in the defense industries is expected to grow by 2.0% or \$10.6 billion between 2015 and 2020 and [Virginia is home to Northrup Grumman and General Dynamics.](#) In 2013, [Virginia had one of the highest concentrations of government workers in the United State with 11% of the workforce working for the government.](#) The Unified State Plan includes a number of references to outreach to federal employers.

From page 186: The DBVI Workforce Unit will Identify employers and federal contractors by attending the Society of Human Resource Management and Economic Development meetings and Chamber of Commerce meetings and Industrial Round Tables, by

networking with the Virginia Employment Commission, through review of Virginia Jobs Investment programs, and by establishing relationships with various Veterans Representatives, Workforce Development Boards and Office of Federal Contractor Compliance (OFCCP). Additionally, the Unit will initiate distribution of employer outreach letters, review various recruiting websites, and meet with Business Services/Solutions teams.

From Page 243 of the State Plan: “DARS Workforce Unit is actively working with The National Employment Team (The NET) through the Council of State Administrators of Vocational Rehabilitation using a Talent Acquisition Portal (TAP) where businesses may place job openings and select qualified candidates. The Unit also provides education to employers who are federal contractors (503) on hiring individuals with disabilities and assisting with recruitment efforts to meet business needs. The Unit is listed as the point of contact on all compliance letters sent to 503 employers in the Commonwealth from the Department of Labor’s Office of Federal Contract Compliance Programs.”

From page 278, “. DARS provided awareness training to businesses who are 503 contractors under the Office of Federal Contracting Compliance Program. As a result, DARS is the point of contact when these businesses are identified as out of compliance and need additional disabled workers. An expansion of working more closely with federal contracting employers has extended our ability to successfully place more job candidates in businesses. **For example, DARS place over 130 job candidates with one business and this business continues to seek more job candidates.**

The attention given in the United State Plan is very good, because it works with businesses to comply with section 503. Virginia is in a position to lead the nation in section 503 compliance. However, we recommend that DARS and the Business Services team should be partnering with the Virginia BLN and the DC Metro BLN in their outreach efforts. We encourage you to focus on some of the biggest corporations that have section 503 requirements. As mentioned before, in the Unified State Plan the defense industry is expected to grow by 2% by 2020 and Virginia is home to some of the largest federal contractors such as [General Dynamics and Northrup Grumman](#).

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

The Common Assurances listed on page 111 of Virginia’s Combined State Plan will be critical factors in the overall implementation and ultimate success of WIOA. **As such, it is critical that each assurance is matched up with a strategy fitted to meeting and, if possible, exceeding the requirements of the law.**

For example, it is critical that the assurances for Title 1-B Programs are matched up to specific strategies to achieve the “delivery of career and training services to individuals.” Further, the Wagner-Peyser Assurances need careful implementation efforts as do the Adult Basic Education Assurances and the VR assurances on pages 227 through 233.

As a good example of the level of detail needed here, consider WIOA Section 188. The anti-discriminatory rules originally outlined under WIA need to be updated to reflect the steps needed towards making universal access a reality. **For example, in seeking to meet Common Assurance #7 listed in the State Plan on page 101, we are directing states to consider the resources made available from the Office of Disability Employment Policy (ODEP). [They have recently released a guide that digs deep into what universal accessibility will mean for the](#)**

[workforce system](#). Further, Common Assurance #10 affirms each state plan's commitment to meeting the requirement that "one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990." **However, merely meeting legal requirements should not be the end of this process. Indeed, looking at physical and programmatic accessibility can be an opportunity to invest in a more proactive workforce system very actively committed to collaboration and partnerships.** If there is no plan that specifically identifies how the state is going to get to the commitment made in the assurance; the state is facing a serious problem.

6. Avoid the Opportunity Costs of Focusing Too Much on One-Stop Centers. Programmatic and Database Accessibility and Privacy is Critically Important:

Public policy is about the allocation of scarce resources to meet infinite needs. It is vital to invest resources on those points where they can have the greatest effect. **One challenge that we have seen in many states WIOA plan has been the prioritization of expensive bricks and mortar One-Stops as the primary access point for programs and services under WIOA.** Focusing exhaustively on One-Stop Centers, physical infrastructure, and co-locating services comes at the opportunity cost of losing the chance to improve supports and increase outcomes.

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.](#)

At the same time considerable thought needs to take place around the creation of a unified intake system for the workforce system and government benefits programs. Those shared databases must be fully accessible to people with disabilities who use screen readers or who need captions to understand videos that explain how to use the system. Thought also needs to go into privacy issues as private disability issues should not be shared where it is not needed and appropriate.

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

Improving employment outcomes in Virginia 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 integrated employment for individuals with disabilities is engaging employers and meeting their talent needs.

As such we very disappointed to see limited attention given to one of the most important assets that Virginia has in terms of making the business case for hiring people with disabilities. There is a limited reference, on page 218, that says "DBVI will sponsor workshops with other Workforce Development partners and relevant organizations such as the state Business Leadership Network." However, this is the only reference to a BLN in your state plan and is one of the few areas where the Combined State Plan is seriously lacking.

Virginia is at a significant advantage because it has access to not one but two affiliate chapters of the United States Business Leadership Network (USBLN). Not only is there the [Virginia Business Leadership Network](#) located in the Richmond area, there is also [the DC Metro](#)

[Business Leadership Network](#). Both of these BLNs are affiliate chapters of the national BLN and we are disappointed to see that it is not yet at the WIOA table. To quote the USBLN's affiliate website, "Affiliates engage in networking discussions to increase their knowledge of community outreach, recruiting and interviewing, the accommodation process and barriers to employment and equip employer to learn —learn how to leverage their organizations for success."

The absence of any discussions of the local affiliate chapter neglects one of the key building block needed for improved outcomes. Both BLNs have specific roles to play moving forward. The Virginia BLN could act as a coordination point for outreach efforts to employers in the diverse communities that make up the Commonwealth. At the same time, the DC Metro BLN could focus on building deep connections to employers in the Northern Virginia area and to show inclusive employers whose bottom lines have benefits from employees with disabilities. Both BLNs could be incredible assets to your state's workforce system and we hope that they will be involved in the WIOA process moving forward.

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

As your state 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 your state or region.](#) 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 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.

9. Overcome the gap between disability 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. Your state 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.

10. Supporting Pre-Employment Transition Services through the Development of Public-Private Partnerships:

We are encouraging states to follow the example set by Florida and Wisconsin by working hard to expand the number of Project SEARCH sites. However, this is not the only paradigm that you should follow. The school system, vocational rehabilitation, and local workforce boards can build creative, collaborative partnerships with companies that are leading in the disability space.

States would benefit greatly by looking at other models of innovation that are showing great potential to fundamentally improve employment outcomes. To begin with, we would highly recommend that state workforce systems 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.”](#)

11. Getting Out the Word on Free and Accessible Services and Resources:

There are many online and in person resources to help employers and people with disabilities come together to build success. However, all the stakeholders need to be educated to know that these resources exist, and that they are free and user-friendly. These resources must

also all be accessible. We know that broadband access is a huge issue in rural states. However, it's important to ensure that online resources enhance the effort of your workforce system.

Your state needs to make an effort to demonstrate to employers and prospective employees that these services exist. Doing so by coordinating it with the possible public relations campaign is one way to go about this. Also, your state 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](http://theUSDepartmentofLabor'sOfficeofDisabilityEmployment) Policy, [our organization and others also offer free toolkits](http://ourorganizationandothersalsoofferfreetoolkits), [webinars and training opportunities](http://webinarsandtrainingopportunities). Another resource is Understood.org. This is a comprehensive resource to help families and individuals with learning and attention issues build their educational and career plans. It will be helpful to collaborate with those groups however to ensure that the best tools are created to fit the training and information needs on these issues.

12. Nothing About Us Without Us:

“Nothing About Us without Us” has long been a rallying cry for the one-in-five Americans who have a disability and it has implications for the workforce system. Section 107 of WIOA dictates the establishment, criteria, and membership for the Local Workforce Development Boards that are crucial implementers of each state's overall workforce strategy. **As such, we feel there is a critical need to ensure that people with disabilities are represented on such local boards and make their voices heard.** Section 107(b)(2)(A)(iii) of WIOA specifically states that “community-based organizations that have demonstrated experience and expertise in 9 addressing the employment needs of individuals with barriers to employment” may be represented on the boards and this includes “organizations....that provide or support competitive integrated employment for individuals with disabilities.”

Even a non-voting, ex-officio member of a WIB can bring critical perspectives that improve the WIB's efforts overall. As such, we recommend that states look for ways to recruit local community organizations or self-advocates for inclusion on their local boards. Perhaps this could be a natural point of partnership for Independent Living Centers across the country that do crucial work supporting employment and independence for people with a wide range of disabilities.

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

One significant reservation that we have regarding many of the state plans that we have reviewed has been the limited attention given to the issue of transportation. This issue is critically important for both people with disabilities and other low-income communities. Many people with disabilities do not drive. Others cannot afford private transportation.

As such, we were very glad to discover see that transportation was referenced as a significant barrier to employment in your State Plan. “Lack of transportation” was listed first in among the “major barriers to employment for individuals who are blind, vision impaired, or deafblind in Virginia” on page 200. That sentiment is echoed on the next page where it states that “Lack of transportation...adversely affect DBVI's general population of individuals served in the pursuit of their employment goals.” Lastly, in the DARS Stakeholder Survey listed on page 255, “Transportation emerged as the number one “very significant” barrier to employment with a 73% agreement.”

These references in Virginia's Combined State Plan speak to the profound need for solutions. However, the Plan does a lot to say that this is a problem but doesn't offer specific recommendations. Buried on page 319, we find that “Virginia will provide up to one year of

transitional child care and transportation assistance to some VIEW clients who are no longer eligible for TANF benefits.” Likewise, on page 333, the Plan states that Virginia will provide "Supportive Services" including “Transportation to include □ Agency or public transportation; □ Individuals other than public transportation.” While we are glad there are solutions for SNAP and TANF Clients, where are the transportation solutions for DARS clients or other Virginians with disabilities?

People with disabilities need transportation solutions now and public transportation is only part of the solution. **In places where it is not possible to coordinate a bus route, states could look at partnering with Uber, Lyft, or other new transportation solutions.** For people with disabilities who do drive, [such companies as Uber and Lyft can also provide a way to enter into the workforce with flexible hours](#). Public sector employers and federal contractors who have Section 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 as well.

14. Aging workers and those with recently acquired disabilities must be addressed:

Attention should start BEFORE aging workers and those with recently acquired disabilities 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.

15. Strategic Engagement to Build a Mentor System for Workforce System Customers:

Government can’t and shouldn’t do everything. There is a massive role that can be played by volunteers who are willing to help people with barriers to work, including people with disabilities, find and keep jobs. 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. 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.

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.](#)

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

The lens of disability needs to be applied to the work being done with this population, whether through corrections education or reintegration support. [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 states identify how many of the individuals in the corrections system and in the ex-offender pipeline have disabilities. There are two related challenges here. First, there is a need to identify potential disability issues among inmates during the intake process and ensure their needs can be met. Ideally, this type of assessment could be done within the first thirty days of their sentence. Such identification could then feed into the work being done through educational programs in corrections. Second, are the issues related to preparing inmates for their release and reintegration into society. Whether it’s mental health supports or learning accommodations, help ex-offenders to find employ when they are home is a critical workforce development challenge. It is a challenge that only grows more complicated when a disability remain unaddressed. The price paid for ignoring these issue are higher rates of recidivism and greater costs to society. Addressing these issues at the beginning and at the end of the corrections process will have downstream effects and hopefully will enable states to address the intersectionality of these workforce, disability, and justice issues.

Conclusion

The bottom line is that expanding job opportunities for people with disabilities is beneficial to all. 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 people 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. And it is good for taxpayers, because it reduces the amount of funding spent on SSDI and other disability programs in the long run.

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. Virginia’s WIOA State Plan demonstrates some of the hard work, dedicated effort, and specific policies needed to realize those hopes. People with disabilities want to pursue the American Dream, just like everyone else. We are encouraged by what we have seen in Virginia’s plan. We are happy to answer any questions you may have. Thank you for your time and consideration.

APPENDIX – Ranking 50 States by Employment Rates and Employment Gap

<http://disabilitycompendium.org/compendium-statistics/employment> 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 each state ranks nationally.

Data Source- Chart 1: Table 2.1: Employment—Civilians with Disabilities Ages 18 to 64 Years Living in the Community for the United States and States: 2014 from the Annual Disability Statistics Compendium

Disability Employment Rate by State, 2014

	State	%		State	%		State	%		State	%		State	%
1	South Dakota	50.1	12	Montana	40.5	23	Oklahoma	36.4	34	California	33.3	45	Arkansas	29.2
2	North Dakota	49.9	13	Connecticut	40.2	24	Oregon	36.4	35	Arizona	32.8	46	South Carolina	29.0
3	Iowa	46.5	14	New Hampshire	40.0	25	Indiana	36.2	36	Missouri	32.8	47	Mississippi	27.4
4	Nebraska	46.0	15	Kansas	39.8	26	Vermont	36.2	37	Maine	32.5	48	Kentucky	27.3
5	Wyoming	45.2	16	Wisconsin	39.8	27	Illinois	35.7	38	Louisiana	32.1	49	Alabama	27.2
6	Minnesota	44.4	17	New Jersey	39.2	28	Delaware	35.6	39	North Carolina	31.3	50	West Virginia	25.6
7	Utah	44.0	18	Maryland	39.1	29	Massachusetts	35.5	40	New Mexico	30.4		Washington D.C.	30.3
8	Hawaii	42.4	19	Idaho	38.8	30	Ohio	34.6	41	Florida	30.1			
9	Colorado	41.6	20	Texas	38.0	31	Pennsylvania	34.5	42	Tennessee	29.9			
10	Nevada	40.9	21	Washington	37.7	32	Rhode Island	33.9	43	Georgia	29.6			
11	Alaska	40.8	22	Virginia	37.6	33	New York	33.6	44	Michigan	29.6			

Source: [Annual Disability Statistics Compendium](#)

Data Source-Chart 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: 2014 Disability Statistics Compendium

The Difference in the Employment Gap Between Disabled and Non Disabled Adults 2014

	State	Gap		State	Gap		State	Gap		State	Gap		State	Gap
50	Maine	47.4	39	Mass.	43.5	28	Delaware	40.7	17	Minnesota	38.5	6	Alaska	35.3
49	Kentucky	47.1	38	Georgia	43.5	27	New York	40.4	16	Washington	38.3	5	Hawaii	34.2
48	South Carolina	45	37	Florida	43.3	26	Louisiana	40.3	15	Nebraska	37.9	4	South Dakota	33.6
47	Michigan	45	36	Mississippi	43.1	25	Virginia	40	14	Connecticut	37.7	3	Utah	33.5
46	West Virginia	44.9	35	N. Carolina	43	24	Illinois	40	13	Colorado	37.4	2	Nevada	33.4
45	Arkansas	44.6	34	Ohio	42.5	23	Kansas	39.9	12	Texas	37.3	1	North Dakota	32.1
44	Tennessee	44.5	33	Pennsylvania	42	22	Arizona	39.7	11	New Jersey	37.3		Washington DC	45.2
43	Missouri	44.4	32	Wisconsin	41.4	21	Oklahoma	39.2	10	Montana	37.3			
42	Vermont	44.2	31	New Hampshire	41.3	20	Maryland	39.1	9	Idaho	37			
41	Alabama	44.1	30	New Mexico	40.8	19	California	38.9	8	Wyoming	35.9			
40	Rhode Island	43.8	29	Indiana	40.7	18	Oregon	38.5	7	Iowa	35.7			
													USA	40.3

Source: [Annual Disability Statistics Compendium](#)