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Feb. 9, 2016

## RespectAbility – Public Comments – Washington Combined State Plan

*“Washington State is committed to developing and maintaining a high performing public workforce that provides access, meaningful services, and improved outcomes for all citizens. In order to achieve these aims, state leaders must be able to apply diverse perspectives and experiences to the examination of the issues facing the state. Such diversity enhances the fullness of our understanding of these issues and opens opportunities for the consideration of new and better solutions.*

*WHEREAS, while Washington State remains a national leader in the recognition and protection of civil rights for people with disabilities, the representation of people with disabilities in the state workforce has been falling steadily since 1997. Private employers now surpass state government in their success at attracting and retaining workers with disabilities; and*

*WHEREAS, people at the middle and lower bounds of the income spectrum derive most of their income from work and only 36 percent of Washington’s 442,000 working-age people with disabilities are employed; and*

*WHEREAS, nationally, 28 percent of people with disabilities live in poverty, compared to 12 percent of people who do not experience a disability. Research indicates that the level of employment, the quality of jobs, and the degree of access to those jobs are crucial determinants of poverty reduction; and*

*WHEREAS, the state has a vested interest in reducing discrimination against people living with a disability, eliminating barriers to meaningful employment, and attracting the highest quality candidates into state employment opportunities; and*

*WHEREAS, when the workforce that directs and provides essential services to residents of the state reflects the diversity of the population, those services are more likely to be responsive to and respectful of that diversity.” – [Gov. Jay Inslee, Executive Order 13-02, May 22<sup>nd</sup>, 2013.](#)*

RespectAbility is pleased to submit the following comments regarding the current draft of the Washington’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 Washington has made great strides under the leadership of Governor Jay Inslee, your state must do better in terms of competitive, integrated employment for people with disabilities. While 37.7% of the 488,620 working age Washingtonians with disabilities are employed, there remains a 38.3 percentage point gap in the labor force participation rate between people with and without disabilities. Further, there are over 25,000 youth with disabilities and each year a quarter of them will age out of school into an uncertain future.** As the labor force in Washington is starting to experience talent shortages, Washingtonians with disabilities can offer valued and needed talent that can help grow Washington’s economy overall.

**Washington, thanks to Governor Inslee and WIOA, now has the opportunity to work hard to improve outcomes in terms of competitive, integrated employment for people with disabilities.** Your 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 Washington 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 Washington.** 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 Washington's workforce system and the need to better align programs.** Your state plan contains some of the best efforts around accessibility and your state's One-Stop Centers. However, at the same time, it completely omits any discussion of the Project Search model of school to work transitions, omits any references to Section 503, and it neglects the need to address disability issues among ex-offenders.

**Our public comments on Washington'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 Washingtonians with disabilities.

### **1. PERFORMANCE METRICS: Ensure that the great data included in Washington'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 Washingtonians 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 Washington.

Fortunately, it is clear from our review of your Combined State Plan, that the system is starting to look at the right metrics. For example, on page 4, your Plan looks at labor force participation rates by age, on page 6 it looks at LFPR by gender, and on page 7 it looks at LFPR and disability status. We are very pleased to see the inclusion of labor force participation rate data for people with and without disabilities on page 7 in Figure 9. Labor Force Participation/Unemployment Rates for Disabled and Non-disabled Washington, 2010-2013.

These types of statistics are essential to the success of WIOA implementation in Washington. This shows that your 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 Washington's workforce system set the gap in the labor force participation rate between Washingtonians 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 your workforce system. However, such metrics need to be codified in the context of the State Plan.

Further, while Washington currently ranks 21<sup>st</sup> 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 44.9% of the 27,700 Washingtonians who are blind or have vision loss are employed while 55.6% of the 58,000 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 24.9% of Washingtonians 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 Washington's workforce system expands successful school to work transition programs.** Washington 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.

## **2. Make busting stigmas, myths, and misconceptions a key part of your 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 Washington'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 Washingtonians 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. Washington 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. Washington's WIOA efforts needs to be supported by a PR campaign that will inspire people 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 Inslee 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 Washington 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 VR staff as well as community agencies in supporting Washington companies through messaging efforts around related to fear and stigma.**

### **3. 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 Washington 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.** Throughout the current draft of the State Plan, the importance of “in-demand industry sectors and occupations” are emphasized. On page 16 of the State Plan, we see a well development Figure showing “Growth Occupations, Washington, 2012-2022.” Further in page 23, “Occupations projected to be in demand in the future are a mix of information technology, construction, healthcare, and various service jobs.”

In looking to meet the talent needs of these occupations, we emphasize the critical importance of looking at Washingtonians with disabilities as an untapped labor resource ready to meet these needs. **The jobs gains in these sectors offer great opportunities for focused sector strategies improve employment outcomes among people with disabilities in Washington State. 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 your state’s growing job sectors. Below, we offer our ideas on how to implement such efforts:

#### **A. Health and Elder Care**

The current draft of your Combined State Plan very clearly describes how and why healthcare is an sector with growing talent needs in Washington. As stated on page 15, “Across the nation, and here in Washington, the population of older people is rising. By 2030, one in five Americans will be a senior citizen (65 years or older). That’s nearly double the 12 percent in 2000.” 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.**

**Project Search should be significantly expanded as they have done in Wisconsin, Florida and other states.** Nationally, each year approximately 2,700 such young people, spread out in 45 states, do a nine-month, school-to-work program that takes place entirely at the workplace. This innovative, business-led model features total workplace immersion, which facilitates a seamless combination of classroom instruction, career exploration, and worksite-based training and support. To name a few select locations, Project Search already exists in Washington State and these sites overall have been achieving outstanding results for people with disabilities, employers, and taxpayers alike. 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**

From our review of your Combined State Plan, we know that there are several “Critical Industry Sectors” that the Governor has emphasized as being a critical priority under WIOA. Several of these sectors fall firmly into the Science, Tech, Engineering and Mathematics (STEM). These sectors are “Aerospace”, “Information and Communication Technology”, and “Military and Defense” listed on page 1 of the State Plan. Further, we

**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 people 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 Washington. **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.**

### **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 Washington to improve employment outcomes for people with disabilities.](#) Washington'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 people with disabilities are proven to have significantly higher retention rates. It is important to identify more specific opportunities with employers and to site them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future. **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:**

Normally in our comments to the states regarding their WIOA plans, we have a specific section emphasizing the importance of public sector employment as a source of opportunity for

people with disabilities. [In those comments, we point to Governor Jay Inslee’s commitment to making Washington’s state government model employer for people with disabilities as a core example of the type of full-spectrum, all-of-the-above-and-more approach that is needed to move the need.](#)

In the years ahead, the workforce of Washington’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.](#)”

Washington could also explore the feasibility of expanding state contracting obligations similar to the model we see in Section 503 for Federal contractors. [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 Washingtonians 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.

#### **4. FEDERAL CONTRACTORS: Section 503 of the Rehabilitation Act and Federal Contractors offer your state the chance to innovate, and expand opportunity:**

While there is a great deal of data and detail in the current draft of your Combined State Plan, there is a significant omission. **The current draft of your Combined State Plan does not contain any references to the opportunities created by Section 503 of the Rehabilitation Act. By omitting Section 503, your State Plan is not fully developed as a strategy and has missed a significant opportunity to coordinate 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.](#)

**Washington State 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.

Washington is fortunate to be home to the operations of several massive businesses with extensive federal contracts. For example, The Boeing Company, URS Corp., Battelle Memorial Institute Inc., Bechtel Group Inc., and CH2M Hill Companies LTD. all do business with the federal government from within Washington State. 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.



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

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

As such we are disappointed to see the only limited attention given to one of the most important assets that Washington has in terms of making the business case for hiring people with disabilities. [The Washington State Business Leadership Network is an affiliate chapter of the national BLN and we are disappointed to see that it is not yet at the WIOA table.](#) To quote the affiliate chapter's Mission Statement, the WSBLN exists to the "to educate and support businesses to recruit, hire, retain, promote and improve customer service for people with disabilities." Moving forward, we hope that the WSBLN will become a key partner of Washington state's workforce system moving forward.

**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. Washington 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. 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 Washington state will be focusing on “in-demand industry sectors and occupations, including through apprenticeships” as discussed on page 2, that apprenticeships are discussed as “an important avenue to self-sufficiency and higher wages “ for youth with barriers to employment on page 4, and the collaborative work of Workforce Development Councils (WDCs) around “on-the-job training (OJT) and related classroom instruction” on page 8. This is critical work and we are pleased to see that it is being done.

As Washington 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 Washington.](#) 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 Washington State 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. Washington State 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 your state workforce system look to [the type of public-private partnerships that is doing incredibly innovative work in diverse states like Ohio](#) and [the incredible VR work being done in Georgia.](#) Both states are building on partnerships with non-profit organizations such as the Poses Family Foundation. They unite the strengths of the VR with the insights offered by non-profits focused on workforce development. We are encouraged by the work being done here and we look forward seeing the continuing results of this work.

## **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. Physical accessibility in the One-Stops is important no doubt and one of the many new elements of WIOA. However, our perspective as an organization is that 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. **Your State Plan contains some of the most detail plans related to “accessibility and barrier solutions” of any of the state plans we have reviewed. We are delighted that you are looking a strategy “Secure Wireless at Comprehensive One-Stops” as discussed on page 3 and setting such access as a specific goal on page 6 of the State Plan.**

**Further we deeply appreciate the fact that your state plan is realistic about the limits of technology and the importance of Technology. To quote the Combined State Plan, “Every Washington resident needs universal, barrier-free access to our state’s workforce system. Technology is a powerful tool that can reduce obstacles to access. However, it’s clear that technology will not solve all accessibility issues. Tailored approaches to different populations are required. “**

However, we offer the caution that 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, Washington should be careful not to waste money trying to re-**

invent the wheel in creating online resources as [ASKJAN.org](http://ASKJAN.org), [the US Department of Labor's Office of Disability Employment](http://theUSDepartmentofLabor.org) Policy, [our organization and others also offer free toolkits](http://ourorganizationandothersalsoofferfreetoolkits.com), [webinars and training opportunities](http://webinarsandtrainingopportunities.com). [Another resource is Understood.org](http://AnotherResourceisUnderstood.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 Washington’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 Washingtonians with disabilities would be a powerful additional to the State Board’s work. Second, Washington is lucky to possess an innovative Business Leadership Network. **As such, we also recommend that a representative of the Washington State BLN be appointed to the State Board.** Their voices and perspective will be critical to ensuring greater opportunities for Washingtonians with disabilities.

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

**One significant reservation that we have regarding Washington’s Combined State Plan is that the issue of transportation is discussed but solutions are not fully developed.** This is a critical oversight not only for Washingtonians 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.**

Public transportation need not be the only solution. In places where it is not possible to coordinate a bus route, Washington could look at partnering with UBER, Lyft and other new transportation solutions. Indeed, 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.

#### **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 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, your state already has an incredible model to follow in 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:**

**Sadly, the current draft of your Combined State Plan does not fully address the unique workforce challenges facing ex-offenders as they attempt to reenter society.** Those sections which do touch on issues related to corrections education do not have the lens of disability applied to their work. This is a critical omission.

[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 Washington 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 Washington to address those issues productively and proactively.**

#### **Conclusion**



As we stated at the beginning of our Public Comments, Washington has begun to make progress in terms of jobs for people with disabilities. You have the leadership and the will from your Governor on down. However, despite growing opportunities, Washington only ranks 21<sup>st</sup> in the country in terms of your employment rate for people with disabilities. Such outcomes can be turned around. Failing to properly train and prepare job seekers with disabilities costs your state economy incredible talent and shatters the aspirations of so many Washingtonians with disabilities who want to pursue the American Dream, just like everyone else.

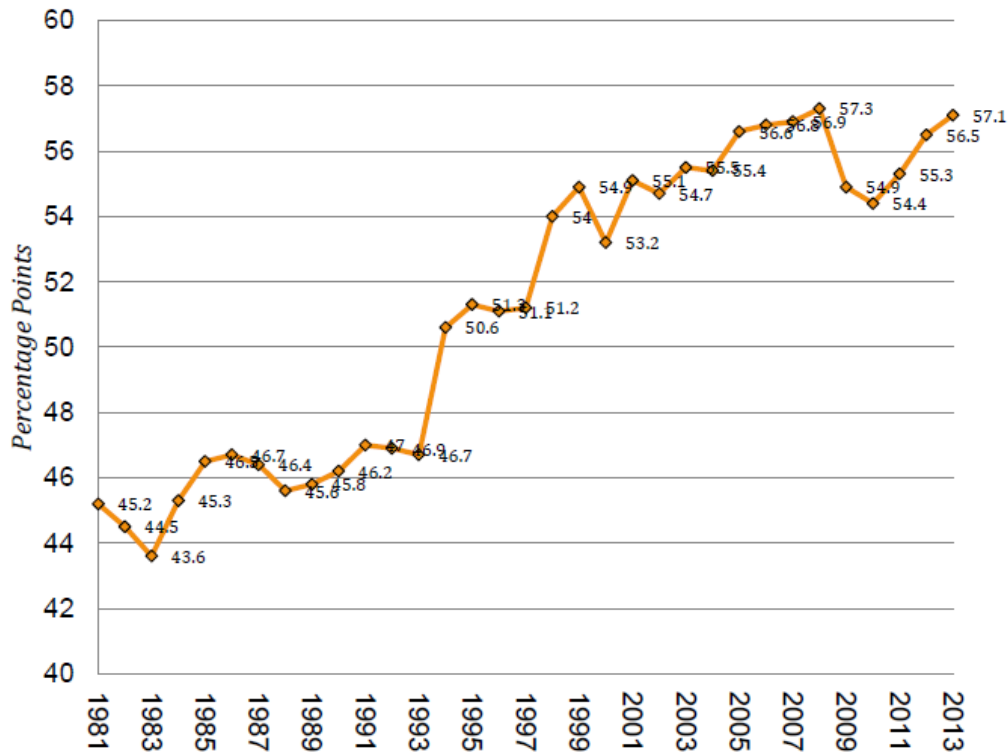
However, thanks to WIOA, Washington has the chance to lead by example in terms of investing resources in successful models and implementing best practices to expand job opportunities for people with disabilities.

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 Washington’s WIOA Plan 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 Washington ranks nationally and to showcase several of the data points needed in Washington’s WIOA State Plan.

**Table 1 Ranking 50 States by Employment Rates and Employment Gap**

Data Source- Column 1: Table 2.1: Employment—Civilians with Disabilities Ages 18 to 64 Years Living in the Community for the United States and States: 2013 from the Annual Disability Statistics Compendium

Data Source-Column 2: Table 2.9: Employment Gap—Civilians Ages 18 to 64 Years Living in the Community for the United States and States, by Disability Status: 2013 from the Annual Disability Statistics Compendium

Link: <http://disabilitycompendium.org/compendium-statistics/employment>

| <b>Column 1<br/>Ranking of States by Employment Rate of People with Disabilities</b> |               |                           | <b>Column 2<br/>Ranking of States by the Employment Gap between People with disabilities and people without disabilities</b> |              |                           |  |                              |
|--|---------------|---------------------------|--|--------------|---------------------------|--|------------------------------|
| <b>#</b>   | <b>State</b>  | <b>% of PWDs Employed</b> | <b>#</b>   | <b>State</b> | <b>% of PWDs Employed</b> | <b>% of People without Disabilities Employed</b> | <b>Employment Gap as a %</b> |
| 1  | South Dakota  | 50.1                      | 1  | North Dakota | 49.9                      | 82.0   | 32.1                         |
| 2  | North Dakota  | 49.9                      | 2  | Nevada       | 40.9                      | 74.3   | 33.4                         |
| 3  | Iowa          | 46.5                      | 3  | Utah         | 44.0                      | 77.4   | 33.5                         |
| 4  | Nebraska      | 46.0                      | 4  | South Dakota | 50.1                      | 83.7   | 33.6                         |
| 5  | Wyoming       | 45.2                      | 5  | Hawaii       | 42.4                      | 76.6   | 34.2                         |
| 6  | Minnesota     | 44.4                      | 6  | Alaska       | 40.8                      | 76.0   | 35.3                         |
| 7  | Utah          | 44.0                      | 7  | Iowa         | 46.5                      | 82.2   | 35.7                         |
| 8  | Hawaii        | 42.4                      | 8  | Wyoming      | 45.2                      | 81.0   | 35.9                         |
| 9  | Colorado      | 41.6                      | 9  | Idaho        | 38.8                      | 75.7   | 37.0                         |
| 10   | Nevada        | 40.9                      | 10   | Montana      | 40.5                      | 77.7   | 37.3                         |
| 11   | Alaska        | 40.8                      | 11   | New Jersey   | 39.2                      | 76.5   | 37.3                         |
| 12   | Montana       | 40.5                      | 12   | Texas        | 38.0                      | 75.3   | 37.3                         |
| 13   | Connecticut   | 40.2                      | 13   | Colorado     | 41.6                      | 79.1   | 37.4                         |
| 14   | New Hampshire | 40.0                      | 14   | Connecticut  | 40.2                      | 77.9   | 37.7                         |
| 15   | Kansas        | 39.8                      | 15   | Nebraska     | 46.0                      | 83.9   | 37.9                         |

|           |                   |             |           |                   |             |             |             |
|-----------|-------------------|-------------|-----------|-------------------|-------------|-------------|-------------|
| 16        | Wisconsin         | 39.8        | <b>16</b> | <b>Washington</b> | <b>37.7</b> | <b>76.0</b> | <b>38.3</b> |
| 17        | New Jersey        | 39.2        | 17        | Minnesota         | 44.4        | 82.9        | 38.5        |
| 18        | Maryland          | 39.1        | 18        | Oregon            | 36.4        | 74.9        | 38.5        |
| 19        | Idaho             | 38.8        | 19        | California        | 33.3        | 72.2        | 38.9        |
| 20        | Texas             | 38.0        | 20        | Maryland          | 39.1        | 78.2        | 39.1        |
| <b>21</b> | <b>Washington</b> | <b>37.7</b> | 21        | Oklahoma          | 36.4        | 75.6        | 39.2        |
| 22        | Virginia          | 37.6        | 22        | Arizona           | 32.8        | 72.5        | 39.7        |
| 23        | Oklahoma          | 36.4        | 23        | Kansas            | 39.8        | 79.7        | 39.9        |
| 24        | Oregon            | 36.4        | 24        | Illinois          | 35.7        | 75.7        | 40.0        |
| 25        | Indiana           | 36.2        | 25        | Virginia          | 37.6        | 77.6        | 40.0        |
| 26        | Vermont           | 36.2        | 26        | Louisiana         | 32.1        | 72.4        | 40.3        |
| 27        | Illinois          | 35.7        | 27        | New York          | 33.6        | 74.0        | 40.4        |
| 28        | Delaware          | 35.6        | 28        | Delaware          | 35.6        | 76.3        | 40.7        |
| 29        | Massachusetts     | 35.5        | 29        | Indiana           | 36.2        | 77.0        | 40.7        |
| 30        | Ohio              | 34.6        | 30        | New Mexico        | 30.4        | 71.2        | 40.8        |
| 31        | Pennsylvania      | 34.5        | 31        | New Hampshire     | 40.0        | 81.3        | 41.3        |
| 32        | Rhode Island      | 33.9        | 32        | Wisconsin         | 39.8        | 81.1        | 41.4        |
| 33        | New York          | 33.6        | 33        | Pennsylvania      | 34.5        | 76.5        | 42.0        |
| 34        | California        | 33.3        | 34        | Ohio              | 34.6        | 77.0        | 42.5        |
| 35        | Arizona           | 32.8        | 35        | North Carolina    | 31.3        | 74.3        | 43.0        |
| 36        | Missouri          | 32.8        | 36        | Mississippi       | 27.4        | 70.4        | 43.1        |
| 37        | Maine             | 32.5        | 37        | Florida           | 30.1        | 73.4        | 43.3        |
| 38        | Louisiana         | 32.1        | 38        | Georgia           | 29.6        | 73.1        | 43.5        |
| 39        | North Carolina    | 31.3        | 39        | Massachusetts     | 35.5        | 79.0        | 43.5        |
| 40        | New Mexico        | 30.4        | 40        | Rhode Island      | 33.9        | 77.7        | 43.8        |
| 41        | Florida           | 30.1        | 41        | Alabama           | 27.3        | 71.3        | 44.1        |
| 42        | Tennessee         | 29.9        | 42        | Vermont           | 36.2        | 80.4        | 44.2        |

|    |                |      |    |                |      |      |      |
|----|----------------|------|----|----------------|------|------|------|
| 43 | Georgia        | 29.6 | 43 | Missouri       | 32.8 | 77.2 | 44.4 |
| 44 | Michigan       | 29.6 | 44 | Tennessee      | 29.9 | 74.4 | 44.5 |
| 45 | Arkansas       | 29.2 | 45 | Arkansas       | 29.2 | 73.8 | 44.6 |
| 46 | South Carolina | 29.0 | 46 | West Virginia  | 25.6 | 70.5 | 44.9 |
| 47 | Mississippi    | 27.4 | 47 | Michigan       | 29.6 | 74.6 | 45.0 |
| 48 | Kentucky       | 27.3 | 48 | South Carolina | 29.0 | 74.0 | 45.0 |
| 49 | Alabama        | 27.2 | 49 | Kentucky       | 27.3 | 74.4 | 47.1 |
| 50 | West Virginia  | 25.6 | 50 | Maine          | 32.5 | 79.9 | 47.4 |



**Table 2**

From 2012 to 2013, the employment gap closed by one percentage point or more in 22 states. The top four states with the greatest reductions (AK, RI, WY, and NH) were small states-- with working-age populations under one million persons. It is hard to make comments about small states, because these statistics are estimates based on state-level samples. Smaller states have smaller samples and thus have a higher degree of year-to-year variability. I am hesitant to read too much into reductions and expansions in the employment gap for small states.

Looking at large states-- with working-age populations over 5 million persons--Illinois (a 2.3 percentage point reduction) and New Jersey (a 1 percentage point reduction) stand out. These are two large industrial states

**All of the states that experienced reductions greater than one percentage point also experienced increases in employment rate of people with disabilities, so none of these reductions were due 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 | <b>27.0</b> | <b>71.4</b> | <b>44.4</b> | <b>30.7</b> | <b>72.7</b> | <b>41.9</b> | <b>-2.5</b> | <b>42</b> | <b>2,893,842</b> | <b>24</b> |  | <b>3.7</b> | <b>1.3</b> |
| NM | 33.1        | 70.4        | 37.3        | 35.3        | 70.1        | 34.8        | -2.5        | 42        | 1,243,353        | 36        |  | 2.2        | -0.3       |
| IL | <b>33.4</b> | <b>74.6</b> | <b>41.2</b> | <b>36.1</b> | <b>75.0</b> | <b>38.9</b> | <b>-2.3</b> | <b>41</b> | <b>8,010,771</b> | <b>5</b>  | Working-age pop. over 5 million        | <b>2.7</b> | <b>0.4</b> |
| IA | 42.0        | 81.4        | 39.5        | 44.8        | 82.1        | 37.2        | -2.3        | 40        | 1,868,852        | 30        |  | 2.8        | 0.7        |
| UT | 41.1        | 77.2        | 36.1        | 42.5        | 76.6        | 34.1        | -2.0        | 39        | 1,701,705        | 35        |  | 1.4        | -0.6       |
| DE | 34.6        | 75.1        | 40.6        | 36.4        | 75.1        | 38.7        | -1.9        | 38        | 565,138          | 45        | Working-age population under 1 million | 1.8        | 0          |
| CO | 40.3        | 77.1        | 36.8        | 42.3        | 77.3        | 35.0        | -1.8        | 36        | 3,304,940        | 22        |  | 2.0        | 0.2        |
| HI | 37.3        | 75.6        | 38.3        | 39.1        | 75.7        | 36.5        | -1.8        | 36        | 822,542          | 42        | Working-age population under 1 million | 1.8        | 0.1        |
| NE | 43.5        | 82.2        | 38.7        | 45.5        | 82.6        | 37.1        | -1.6        | 35        | 1,125,425        | 38        |  | 2.0        | 0.4        |
| ND | 51.6        | 83.3        | 31.7        | 52.8        | 83.1        | 30.2        | -1.5        | 34        | 451,304          | 48        | Working-age population under 1 million | 1.2        | -0.2       |
| KS | 40.1        | 78.8        | 38.7        | 41.7        | 79.0        | 37.3        | -1.4        | 33        | 1,730,369        | 33        |  | 1.6        | 0.2        |
| MA | 33.0        | 77.2        | 44.2        | 34.9        | 77.9        | 42.9        | -1.3        | 31        | 4,272,843        | 14        |  | 1.9        | 0.7        |
| OK | 34.4        | 75.1        | 40.7        | 35.8        | 75.2        | 39.4        | -1.3        | 31        | 2,295,734        | 28        |  | 1.4        | 0.1        |
| TN | 28.0        | 73.2        | 45.2        | 29.9        | 74.1        | 44.1        | -1.1        | 30        | 3,983,560        | 16        |  | 1.9        | 0.9        |
| NJ | <b>35.0</b> | <b>74.5</b> | <b>39.5</b> | <b>36.6</b> | <b>75.1</b> | <b>38.5</b> | <b>-1.0</b> | <b>29</b> | <b>5,528,837</b> | <b>11</b> | Working-age pop. over 5 million        | <b>1.6</b> | <b>0.6</b> |
| 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        | million Working-age pop. over 5 million | 1.3  | 0.6  |
| AL        | 26.8        | 70.8        | 44.0        | 27.1        | 70.5        | 43.4        | -0.6       | 25        | 2,945,466        | 23       |   | 0.3  | -0.3 |
| GA        | 30.3        | 70.8        | 40.5        | 31.5        | 71.5        | 40.0        | -0.5       | 22        | 6,151,890        | 8        | Working-age pop. over 5 million         | 1.2  | 0.7  |
| CT        | 39.7        | 76.6        | 36.9        | 40.0        | 76.4        | 36.4        | -0.5       | 22        | 2,235,695        | 29       |   | 0.3  | -0.2 |
| WV        | 24.3        | 70.1        | 45.8        | 25.3        | 70.6        | 45.3        | -0.5       | 22        | 1,132,703        | 37       |   | 1.0  | 0.5  |
| WA        | 35.7        | 74.3        | 38.7        | 36.4        | 74.7        | 38.3        | -0.4       | 21        | 4,339,199        | 13       |   | 0.7  | 0.4  |
| PA        | 33.0        | 75.1        | 42.1        | 33.9        | 75.6        | 41.7        | -0.4       | 20        | 7,849,516        | 6        | Working-age pop. over 5 million         | 0.9  | 0.5  |
| MT        | 38.7        | 76.4        | 37.7        | 39.4        | 76.8        | 37.4        | -0.3       | 19        | 616,125          | 44       | Working-age pop. under 1 million        | 0.7  | 0.4  |
| MI        | 27.9        | 71.7        | 43.8        | 29.9        | 73.4        | 43.5        | -0.3       | 18        | 6,096,761        | 9        | Working-age pop. over 5 million         | 2.0  | 1.7  |
| MS        | 26.4        | 69.6        | 43.3        | 26.3        | 69.4        | 43.1        | -0.2       | 17        | 1,790,746        | 31       |   | -0.1 | -0.2 |
| CA        | 31.8        | 70.2        | 38.5        | 32.7        | 71.1        | 38.4        | -0.1       | 15        | #####            | 1        | Working-age pop. over 5 million         | 0.9  | 0.9  |
| VA        | 36.3        | 76.5        | 40.1        | 36.9        | 76.9        | 40.0        | -0.1       | 15        | 5,112,923        | 12       | Working-age pop. over 5 million         | 0.6  | 0.4  |
| KY        | 26.2        | 72.9        | 46.7        | 26.9        | 73.7        | 46.8        | 0.1        | 14        | 2,687,179        | 26       |   | 0.7  | 0.8  |
| <b>OH</b> | <b>32.8</b> | <b>75.1</b> | <b>42.2</b> | <b>33.5</b> | <b>75.9</b> | <b>42.4</b> | <b>0.2</b> | <b>13</b> | <b>7,072,114</b> | <b>7</b> | <b>Workin g-age pop.</b>                | 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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