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RespectAbility – Public Comments – Wisconsin Combined State Plan

One of our top priorities for the state is developing our workforce. A strong Wisconsin workforce enables our businesses to grow and thrive, which in turn, helps to strengthen our economy. We need workers with diverse skills, and that includes workers with disabilities, who have a unique set of abilities to contribute to Wisconsin businesses."

- [*Governor Scott Walker Announces Wisconsin Job Seekers with Disabilities Achieve Employment Goals at Historic Levels, October 29, 2015.*](#)

Introduction

RespectAbility is pleased to have the opportunity to submit public comments regarding the current draft of Wisconsin's Combined State Plan as required under Section 102 of the Workforce Innovation and Opportunity Act (WIOA). The Wisconsin WIOA draft is very well done. It creates a win-win-win strategy and system for vital improvements for Wisconsin's workforce system and its ability to serve people with barriers to work, employers and taxpayers alike. This draft plan will break down silos and build thoughtful collaborations, especially for youth transitioning from school to work. It is to be strongly commended. The high expectations, pre-employment pipeline, commitment to metrics, common application and partnership between government agencies will go a long way through this draft WIOA plan to build success. We are pleased to report that the current draft of Wisconsin's Combined State Plan is significantly better than many of the other WIOA state plans that we have reviewed. We commend the Combined State Plan for articulating and discussing the great partnerships at work in Wisconsin between Vocational Rehabilitation, the healthcare providers, the educational system and others. Still, even more can be done.

As a national non-profit organization devoted to empowering people with disabilities to achieve the American dream, we offer the leaders of Wisconsin's workforce system our comments, questions, and suggestions on how to strengthen this draft even further so you can maximize the opportunities created by WIOA. Our goal is to help the state and people of Wisconsin move forward with a WIOA plan that will be inclusive of the most integrated job opportunities for people with disabilities while meeting the talent demands of tomorrow.

Already Wisconsin's 40.9% labor force participation rate (LFPR) for people with disabilities (PwDs) is well above the national average of 30%. However, other

states (North and South Dakota, Wyoming and Alaska) and Montgomery County, Maryland have all achieved approximately a 50% LFPR level for PwDs. Likewise, we are also seeing pockets of excellence around innovative youth programs to address disability employment in [Georgia](#), [Nevada](#), and [Kentucky](#). We believe that Wisconsin is poised to do the same as well. Under your new WIOA plan, with strong leadership and implementation, people with disabilities in Wisconsin will be ever-increasingly contributing members of their communities in new and better ways. This will strengthen the economy for all people in Wisconsin.

As Baby Boomers retire and Wisconsin's economy evolves, the Badger State is starting to experience an increasing talent shortage. **There are 312,200 people with disabilities between the ages of 21 to 64 in Wisconsin and 60% of them are outside of the workforce. Many of those who are working are only working part time and/or are under-employed.** [A recent detailed study by the Kessler Foundation and the University of New Hampshire shows the 70% of working age people with disabilities \(PwDs\) are striving for work.](#) PwDs can provide a wonderful solution to companies and other employers that want to succeed. The diverse skills, higher loyalty, and retention rates of people with disabilities are already starting to meet employer talent needs in increasing numbers. However, a major growth opportunity exists for the future.

We have had the honor of meeting with Governor Walker and Secretary Reggie Newson to discuss best practices as part of our national coalition with Paralyzed Veterans of America, the Independent Living movement, NACDD, Best Buddies and NOD. We are delighted to see so many of these best practices and others integrated into your plan . We know that the team in Wisconsin has worked successfully to improve outcomes and opportunities, especially for young Wisconsinites with disabilities and other barriers to work.

Governor Walker has been a champion for the highly successful Project Search model. It is achieving 70% employment outcomes for young people with disabilities, and we are thrilled with the expansion of that program. Likewise, we are deeply impressed with the new collaborations and early intervention represented with PROMISE, PETS and other work.

Because of your good work, the 24,800 youth with disabilities between the ages of 16 and 21 living in Wisconsin have increasing chances to successfully transition into the world of work. If this plan is further strengthened and implemented, we believe that Wisconsin too can join the ranks of other states that have approximately a 50% LFPR rate for their citizens with disabilities.

In reviewing your plan, which overall is excellent, there remains several critical gaps that can be addressed so you can achieve the best results possible. These issues are:

1. Stigma Reduction and High Expectations: Stigma, 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 highly recommend that the Combined State Plan be amended to include a communications/public relations/education strategy for reducing such stigmas. Governor Walker has already begun to do this by visiting many successful models of inclusive employment. [In 2014, Governor Scott Walker announced a new program fashioned after the leadership effort of Delaware Governor Jack Markell.](#) Markell, when he was chair of the National Governors Association, made employment for people with disabilities a key priority. [The result of that work was a body of best practices that is still having a big impact.](#) Above all, both Walker's efforts and Markell's leadership gravitated towards using their role as Governors to showcase the benefits of hiring people with disabilities and recruiting diverse talent to meet employer needs. Getting employers to understand how people with disabilities can meet their most critical talent needs is very much a communications challenge and it has bearing on the Combined State Plan. [A great example of the business case for disability inclusion is provided by Walgreens who has demonstrated that workers with disabilities in their distribution centers are as productive, safer, and turn over less when compared to peers without disabilities.](#) Several sections of the Plan talk about outreach to business about how the workforce system can train job seekers to meet employer need. Where is the messaging strategy and communications plan for showcasing the bottom line benefit of hiring people with disabilities? Are there any plans for highlighting those employer heroes who are capitalizing on the talents of people with disabilities? Governor Walker's media appearances and speeches to chambers of commerce and other groups have been vital in demonstrating the business case for hiring PWDs. A systematic and ongoing communications campaign must continue if you want to maximize your success. It is critical that Wisconsin VR staff and community agencies be prepared to support companies in dealing with their specific fear & stigma. Partners like the Poses Family Foundation Workplace Initiative can provide training to VR staff & community agencies in supporting Wisconsin companies through messaging efforts around related to fear & stigma.

2. Specific Partnerships with Leading Employers: The Wisconsin draft WIOA plan outlines a wonderful strategy with a team of professionals who reach out to employers. This is fantastic. At the same time, it should specifically site many

more private sectors and other employer partners and the criteria for successful partnerships. The Badger State is blessed with many examples of employment collaboration that are creating tremendous opportunities for Wisconsinites with disabilities. For example, Meijer has announced aggressive expansion plans into Wisconsin and has already begun proactively hiring people with disabilities in their Pleasant Prairie distribution center. It is critical to provide support to Meijer in terms of job training & follow-up for employees with disabilities as they open stores across Wisconsin. There are several other leading Wisconsin employers doing incredible work around inclusive hiring of people with disabilities. This includes Kwik Trip and ManPower, each of whom is on the front line of innovation on inclusive employment. [Indeed, Kwik Trip alone has hired more than 240 people with disabilities in their stores in Wisconsin and surrounding states, and it is a part of their success as a company.](#) They are a model for others. [ManPower is on the cutting edge of assessing and placing talent and can play a wonderful “middle man” role to help place talent into temporary jobs that can be turned into permanent positions.](#) Governor Walker’s 2015 State of the State addressed identified several employer heroes who have been great partners. [For example, he spoke about Dickmann Manufacturing, Beyond Vision, Mosinee Cold Storage”, and McGlynn Pharmacy.”](#) [The Poses Family Foundation Workplace Initiative has established national partnerships with companies such as Amazon, PepsiCo, UPS, Cintas, Xerox, and Sears that can be leveraged to work with locations in Wisconsin.](#) As part of the Poses Family Foundation’s Workplace Initiative, a coalition of employment service providers have 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 in Downtown St. Louis. Trainees have gone on to permanent employment at the Hyatt and other hotel partners in a range of departments—culinary; auditing; and customer service. As agriculture is such a key industry within Wisconsin, [there is an opportunity to replicate the success of TIAA-CREF’s Fruits of Employment project that provides internships and job training to workers with disabilities to prep them for careers in competitive agriculture.](#) Shifting to other potential partners, the [Disability Equality Index that assesses the inclusion and hiring efforts of major employers.](#) It is 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, there is not yet an affiliate chapter in Wisconsin. Moving forward, we encourage committed leaders to work hard in order to create a USBLN affiliate. [Meanwhile, the companies which scored](#)

[100% in the USBLN index can be a great resource.](#) These are Ameren Corporation, AT&T, Booz Allen Hamilton Inc., Capital One Financial Corporation, Comcast, NBCUniversal, Ernst & Young LLP, Florida Blue, Freddie Mac, Highmark Health, JPMorgan Chase & Co., Lockheed Martin Corporation, Northrop Grumman Corporation, Pacific Gas and Electric Company, PricewaterhouseCoopers LLP (PwC), Procter & Gamble, Qualcomm Incorporated, Sprint Corporation, Starbucks Coffee Company, and TD Bank N.A. Your Combined State Plan should talk about these employers as well as the one employer you do highlight, Walgreens. Success sells success and that is something the workforce system should seriously utilize in an intentional manner moving forward.

- 3. Opportunities with Federal Contractors:** The Combined State Plan should contain references to Section 503 for federal contractors. [This is a massive opportunity as Federal contractors have a new 7% utilization goal to recruit, hire, and retain qualified individuals with disabilities in all job categories.](#) Even if employers face challenges finding the talent they need, Section 503 is an opportunity to start thinking about ways to attracting the diverse talents that people with disabilities bring to the workplace. Thus, we **encourage the Wisconsin WIOA draft be revised to include language around Section 503 and federal contractors.** [There are multiple sources for information regarding what Wisconsin based businesses hold federal contracts](#) and [what job sectors those contractors represent.](#) [Many federal contractors need STEM qualified talent. See more on that topic below.](#)
- 4. Success in Wisconsin needs to be guided by the labor force participation rates of people with disabilities.** As we expressed in our introduction, it is our view that Wisconsin in the path towards achieving greater outcomes and higher employment rates for people with disabilities. Sustaining this success will very much depend on making sure Wisconsin's leaders have access to the right data. **It is vital that the workforce system and the State Board include the labor force participation rates of people with disabilities on their state dashboards and performance metrics.** Looking solely at unemployment information, decision makers are missing the bigger picture of those individuals with barriers to employment who are not actively seeking work. [As an example of the data that is needed, we are including a link to, and a copy of, the presentation our organization has compiled about employment for Wisconsinites 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 Wisconsin.

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

Many people with disabilities do not drive. Others cannot afford private transportation. It is vital to work with public transportation to ensure that there are bus routes to places where there are internships, apprenticeships and other work opportunities. In places where that is not possible, Wisconsin should look at partnering with UBER and other new transportation solutions. Indeed, for PwDs who do drive, such companies as UBER can also provide a way to enter into the workforce with flexible hours.

6. Public Education on Free and Accessible Services and Resources:

Wisconsin offers many online and in person resources to help employers and people with disabilities come together to build success. But 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. There is also no need 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, webinars and training opportunities](http://ourorganizationandothersalsoofferfreetoolkits,webinarsandtrainingopportunities). [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.

7. One-Stop-Shops/American Job Centers Should be Mobile and Online: One

critical challenge that we have seen in the WIOA State Plans of many other states has been an excessive focus on the expensive physical infrastructure of the One-Stop or American Job Center (AJC) system. 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 who go to schools, hospitals, and community organizations where they are better able to serve the public](http://theDistrictofColumbiaandothershavesuccessfullymovedmuchoftheirone-stopservices). With that in mind, we are pleased to see the extensive internet based resources referenced in the current draft of Wisconsin's WIOA plan. However, there is a critical question that needs to be asked. Are Wisconsin's workforce system websites fully accessible for people with visual differences who use screen readers? Are there plain language summaries for people with intellectual or developmental differences? Do training videos or

online instruction modules have closed captioning for people with hearing differences? Addressing these challenges may take time, but they will net a great deal of benefits to the workforce system.

8. Nothing About Us Without Us. “Nothing About Us Without Us” has long been a rallying cry for the one in five American who have a disability and it has implications for the workforce system. Even a non-voting member of a WIB can bring critical perspectives that improve the WIB’s efforts. There are two ways that the Combined State Plan can address this issue of representation of people with disabilities and VR. First, Secretary Reggie Newson is currently the only DWD rep on the Governor's Council on Workforce Investment and is representing all components. This Council is missing the voices of VR and people with disabilities. This is a critical gap that should be closed. Second, the State Plan could also direct local workforce boards to connect with local community organizations to recruit self-advocates to add their perspectives.

9. Aging workers and those with recently acquired disabilities must be specifically addressed in the plan. The plan does talk about the aging of the Baby Boomer generation and how their retirements will lead to talent shortages. However, many people who have been in the workforce for decades find that before full retirement age they cannot keep up with the physical demands from their jobs. In Iowa, IVRS works with Unity Point Hospital. They find that ER nurses, for example, come to a point where they can no longer keep up with the physical demands of the 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 workers in the workforce 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.

10. People with disabilities are can be ideal talent in serving Wisconsin’s aging population. 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](#). There are numerous examples of young people with disabilities doing incredible work [in the fields of healthcare, elderly care, and in assisted living](#). Project Search sites in Wisconsin generally today are in hospitals but there is great growth potential for them in nursing homes, senior living facilities and at hotels.

11. Beware “Order of Selection” and Utilize a “Jackie Robinson Strategy”. The

workforce system only gets one chance with new employers to make a good impression. By law, policy, and custom, the system looks to serve people with the most significant disabilities first. However, if they are not the right match for the employer, it will only undermine our long term goals. Thus it is vital to also use a “Jackie Robinson Strategy” to make sure that the right talent gets into the right positions so it is win-win for the employer and worker alike. As the first African-American to play major league baseball, Robinson tore down decades of discrimination and blazed a trail for other talented and diverse athletes to follow. He was the talent that his employer needed, and contributed to the bottom line. Because, stigma and misconception remain a critical obstacle and one that Wisconsin’s workforce system needs to focus on, sometimes the best way to help people with more significant disabilities in the long term is to start with new employers by placing talent with fewer disabilities first. Once they understand accommodations and how to maximize the use of talent, they will be ready to more broadly open their employment “tents”.

12. Ensuring the young people with disabilities get STEM qualified. 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 Wisconsin. 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. Partnerships should be created with federal contractors who have 503 requirements and talent shortages. This includes Northrup Grumman, Lockheed Martin, Raytheon and Boeing.

13. Finding a market niche with high turnover jobs. 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 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 accommodations were far outweighed by the low turnover rates and better tenures of the employees with disabilities. Hospitals, elder care institutions, hotels, and distribution/supply chains including [UPS, Walmart, Walgreens have proven records of success.](#) They can be outstanding partners for disability employment as these industries suffer from high turnover rates and PwDs are proven to have significantly higher retention rates. It is important to identify more specific opportunities with employers and to site them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future.

14. The disability issues of people involved in the corrections system must be addressed. [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 or unaddressed through childhood and into the school years. Given these statistics from the BJS, it is vital that Wisconsin identify how many of the individuals in the ex-offender pipeline have disabilities. Serving ex-offender is a critical workforce development challenge and one that can only increase when disability is a factor as well. The price paid for ignoring this issue are higher rates of recidivism and greater costs to society. Can there be screening or assessment tools for identify disability as people either enter or exit the prison system? If people who have been in the corrections system are to be well served by Wisconsin’s workforce system, then it is vital that disability issues be identified and addressed in a way that will help them develop their talents so they can be successful citizens and workers in the future.

The Bottom Line – Empowering People with Disabilities in Wisconsin:

Below are some specific comments that go with page numbers from the draft. We are willing to meet with you and answer any questions that you have. 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. Your neighbors in Iowa also have a strong success in helping people with disabilities start and run their own companies. Other states are using state hiring as a way to make a difference as well. 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.

- Starting on page 34, the State Plan's economic analysis examines the “Characteristics of Those Not in the Labor Force.” Specifically, it talks about how many working age people who are not in the workforce do not want to work or reenter the workforce. We would add that it is also important to consider those who are actively STRIVING for work despite barriers to employment. [The Kessler Foundation’s 2015 survey which shows “that more than 68% of PWDs are striving to work” is another factor to strengthen this analysis.](#)
- Starting on page 36, the Plan examines the “Labor Force Status of Notable Subgroups”, especially people with disabilities and veterans. We are glad of the focus and detail on the characteristics of these subpopulations. However, we would also recommend the inclusion of data on the labor force participation rates of working age people with disabilities. This is a useful measure because looking at unemployment rates alone only captures those who are actively seeking work. [There are multiple sources, from universities to research foundations to the federal government](#) that provide in-depth data that is widely available.
- Likewise, on page 37, we would suggest that it would be useful to add data here around how many people who have been involved in the corrections system are themselves people with disabilities. As stated previously in our comments, too many people end up in the justice system due to unidentified and unaddressed differences.
- Page 47 of the Combined State Plan discusses how Wisconsin’s economic growth is impacted by the challenge that employers face in finding and retaining talent that fits their labor needs. This section would be a natural point to include some comments or information about how employees with disabilities are often more loyalty, more productive, and easier to retain than their non-disabled peers.
- Page 51 of the Plan contains information about Wisconsin's goals for improving “the talent development system.” We are pleased to see that accessibility is the first goal listed and emphasize the importance of programmatic as well as physical access. As stated previously in our comments, moving forward, we encourage Wisconsin to look at more technology driven employment services and mobile solutions.
- On page 55, we are thrilled to see the prioritization of a common intake process for all of the core WIOA partners in Wisconsin. Common processes are one of the most important

ways of breaking down siloes and building partnership. We are also particularly impressed with the integration of privacy protection in these efforts.

- Page 56 of the Plan discusses Governor Walker, Executive Order #152, and the Governor's Council, and the drive to be “responsive to employer needs.” However, especially in terms of jobs for people with disabilities, this element needs to be more fully developed. We say this for a simple reason. Government action alone is insufficient. The necessary condition for achieving greater competitive, integrated employment for individuals with disabilities is engaging employers and meeting their talent needs. One way to do this would be to at the US Business Leadership Network. Wisconsin currently does not have a state affiliate despite having multiple “employer heroes” such as ManPower, Kwik Trip, and other successful businesses whose bottom line has benefited from employees with differences.
- One of the resources discussed page 68 is DWD’s online platform: <http://www.wisconsinjobcenter.org/> Is this website fully accessible for people with disabilities? Is it screen reader accessible? Does it’s video content have closed captioning? What accessibility standards are used to review the website? [Even basic accessibility efforts can make a significant difference in terms of delivery of services through such platforms, as discussed by one of our previous webinars.](#) This website holds promise as a means of encouraging people to interface with the workforce system in Wisconsin. As such, there should an effort at outreach and messaging around the resources it provides to job seekers. Likewise, on page 210 the State Plan talks about “DVR has a link from the Job Center of Wisconsin website to the DVR website for job seekers with disabilities.” We would reiterate the importance of ensuring that all such websites are fully accessible and marketed directly to the people who will most benefit from these types of resources.
- Page 72 includes a roster of the membership of the State Board as required by law. We are thrilled to see that MANPOWER and Kwik Trip are members of the State Board. They are both big employers of people with disabilities and their perspectives are critical. However, as stated previously in our comments, where are the representatives from the vocation rehabilitation system or Wisconsin’s own disability community? Both VR and community advocates have a critical voice to add to the State Board’s conversations.
- “Developing capacity to deliver awareness- and knowledge-building training to workforce staff, employers, and the public” is discussed on page 82 as being a key element of Wisconsin’s participation in the Disability Employment Initiative (DEI). As before, we feel that stigma busting and improving outcomes is very much a communications challenge. To address that challenge, it will be critical to highlight (through press releases, social media, and other avenues) model employers such as Walgreens, MANPOWER, Kwik Trip, and others that are prospering because of their employees with disabilities. Likewise, in terms of training for staff in the One-Stop system, we HIGHLY recommend conducting site visits of inclusive employers. Touring a model employer can be an eye opening experience. As such, it should be a priority in terms of building the capacity of the system to serve job seekers with disabilities.
- There is a missed opportunity on page 96 where the state plan discusses the role and growth of Registered Apprenticeships. Specifically, these types of “job-driven opportunities” could be a very attractive way of finding diverse talent for Wisconsin businesses that hold contracts with the Federal government. Thanks to Section 503, federal contractors have a 7% utilization goal for recruiting, hiring, and retaining qualified individual with disabilities. Apprenticeships, which cover many of the costs associated with

skill training and job readiness that otherwise would be carried by the employer, could be a way creating pathways for contractors to meet their Section 503 goals. On a related note, youth with disabilities can benefit enormously from the work done through these types of programs. [This is especially important thanks to the many new resources out there from the Office of Disability Employment Policy which discuss practical ways of getting young people with disabilities into the workforce through apprenticeships.](#) As such, this section should be amended to reflect the opportunities created by Section 503.

- What gets measured, gets done. This is a simple true and one reflected in the sections of the Combined State Plan that define the performance metrics, criteria, outcomes, and standards that Wisconsin's Workforce Development Boards will use for their programs. One issue we would raise is whether on Wisconsin's state dashboard there are any metrics that employee retention, especially of workers with disabilities. As much as we are focused on and discuss the importance of getting people into the workforce, retention is another absolutely critical element of disability employment policy. All the effort to train and prepare someone for the world of work mean nothing if they are ultimately unsuccessful in their role or do not keep their job. Likewise, are there any metrics that track promotion or career progression? If not, then we recommend the State Plan be amended to include such metrics.
- Page 117 concerns the rules, requirements, and processes facing an individual claiming unemployment benefits. The strong emphasis on online services and surveys is a good sign as is the notification of eligibility for vocational rehabilitation services.
- Page 120 concerns the referral process across many WIOA partners in Wisconsin. One concern we have is whether VR is part of this process development and if not SHOULD VR have a role in the referral system. Partnership and collaboration under WIOA is vital and will very much depend on clear lines of communication.
- Given that WIOA requires the entire workforce system to now be accessible to job seekers with disabilities, it is vital to consider how other WIOA partners will screen for and serve people with disabilities. This is an important conversation to be especially for the Adult Education and Literacy Programs discussed on page 135, the Wisconsin Technical College System on page 136, and Corrections Education on page 138. In terms of Adult Ed, when someone is found to be basic skill deficient, can they be referred to VR for disability evaluation or assessment? Are there screening tools that can be used for identifying previously undisclosed learning differences? What steps would that program take to serve someone IF a disability is identified? Likewise, are the tools and programs offered by other WIOA partners fully accessible? We asked these questions because we believe that improving employment services and supports for job seekers with disabilities should be a catalyst for improving services and supports across the entire workforce system.
- One of the areas that reflect best practices in Wisconsin's Combined State Plan is the strong emphasis on looking at career plans for all students. It is terrific that Wisconsin in prioritizing career pathways such as on page 141. This is vital to success and will save a lot of tax payer money.
- The requirements around providing Pre-Employment Transition Services are some of the most important changes made in the VR system by WIOA. New federal mandates around provision of such services reflect the critical need for high expectations and early interventions to prepare all students for successful transitions into the workforce. We very pleased to see the depth of collaboration discussed in the State Plan and the formalization of those efforts. We also incredibly pleased with the prioritization of competitive integrated

employment on this point. We would note, however, that this section could easily include the raw demographic numbers in terms of the need for PETS.

- As we have stated before, we are very pleased with the focused emphasis put on youth with disabilities and the strong partnerships that WDVR has created. Much of that is on display in the Pre-Employment Transition Services (PETS) section of the State Plan. However, shouldn't this section also discuss recruiting and coordinating with employers and meeting their talent needs? There are two categories of employer partner who could be a great focus for Wisconsin's efforts around PETS. Federal contractors with Section 503 have outstanding needs to recruit, hire, and retain individuals and businesses with high labor turnover rates such as eldercare facilities and hotels should be natural points of partnership around PETS. Further, in terms of formal interagency agreements around WDVR and PETS, the Transition Action Guide (TAG) is incredible. The TAG reflects how fundamentally important intervening to support youth with disabilities is and how to do it. This Guide will be a key factor in creating successful outcomes. Lastly, the clear cooperative agreements outlined on page 161 provide clarity around the complexity of interfacing with non-profit organizations.
- Page 162 concerns "Arrangements and Cooperative Agreements for the Provision of Supported Employment Services." Of particular note on that score is the issue of assistive technology. How much flexibility is there in this program for support technology solutions or reasonable accommodation?
- Some of the most dynamic work being done by VR in Wisconsin concerns the role of Business Services Consultants. The plan includes some good numbers about their impact. However, we would also recommend encouraging these Consultants to draw attention to the great work being done by Kwik Trip, Manpower, and other inclusive employers. We are very happy that Wisconsin has dedicated professionals working with companies and the more employers that hire VR candidates, the more tax payer money will be saved.
- The section on "Innovation and Expansion—Place and Train Models" addresses the high priority Wisconsin is placing on the model of Project Search. We commend the Combined State Plan for its commitment to "create 20 new sites in Wisconsin by 2017, with seven new sites accepting students for the 2015-16 school year." As ever, we would reiterate that Project Search should not be solely focused on expanding into more hospitals. [In other states, Project Search interns have done incredible work with senior citizens in nursing homes. Likewise, other states have had great successes with Project Search sites in hotels and resorts.](#) While the hospitality sector is not a primary focus of Wisconsin's economy, it should still be considered in terms of expanding opportunities for youth with disabilities. Later on, the State Plan also addresses targeting young people on benefits for services through TAG.
- Beyond Project Search, the PROMISE Grants from the Department of Education is another innovative, impactful program aimed at improving outcomes for young people with disabilities. We are incredibly pleased to see the positive results that Wisconsin has achieved as part of this grant program. We encourage WDVR to use the lessons learned from the PROMISE Grant efforts to get other workforce programs thinking about how to better train and prepare youth with disabilities to enter the workforce. PROMISE is so impactful in no small part because of the emphasis on high expectations and family engagement. These lessons need to be broadly shared across Wisconsin's workforce system where possible.

- Lastly, on page 219, WDVR writes about collaboration efforts around the Walgreens Retail Employees with Disabilities Initiative (REDI). This is incredible work and a testament to the importance of channeling more people with disabilities into ever more job fields. As we have stated elsewhere, we would also recommend that the Combined State Plan to reflect the entire range of employer partners such as ManPower, Kwik Trip, and other Wisconsin businesses benefiting from the talents of people with disabilities.

Conclusion

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

Sincerely,

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