

## BOARD OF DIRECTORS

Jennifer Laszlo Mizrahi, CEO  
Shelley Cohen  
Evelyn Kelley  
Thomas M. Sweltzer  
Donn Weinberg

## BOARD OF ADVISORS

Donna Meltzer  
Steven James Tingus  
Debra Ruh  
Dana Marlowe  
Linda Burger

**Feb. 8, 2016**

## **RespectAbility – Public Comments – New York Combined State Plan**

*“WHEREAS, New Yorkers with disabilities represent a significant percentage of the state’s overall population and experience disproportionately low levels of employment; and WHEREAS, working-age New Yorkers, including those with disabilities, should be encouraged and supported in contributing to the state’s economy; and WHEREAS, competitive integrated employment is a component of community inclusion and improved quality of life for individuals with disabilities; and WHEREAS, hiring an individual with a disability meets employer needs and contributes to a diverse workforce; and WHEREAS, New York prioritizes competitive integrated employment as the preferred outcome for working age New Yorkers with disabilities; and WHEREAS, New York seeks to increase the percentage of individuals with disabilities engaged in competitive, integrated employment.” – [Governor Cuomo, Executive Order No. 136: Establishing the New York Employment First Initiative, October 3, 2014.](#)*

RespectAbility is pleased to submit the following comments regarding the current draft of the State of New York’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.

**New York can and must do better in terms of competitive, integrated employment for people with disabilities.** Despite the Empire State’s abundant resources and vast population, New York only ranks 37<sup>th</sup> in the country in terms of their employment rate of people with disabilities. **Only 32.2% of the 997,500 working age New Yorkers with disabilities are employed. Further, there are over 68,800 youth with disabilities and each year a quarter of them will age out of school into an uncertain future.**

**However, thanks to WIOA, New York has the opportunity to work hard to improve outcomes in terms of competitive, integrated employment for people with disabilities.** The Empire 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 Michigan 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.** New York has some outstanding Project Search programs, but far too few of them to even scratch the surface of the need. It also has a model inclusive employer in IBM, yet has not provided enough STEM qualified people with disabilities to fill roles there and elsewhere.

**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 New York.](#) That information is attached to our comments.

**Our public comments on New York’s WIOA State Plan are structured around those \*points where greater clarity, precision, and data are needed to ensure that people with disabilities will be better equipped to pursue the American Dream.** From the accessibility of the workforce system to employer engagement to investing in transition programs for youth with disabilities, our comments are intended to help the Empire State push hard to see improved integrated employment outcomes for New Yorkers with disabilities.

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

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 New Yorkers 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 New York.

As required by Section 102(b)(1)(B) of WIOA, each state plan must include “an analysis of the current workforce, employment and unemployment data, labor market trends, and the educational and skill levels of the workforce, including individuals with barriers to employment (including individuals with disabilities).” **While the “Economic, Workforce, and Development Activities Analysis” starting on page 4 of the Plan provides a great degree of detail, it is sorely lacking on the disability front. This is not a small issue when there are close to a million working age New Yorkers with disabilities and only 32.2% of them are currently employed.** As such, we have several revisions to suggest that will strengthen New York’s Combined State Plan and provide the insights needed to improve outcomes.

First, we highly recommend that the Economic Analysis be amended to include specific detail on one of the most important data points about the economic situation of the disability community in New York. **It is absolutely critical that New York’s workforce system include the labor force participation rates (LFPRs) of people with disabilities both in their performance metrics and on their state dashboards.** If performance metrics are limited to things like unemployment statistics, then people who are not actively looking for work are being excluded from the plan’s analysis of the state economy. These rates are the critical lens that is needed to bring clarity to the issue of employment for people with disabilities. **There is a 41.1 point gap in the Labor Force Participation Rates between people with and without disabilities in New York. Pushing hard to close this gap will require focused energy and effort.** As an example of how to expand the detail included on this subject, we are including our data presentation for New York as well as the LFPR table drawn from Michigan’s WIOA Plan.

Second, while New York only ranks 37<sup>th</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 only 39% of the 191,275 New Yorkers who are blind or have vision loss are employed while 48.9% of the 187,210 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 22.1% of New Yorkers 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 New York's workforce system expands successful school to work transition programs.** New York 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 New York's workforce strategy:**

Low expectations and misconceptions are critical barriers to employment for people with disabilities. [A Princeton study shows that while people with disabilities are seen as warm, they are not seen as competent.](#) Similarly, [a study published by Cornell Hospitality Quarterly found that companies share a concern that people with disabilities cannot adequately do the work required of their employees.](#) **We therefore recommend that the New York'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 New Yorkers with barriers to work also face stigmas, especially those leaving the corrections system.

**This type of strategy has critical implications for the work being done on Employment First as discussed on page 66 of the Combined State Plan. In order to ensure that such efforts have the biggest possible impact, this work needs to be supported by a serious, systematic and ongoing communications campaign that highlights the benefits of inclusive hiring.** 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. New York’s EY and IBM are fantastic role models that can be used in such a campaign.
- 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. New York’s VR staff and community agencies can fully support human resources professionals and managers in dealing with their own specific fears and stigmas surrounding hiring people with disabilities. Moreover, online and in-person training is readily available to help from a variety of sources. RespectAbility has online webinars, as [does ASKJAN.org](#), USDOL and others. Partners like [the Poses Family Foundation Workplace Initiative](#) can provide training to the workforce staff and volunteers systems-wide as well as to community agencies in supporting companies through messaging efforts around related to fear and stigma. [The National Organization on Disability](#) and [the U.S. Business Leadership Network](#) offer strong resources.
- C. People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectations must begin. New York’s new Employment First policy needs to be supported by a PR campaign that will inspire New Yorkers with disabilities to reach for the stars.** For example, Virgin Airways founder Sir [Richard Branson](#) and finance wizard [Charles Schwab](#) are dyslexic. Scientist Stephen Hawking and multi-billionaire businessman Sheldon Adelson, like Gov. Greg Abbott of Texas and President Franklin D. Roosevelt before them, are wheelchair/mobility device users. The CEO of Wynn Casinos, Steve Wynn, is legally blind. Arthur Young, co-founder of the giant EY (formerly Ernst & Young) was deaf. Success sells success and that is something the workforce system should seriously utilize in an intentional manner moving forward.

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

**systematic and ongoing communications campaign must start and continue if you want to maximize your success.**

It is also critical that New York 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 New York VR staff as well as community agencies in supporting New York companies through messaging efforts around related to fear and stigma. New York is also home to many important other foundations such as Ford, Rockefeller, Cummings and others who focus on poverty issues. They could play a major role in working to remove barriers to work for people with disabilities, many of whom also have multiple barriers due to poverty, prison, poor health outcomes and more.**

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

The success of WIOA depends on being an employer driven paradigm shift. **Expanding opportunities for people with barriers to employment such as disability requires strong partnerships with employers in those sectors which are rapidly expanding.** For example, we know from page 5 of the current draft of the Combined State Plan and the table describing “Industry Sectors with Largest Number of Online Ads” show the types of employers with growing talent needs. The three employer categories with the biggest needs include: Administrative and Support Services with 23,623 opening job postings, Professional, Scientific and Technical Services with 20,912, and Health Care and Social Assistance with 20,561 openings. The Combined State Plan then goes on to discuss how past workforce development efforts in New York state have been informed by a “sector strategy” approach.

Next, the Combined State Plan offers great detail on “three broad industry groups” that “emerged as key for implementation” of WIOA. Those sectors are: “Green and Renewable Resources; Healthcare; and Advanced Manufacturing.”

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

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

The State Plan discusses how “the Healthcare industry...is a major entry-level for low-skilled, low-wage workers.” At the same time, this industry has “substantial needs for many types of technical, professional, and advanced degree workers.” The sector is so dynamic that the talent needs of employers “spans entry level health service jobs to high-tech positions in the biosciences.”

**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 New York at [University of Rochester Medical Center](#), [Finger Lakes Health](#), [New York-Presbyterian Hospital/Westchester Division](#), and [Good Samaritan Hospital](#). These Project Search sites overall have been achieving outstanding results for people with disabilities, employers, and taxpayers alike. For example, [the first longitudinal study of the program, 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...New York that have an impressive 83% success rate overall.”](#) The goal for each program participant is competitive employment.

**As New York looks for ways to expand Project Search, we highly encourage you to learn from Wisconsin.** The experiences of the dedicated state officials, VR counselors, workforce professionals, and special educators who have increased Wisconsin’s Project Search programs offer profound insights in the steps necessary to make rapid expansion a reality. In the long term investments in Project Search and other such programs will save big money for taxpayers while also strengthening the talent pool for employers.

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

As has been documented in many cases, there can be an “Autism Advantage” in the STEM space. Indeed, some people on the Autism spectrum can have the very best skills in science, math and engineering. [Microsoft](#), [SAP](#), and [Specialisterne](#) have committed themselves to “[provide employment opportunities for people on the autism spectrum in roles such as software testers, programmers, system administrators, and data quality assurance specialists.](#)” [The Israeli Defense Forces recruits and trains their citizens on the Autism spectrum for work in their elite intelligence unit.](#) As Carol Glazer said, writing earlier this year in *Huffington Post*, “[America is already lagging when it comes to STEM-skilled workers. The U.S. will have more than 1.2 million job openings in STEM fields by 2018.](#)”

**Federal contractors and other employers have huge demands for STEM qualified talents. However, many schools place their best supports for students with disabilities in schools that do not have strong STEM training.** This is a huge loss as people on the Autism Spectrum, for example, can have the very best skills in science, math and engineering. [Microsoft](#), [SAP](#), and [Specialisterne](#) have committed themselves to “[provide employment opportunities for people on the autism spectrum in roles such as software testers, programmers, system administrators, and data quality assurance specialists.](#)” These experiences and partnerships offer insights into how to challenge employer perceptions, recruit diverse talent, and ultimately put peoples to work. Delaware’s Governor Jack Markell has led the way in partnering with companies to employ more people on the autism spectrum. Such examples need to be implemented by New York. **This issue of STEM and access for student with disabilities is a natural point of partnership between the workforce system and the educational system. That work needs to start young, be matched with high expectations for success, and work**

**to ensure people with disabilities have the chance to become future scientists, engineers, and mathematicians.** This will take partnerships with early childhood interventions, schools, community colleges and universities.

Partnerships should be created with federal contractors who have 503 requirements and talent shortages. **New York is lucky to be home to some of the largest and most important Federal Contractors including Northrop Grumman Corp., Lockheed Martin Corp., Brookhaven Science Associates LLC, Harris Corp, and the Interpublic Group of Companies INC.** Through WIOA, New York's workforce system should be leading the nation in terms of helping these dynamic businesses meet and exceed their Section 503 requirements.

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

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

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

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

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

Likewise, in other states, [hotels and other hospitality employers have found Project SEARCH to be an amazing source of talent.](#) [The work done by Embassy Suites and David Scott in Omaha, Nebraska offers valuable lessons that can enable Michigan to improve employment outcomes for people with disabilities.](#) New York's state Board, along with other components of the workforce system, should connect with employers in the hospitality sector to begin figuring out how to benefit from these models.

**Another sector with high turnover and big potential are distribution/supply chains. Many companies, including [UPS, Wal-Mart, and OfficeMax have proven records of success.](#) [Walgreens has demonstrated that workers with disabilities in their distribution](#)**

**centers are as productive, safer, and turn over less when compared to peers without disabilities.** These efforts have taken the logistics sector by storm with [Lowe's](#), [OfficeMax](#), [Pepsi](#), as well as [P&G](#) are all launching their own successful disability hiring initiatives. For example, [as reported by the National Organization on Disability](#), “[Lowe’s hired more than 150 new workers with disabilities in the first year, and an additional 250 workers in the following 18-month period.](#)” They can be outstanding partners for disability employment as these industries suffer from high turnover rates and PwDs are proven to have significantly higher retention rates. It is important to identify more specific opportunities with employers and to site them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future. **Another great example is Starbucks.** Their “[Inclusion Academy](#)” has rapidly grown from just a pilot program in Carson Valley, NJ to a complete program at their largest roasting plant.

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

While there is a great deal of data and detail in the current draft of New York’s Combined State Plan, there is also an omission. **Specifically, the State Plan lacks explicit references to the employment opportunities and talent challenges created by the Section 503 regulations and federal contractors.** [New York’s Plan does not discuss at all the new 7% utilization goal set for companies to recruit, hire, and retain qualified individuals with disabilities in all job categories.](#)

**New York 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.

New York is fortunate to be home to the operations of several massive businesses with extensive federal contractors. For example, Northrop Grumman Corp., Lockheed Martin Corp., Brookhaven Science Associates LLC, Harris Corp, and the Interpublic Group of Companies INC, all do business with the federal government from within New York. 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.

#### **5. Implementing New York’s Employment First Policy:**

RespectAbility is very pleased to see that a discussion around implementing New York’s Employment First policy is included within the overall context of WIOA implementation. Ideally, WIOA will be a paradigm shift which sees the entire workforce system evolving to be able to better serve people with disabilities. Having an Employment First policy in place is needed in order to take the initiative and get the effort moving. Further, having an committed team of state leaders offers the chance for champions of change to collaborate on the hard work that needs to be done in order to prioritize employment opportunities for New Yorkers with disabilities.



It is critical that the Employment First efforts compliment the larger work of WIOA in New York and that these policy efforts be closely coordinated. The work done on Employment First should inform the efforts of the entire workforce system to evolve and adapt to meet the needs of job seekers with barriers to employment such as disability. We are grateful for Governor Cuomo's championship of Employment First in New York and we offer the points below as food for thought:

- A. PUBLIC SECTOR AND STATE CONTRACTING JOBS and Cultural Modeling:** In the right circumstances, hiring initiatives to recruit qualified individuals with disabilities to work in state government can be a best practice that creates opportunity. This type of effort was 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.](#)" Just as it is good for businesses to reflect their customer base, so too should the government reflect the governed. [Governor Inslee in Washington State](#) and [Governor Dayton in Minnesota](#) have been working to implement such measures through executive orders. Likewise, [we are also seeing great success with governmental hiring of people with disabilities at the local level in Montgomery County Maryland.](#) However, we would add another recommendation on this point. Specifically, we suggest that New York also look at state contracting as another element of the "Cultural Modeling" discussed in the Employment First policy. As with Section 503, state government can also use contracting as a means to promote the hiring, retention and promotion of people with disabilities. Contracts with state may not be as vast or lucrative as federal contracting, but this is yet another place where innovative work can be done to improve employment outcomes for people with disabilities at the state level.
- B. Energizing the "Demand-Side" of the Equation:** Improving employment outcomes in New York very much depends on being an employer driven paradigm shift. As we mentioned before, it is vital to emphasize the business case for hiring people with disabilities again and again for a simple reason. Government action alone--even through vocation rehabilitation -- is insufficient to improve employment outcomes for people with disabilities. The necessary condition for achieving greater competitive, integrated employment for individuals with disabilities is engaging employers and meeting their talent needs. As such, we are very excited to see what results from the commitments made on page 66 of the State Plan. Key to the Employment First equation is "Energizing the "Demand-Side" of the Equation." **We approve of the "aggressive goal of engaging 100 business partners" and the focus on a "business first platform."** These are some of the steps necessary to improving employment outcomes. In order to meet these goals, New York's workforce system and Employment First leaders need to balance between speed and strategy. Towards that end, we have several recommendations to make. First and foremost, New York needs to capitalize on the opportunity created by Section 503 and federal contractors. In order to "Redesign and reinvigorate the New York Business Leadership Network", the staff in the Empire State need to begin with companies subject to these requirements and work to ensure their diverse talent needs can be met by the skills of New Yorkers with disabilities. Second, New York needs to rapidly expand Project Search and other school to work transition programs. Inspiring youth with disabilities

through high expectations, training them with early-work experiences, and then transition them into the world of work will be a huge return on investment for the state. Third, given New York's record on "Sector Strategies" we hope Employment First will prioritize growing sectors of the state economy. As discussed previously in our comments, people with disabilities can be outstanding employees in fields like STEM, health care, and hospitality.

- C. New York Employment Services System (NYESS):** Page 66 of the State Plan reports that "NYESS system has already distinguished New York...in moving individuals with disabilities into the world of employment as the largest Social Security Administration Ticket to Work (TTW) network in the nation." Capitalizing on the lessons learned from such past efforts will be critical ingredients if New York is to achieve more employment outcomes among people with disabilities. As such, we recommend that the TTW network meet, partner, and collaborate with other elements of New York's workforce. The insights and institutional knowledge developed from serving individuals with disabilities need to be shared widely if New York is to fully maximize outcomes through the paradigm of shift.
- D. Benefits Advisement:** Benefits counseling is a critical issue and one that we have not seen fully address in other state WIOA Plans. As such, we are very glad to see it included on pages 66 and 67. The only caution we would offer is to avoid reinventing the wheel and seeing how far New York can utilize existing resources that provide information on disability and employment challenges related to benefits. When it comes to counseling, government need not carry this burden alone. **There is a massive role that can be played by trained and vetted volunteers who are willing to help people with barriers to work find and keep jobs.** Faith-based organizations and many others can fill massive gaps. [There is a terrific booklet, Clearing Obstacles to Work, put out by the Philanthropy Roundtable that is rich with potential partners and proven programs.](#) This is a huge missed opportunity as you will see in the booklet we just mentioned above. It's all about teaching people to fish (helping them get and keep a job) rather than just giving them fish.
- E. Medicaid Buy-In for Working People with Disabilities (MBI-WPD):** One of the most important best practices is maximizing available resources by blending and braiding funding to support employment outcomes. We see reflected by the central place that discussing the Medicaid Buy-In programs has in the context of Employment First and WIOA. In particular, we highly encourage the Empire State to reach out to Delaware, Iowa, and Wisconsin to learn about how these states have blended and braided funding streams to expand transition programs for youth with disabilities.
- F. Transportation:** To quote page 67 of the Combined State Plan, "Transportation to work is a key element for employment success." In discussing this as a topic to be addressed as a part of the state's Employment First efforts, the Plan discusses how "cross-agency taskforce" could "examine barriers to integrated transportation" and "identify potential solutions." [This is a critical issue that limits the employment aspirations of far too many people with disabilities.](#) Many people with disabilities do not drive. Others cannot afford private transportation. It is vital to work with public transportation to ensure that there are bus routes to places where there are internships, apprenticeships and other

**work opportunities.** In places where that are not possible, Connecticut could look at partnering with UBER, LYFT and other new transportation solutions. Indeed, for PwDs who do drive, such companies as UBER and LYFT can also provide a way to enter into the workforce with flexible hours. We recognize that as start-ups they still are working out accessibility issues, however, they have great potential. Public sector employers and federal contractors who have 503 obligations are key places for apprenticeships and internships and onboarding of talent. It is important for them to play a key role in planning for public transportation.

- G. Education:** One of the most important facets of WIOA is that it “*raises expectations for youth with disabilities and assists states to provide them with the supports they need to ensure success.*” Such success needs to begin in the educational system and PROMISE is a clear demonstration of the role that high expectations play. In committing to this area of effort, the Plan talks about how “Local schools districts should be supported with best practices that give them the ability to place a greater emphasis on career planning and counseling for all students.” This is critical work and it will be especially important for supporting students with disabilities. The one point we would add is that the “career planning and counseling” efforts need to be informed by the State’s Sector Strategies. STEM is good example of how this needs to be done. Magnet schools focused on science and mathematics need to be fully accessible to students with disabilities. Those schools should put the necessary supports in place in order to welcome and serve students who are “twice exceptional”. Employment First provides the leadership so that New York can look to supported-employment programs such as Project Search, Specialisterne, and [the Marriot Foundation’s Bridges to Work program](#) as models for developing a systematic approach to providing the supports necessary for our students on the autism spectrum to excel in the STEM space.
- H. Creating an Employment First Service Culture:** As state elsewhere in our comments, New York VR staff, the workforce system, and community agencies need to collaborate on a communications campaign focused on stigma busting. In terms of Service Culture, there is a need for staff and community agencies that are fully prepared to help employers to overcome their specific fears and stigmas. **Partners like the Poses Family Foundation Workplace Initiative can provide training to services staff as well as community agencies in supporting New York companies through messaging efforts around related to fear and stigma.**
- I. Self-Employment and Entrepreneurship:** We are excited to see entrepreneurship and self-employment included in the full spectrum of employment opportunities discussed by Employment First. In terms of best practices, New York already has a trail blazing model that can be adapted to the particular challenges of self-employment/entrepreneurship. [Syracuse University’s Entrepreneurship Bootcamp for Veterans with Disabilities \(EBV\) offers considerable lessons many of which can be adapted to meet the needs of the larger disability community.](#) This is a natural point of partnership where the workforce system and the educational system can come together.
- J. Expanded Access to Assistive Technology:** Assistive technology is a game changer for people with visual and hearing differences. As such, it is critical for New York to track the

employment rates of young people with disabilities by type of disability. **From the data, we see only 39% of the 191,275 New Yorkers who are blind or have vision loss are employed while 48.9% of the 187,210 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. People who are blind or deaf have incredible talents that can be unleashed by something as simple as a smartphone. [Speech to text software can help communicate by sending texts and responding to emails.](#) These are all [examples of assistive technology](#) and [it will be critical for your work.](#)

**K. Outcome Measures:** In previous sections of our public comments, we have emphasized the critical need for the right data to drive the decision making process in New York. **It is absolutely critical that New York’s workforce system include the labor force participation rates (LFPRs) of people with disabilities both in their performance metrics and on their state dashboards.** If performance metrics are limited to things like unemployment statistics, then people who are not actively looking for work are being excluded from the plan’s analysis of the state economy. These rates are the critical lens that is needed to bring clarity to the issue of employment for people with disabilities. While we will be glad to see “NYESS...compare Medicaid data to New York wage data” and to detect “changes in the employment and poverty rates”, the LFPR are needed. Such data has been attached to our public comments.

**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. Michigan 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**

**We are pleased that New York is looking to expand the vital opportunity that apprenticeship training can offer to young people with disabilities.** Specifically, we are encouraged by the discussion on page of the state plan in the section about “Registered Apprenticeship.” In this section, NYSDOL reports that they will be working “to expand relationships between Registered Apprenticeship and the State’s Education system by encouraging an increase in the amount of articulation agreements between Registered Apprenticeship programs and the Education system.” **This is a significant opportunity and as with so much, it needs to be viewed through the disability lens.**

At the federal level, the Office of Disability Employment Policy has worked hard to generate resources which can open up these exciting programs to “youth and young adults with a full range of disabilities.” The regulations related to apprenticeship which have recently come out of the Department of Labor provide states the flexibility them 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 New York.](#) Such innovative partnerships and improved accessibility are essential elements of realization the full promise of WIOA for people with disabilities.

## **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.

New York 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



New York examine how to support disability employment efforts through establishment of public/private partnerships in local communities. These types of partnerships could focus on the “cluster” model, started by Poses Family Foundation that is having tremendous success in diverse states as Nevada, Georgia, and Ohio. [This model depends on “consortium of employers committed to implement or expand programs”, “a public/private partnership to coordinate services for job-seekers with disabilities, with a single point of contact for employers”, and “Connections among employers, public and private agencies, and schools to reach young adults with disabilities who are in transition from school to work.”](#)

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

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

**The workforce needs of state economies are evolving rapidly thanks to technology and globalization.** Investing excessive resources on physical locations at the expense of improving online delivery of workforce services and supports is an example of looking backwards, not forwards. Moreover, [the District of Columbia and others have successfully moved much of their one-stop services to trained staff with laptops that go to schools, hospitals, and community organizations where they are better able to serve the public.](#)

## **10. Getting Out the Word on Free and Accessible Services and Resources:**

**There are many online and in person resources to help employers and people with disabilities come together to build success.** However, all the stakeholders need to be educated to know that these resources exist, and that they are free and user-friendly. These resources must also all be accessible. **Also, New York should be careful not to waste money trying to re-invent the wheel in creating online resources as [ASKJAN.org](#), [the US Department of Labor’s Office of Disability Employment](#) Policy, [our organization and others also offer free toolkits, webinars and training opportunities.](#) [Another resource is Understood.org.](#)** This is a comprehensive resource to help families and individuals with learning and attention issues build their educational and career plans. It will be helpful to collaborate with those groups however to ensure that the best tools are created to fit the training and information needs on these issues.

## **11. Nothing About Us Without Us:**

**“Nothing About Us without Us” has long been a rallying cry for the one in five American who have a disability and it has implications for the workforce system.** Even a non-voting member of a WIB can bring critical perspectives that improve the WIB’s efforts. **As such we recommend that your state plan look at adopting language which would include the placement of a representative from the disability community and a representative of your state’s VR system on your State Board.** Second, the State Plan could also direct local workforce boards to connect with local community organizations to recruit self-advocates to add their perspectives.

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

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

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

There are several points where the current draft of New York’s Combined State Plan addresses the unique workforce challenges facing ex-offenders as they attempt to reenter society. To quote the Plan, “Offender Workforce Specialists are trained to assist ex-offenders” and in the section about Staff Development for ACCES-VR staff, it mentions “re-entry for ex-offenders with disabilities.” There is critical work and we applaud the plan for including raising these issues. **Serving this population and rehabilitating them into society is a critical issue facing the workforce system and it needs to be viewed through the lens of disability. The reason is simple.** [According to recently published data from the Bureau of Justice Statistics, “An estimated 32% of prisoners and 40% of jail inmates reported having at least one disability.” This issue is a serious one and it needs to be addressed at the state level.](#) Frequently people are involved in the criminal justice system because they have disability issues, including learning differences, ADHD, executive function, and mental health issues that went undiagnosed and/or unaddressed through childhood and into the school years. Given these statistics from the BJS, it is vital that your state identify how many of the individuals in the ex-offender pipeline have disabilities. Serving ex-offenders is a critical workforce development challenge and one that can only increase when disability is a factor and it is not addressed appropriately. The price paid for ignoring this issue are higher rates of recidivism and greater costs to society. Assessment tools are needed to identify disability issues as people enter the prison system. Doing so creates opportunities to address those issues productively. If people in the corrections system who will be released eventually are to be well served by New York’s workforce system, then it is vital that disability issues be identified and addressed in a way that will help work successfully in the future.

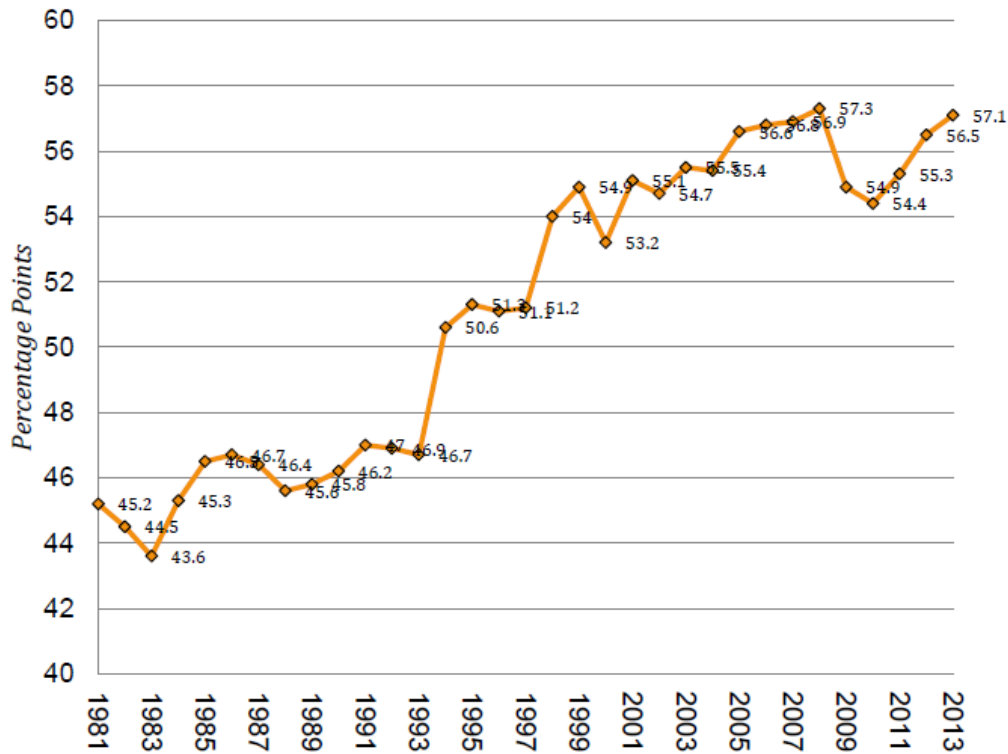
## **Conclusion**

As we stated at the beginning of our Public Comments, New York can and must do better in terms of jobs for people with disabilities. With one of the largest populations and largest state economies, the rest of the nation looks to the Empire State for leadership on the most important issues of our time. Despite abundant resources and vast population, New York only ranks 37<sup>th</sup> in the country in terms of their employment rate of people with disabilities. Such poor outcomes are shameful. Failing to properly train and prepare job seekers with disabilities costs the New York economy incredible talent and shatters the aspirations of so many New Yorkers with disabilities who want to pursue the American Dream, just like everyone else.

However, thanks to WIOA, New York has the chance to lead by example in terms of investing resources in successful models and implement 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.

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 New York’s WIOA plan’s potential 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 New York ranks nationally and to showcase several of the data points needed in New York’s WIOA State Plan.

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

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

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

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

<b>Column 1 Ranking of States by Employment Rate of People with Disabilities</b>			<b>Column 2 Ranking of States by the Employment Gap between People with disabilities and people without disabilities</b>				
<b>#</b>	<b>State</b>	<b>% of PWDs Employed</b>	<b>#</b>	<b>State</b>	<b>% of PWDs Employed</b>	<b>% of People without Disabilities Employed</b>	<b>Employment Gap as a %</b>
1	North Dakota	52.8	1	Alaska	47.8	75.2	27.4
2	Wyoming	50.7	2	Wyoming	50.7	79.4	28.7
3	South Dakota	48.1	3	North Dakota	52.8	83.1	30.3
4	Alaska	47.8	4	Nevada	39.2	73.1	33.9
5	Minnesota	46	5	Utah	42.5	76.6	34.1
6	Nebraska	45.5	6	New Mexico	35.3	70.1	34.8
7	Iowa	44.8	7	South Dakota	48.1	83	34.9
8	Utah	42.5	8	Colorado	42.3	77.3	35
9	Colorado	42.3	9	Texas	38.7	74.7	36
10	New Hampshire	41.8	10	Minnesota	46	82.1	36.1
11	Kansas	41.7	11	Connecticut	40	76.4	36.4
12	Wisconsin	40.9	12	Hawaii	39.1	75.7	36.6
13	Connecticut	40	13	Nebraska	45.5	82.6	37.1
14	Maryland	40	14	Iowa	44.8	82.1	37.3
15	Montana	39.4	15	Kansas	41.7	79	37.3
16	Nevada	39.2	16	Montana	39.4	76.8	37.4
17	Hawaii	39.1	17	Arizona	33.6	71.3	37.7
18	Texas	38.7	18	Maryland	40	78.3	38.3
19	Virginia	36.9	19	Washington	36.4	74.7	38.3
20	Idaho	36.7	20	California	32.7	71.1	38.4
21	New Jersey	36.6	21	Idaho	36.7	75.2	38.5
22	Delaware	36.4	22	New Hampshire	41.8	80.3	38.5
23	Washington	36.4	23	New Jersey	36.6	75.1	38.5



24	Illinois	36.1	24	Delaware	36.4	75.1	38.7
25	Oklahoma	35.8	25	Oregon	35.2	73.9	38.7
26	New Mexico	35.3	26	Illinois	36.1	75	38.9
27	Oregon	35.2	27	Wisconsin	40.9	80.1	39.2
28	Massachusetts	34.9	28	Oklahoma	35.8	75.2	39.4
29	Rhode Island	34.3	29	Georgia	31.5	71.5	40
31	Indiana	33.8	31	Louisiana	31.3	72.4	41.1
32	Arizona	33.6	<b>32</b>	<b>New York</b>	<b>32.2</b>	<b>73.3</b>	<b>41.1</b>
33	Ohio	33.5	33	Florida	30.5	72.2	41.7
34	Vermont	33.3	34	Pennsylvania	33.9	75.6	41.7
35	Missouri	33	35	South Carolina	30.7	72.7	42
	Louisiana	31.3					
				Carolina	30.3	73.5	43.2

**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 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.	78.	34.	50.	79.	28.	-5.9	48	358,526	50	Working	6.8	0.9

NH	37.9	80.5	42.6	41.8	80.3	38.5	-4.1	47	842,880	40	g-age pop. under 1 million Workin g-age pop. under 1 million	3.9	-0.2
MN	42.1	81.6	39.6	46.0	82.1	36.1	-3.5	46	3,357,171	21		3.9	0.5
NV	35.5	72.2	36.7	39.2	73.1	33.9	-2.8	45	1,719,885	34		3.7	0.9
WI	37.6	79.5	41.9	40.9	80.1	39.2	-2.7	44	3,544,103	20		3.3	0.6
SC	<b>27.0</b>	<b>71.4</b>	<b>44.4</b>	<b>30.7</b>	<b>72.7</b>	<b>41.9</b>	<b>-2.5</b>	<b>42</b>	<b>2,893,842</b>	<b>24</b>		<b>3.7</b>	<b>1.3</b>
NM	33.1	70.4	37.3	35.3	70.1	34.8	-2.5	42	1,243,353	36		2.2	-0.3
<b>IL</b>	<b>33.4</b>	<b>74.6</b>	<b>41.2</b>	<b>36.1</b>	<b>75.0</b>	<b>38.9</b>	<b>-2.3</b>	<b>41</b>	<b>8,010,771</b>	<b>5</b>	<b>Worki ng-age pop. over 5 million</b>	<b>2.7</b>	<b>0.4</b>
IA	42.0	81.4	39.5	44.8	82.1	37.2	-2.3	40	1,868,852	30		2.8	0.7
UT	41.1	77.2	36.1	42.5	76.6	34.1	-2.0	39	1,701,705	35		1.4	-0.6
DE	34.6	75.1	40.6	36.4	75.1	38.7	-1.9	38	565,138	45	Workin g-age populat ion 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	Workin g-age populat ion 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	Workin g-age	1.2	-0.2

											populat ion under 1 million		
KS	40. 1	78. 8	38. 7	41. 7	79. 0	37. 3	-1.4	33	1,730,36 9	33		1.6	0.2
MA	33. 0	77. 2	44. 2	34. 9	77. 9	42. 9	-1.3	31	4,272,84 3	14		1.9	0.7
OK	34. 4	75. 1	40. 7	35. 8	75. 2	39. 4	-1.3	31	2,295,73 4	28		1.4	0.1
TN	28. 0	73. 2	45. 2	29. 9	74. 1	44. 1	-1.1	30	3,983,56 0	16		1.9	0.9
<b>NJ</b>	<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>5,528,83 7</b>	<b>11</b>	<b>Worki ng-age pop. over 5 million</b>	<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	Workin g-age pop. over 5 million	1.7	0.9
FL	28. 9	71. 4	42. 5	30. 5	72. 2	41. 7	-0.8	27	#####	4	Workin g-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	Workin g-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	2,945,46 6	23		0.3	-0.3
GA	30. 3	70. 8	40. 5	31. 5	71. 5	40. 0	-0.5	22	6,151,89 0	8	Workin g-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	2,235,69 5	29		0.3	-0.2
WV	24. 3	70. 1	45. 8	25. 3	70. 6	45. 3	-0.5	22	1,132,70 3	37		1.0	0.5
WA	35. 7	74. 3	38. 7	36. 4	74. 7	38. 3	-0.4	21	4,339,19 9	13		0.7	0.4
PA	33.	75.	42.	33.	75.	41.	-0.4	20	7,849,51	6	Workin	0.9	0.5

	0	1	1	9	6	7			6		g-age pop. over 5 million		
MT	38.7	76.4	37.7	39.4	76.8	37.4	-0.3	19	616,125	44	Workin g-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	Workin g-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	Workin g-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	Workin g-age pop. over 5 million	0.6	0.4
KY	26.2	72.9	46.7	26.9	73.7	46.8	0.1	14	2,687,179	26		0.7	0.8
OH	32.8	75.1	42.2	33.5	75.9	42.4	0.2	13	7,072,114	7	Workin g-age pop. over 5 million	0.7	0.8
MO	32.2	76.2	44.0	33.0	77.1	44.2	0.2	12	3,666,019	19		0.8	0.9
MD	39.5	77.4	37.9	40.0	78.3	38.2	0.3	11	3,722,201	18		0.5	0.9
IN	33.5	75.5	41.9	33.8	76.0	42.3	0.4	10	4,008,950	15		0.3	0.5
VT	34.3	79.8	45.5	33.3	79.6	46.3	0.8	9	397,726	49	Workin g-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	2,440,75 2	27		0.9	1.8
NC	30. 2	72. 2	42. 0	30. 3	73. 5	43. 2	1.2	6	6,000,20 2	10	Workin g-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	Workin g-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	Workin g-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	2,825,10 1	25		-3.1	-0.2
AR	31. 4	72. 7	41. 3	28. 2	72. 7	44. 5	3.2	2	1,759,90 0	32		-3.2	0
SD	52. 0	81. 8	29. 8	48. 1	83. 0	34. 9	5.1	1	501,769	46	Workin g-age pop. under 1 million	-3.9	1.2

