

**State of Oregon Workforce System  
Unified State Plan  
Public Comments Received**

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To Whom It May Concern:

As the leaders of Oregon’s nine Local Workforce Boards (LWBs), we are excited to build a comprehensive workforce system that supports better alignment of resources, increased coordination among programs, and improved efficiency and effectiveness in service delivery to all Oregonians. We appreciate the opportunity to provide comment on the State of Oregon Workforce System Unified Plan 2016-2019, which should be the catalyst for building that comprehensive system.

We are concerned that the proposed plan continues to promote a programmatic rather than a systemic response to workforce development. Federal regulations describe the purpose of the state plan, in part, as a "vehicle for aligning and integrating the state workforce system across multiple programs." We support this vision, and believe that through the Workforce Innovation and Opportunity Act (WIOA) we have an unprecedented opportunity to better serve Oregonians by implementing a unified, integrated system rather than a series of separate, disconnected programs. We consider Oregon’s primary workforce service delivery network—WorkSource Oregon (WSO)—to be the mechanism by which to further build that integrated system.

Oregon has had considerable success in integrating several federal, state and local programs and has transformed the WSO system into a valued state and local resource, and a national model for workforce program integration and innovation. Last year, WSO served 139,349 Oregonians and placed more than 86,000 into jobs. These workers earned more than \$1.1 Billion in the first six months after employment and 84% were still employed nine months later.

Despite the success, we know there is much work to be done. While the economy has improved for some tens of thousands of Oregonians, many are falling further behind. The recent changes in the economy have left less educated workers further behind and increasingly unable to secure work at family-supporting wages. Demographic data of the people served last year by WSO illustrates the challenges faced by our customers. It also shows the need to integrate additional programs into the WSO service delivery network—especially programs that primarily serve low-income, underserved and vulnerable populations.

<b>*Characteristics of New WSO Enrollments July 1, 2014- June 30, 2015</b>					
Unemployed	58,331	50%	Ages 18-29	28,773	25%
People of Color	25,297	22%	Age 55+	22,338	19%
Less than HS Education	14,929	13%	Disabled	6,291	5%
Public Assistance	54,685	47%	Ex-Offender	9,122	8%
-Food Stamp Recipients	40,675	35%	Homeless	5,318	5%
-General Assistance/SSI/SSDI	7,638	7%	Limited English Proficient	3,354	3%
-TANF	6,372	5%	Exhausted Unemployment	4,837	4%

One of WIOA's principle areas of reform is requiring states to plan across programs and promote a comprehensive strategy for: addressing shared workforce needs, better aligning resources, increasing coordination among programs, and improving efficiency in service delivery for the common customer. We request that the Governor and the Oregon Workforce Investment Board (OWIB) ensure that Oregon’s Unified Plan do the following:



- Identify WSO as the foundation to build further program integration and alignment. Through the WSO infrastructure, we have a unique opportunity to support better alignment of resources, increase program coordination and improve efficiency and effectiveness in service delivery.
- Expand the scope of the state plan to include the TANF JOBS program, SNAP employment and training programs, Corrections employment programs, Trade Act, Unemployment Insurance, Veterans Employment Services and other relevant programs to assure comprehensive approach.
- Require State Agency Directors in charge of core workforce programs to develop and implement a cooperative agreement that clarifies expectations for program and resource alignment at the state level. This agreement should serve as the blue print to connect state expectations with state and local plan goals.
- Require workforce programs that serve targeted populations identified in local plans to prioritize services for individuals actively engaged in the WSO system.
- Describe a plan to develop mechanisms for data-sharing and shared performance reporting across workforce system programs.
- Reaffirm the role of LWBs in: convening local workforce system stakeholders to determine alignment of workforce programs necessary to achieve plan goals; reviewing and approving local Title II service providers to assure coordination with the WSO system; and identifying strategies to serve targeted populations such as families in poverty, communities of color, and rural communities.
- Specify the expectation of workforce partners to invest in the WSO service delivery system and to utilize the existing service delivery model to continue to build a more integrated system.

While there may be isolated examples of local programmatic collaboration, there is no systemic connection between the workforce organizations resourced to provide services to the most vulnerable Oregonians (such as DHS) and the existing WSO system. This results in unnecessary duplication, confusion of roles, and diminished results. The state plan is an opportunity to set these expectations and resulting accountability for our state workforce partners and we appreciate your consideration to our comments and requests.

Sincerely,

Bridget Dazey, Clackamas Workforce Partnership  
Heather DeSart, Oregon Northwest Workforce Investment Board  
Heather Ficht, East Cascades Workforce Investment Board  
Jim Fong, Rogue Workforce Partnership  
Ton Frazier, Incite Incorporated  
Jake McClelland, Southwestern Oregon Workforce Investment Board  
Andrew McGough, Worksystems, Inc.  
Kristina Payne, Lane Workforce Partnership  
William Rosholt, Eastern Oregon Workforce Investment Board

PCC would like to reiterate the points made by all of the community colleges on the plan that includes the following:

- Education and training are essential to high-demand, high-wage jobs. (It is important to note that education and training is instrumental in breaking the cycle of poverty for marginalized populations.)
- Community Colleges are key partners with business
- Points of reference are important.
- Oregon community colleges are already national leaders in career pathways and could be leveraged in state/local WIOA planning.
- WIOA “systems, framework and templates” be developed with both state and local knowledge.
- Title II references clarified for local or state level.

Additionally, PCC would like to make the following comments on behalf of the college:

- 1) Effective partnerships (page 67) - PCC applauds the efforts in the plan that highlight the emerging partnership for Oregon’s Employment and Training programs.
  - PCC has partnered for over 26 years with the Department of Human Services in Multnomah and Washington County to provide innovative services for TANF and SNAP recipients.
  - PCC has also been leading a community college consortium over the past year to support SNAP recipients in entering college Career Pathways programs and solidifying employment.
  - The colleges are called out in the plan as a partner for the SNAP 50/50 initiative but are also taking a leadership across the state in collaboration with DHS and the LWIBS on these efforts.
- 2) Business engagement (pages 63 & 68)- PCC hopes to see stronger integration of business engagement in the plan.
  - While the draft plan indicates that the Oregon Employment Department oversees Business Services, it is clear that many of the core WIOA partners regularly interface with regional employers. Community colleges offer customized training and provide services through the Small Business Development Centers as noted in the plan but also engage actively with employers in the following ways:
    - Career and Technical Education programs have advisory committees comprised of industry representatives that help shape curriculum.
    - PCC and other colleges engage with employers to create new programs that support the changing workforce. This includes responding to pipeline needs as well as incumbent worker resources and training.
    - PCC programs have internship/co-op experience opportunities for students to hone their practical skills and for employers to “try-out” potential employees
    - PCC’s Foundation works closely with employers to identify fundraising opportunities for student scholarships, donations, etc...
    - Employers regularly hire graduates of programs at PCC. The businesses post position with PCC and participate in periodic job fairs.

3.) Equity and Inclusion (pages 8-24)--PCC hopes to see a more in-depth economic and workforce analysis, using an equity and inclusion lens.

- It would be beneficial to see an analysis of any disparities for communities of color threaded throughout all sections of the economic and workforce analysis, not just as a stand alone section on Oregon's population. For instance, when looking at urban and rural employment rates, it would be helpful to break those down by population.
- In addition, we would hope to see economic and workforce analysis for other populations being focused on in WIOA, including disconnected youth, under-skilled adults (no GED/HS diploma), non-native English speakers, and low income Oregonians.
- Lastly, it seems important to mention Oregon's high rate of growth in the 2015 (16th in the nation), along with the trend of importing talent to fill new and replacement jobs. This speaks to the importance of closing the skills gap and offering training to disconnected youth, under-skilled adults, and low income Oregonians.

Thank you for the opportunity to review and comment on the draft State Workforce System Plan. Overall it was an understandable read so will just report below my concerns:

Page 30 references 7 system performance measures so will equity be measured within those 7 systems as I understood that will also be a performance measurement? So will the service levels of targeted populations be measured in relation to numbers entering employment, retaining employment, wage gains, etc.... Are we serving all populations equitably?

There are multiple spelling errors or unintended verbage through the document so would recommend someone very carefully edit to ensure correct grammar and intent.

For instance I found the following:

page 36 first paragraph "Tittle II"

page 37 3<sup>rd</sup> paragraph states goal (singular) is to "markets" (should be market)

page 43 paragraph starting Title IV talks about "VR is participant ( should be is a participant)

page 36 and 46 have duplicated same exact paragraph...is that intended, necessary? Paragraph starts "Executive leadership".....

page 67 last paragraph has "Community Collages"

On page 49 it lists the WSO required feedback loops of evaluation/effectiveness of training from both business and trainee as first and then second it lists feedback to be solicited from businesses on quality of job seeker referrals. If the intent is to improve the system's ability to improve services wouldn't there also be a feedback loop from the job seekers' perspectives?

Especially since job seeker satisfaction is called out in page 7 under performance measures.

On page 66 it shows a map reflecting Self-Sufficiency and Vocational Rehabilitation Offices; We have both SSP and VR offices in Hood River and Wasco Counties which are reflected there but it additionally shows a VR office in the southern part of Sherman County. That is incorrect! There are no offices based in Sherman, Wheeler and Gilliam coutnies. Both Self Sufficiency and VR cover those counties on an itinerant basis out of their offices based in The Dalles.

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Greetings,

Upon reviewing the WIOA State Plan for Oregon, I have the following to add:

- 1) In the Department of Human Services Section around the SNAP Employment and Training Program, the word "SNAP" is missing. It simply states "Oregon's Employment and Training Program" making it unclear that this pertains directly to SNAP in the title.
- 2) Oregon demographics in regards to Special Populations (source WSO LMI):

<b>Total Population</b>	3,868,721
<b>Youth Population</b>	462,193
16 to 19 years	202,437
20 to 24 years	259,756
<b>Seniors (in Labor Force)</b>	409,128
55 to 64 years	328,427
65 to 74 years	68,837
75+ years	11,864
<b>Communities of Color, 16+ Years</b>	
White alone, not Hispanic or Latino	2,521,078
Not white alone, Hispanic or Latino	584,948
<b>American Indian and Alaska Native, 16+ Years</b>	35,870
In labor force	21,988
<b>People with Disabilities (18 to 64)</b>	280,616
Employed	98,675
Unemployed	27,665
Not in labor force	154,276
<b>Veterans (18 to 64)</b>	174,191
In labor force	121,199
<b>Less Than High School Graduate (18 to 64)</b>	262,357
18 to 24 years	54,345
25 to 64 years	208,012
<b>Living at or below Poverty Level</b>	614,778
Percent below poverty level	16.2%
<b>Migrant seasonal farmworkers (2012)</b>	87,057
<b>Corrections community population (Sept. 2014)</b>	32,265

**Long-term unemployed, 6-months or more  
(2013)** 53,127

**Involuntary part-time workers (state only 2014)** 115,700

**3) The TANF and SNAP Fast Facts data that I provided for TANF and SNAP is missing from the report (attached)**

Please let me know if you have questions or need help interpreting my responses here. Thank you!

Greg Ivers  
Employment Coordinator  
TANF and JOBS  
Department of Human Services  
(503) 947-5403



## **TANF Fast Facts**

- ▶ 25,448 families received TANF in October 2015
- ▶ October 2015 caseload was 22 percent higher than in July 2008
- ▶ 77 percent of families are headed by a single female
- ▶ 50 percent of adults have at least one disability or limitation
- ▶ 84 percent do not have public housing or rent subsidies
- ▶ 69 percent are children
- ▶ 47 percent of the children are between the ages of 0 and 6
- ▶ 14,786 jobs were filled by TANF participants from November 2014 to October 2015

## **SNAP Fast Facts**

- ▶ 1 in 5 Oregonians participate in SNAP
- ▶ 43% of participants are working
- ▶ 36% of participants are children
- ▶ 46% of households include a child or elderly person
- ▶ More than 50% of participants are between the ages of 18 and 59
- ▶ Seniors are the fastest growing category of participants
- ▶ Nutrition education efforts touched 316,075 people in 2015
- ▶ 28,671 participated in the employment and training program in 2015



Regarding the map on page 66 – Coos Self Sufficiency office is not shown on the map and should be added.

Thank you.

Debbie Swafford  
D7 SSP Program Manager



While we understand that the Workforce Innovation and Opportunity Act State Plan focuses on specific services provided by the Core Partners (Titles IB, II, III, and IV), we feel it is important that the role of the Community Colleges in the overall workforce system in Oregon be made clearly evident in the plan. The largest investment in rural communities, as well as some urban areas, in workforce preparation is through the community colleges. This locally determined investment goes beyond Title II, Adult Basic Skills, and includes Career and Technical Education, Career Pathways, small business development, contracted training, and continuing education.

The colleges look forward to being actively involved in state and local conversations to build a successful One-Stop System in Oregon, and hope to be full partners in collaboration for the success of WIOA in Oregon.

1. Education and training are essential to high-demand, high-wage jobs, not merely a "suggested" part of the solution as this document seems to imply. This perspective is reflected from the ordering of terms describing tools and approaches throughout the draft plan to the lack of any mention of secondary or post-secondary education and training in at least one programmatic section (JOBS). In addition, no traditional educational approaches are mentioned in the Rethinking and Restructuring Training and Skill Development section. It seems to make sense to call out Community Colleges as a key partner in continuing educational efforts that are working well, and to achieve improvements. The substantial engagement of Community Colleges with industry -- through advisory boards, internship co-ops, small business development centers, customized training, sector partnerships and more -- is not mentioned anywhere in the document. This work directly aligns with the industry-driven, customer-oriented approach to the plan.

2. Community Colleges are key partners with business in responding to workforce needs. While Local Workforce Investment Boards play a key role in WIOA in convening business, coordination and integration of business outreach with the colleges is critical because of the high level of engagement with businesses that is ongoing at the community colleges.

3. Points of reference are important. We recommend that some items be included for clarity and completeness, such as a 40-40-20 diagram (to which references are made), as well as a definition of what exactly constitutes the "Oregon Workforce System." To be accurate, this "system" encompasses more than WorkSource and the various Titles, and perhaps enhancing and editing existing diagrams in the document might be helpful to illustrate this.

- References to I-Best, VESL and OPABS programs should include a statement that indicates other Integrated Education and Training programs may also be implemented. This emphasizes support for local programs to develop and pilot new models when appropriate.
- References to "soft skills" should be included in the document as an important point of reference for what employers ask for in workers. Services that address development of soft skills may be especially important to employers.

- A reference point differentiating what is required vs. optional in terms of co-location is needed to clear up confusion among partners on this point.
- A reference point clarifying that references to “education” in the document should most often indicate that both K-12 and post-secondary institutions are referenced, unless only post-secondary institutions are actually referred to.
- The diagram on pg. 60 includes funding levels for a variety of workforce development entities. Recommend that funding levels for Title II, Carl Perkins and community college support fund be included under the HECC.

4. Since this document is in part a panorama showing the current and future work of the state as it relates to elements in WIOA, including examples of outstanding collaborative efforts and groups in this regard, we would strongly recommend the inclusion of Community College Career Pathways in the various sections as appropriate. In the workforce higher education world, Oregon is known across the country for Community College Career Pathways certificates in education. These Career Pathway certificates, which are required to align with high-demand, entry-level job needs, provide a key strategy for Adult Basic Skills, Vocational Rehabilitation, Career and Technical Education, high school students and job seekers served by the core partners of WIOA. Career Pathways certificates also relate directly to the goals of WIOA.

- Description on pg. 62 should include description of Career Pathways.
- Graphic on pg. 63 should add workforce education and continuing education under “Business” section of community colleges to capture services more fully.
- Language emphasizing that community college Career Pathways certificates are developed in partnership with employers would be helpful.

5. References are made to "statewide templates" to assist the coordination of the Local Workforce Boards. We would request that all the "systems, framework and templates" are developed with both state and local knowledge.

- The graphic on pg. 35 related to Career Pathways is an example of a model created by a large cross-section of stakeholders, and vetted through numerous stakeholder groups.
- References to cross-training of partners in the State Plan could be strengthened by identifying how partners will be involved in building the “system, framework and/or template” to be used in this cross-training.
- WSO Operational Standards are referenced frequently in the State Plan. Information as to how partners will be involved in vetting, revising or understanding these standards would be helpful to avoid confusion about, in particular, the role of the WSO standards in adult basic skills services.

6. Title II is referenced throughout the document, but at some points it is unclear whether the information pertains to state level or local level work.

- In addition to referencing Title II providers to indicate local program providers, it would be helpful to indicate CCWD Title II in all references to state level Title II.

7. Measuring both skill level gains and achievement of WIOA outcomes will be important, in order to preserve needed services for Oregonians who are not well served by “quick fixes”.

- The new GED test, implemented in January of 2014, is significantly more rigorous than the prior version. It will take longer for students to earn this credential. Progress expectations need to reflect the rigor of the test.
- Whether skill gains in Title II Adult Basic Skills are measured using the current metrics or updated elements, transition and retention between skill levels is critical to achieving WIOA outcomes and should be emphasized.

Thank you again for the opportunity to provide input. Oregon’s Community Colleges look forward to continuing to play a role in local planning.

Respectfully submitted by: Dana Young, Chair  
Oregon Presidents Council



## Memorandum

**To:** Oregon Workforce Investment Board, [OWIB.INFO@state.or.us](mailto:OWIB.INFO@state.or.us)  
**From:** Janet Bauer, Policy Analyst  
**Re:** Comments on Draft Oregon Workforce System Unified State Plan 2016-19  
**Date:** January 22, 2016

Thank you for the opportunity to provide comment on the draft State of Oregon Workforce System Unified State Plan, 2016-2019. I appreciate Oregon Workforce Investment Board's efforts to capitalize on the opportunities offered in the new Workforce Innovation and Opportunity Act to build a more effective Oregon workforce system.

My comments below reflect my view that the document should be revised throughout to describe a strong vision and the implementation details for serving individuals with barriers, as directed in the recent *information collection request* (ICR) guidance from the Department of Labor.<sup>1</sup> This vision and detail is generally lacking in the draft plan.

### Workforce Analysis (beginning on page 13)

According to the recent ICR, state plans must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA.

The relevant section of the draft plan, beginning on page 13, describes two such populations (older workers and long-term unemployed) but leaves out other groups that are prominent in Oregon's struggling workforce. This section should describe the population of low-income individuals (Oregon's poverty rate remains higher than during the Great Recession; [see latest data](#)), ex-offenders, homeless individuals, youth who are in or have aged out of the foster care system, English language learners, individuals within 2 years of exhausting lifetime eligibility under TANF and single parents including single pregnant women.

### Workforce Development, Education and Training Activities Analysis (beginning on page 22)

The draft plan does not describe the workforce system to include activities within human services, specifically the JOBS program for individuals participating in TANF. This omission expresses a limited vision of systems in silos rather than systems whose assets can be coordinated, upon which to capitalize. The presence of the JOBS program and a vision for better integrated systems could be included in the subsection, Strengths and Weaknesses of Workforce Development Activities (beginning on page 24), but in any case, both should be included somewhere in the broad section.

### State Strategic Vision and Goals (beginning on page 28)

In order to address the unique needs of families in poverty, communities of color and rural communities as intended by the OWIB, **Goal 1** to “[c]reate a customer-centric workforce system” should include coordination with various human services entities at the state and local levels that serve those communities. This reality should be spelled out in the Goal 1 detail on page 29 as well as associated strategies (beginning on page 31).

Likewise, strategies to achieve **Goal 3** to “[a]ctively reach out and engage customers, especially target populations, in education, training, employment, and entrepreneurial opportunities,” would need to include strategies to address needs of populations with barriers. (Beginning on page 33). At a minimum, strategies should include coordinating with state agencies that serve those populations.

### State Strategy (beginning on page 35)

The recent ICR states that the strategies to achieve the state’s vision and goals must “... include discussion of specific strategies to address the needs of populations provided in Section (a)”<sup>2</sup> which under our recommendations above would include an expanded list of groups with barriers to employment.

This section lacks this required discussion of strategies. As a start, key strategies could be developed in consultation and coordination with state and private human services providers.

### Alignment with Activities Outside the Plan (beginning on page 45)

The state plan should conform to the ICR guidance relevant to this section,<sup>3</sup> specifically, it should “[d]escribe how activities... will be aligned with programs and activities provided by ... human services... assuring coordination of, and avoiding duplication among these activities.” This discussion is missing in the draft plan. If Oregon is currently engaged in this coordination, the discussion should focus on how coordination can be strengthened to better achieve goals. If Oregon is currently developing local approaches to this kind of coordination through the Local Area Alignment Meetings, the state plan should be explicit that alignment is being developed and a description will be included in an amended plan.

### Coordination Alignment and Provision of Services to Individuals (beginning on page 48)

Likewise, this section does not yet conform with the ICR guidance<sup>4</sup> in that it does not describe how the core program activities will coordinate activities with human services partners to provide “comprehensive, high-quality, customer-centered services, including supportive services to individuals” with barriers to employment.

### State Program and State Board Review (beginning on page 58)

This section appropriately identifies the Department of Human Services and its Self-Sufficiency programs, as one of three state agencies directly responsible for implementation of the major programs involved in the Workforce System in Oregon. In general, the plan should better outline the role of DHS as an accountable agency in

outcomes. Perhaps this detail is appropriate elsewhere, however, it should be included somewhere.

Assessment of One-Stop Program Partner Programs (beginning on page 70)  
Consider including assessment of performance for Self-Sufficiency programs such as TANF and SNAP.

Adult and Dislocated Worker Program Requirements (beginning on page 82)  
As required in the ICR, the state plan must “[d]escribe how the State will implement and monitor the **priority** for public assistance recipients, other low-income individuals, or individuals who are basic skills deficient... which applies to individualized career services and training services funded by the Adult Formula program.”<sup>5</sup>

As yet, the plan lacks a description of how it will implement and monitor priority of service for these populations, but should include these descriptions.

Related to this, the state will need to provide an assurance that “the State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients or basic skills deficient.”<sup>6</sup>

[Materials](#) from the Center for Law and Social Policy are a good resource for how states can establish this priority of service.

<sup>1</sup> Required Elements for Submission of the Unified or Combined State Plan and Plan Modifications under the Workforce Innovation and Opportunity Act, draft December 9, 2015, OMB Control Number 1205-0522.

<sup>2</sup> Ibid, p. 8.

<sup>3</sup> Ibid, p. 9.

<sup>4</sup> Ibid. p. 9.

<sup>5</sup> Ibid. p. 17.

<sup>6</sup> Ibid. p. 19.



Thank you for allowing public comments on OWIB's "State of Oregon Workforce System Unified State Plan." Umpqua Community College would like to submit the following comments for consideration on the plan. Please contact April Hamlin by replying to this e-mail or at 541-440-7802 for any clarification on the comments.

1. Customized training is listed throughout section 3. However, customized training is specifically for large groups and scheduled by a specific business/employer. We would like to see continuing education listed as well as customized training. Continuing education is specifically directed toward individuals wishing to increase and improve their job skills. Further, professionals who are required to earn Continuing Education Units also fall into this category—to maintain their credentials and licenses. The goal of customized training is employer satisfaction and employee retention. The goals of continuing education are individualized, according to the needs of the student. If the goal of the WSO's is to be customer-centered, we think that individual employees should also be considered as a customer in this equation. We think that continuing education needs to also be included in the narrative and graphics on page 42, 50, and 63.
2. Soft Skills are regularly brought up by employers as a necessary component that they are looking for in an employee. Yet, there is no mention of soft skills throughout section 3. We would like to see soft skills included in both the narrative and graphics where other education and training are listed.
3. Under the section for DHS Self-Sufficiency and Oregon's Employment and Training Program (pages 65-75). Federal participation requirements do not coincide with the same guidelines and requirements as WIOA. Therefore, this can be difficult to work with other WIOA providers that have different objectives and performance measures to assist people in entering the workforce. This is also where necessary support services and basic education frequently ends up. The JOBS system is set up to become a revolving door for clients, many of whom are referred while they are in crisis (suffering from mental health issues, undiagnosed and/or untreated drug and alcohol issues, and people in D&A recovery). These folks are not prepared for job search and placement activities, particularly until their other health problems are sufficiently addressed – yet many of these people are quickly placed into job search and placement without this first consideration of their whole being. Further, for adult JOBS clients, GED attainment, English Language Acquisition, and education are NOT prioritized. Funding is not available for specialized training. Without these fundamental educational and training opportunities, clients are placed into low-wage and low-interest jobs. Yet, job placement is the core measure of performance, not whether employees persist, retain employment, or receive the services that would be required in order to maintain employment. Until these things are addressed, JOBS will continue to see a revolving door of clients who do not persist in their quest to transition from TANF and SNAP to high-demand, family wage jobs.
4. Title II programs at the local level need to be able to coordinate their activities under the umbrella of Integrated Education and Training (IET) programming. Although several models are specifically called out (I-BEST, VESL, and OPABS), the larger umbrella of IET and career pathways should be the primary umbrellas under which Title II activities should occur. This is specifically mentioned on page 40, 52, and 53. Further, if the plan specifically requires Title II programs to "be involved in improving access to post-secondary credentials..." then the RFA process should

definitely describe how Title II programs propose to achieve this—particularly if they are not tied to providers already connected to the Community Colleges.

5. In the graphic on page 42, the MEASURES should read in the order of which a person could reasonably be expected to achieve them, namely: Education-Training-Credentials-Employment-Earnings-Retention-Satisfaction. The current order of “measures” is out of order and missing several key pieces in order to achieve.
6. This document goes back and forth in making co-location optional or required. Issues such as cross-training, staffing, non-duplication of services, and assessment of services/performance need to be made much clearer in the Unified state plan so that core partners can include that in local planning.
7. Do the WSO standards actually require Title II services? Who then becomes responsible for providing those “workforce preparation services”? (page 46). Again, this seems to indicate confusion between the co-location option/requirement for all core partners.
8. Page 48: Title II providers in local areas should also create, maintain, and build connections with training providers for career pathways and workforce preparation activities.
9. Page 48: “Industry sectors and groups will work with education, workforce development...” We believe that “education” needs to be specifically defined as K-12 and post-secondary institutions.
10. Graphic on page 50: Please make the connection between Career Services and Training Services much more fluid. Training services should be coming *prior to* job placement. Please also include credentials, career pathways, and continuing education on this graphic.
11. Page 51: Building Partnerships to Connect School to Work makes the OWIB responsible for making connections between education and workforce development and business. Where does the WSO come in? Where is the responsibility for education and training *prior to* job placement from all the core partners?

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Jan. 23, 2016

## RespectAbility – Public Comments – Oregon Unified State Plan

*Individuals with disabilities persistently face higher rates of unemployment than their non-disabled fellow citizens....while the state cannot guarantee a job to any Oregonian, the state can and should consistently work to continue to improve its provision of employment services to provide the best possible opportunities for success and choice for individuals receiving those services. This requires new approaches and partnerships with government, the non-profit services sector, and current and potential employers in business community.*

- [Excerpt from Executive Order No. 15-01 Providing employment services to individuals with intellectual and developmental disabilities](#)

### Introduction

RespectAbility is pleased to submit the following comments regarding the current draft of the State of Oregon's Unified 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 Oregon's state plan.

**Today Oregon has the opportunity to work hard to improve outcomes in terms of competitive, integrated employment for people with disabilities.** Currently, Oregon ranks 27<sup>th</sup> in the country in terms of their employment rate of people with disabilities. **Only 35.2% of the 274,900 working age Oregonians with disabilities are employed. Further, there are over 14,000 youth with disabilities and each year a quarter of them will age out of school into an uncertain future.**

Thanks to WIOA, Oregon has the chance to invest resources in successful models and implement best practices to expand job opportunities for people with disabilities. Oregon 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 Oregon can dramatically improve their outcomes with the right choices. **Likewise, we are also seeing pockets of excellence around innovative youth programs designed to address disability employment in [Georgia, Nevada, and Kentucky.](#)**

**To help the states succeed in this [process we developed a resource called the Disability Employment First Planning Tool.](#)** This document details best practices and effective models. This toolkit contains models that are proven to work, be cost effective to implement, and be successful. [Likewise, we have developed an extensive collection of data on disability and employment in Oregon.](#) That information is attached to our comments.

**Our public comments on Oregon'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 Oregon push hard to see improved integrated employment outcomes for Oregonians with disabilities.

**1. Use the best data points, including the Labor Force Participation Rates of people with disabilities v. those without disabilities, as performance metrics.**

On page 16 of the current draft of Oregon’s Unified State Plan, there is an entire section dedicated to talking about “Workers with Disabilities.” This section identifies many critical barriers to employment such as “skill gaps, institutional barriers, and societal acceptance of individuals with disabilities.” Likewise, this section addresses how “individuals with disabilities face other forms of discrimination in hiring practices.” It concludes by including a chart showing “the employment rate for individuals with disabilities in the United States and in Oregon” between 2008 and 2013.

RespectAbility is pleased to see a discussion of the critical stigmas, misconceptions, and attitudinal barriers that keep far too many people with disabilities from being able to pursue the American Dream. **However, this section is completely useless without quantifying the actual number of people with disabilities living in Oregon. Precise numbers and clear statistics are needed if Oregon is to make any serious progress in terms of employment outcomes for people with disabilities.** To quantify the challenge of empowering more people with disabilities through the transformational power of employment, we recommend that this section of Oregon’s Unified State Plan be amended to include some of the most important data points related to disability employment.

As we stated in the opening paragraphs of our public comments, Oregon has the opportunity to significantly improve their outcomes in terms of jobs for people with disabilities. **As it stands now, Oregon ranks 27<sup>th</sup> in the nation with only 35.2% of 274,900 working age Oregon with disabilities are employed. Moreover, there is a 38.7 point gap between the labor force participation rate of Oregonians with disabilities (35.2%) and those without disabilities (73.9%). Further, there are 14,000 youth with disabilities between the ages of 16 and 20, one quarter of whom will age out of the school system every year.** The image below contains some of the much of data and detail needed in Oregon’s WIOA State Plan.

Figure 1.

Oregon Performance Metrics on Jobs for PWDs



Gov. Kate Brown (D)

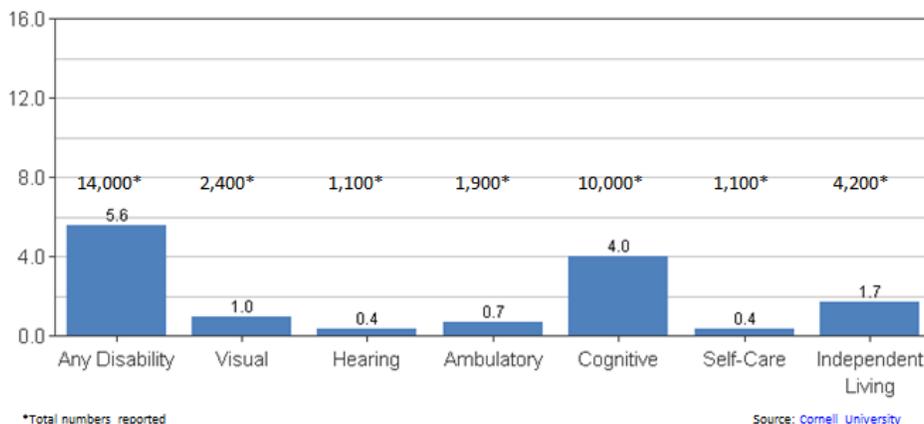
- ❖ 73.9% of persons without disabilities aged 18 to 64 are employed.<sup>3</sup>
- ❖ 35.2% of PwDs aged 18 to 64 are employed.<sup>3</sup>
- ❖ Oregon ranks 27<sup>th</sup> in the country in terms of jobs for PWDs.
- ❖ **There is a 38.7 point between the Labor Force Participation Rate (LFPR) of PWDs and those without disabilities. This is the most important performance metric to measure as this gap must be reduced.**
- ❖ 571,982 people with a disability live in OR.<sup>3</sup>
- ❖ 14,000 persons aged 16 to 20 have a disability.<sup>1</sup>
- ❖ 274,900 persons aged 21 to 64 have a disability.<sup>1</sup>
- ❖ 42,700 PwDs aged 18 to 64 receive benefits.<sup>1</sup>
- ❖ Voc. Rehab. received 7,624 general applicants and 201 blind applicants in OR in 2012.<sup>3</sup>
- ❖ Voc. Rehab. obtained 2,133 jobs for PwDs in OR in 2012.<sup>3</sup>
- ❖ In 2012, OR’s total expenditure on SSDI benefits was \$1,562,076,000.<sup>3</sup>

1. 2012 Disability Status Report: Oregon, [disabilitystatistics.org](http://disabilitystatistics.org)  
2. StateData: The National Report on Employment Services and Outcomes, 2013  
3. [Annual Disability Statistics Compendium](#)

At a minimum, there are two critical data points that need to be added to the current draft of Oregon’s WIOA Plan. **First, it is critical that the Plan include data related to the number of Oregonians with disabilities between the ages of 16 and 20 as well as working age people with disabilities between 20 and 64 years of age.** This data is vital in order to clarify where skills training, early work experiences, and successful school to work transition programs can be applied to improve outcomes, especially for youth with disabilities. **Second, it is absolutely critical that Oregon’s workforce system include the labor force participation rates 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. It is clear from several other section of the Unified State Plan that labor force participation rate data is available for analysis. It is a critical lens that is needed to bring clarity to the issue of employment for people with disabilities. If that data is not available through the Oregon Employment Department, [then here is a link to the presentation our organization has compiled with the types of data needed to inform decision making around job opportunities for Oregonians with disabilities.](#) This collection, which is also attached to our public comments, contains data derived from the Census Bureau.

**Additionally, it is vital to monitor the employment rates of young people with disabilities by type of disability.** For example, because of dramatic breakthroughs in assistive technology, the employment rates for people who are hearing or sight impaired, should dramatically improve as Oregon moves forward. To illustrate this point, we have attached the figure below which provides a breakdown of the type of disabilities among Oregon’s approximately 14,000 youth with disabilities.

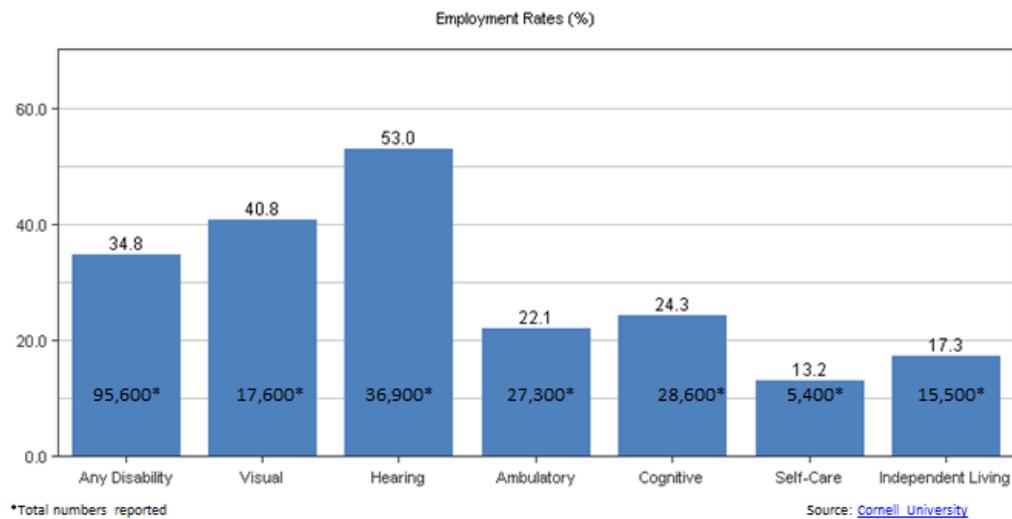
**Figure 2.**  
**Prevalence of Disability Among Non-Institutionalized**  
**People Ages 16 to 20 in Oregon in 2012**  
 Prevalence Rates: Age 16 to 20 years (%)



**This level of detail and data is critical if Oregon’s workforce system is to be fully prepared to overcome the barriers that keep far too many job seekers with disabilities out of the workforce.** For example, thanks to assistive technology, the 2,400 young Oregonians with visual differences can enter the workforce in greater numbers than ever before. Likewise, for the 1,100 young people with hearing disabilities, technological solutions such as speech to text software can easily integrate them into a work setting with their non-disabled peers.

While Oregon currently ranks 27<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. The figure below provides an illustration of the current employment rates of working age Oregonians with disabilities by disability type. From the data, we see that 40% of the 17,600 Oregonians who are blind or have vision loss are employed while 53% of people 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. Sadly, we also see that only 24.3% of Oregonians 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 Oregon’s workforce system invests in and expands successful school to work transition programs. For example, serving this population, Project Search sites have been achieving a 70% employment outcome for people with these types of differences.

Figure 3. Employment of Non-Institutionalized Working-Age People (Ages 21 to 64) by Disability Status in Oregon in 2012



To further underscore the intersectionality of inequality, poverty, and disability, we would also like to add the following chart. This graphic from our state data presentation about Oregon shows the strong correlations between unemployment, disability status, poverty, smoking, and obesity. We hope that such data will better inform the decision making process.

**Figure 4.  
Oregon Data on Poverty, Smoking, Obesity, and Employment**

		People with Disabilities (%)		People without Disabilities (%)	
		2012	2013	2012	2013
Poverty <sup>1</sup>	US	29.2	28.7	13.6	13.6
	OR	31.8	30.7	15.6	14.8
Smoking <sup>1</sup>	US	26.0	25.4	16.9	16.2
	OR	27.2	25.6	14.3	14.8
Obesity <sup>1</sup>	US	39.1	40.1	24.5	25.0
	OR	37.8	36.9	23.6	22.9
Employment <sup>1</sup>	US	32.7	33.9	73.6	74.2
	OR	34.3	35.2	72.1	73.9

<sup>1</sup>Annual Disability Statistics Compendium, Pg 53, 54, 72, 73, 29

**Precision is needed when using statistics to advance policy proposals. We hope that these important details will be revised as Oregon’s WIOA State Plan moves forward.** For example, there are several other points where the labor force participation rates of people with disabilities can be added to the current raft of Oregon’s Unified State Plan. For example, on page 24, the Plan talks about “The Performance Reporting Information System (PRISM)” used throughout Oregon’s workforce system. Does this system include specific information relating to working age people with disabilities and youth with disabilities in Oregon? Can this system be used to share the LFPR of people with disabilities with partner organizations and state agencies? Does platform also include information on the range of disabilities that people have? This system needs to include detail metrics on disability and employment. Additionally, on page 74, the Plan discusses the “Assessment of Participants’ Post-Program Success” and indicates that research is being done on the “use of additional indicators to monitor service delivery in real-time, improve outcomes, and respond to immediate needs of our local communities.” We would submit, once again, that this is point what data on people with disabilities in workforce is needed. For example, the labor force participation rates of people with disabilities should be included as such “an additional indicator” as should the employment gap between people with disabilities and their non-disabled peers. These are several points where greater detail is clearly needed.

The efforts of Oregon’s VR system and their collaborations with other components of the workforce system need to be data-driven and focused on best practices. In terms of data, [there are multiple sources](#), from [universities](#) to [research foundations](#) to [the federal government](#) that provide in-depth data that is freely available and can be very useful. Further, our organization has developed extensive data about disability, employment, workforce participation, and resources that can be used to empower more Oregonians with disabilities. We hope that data of this kind is added immediately to the draft of Oregon’s Unified State Plan.

**2. Busting the stigma, myths, and misconceptions should be part of Oregon’s overall 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 Unified State Plan be amended to include a communications/public relations strategy for reducing such stigmas.

[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 with a focus on educating employers about how the workforce system can train job seekers to meet their labor needs. The unique talents and tremendous skills of employees with disabilities need to be a key part of that conversation.

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

It is also critical that Oregon 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 Oregon VR staff as well as community agencies in supporting Oregon companies through messaging efforts around related to fear and stigma.**

### **3. Focus on Effective and Strategic Employer Engagements, Especially with Federal Contractors around Section 503**

More emphasis is needed in Oregon’s Unified State Plan around the employment opportunities and talent challenges created by the Section 503 regulations and federal contractors. [Oregon’s Plan as written contains only minimal references to the new 7% utilization goal set for companies to recruit, hire, and retain qualified individuals with disabilities in all job categories](#). Given the priority placed on Sector Strategies by the Unified State Plan and the vast number of employers doing business with the Federal government, this is a huge opportunity to outcomes for people with disabilities.

**Oregon needs to respond to the opportunity created by Section 503 with a strategy focused on competitive advantage, not just compliance.** For example, the only explicit reference to Section 503 of the Rehabilitation Act in Oregon’s WIOA Plan is on page 43 where a passing reference is made to how “VR also works with federal contractors to help meet their 503 requirements and targets.” Greater depth and detail is needed here and elsewhere in the Plan. **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.

### **4. Ensure the Accessibility of Science, Technology, Engineering and Mathematics (STEM) Programs and Careers for People with Disabilities, especially Students with IEPs.**

The current draft of Oregon’s Unified State Plan clearly identifies many of the skills and opportunities that are needed as the economy of the future evolves. For example, the Plan talks about how “The knowledge and technology base for the vast majority of professional and technical occupations is changing rapidly” and that “innovations and others are generating the

need for occupations such as cybersecurity specialists, business intelligence analysts, and mechatronics engineers.” Further, the Plan references “The 2015 Oregon Talent Plan” which identified “ten top occupational clusters in three categories” that include “advance manufacturing, energy, healthcare and biosciences industry sectors.” Such examples reflect the forward thinking and future planning that WIOA was intended to spur.

**Given the evolving opportunities and openings in Oregon’s economy, it is critical that Oregonians with disabilities not be excluded from being able to pursue careers in these fields.** 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.](#)” People with disabilities should be part of the solution.

**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 Oregon. **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. **Oregon is lucky to be home to such diverse Federal Contractors as URS Corp, Vigor Industrial LLC, Flir Systems Inc., Kalama Export Company LLC, and Marubeni Corp.** Through WIOA, Oregon’s workforce system has a chance to collaborate with these dynamic businesses to help them meet and exceed their Section 503 requirements.

The Oregon Vocational Rehabilitation has a critical role to play in acting as that catalyst in the future. **At a minimum, the VR sections of the Unified State Plan should be amended to ensure that Title IV Program staff members are fully trained in all 503 regulations.** In order to ensure that such knowledge does not get trapped in a silo, 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.

##### **5. Examine the Gap in Performance Metrics between Oregon and other states like Alaska, the Dakotas, Wyoming, and Iowa.**

Other states facing a variety of challenges have higher than 50% employment rates for their citizens with disabilities. [States like the Dakotas, Alaska, and Wyoming have achieved incredible results by putting best practices into places.](#) Fully 52% of North Dakotans with disabilities are employed, as are 50% of Wyomingites with disabilities and 48% of South Dakotans with disabilities. These states show that Oregon can dramatically improve their outcomes with the right choices. **Likewise, we are also seeing pockets of excellence around innovative youth programs designed to address disability employment in [Georgia](#), [Nevada](#),**

and [Kentucky](#). [To help the states succeed in this process we developed a resource called the Disability Employment First Planning Tool](#). This document details best practices and effective models. This toolkit contains models that are proven to work, be cost effective to implement, and be successful at employing people with disabilities.

## **6. Focus on Sector Strategies to Get More PWDs Employed**

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.

Graph 2 on page 10 of the current draft of the WIOA State Plan provides a clear view of the economies opportunities that growing in Oregon's near term future. The "Expected Job Changes by Industry Sector over the Year" reflect a strong sense of economic optimism. Namely, the plan says that "Net job gains are expected across all major private industries."

**Ensuring that such economic growth doesn't leave people with disabilities behind requires the focused attention and dedicated effort of Oregon's workforce system.** Specifically the State Plan says that "Professional and business services is expected to continue adding a lot of jobs (+16,800), followed by leisure and hospitality (+7,300), retail trade (+5,900), health care (+4,400), and construction (+4,300)."

**We submit that most of these are job sectors where people with disabilities can excel and benefit their employer's bottom line.** As example of how Oregon can do this, we would recommend that Oregon look at disability employment programs that have helped hotels and resorts meet their talent needs in other states. **The draft of Oregon's WIOA state plan indicates that "leisure and hospitality" is a key industry sector propelling the state's economic growth. Employers working in this sector can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities.**

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 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. 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 the overall Sector Strategies for Oregon.**

Likewise, in other states, [hotels and other hospitality employers have found Project SEARCH to be an amazing source of talent](#). Each year approximately 2,700 young people, spread out in 45 states, do a one-year, school-to-work Project Search 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. The goal for each program participant is competitive employment.

[The work done by Embassy Suites and David Scott in Omaha, Nebraska offers valuable lessons that can enable Oregon to improve employment outcomes for people with disabilities](#). The Oregon 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.

The untapped potential of Oregon’s 274,900 working age people with disabilities is such that a full-spectrum approach is needed. **Oregon should also be looking to expanding disability employment programs in the supply chain and distribution sector.** We recommend this given the incredible work we have seen by employer who are making employees with disabilities part of their efforts to become more efficient, productive, and competitive.

[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.](#) **These efforts have taken the logistics sector by storm with [Lowe's](#), [OfficeMax](#), [Pepsi](#), as well as [P&G](#) (just to name a few) 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.”](#) 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. **Supply chain continues to be a sector that embraces disability inclusion, and the knowledge of the benefits to companies of inclusion are spreading to other industries.**

#### **7. Improve School to Work Transitions for Youth with Disabilities – Including on disability employment programs in Hotels, Hospitals, and Elder Care Facilities**

**There is a significant need for the State of Oregon to expand Project Search to train, prepare, and transition more young people with disabilities into the workforce.** Already, there are several successful Project Search sites that provide valuable examples of the skills and abilities young people with intellectual and developmental disabilities possess. [Several hospitals in the state of Oregon have already benefitted from the pipeline of talent created by Project SEARCH’s business model.](#) Youth who have gone through this innovative model have proven themselves to be incredible assets in settings such as the Oregon Health & Science University (OHSU) and Portland Providence Portland Medical Center. **Remarkable work of this kind depends on collaboration and partnerships, both key tenants of the paradigm shift of WIOA.**

Project Search sites have been achieving outstanding results for people with disabilities, employers, and taxpayers alike. **For example, [the first longitudinal study of the program found “a 68% success rate in transitioning students from high school into competitive employment” and “Project SEARCH sites in Upstate New York that have an impressive 83% success rate overall.”](#)** These are the types of successful outcomes that Oregon should be working hard to achieve.

#### **8. Avoid the Opportunity Costs of Focusing on Bricks and Mortar One-Stop Centers / American Job Centers. Many Should be Mobile and All Services Online**

There is a significant note of caution that we will like to add in terms of both the current draft of the Unified State Plan as well as the future of Oregon’s Workforce System. The State Plan should look to innovate beyond simply co-locating services and supports at the One-Stop Centers in Oregon. **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.** 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.

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.](#)

We are pleased to see the level of detail that is included in the section of the State Plan that addresses “the Accessibility of the One-Stop Delivery System.” From the language on page 76, it is clear that Oregon’s system is putting on a priority on programmatic as well as physical accessibility. Site visits, Coordinators, and checklists are all useful tools. We would only hasten to add that expanding online resources and digital access can have broad benefits across Oregon’s workforce system.

#### **9. Overcome the gap between disability services and career services in Secondary Education.**

There is a looming issue that needs to be addressed before we can fully details the points and priorities needed in order to open more career pathways to Oregonians with disabilities. In fact, the State Plan expresses a great deal of pride in terms of the career pathways offered in Oregon. Specifically on page 35 of the Unified State Plan, it says that “Oregon has long been a leader in career pathways. We have a strong collation of community colleges and training providers that promote and provide career pathways.”

**The issue we have in mind is the 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. **Oregon must 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.**

Returning to the text of the Unified State Plan, page 51 includes specific information about the extensive collaboration between the “Oregon Workforce Investment Board (OWIB) and Higher Education Coordinating Commission (HECC).” While the statistics cited above are national ones, they have significant bearing on the partnership between OWIB and HECC. Students with disabilities who go into post-secondary education need to be equipped with the skills to succeed in the world of work, regardless of whatever difference they have. The disconnect between disability and career services has to be solved. The solution depends on collaboration between OWIB and HECC. Further, this can also play into the work that needs to be done around Section 503. As Oregon’s workforce system evolves to train and educate succeeding generations of talented employees, they need to ensure that college graduates with disabilities succeed. As the Beaver State looks to triangulate between employer needs, skills training, and recruiting workers; it will do well to remember the importance of getting students with disabilities connected to career services and prepared for the workplace.

#### **10. Ensure that Apprenticeship Programs in Oregon are Fully Accessible and Actively Recruiting Young People with Disabilities**

Starting on page 31, the current draft of Oregon’s WIOA State Plan goes into great detail concerning “State Strategies to achieve its Vision and Goals.” One of those goals that we think is important to discuss is the opportunities available through apprenticeships. Specifically in Strategies 3.4 and 4.3, the Plan discusses how to “Rethink and restructure training and skill development to include innovative and effective work-based learning” as well as “Provide technical assistance...to support adoption and expansion of work-based learning, apprenticeships, and internships.” Further, on page 55 of the Plan, there is a clear awareness of the need to attract underrepresented demographic groups into the dynamic opportunities offered by apprenticeships and other work-based training programs. The language here says that “OED and the Apprenticeship Training Division will continue to work towards increasing the number of women and minorities involved in structured work based learning and registered apprenticeship programs.”

**We strongly emphasize to the Oregon Workforce Investment Board to consider the vital opportunity that apprenticeship training and credentialing can offer to young people with disabilities in Oregon.** At a minimum, people with disabilities should be identified as a group to be reached with information and resources about work based training. Further, we direct OWIB and OED to the work being done by the Office of Disability Employment Policy at the federal level. ODEP has worked hard to generate resources which can open up these exciting programs to “youth and young adults with a full range of disabilities.” The regulations related to apprenticeship which have recently come out of the Department of Labor provide states the flexibility they need to refine and design training programs that maximally inclusive of people with diverse talents. **[We encourage the Oregon Workforce Investment Board to invest time and energy to understand the best practices contained in ODEP’s apprenticeship toolkit.](#)**

#### **11. VR Innovations - Prioritize pre-employment training expand partnerships with VR**

As much as we would encourage Oregon to follow Wisconsin’s example by working hard to expand the number of Project SEARCH sites, this is not the only paradigm that the Beaver State should follow. **The school system, vocational rehabilitation, and local workforce boards should be encouraged to build creative, collaborative partnerships with companies that are leading in the disability space such as Amazon, UPS, and Pepsi.**

**A great example of the type of effort that Oregon can follow comes from UPS in Louisville, Kentucky.** At one of the global logistics company’s busiest facilities in a training program dedicated to preparing youth with disabilities to succeed. [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.**

**To begin with, we would highly recommend that the Oregon Workforce Investment Board examine how to support disability employment efforts through establishment of public/private partnerships in local communities.** For example, such partnerships could be a tremendous asset to the work of the local WIBs that will be doing so much under the regional planning focus of Oregon’s Unified State Plan. **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 to employ individuals with disabilities”, “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.”](#)

**Further, the experiences of Georgia’s vocational rehabilitation agency could inform that efforts of VR in Oregon.** Prompted by WIOA, GVRA is designing a new service delivery model to serve young people with disabilities both in and out of school. The model, which is being developed in partnership with Georgia’s Department of Education and Workforce Development division, will be piloted in five school districts in 2016, and then offered to every school in the state. **The model will build on the state’s existing Career Pathways curriculum, directing students with disabilities into high-demand career pathways and comprehensive work-based learning experiences with employer partners in each school district.** Beyond this effort, GVRA sees WIOA as an opportunity to re-structure the agency to serve many more Georgians with disabilities and to increase its placement and retention rates. Poses Family Foundations has been working to meet GVRA’s training needs and could easily provide similar support in Oregon.

## **12. Effective employer engagement depends on having the right partnerships, using the right language, and focusing on the right business audience.**

**Our hope to see improving employment outcomes in Oregon very much depends on being an employer driven paradigm shift.** Yes, there are new rules and regulations, but this law is fundamentally about spurring innovation and expanding opportunity. **There will be no outcomes in terms employment for Oregonians with disabilities without early, often, systematic, and aggressive business engagement.**

It is clear that the current draft of the State Plan takes the issue of employer engagement very seriously. For example, starting on page 45, it goes into great detail around how to coordinate and align the “activities and resources in WorkSource centers”, “involve multiple stakeholders”, by providing “comprehensive, high-quality services to employers.” The Plan then goes on to list the multiple points of impact across the workforce system for carrying this work forward. Another reflection of this commitment is the discussion of how to create “feedback loops aimed at aligning and improving services” to employers on page 46.

There are several points to be made about how to make these efforts as maximally effective as possible, especially in terms of enabling employers to benefit from the incredible talents of people with disabilities. Successful employer engagement depends on collaborating with the right partners, speaking the right language, and targeting the right audience.

First and foremost, there is a critical need to involve the affiliate chapter of the United State Business Leadership Network. [Based in the Portland metro area, USBLN's Oregon affiliate is "a local educational organization" focused on helping "employers learn how to leverage their organizations for success" in terms of recruiting, hiring, and retaining employees with disabilities.](#) **The Portland BLN represents the very stakeholders discussed in the Unified State Plan and it needs to be part of this employer engagement process.**

Second, we 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 Oregonians with disabilities.** The necessary condition for achieving greater competitive, integrated employment for individuals with disabilities is engaging employers and meeting their talent needs.

**Our perspective as an organization is that engaging employers is very much a communication challenge that can be overcome being reaching the right audience with the right message.** In the case of disability employment, there are actually two audiences that have to be reached. **The first half is the CEOs or leaders with policy making authority. The second are the hiring managers and on-the-ground supervisors.** The right message for CEOs or other leaders of a company in the business case for their specific company around how to overcome stigma, alleviate fears, and integrated disability into the talent pipeline.

**To reach the leaders in an employer, they need support with understanding the business case for their specific company plus dealing with their fear/stigma at the top level.** Hiring managers and supervisors are the key implementers who will turn high minded policy into action at the ground level. 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.

### **13. Adopt a "Jackie Robinson" Strategy to Improve Outcomes for Youth with Barriers to Employment**

While we hope the WIOA will improve employment opportunities and training for all youth, it is especially critical for youth with disabilities that Oregon abandon the failed policies of the past. **In particular, we hope Oregon's workforce system will seriously consider that attitudinal barriers, stigma, myths, and misconceptions about people with disabilities are a critical obstacle in the push for improved employment outcomes.** [Our perspective as an organization is that the barriers created by stigma will be broken by using what we call a "Jackie Robinson Strategy."](#) 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. **The Jackie Robinson strategy suggests that strategic triage is needed.** While it is important to have multiple pathways to success for people with disabilities who have been long-term unemployed or in sheltered workshops, we must need to achieve early wins for employers. Indeed, the greatest focus and largest efforts need to be where there will be a serious return on investment for employers so that they will want to continue to expand the practice of inclusive employment. **Helping young people with disabilities to successfully transition into the right jobs for them in the workforce will create a path for those who may have a**

**greater need for employment supports to also succeed.** Put differently, by enabling trailblazers with less significant disabilities to succeed first with new business partnerships/employers, it can open doors for people with the most significant disabilities to follow them into those places of employment. Oregon can do this by focusing WIOA resources on what works best – [early interventions](#), paid internships, [academic internships](#), [connecting youth with apprenticeships](#), [job coaching](#), and other best practices.

**As we stated at the beginning of our public comments, there are over 115,000 youth with disabilities and each year a quarter of them will age out of school into an uncertain future.** This figure includes people with a wide range of different disabilities. For the sake of strategic planning in the workforce system, it is important to look closely at the different subpopulations with the disability community because one size does not fit all when it comes to employment opportunities. It is also worth noting that the solutions to these barriers to employment are rapidly evolving. **For example, ten years ago, it would have been very difficult for people with visual or hearing disabilities to be fully integrated in the workplace.** Now, thanks to assistive technology such as speech to text software or screen reader software can easily accommodate visual or hearing differences. For the 2,400 young Oregonians who are blind or have limited vision, training to use JAWs or other screen reader software can give them the skills to enter the workplace. Likewise, for 1,100 young people with hearing disabilities between the ages of 16 and 20, speech to text software or smart phones can help them communicate with their nondisabled peers. These are simple solutions that can overcome significant barriers. As such, they are issues that are very focus under the prevue of Oregon’s workforce system. We raise these to showcase ways to employment barriers in a cost-effective and replicable manner.

When dealing with the cyclical patterns of economic growth, issues of adequate resources will always remain an issue. **To support innovation and expand opportunity, Oregon’s VR system should look at connecting [with private-sector and philanthropic resources to complement public-sector funding with short-term pilots, innovative ideas, or evaluations and studies](#).** Successful models in Delaware, [Nevada](#), and [other states show how improved employment outcomes can be achieved through collaboration and cooperation](#) with philanthropy.

**The Poses Family Foundation’s philanthropic efforts in workforce development and disability employment has been incredible at creating system in such diverse states as Ohio, Missouri, and Georgia.** The change they have helped to develop and sustain is doing remarkable, creative work. The models followed in these states offer significant hope for Oregon to dramatically improve their outcomes.

#### **14. People with disabilities are can be ideal talent as Oregon’s population ages and Baby Boomers leave gaps in the workforce.**

Early in the current draft of Oregon’s WIOA State Plan, detail and attention is given to the impact that aging Baby Boomers are having on the “age structure of Oregon’s workforce.” As stated above, many of the sectors projected to undergo significant growth are the kinds of job sectors where people with disabilities, with appropriate training and early work experiences, can succeed. **As demand for health care grows and more aging Americans exit the workforce, RespectAbility submits that people with disabilities are a natural labor resource that should be tapped to meet these economic trends.**

To quote a 2014 report from the Office of Disability Employment Policy (ODEP), [“\[people with disabilities\] not only represent an untapped talent pool, but \[they\] 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](#). [Already, Project Search has been creating pathways into competitive, integrated employment in the healthcare sector for youth with disabilities at Oregon Health & Science University \(OHSU\) and Providence Portland Medical Center](#). However, there is great growth potential for such work sites in nursing homes, senior living facilities and at hotels.

Likewise, the current draft of Oregon’s Unified State Plan goes into great detail concerning the critical difference between “replacement openings” and “growth openings” on pages 12 and 13. Graph 3 in that section does a good job of visually stating that gap between “Growth Openings vs. Replacement Openings” in the immediate future. In looking for ways to address those “Replacement Openings”, we recommend that the state’s workforce system look for ways to train and prepare the seven out of ten Oregonians with disabilities to plug those gaps. People with disabilities represent an untapped talent pool and one that needs to be tapped for the sake of growing the economy. As such, we recommend that the Plan be amended to consider what role Oregonians with disabilities can play in the future workforce.

#### **15. Finding market niches 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, Wal-Mart, and Walgreens have proven records of success](#). **They can be outstanding partners for disability employment as these industries suffer from high turnover rates and employees with disabilities are proven to have significantly higher retention rates.** It is important to identify more specific opportunities with employers and to site them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future.

#### **16. Local Planning efforts need to include planning for disability employment efforts.**

A key facet of Oregon’s approach to implementing Sector Strategies is to delegate much of the work to local boards. Those boards in turn, as outlined in the Plan on page 34, will focus their efforts to other job sectors specific to their local regions. This emphasis on local organization and planning throughout the draft WIOA Unified State Plan creates unique challenges in the drive for improved employment outcomes for Oregonians with disabilities. **While regional differences needed to be accounted for, guiding this entire process needs to be a unifying vision and clear sense of what works.** The diversity of regions and economic opportunities in Oregon create many challenges, but the solutions to those challenges can have common features. For example, [RespectAbility collaborated with a range of other organizations to develop 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 at employing people with disabilities. These practices can be adapted and applied to meet the unique challenges created by the emphasis on regional organization in Oregon’s Draft State Plan.

Particularly in the eastern segments of Oregon, agriculture should be a huge employment pathway that should be fully accessible to people with disabilities. [There is a significant opportunity through WIOA to build on and expand on TIAA-CREF's Fruits of Employment project. This program provides internships and job training to workers with disabilities to prep them for careers in competitive agriculture.](#) Further, the State Board and the State Plan should also look at the opportunities being created in other states by [the AgrAbility Program of the USDA](#). Further, [there is already some work being done in this sector through the Youth Transition Program in Oregon and it should be referenced in the State Plan.](#)

**17. Seeing is believing when it comes to jobs for people with disabilities.**

On page 36 of the current draft of Oregon's Unified State Plan, there is a discussion of how the "Executive leadership from VR, HECC, OED, and Self Sufficiency Programs (SSP)" will be collaborating with local boards to sponsor "a series of Local Area Alignment Meetings". We are hopeful that such meetings will be a great opportunity to collaborate, share, and break down barriers. We suggest that this Executive team, in their work with regional partners, have an opportunity for leadership. As a specific, easy, first step, they have a chance to focus on one of the important best practices that encourage innovative thinking and engagement around jobs for people with disabilities. That step is to conduct site visits to successful disability employment programs and model systems. Touring a model employer who is capitalizing on the talents of employees with disabilities can be an eye opening experience. As such, it should be a priority to help regional partners to serve job seekers with disabilities.

**18. 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 a place where that is not possible, Oregon should look at partnering with UBER and other new transportation solutions. Indeed, for people with disabilities who do drive, such companies as UBER can also provide a way to enter into the workforce with flexible hours.](#)

**19. 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 Oregon identify how many of the individuals in the ex-offender pipeline have disabilities.**

**Such an effort could easily be integrated into the current draft of Oregon's WIOA State Plan.** For example, page 97 of the Plan reiterates Oregon's commitment "to support corrections education programs under section 225 of WIOA in accordance with Title II" and goes on to add that "Academic programing within Oregon Department of Corrections (DOC) facilities will include adult education and literacy activities, English language acquisition activities, peer tutoring and special education where feasible." We would recommend that screening for disabilities be part of the assessment tools used to support corrections education

programs. Screening for previously undisclosed, invisible, or mental health differences will become an ever more critical as the national- impetus grows around the release and rehabilitation of more and more non-violent offenders.

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 Oregon’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.

## **20. 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 on such critical decision making bodies as the Oregon Talent Council (OTC). This is a critical gap that should be closed. Likewise, the State Plan could also direct local workforce boards to connect with local community organizations to recruit self-advocates to add their perspectives.

## **21. Educating the Entire Workforce System, Employers, Customers and the Public about Free, Accessible Services and Resources on Best Practices:**

Oregon 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](http://ASKJAN.org), [the US Department of Labor’s Office of Disability Employment Policy](http://the US Department of Labor’s Office of Disability Employment Policy), [our organization and others also offer free toolkits, webinars and training opportunities](http://our organization and others also offer free toolkits, webinars and training opportunities). [Another resource is Understood.org](http://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.

## **22. State Level Affirmative Action –hiring of people with disabilities for jobs in state government and state contracting obligations:**

As stated above, the continuing challenge of improving employment outcomes for people with disabilities requires a full spectrum approach. One of the best practices identified first in Governor Markell’s *Better Bottom Line* Initiative and later in RespectAbility’s *Disability Employment First Planning* Toolkit concerns hiring people with disabilities at the state level. Specifically, state government hiring and contracting can also be a source of opportunity for people with disabilities. 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.”](#) **This is an action that Oregon should take in so far as “Local government employment is recovering as budgets have recovered” as discussed on Page 9 of the State Plan.**

Beyond Delaware, other states have also followed this recommendation. For example, [Governor Inslee in Washington State](#) and [Governor Dayton in Minnesota](#) have been working to implement this idea 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.](#) While many states may have hiring freezes in place, those states where government itself has growing talent needs, people with disabilities can be a successful solution.

Next is the matter of contracting in state government. 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. Lastly, as shown by Delaware and Montgomery County, having a fast track or selective placement hiring system for people with disabilities can create more jobs.

### **Oregon, Jobs, People with Disabilities, and Lane v. Brown:**

[Lane v. Brown, initially filed in January 2012](#), is a class action lawsuit of eight Oregon-based plaintiffs with Intellectual/Developmental Disabilities (I/DD), [claiming violations of Title II of the Americans with Disabilities Act \(ADA\) and \*Olmstead v. L.C.\*, due to segregation in sheltered workshops or being at risk of segregation](#). This lawsuit involved community service providers and those “similarly situated” with I/DD in, or referred to, Oregon’s sheltered workshops; [such workshops paid subminimum wages \(less than \\$1.00/hour versus the much-higher \\$8.80 minimum wage\), in exchange for menial tasks \(stuffing envelopes\), offering neither career advancement nor substantive training](#). Essentially, defendants did not provide (and limited access to) integrated services [despite Oregonians with I/DD being open to, and easily able to benefit from, such offerings](#). Integrated workshops offer a reasonable salary and opportunities based on one’s abilities. This class action was amended in June 2012 to include “all individuals in Oregon with...disabilities” relating to sheltered workshops. [In March 2013, the U.S. Department of Justice moved to intervene, resulting in a proposed Settlement Agreement on September 8, 2015](#). The Settlement Agreement, subject to magistrate judicial approval, affects 7,000 Oregon-based people with I/DD who are able to, and wish to work in, everyday work settings; the Agreement builds upon Oregon’s Integrated Employment Plan and the Executive Order 15-01 issued earlier in February 2015.

### **What it means for Oregon going forward**

*Lane v. Brown* is a ground-breaking case. It is the first class action lawsuit to challenge subminimum wages of those with I/DD, and in doing so, establishes a precedent for I/DD advocacy. Oregon, by June 2017, plans to decrease time in sheltered workshops by nearly 30%, and by June 2022, will ensure that 1,115 people with I/DD at sheltered workshops will transition to non-sheltered environments. This case has important implications for Oregon moving forward and yet it is not mentioned at all in the current draft of the Unified State Plan. We raise this issue because this case gives Oregon the opportunity to prioritize competitive, integrated employment moving forward and to invest heavily in improving school to work transitions for youth intellectual and developmental disabilities. Because *Lane v. Brown* is a precedent setting case, the eyes of many across the county are now on Oregon. Oregon’s leaders and the workforce system have a vital responsibility to ensure that the process ends with the largest number of employment outcomes in the community that are possible. People with disabilities, especially

those with intellectual and developmental differences, have incredible talents that if matched to the right employer can empower them to become incredible employees. *Lane v. Brown* gives Oregon to take a hard look at the failed policies of the past and to invest in a better future for all Oregonians.

## **Conclusion**

As we stated at the beginning of our Public Comments, Oregon has the opportunity to do much better on jobs for people with disabilities. From the language of the Unified State Plan, there is a lot of innovative and dedicated work being done on workforce development in Oregon. However, it is critical that these systems, supports, and services collaborate in order to train and prepare job seekers with disabilities to be the talent that employers need and become increasing successful members of society. To be a fully accessible society, career pathways need ramps just as architecture does. The reason why this is imperative is simple. Oregonians with disabilities want to pursue the American Dream, just like everyone else.

Thanks to WIOA, Oregon has an opportunity to invest resources in successful models and implement best practices to expand job opportunities for people with disabilities. We remain concerned with the lack of detail and coordination we have found in certain sections of Oregon's state plan. However, there is some good as well. Our public comments are focus on several critical factors that can help Oregon to significantly improve outcomes and we hope see them implemented soon.

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.

Sincerely,

Jennifer Laszlo Mizrahi, President and CEO, RespectAbility  
Philip Pauli, Policy and Practices Director, RespectAbility



# RESPECTABILITY

## Oregon and Jobs for PwDs

Jennifer Laszlo Mizrahi, President

[www.RespectAbilityUSA.org](http://www.RespectAbilityUSA.org)

# Oregon



Gov. Kate Brown (D)

- ❖ 73.9% of persons without disabilities aged 18 to 64 are employed.<sup>3</sup>
- ❖ 35.2% of PwDs aged 18 to 64 are employed.<sup>3</sup>
- ❖ Oregon ranks 27<sup>th</sup> in the country in terms of jobs for PwDs.
- ❖ **There is a 38.7 point between the Labor Force Participation Rate (LFPR) of PwDs and those without disabilities. This is the most important performance metric to measure as this gap must be reduced.**
- ❖ 571,982 people with a disability live in OR.<sup>3</sup>
- ❖ 14,000 persons aged 16 to 20 have a disability.<sup>1</sup>
- ❖ 274,900 persons aged 21 to 64 have a disability.<sup>1</sup>
- ❖ 42,700 PwDs aged 18 to 64 receive benefits.<sup>1</sup>
- ❖ Voc. Rehab. received 7,624 general applicants and 201 blind applicants in OR in 2012.<sup>3</sup>
- ❖ Voc. Rehab. obtained 2,133 jobs for PwDs in OR in 2012.<sup>3</sup>
- ❖ In 2012, OR's total expenditure on SSDI benefits was \$1,562,076,000.<sup>3</sup>

1. 2012 Disability Status Report: New York, [disabilitystatistics.org](http://disabilitystatistics.org)
2. StateData: The National Report on Employment Services and Outcomes, 2013
3. [Annual Disability Statistics Compendium](#)

# Oregon Data

		People with Disabilities (%)		People without Disabilities (%)	
		2012	2013	2012	2013
Poverty <sup>1</sup>	US	29.2	28.7	13.6	13.6
	OR	31.8	30.7	15.6	14.8
Smoking <sup>1</sup>	US	26.0	25.4	16.9	16.2
	OR	27.2	25.6	14.3	14.8
Obesity <sup>1</sup>	US	39.1	40.1	24.5	25.0
	OR	37.8	36.9	23.6	22.9
Employment <sup>1</sup>	US	32.7	33.9	73.6	74.2
	OR	34.3	35.2	72.1	73.9

1. [Annual Disability Statistics Compendium](#). Pg 53, 54, 72, 73, 29

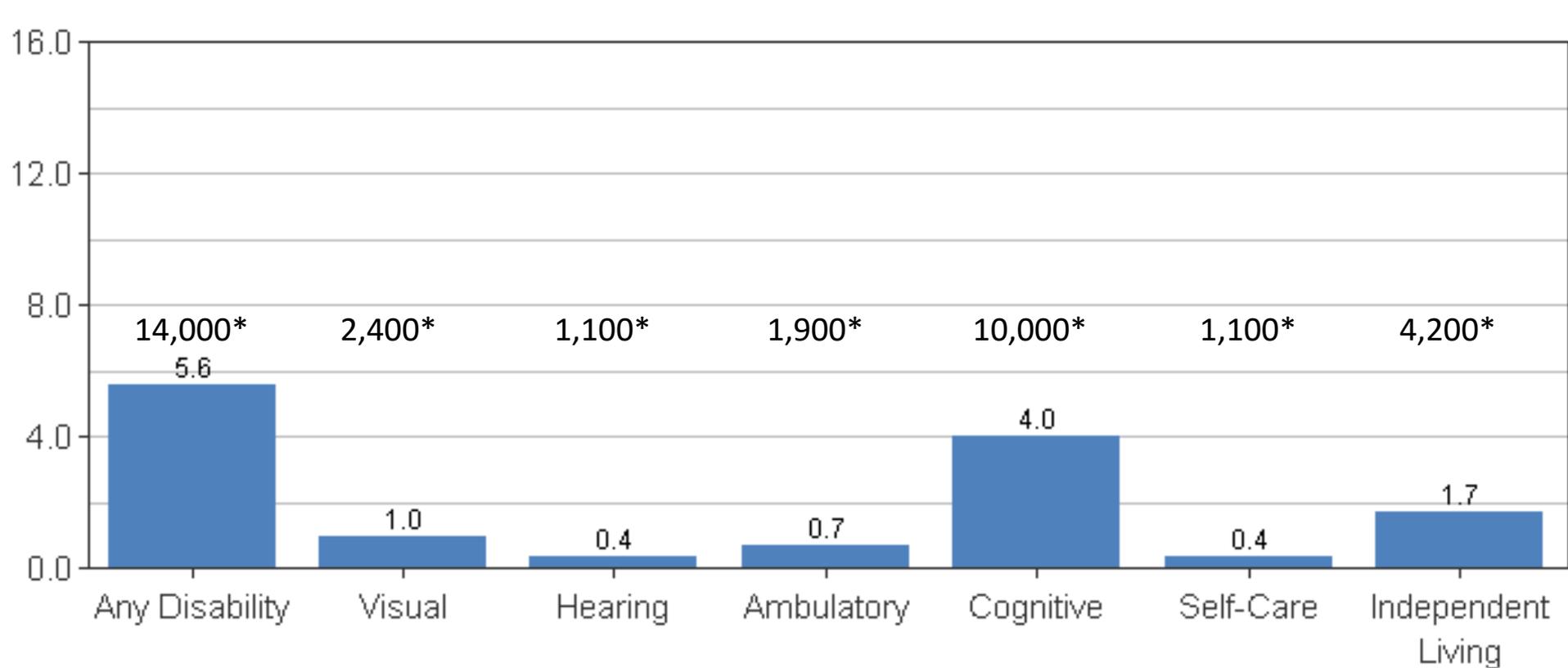
# Ages 6 to 21 IEPs by Category OR

	2011	2012
<b>All Disabilities</b>	71,805	72,131
Specific Learning Disability	27,087	26,897
Speech or Language Impairment	16,206	15,983
Intellectual Disability	3,830	3,847
Emotional Disturbance	4,567	4,524
Multiple Disability	--	0
Hearing Impairment	810	810
Orthopedic Impairment	738	705
Other Health Impairment	10,356	10,956
Visual Impairment	313	300
Autism	7,618	7,888
Deaf-Blindness	12	10
Traumatic Brain Injury	268	256
Developmental Delay	--	0

Source: [Annual Disability Statistics Compendium](#)

# Prevalence of Disability Among Non-Institutionalized People Ages 16 to 20 in Oregon in 2012

Prevalence Rates: Age 16 to 20 years (%)

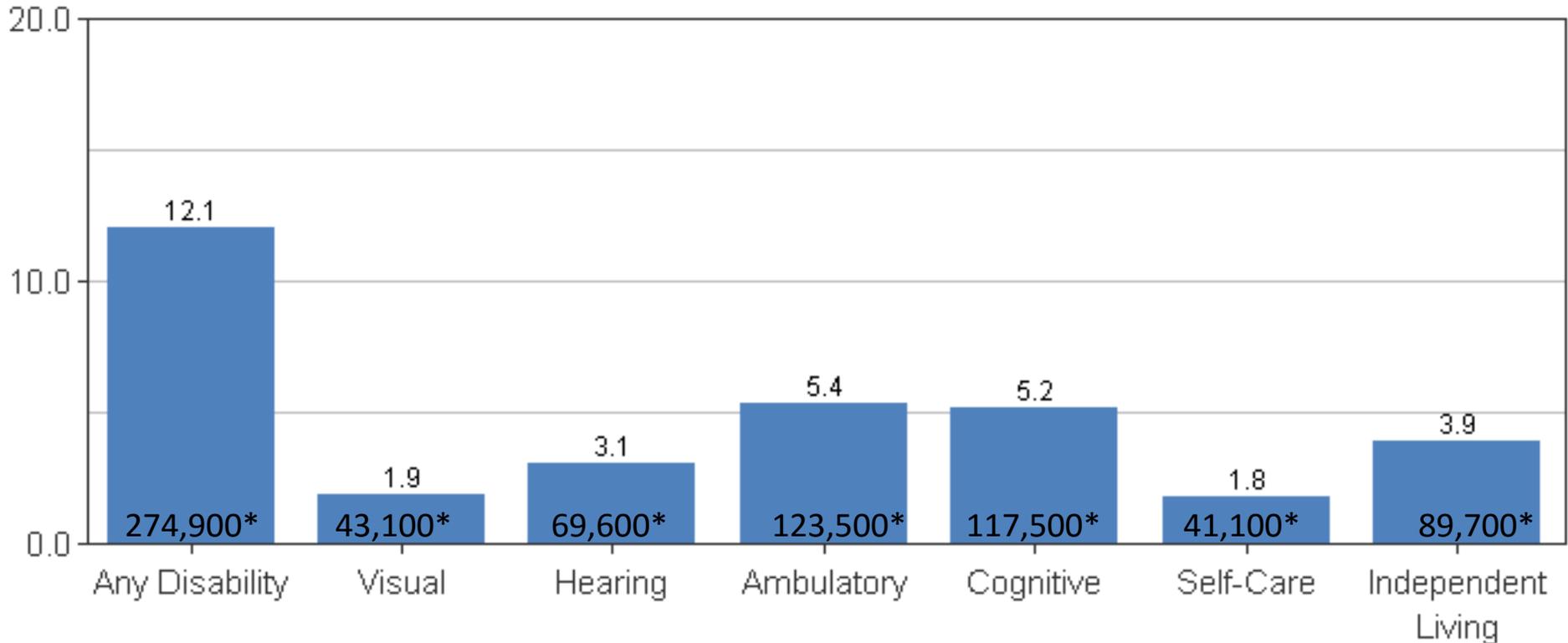


\*Total numbers reported

Source: [Cornell University](#)

# Prevalence of Disability Among Non-Institutionalized People Ages 21 to 64 in Oregon in 2012

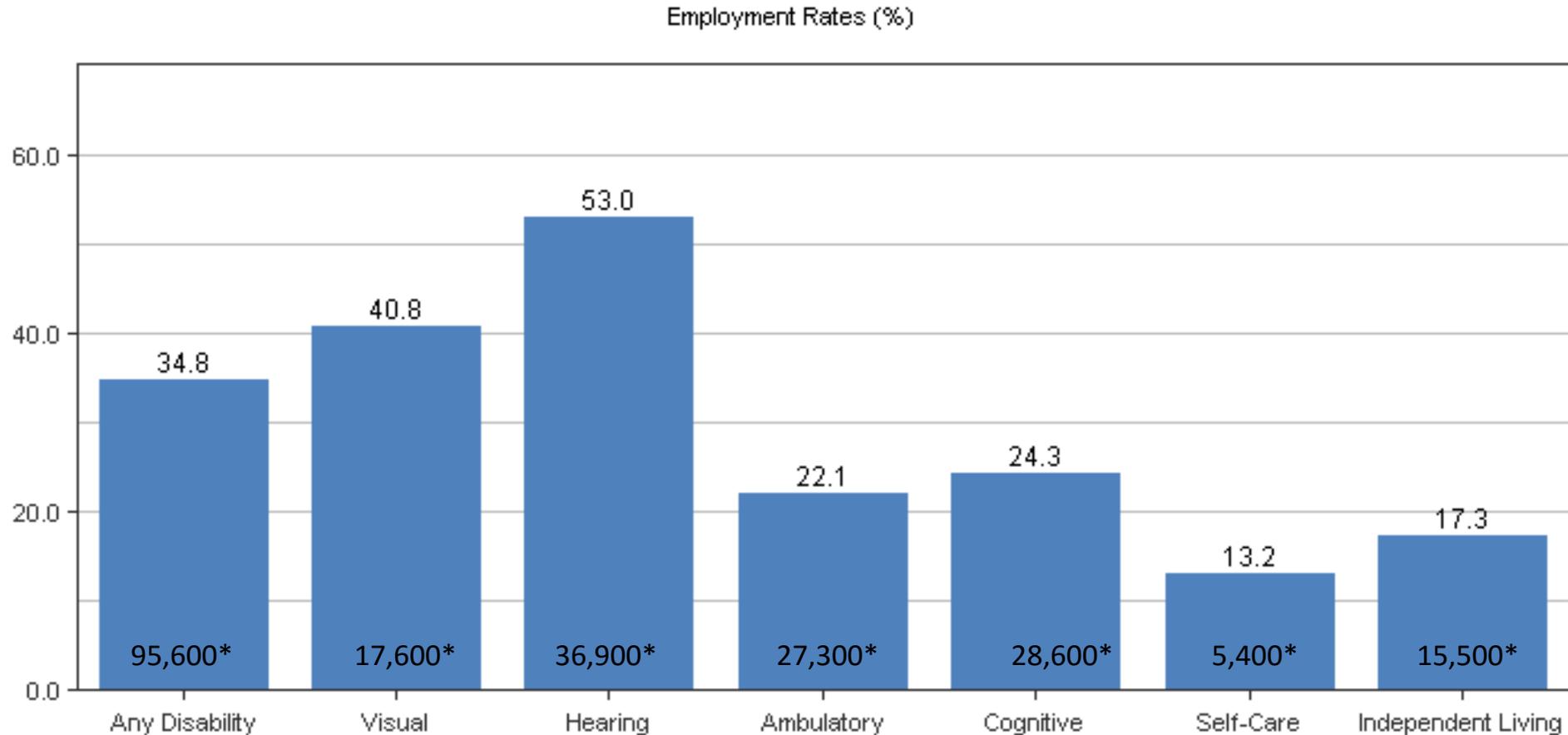
Prevalence Rates: Age 21 to 64 years (%)



\*Total numbers reported

Source: [Cornell University](#)

# Employment of Non-Institutionalized Working-Age People (Ages 21 to 64) by Disability Status in Oregon in 2012



\*Total numbers reported

Source: [Cornell University](#)

# Oregon Project SEARCH Sites

- ❖ Oregon Health & Science University (OHSU), Portland
- ❖ Providence Portland Medical Center, Portland

Project SEARCH: [www.projectsearch.us](http://www.projectsearch.us)

Contact Erin Riehle at [Erin.Riehle@cchmc.org](mailto:Erin.Riehle@cchmc.org)

# Which Employers in Your State Must Meet 503 Rules (Hire PwDs)?

## ❖ Top contractors:

- URS Corp
- Vigor Industrial LLC
- Flir Systems Inc.
- Kalama Export Company LLC
- Marubeni Corp

-Complete list → [Fedspending website](#)

[http://www.fedspending.org/fpds/fpds.php?reptype=p&detail=-1&fiscal\\_year=2011&sortby=f&database=fpds&datatype=T&stateCode=OR](http://www.fedspending.org/fpds/fpds.php?reptype=p&detail=-1&fiscal_year=2011&sortby=f&database=fpds&datatype=T&stateCode=OR)

- Complete federal lists of 2006-2013 → [Federal Procurement Data System website](#)

<https://www.fpds.gov/fpdsng/cms/index.php/en/reports/62-top-100-contractors-report3.html>

- How to get started: Job Accommodation Network → <https://askjan.org/>

US Business Leadership Network → <http://usbln.org/>

# Jobs in Oregon

## ❖ Top five [employers in OR](#):<sup>1</sup>

- Food services, administrative/support services, ambulatory health care services, hospitals, nursing and residential care facilities.

<http://bluebook.state.or.us/facts/economy/employment.htm>

## ❖ OR [strategic plan](#) 2012-2022<sup>2</sup>

[http://www.oregon.gov/gov/skilled\\_workforce/Pages/Vision%20and%20Strategic%20Plan.aspx](http://www.oregon.gov/gov/skilled_workforce/Pages/Vision%20and%20Strategic%20Plan.aspx)

## ❖ Workforce Investment Board [site](#)<sup>3</sup>

[http://www.oregon.gov/gov/skilled\\_workforce/Pages/MeetourBoardMembers.aspx](http://www.oregon.gov/gov/skilled_workforce/Pages/MeetourBoardMembers.aspx)

# Resources

- ❖ StateData: The National Report on Employment Services and Outcomes, 2013 (data from 2012)
- ❖ 2012 Disability Status Report United States, Cornell University, 2012: [www.disabilitystatistics.org](http://www.disabilitystatistics.org)
- ❖ Fedspending: [www.fedspending.org](http://www.fedspending.org)
- ❖ Project SEARCH: [www.projectsearch.us](http://www.projectsearch.us)
- ❖ Job Accommodation Network: <https://askjan.org/>
- ❖ State Vocational Rehabilitation Agency: [http://wdcrobcolp01.ed.gov/Programs/EROD/org\\_list.cfm?category\\_cd=SVR](http://wdcrobcolp01.ed.gov/Programs/EROD/org_list.cfm?category_cd=SVR)
- ❖ RespectAbilityUSA: [www.respectabilityusa.org](http://www.respectabilityusa.org)

# Let Us Know If We Can Help!

**We have many resources for policy makers and employers on our website and are ready to help!**

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**President**

**JenniferM@RespectAbilityUSA.org**



## **Disability Employment First Planning Tool**

Created by RespectAbility, Best Buddies, The National Association of Councils on Developmental Disabilities (NACDD), National Council on Independent Living (NCIL), Paralyzed Veterans of America (PVA) and National Organization on Disability (NOD).

Questions? Contact Jennifer Laszlo Mizrahi at  
202 365 0787 or [JenniferM@RespectAbilityUSA.org](mailto:JenniferM@RespectAbilityUSA.org)

Dear Governors, Workforce Development Board and Agencies,  
Vocational Rehabilitation Agencies and others devoted to enabling  
people with disabilities to get jobs,

Our nation was founded on the principle that anyone who works hard should be able to get ahead in life. People with disabilities deserve to be able to work to achieve the American dream, just like anyone else. Companies like Walgreens, E.Y., AMC Theaters, Lowe's and others have shown that employees with disabilities are loyal, successful and help them make more money. If we find the right jobs for the right people it can and does increase the bottom line of companies, while enabling people with disabilities to achieve dignity and independence.

We stand ready to help governors, states, workforce development boards and agencies, vocational rehabilitation and others in their efforts to enable people with disabilities to get competitive integrated employment. Thus, we have created this “**Disability Employment First Planning Tool**” as a resource for your state, workforce development boards and agencies. It is organized around the key recommendations from the National Governors Association's report, ***A Better Bottom Line: Employing People with Disabilities***<sup>1</sup>. The pages that follow are taken from best practices and can really help you in your work to create win-win-win solutions for people with disabilities, employers and taxpayers alike. The key areas are:

- Making the best of limited resources
- Finding and supporting businesses in their efforts to employ people with disabilities
- Making disability employment a part of the state workforce strategy
- Preparing youth with disabilities for careers that use their full potential, and providing employers with a pipeline of skilled workers
- Being a model employer by increasing the number of people with disabilities working in state government

There is full bipartisan support<sup>2</sup> in Washington and around the nation for employment for people with disabilities. The National Governors Association initiative ***A Better Bottom Line: Employing People with Disabilities***<sup>3</sup> was a significant milestone. The **Workforce Innovation and Opportunity Act (WIOA)**<sup>4</sup> and **ABLE Act**<sup>5</sup> recently became law.

According to section 102 of WIOA, each state will now have to create a “Unified Plan” before March 2016. We recognize that this is not an easy task, and that there is not a lot of time. Until now, tens of billions of dollars of tax money has been wasted on failed programs, while evidence shows that there are better programs and practices that work<sup>6</sup>. Our goal is to ensure that each state puts forward an excellent plan based on best practices — one that will create the most integrated job opportunities that pay competitive wages for people with disabilities possible, while meeting the talent needs of employers. Thus, the pages following will give you a list of best practices that you can replicate in your own work.

1. [bit.ly/1vb4Ib9](http://bit.ly/1vb4Ib9)

2. [bit.ly/1wYGgtc](http://bit.ly/1wYGgtc)

3. [bit.ly/1vb4Ib9](http://bit.ly/1vb4Ib9)

4. <http://www.doleta.gov/wioa>

5. [bit.ly/1w39Iy9](http://bit.ly/1w39Iy9)

6. [bit.ly/1xV9Wvm](http://bit.ly/1xV9Wvm)

This month Section 503<sup>7</sup> came online to ask federal contractors to take affirmative action to recruit, hire, promote, and retain individuals with disabilities. For the first time, they also have a 7% utilization goal for qualified individuals with disabilities in each of their job groups (including management). Moreover, all of their staff, including those with disabilities, must be paid at least \$10.10 an hour. Another regulation, VEVRAA<sup>8</sup>, requires similar obligations on contractors to hire veterans, including veterans with disabilities. Policies are changing fast and we stand ready to help.

We have already met with 33 governors on employment for people with disabilities and real progress is being made. The initial efforts of Governors Jack Markell (DE), Terry Branstad (IA), Scott Walker (WI), Dennis Daugaard (SD), Phil Bryant (MS), Jay Inslee (WA) and others have been stellar.

Please go through all the policies outlined in the following pages. We also have created separate documents for each state as resources. They include statistics, planning data, and a wealth of information. It even has links to lists of all the federal contractors in your state that, due to Section 503, must now become inclusive employers.

Please contact [JenniferM@RespectAbilityUSA.org](mailto:JenniferM@RespectAbilityUSA.org) or at 202-365-0787 if you have any questions. We are here to help you succeed in opening the doors to success for the twenty million working age Americans with disabilities, most of whom want to work.

Sincerely,

Jennifer Laszlo Mizrahi  
President, [RespectAbilityUSA.org](http://RespectAbilityUSA.org)

Lisa Derx, Vice President  
Best Buddies

Donna Meltzer,  
President, The National Association of Councils  
on Developmental Disabilities (NACDD)

Kelly Buckland  
President, National Council on Independent Living (NCIL)

Susan Prokop  
Advocacy Director, Paralyzed Veterans of America (PVA)

Carol Glazer  
President, National Organization on Disability (NOD)

7. [usa.gov/1BLnZ72](http://usa.gov/1BLnZ72)

8. <http://www.dol.gov/ofccp/regs/compliance/vevraa.htm>

## Disability Employment First Planning Tool

Created by RespectAbility, Best Buddies, The National Association of Councils on Developmental Disabilities (NACDD), National Council on Independent Living (NCIL), Paralyzed Veterans of America (PVA) and National Organization on Disability (NOD).

Welcome to the *Disability Employment First Planning Tool*, organized around the five areas from the NGA report *A Better Bottom Line: Employing People with Disabilities*. This tool is meant to be a guide and internal document for you and your state, workforce development boards and agencies, vocational rehabilitation and others. It will help you better understand what a holistic plan for integrated competitive employment for people with disabilities would entail, as well as to see where there are current gaps. Throughout this planning tool, all “jobs” and “employment” refer to jobs that are either competitive integrated employment as defined by WIOA or self-employment. (Please see full WIOA definition of competitive integrated employment in Appendix A.)

This tool is written to provide specific and measurable steps that can be taken to achieve the overall goal of integrated employment of people with disabilities. As you consider these steps and goals we ask that you consider where your state is on the path to achieving each of these. We have provided space to note the state’s progress based on the following:

- N** Not Yet Started or Considered
- B** Beginning to Progress Towards Goal
- D** Developing Steadily Toward Goal (i.e. you have a model program in part of the state but it is only available to a small number of the people with disabilities and employers who need it)
- M** Met Goal
- E** Exceeds Goal and is Exemplar for Other States

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## I. MAKING THE BEST OF LIMITED RESOURCES

One of the most cost effective things that you can do to successfully integrate disability employment into the state workforce strategy is to reduce the barriers caused by negative stigmas surrounding employment for people with disabilities (PwDs). Indeed, efforts that do not cost any taxpayer dollars but rather demonstrate leadership can make a significant difference in lowering barriers to entry into the workforce and to changing the landscape for people with disabilities, employers and taxpayers alike.

A Princeton study shows that while people with disabilities (PwDs) 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. Thus, leadership by the Governor and state to reduce this stigma is vital before broad progress can be made.

Ensuring that there is an *expectation* by employers that employees with disabilities can succeed, and by PwDs that they can work successfully is critical to better outcomes for people with disabilities, businesses, and the state. This is especially true for young people with disabilities and for those with newly acquired disabilities who were previously in the workforce. This section gathers data regarding your leadership and efforts to address and reduce stigmas and other barriers to employment in your state and make disability employment a part of the state workforce strategy.

Additionally, in making the best use of limited resources to advance employment opportunities for people with disabilities, the NGA *A Better Bottom Line* ([bit.ly/1vb4Ib9](http://bit.ly/1vb4Ib9)) report highlights that “Governors can act to secure resources by directing agency heads to continuously review opportunities for federal support and the possibility of partnerships with federal agencies and the private and nonprofit sectors. Areas for governors to consider include: (1) capitalizing on the numerous federal programs, particularly in the U.S. Department of Education Office of Special Education (OSERS), which oversees the Rehabilitation Services Administration (RSA); the U.S. Department of Labor’s Office of Disability Employment Policy (ODEP); and the U.S. Health and Human Services (HHS) Administration on Community Living; (2) connecting with private-sector and philanthropic resources to complement public- sector funding with short-term pilots, innovative ideas, or evaluations and studies; and (3) maximizing the efforts of disability experts in their state, including advocacy organizations, research institutions, and universities that are engaged in similar activities as state agencies to advance opportunities for people with disabilities, such as recruitment, assessment, services, outreach, and awareness campaigns.”

## **A. Internal Issue Awareness and Commitment**

1. The Governor has taken the time to personally understand the issues surrounding the expansion of competitive integrated employment for people with disabilities (PwDs) in this state.
2. The executive director of the state workforce board and agency, and other key state leaders such as the vocational rehabilitation director, special education director and others have taken the time to personally understand the issues surrounding the expansion of competitive integrated employment for people with disabilities (PwDs) in this state.
3. The Governor has openly pledged his/her support and commitment to the National Governor's Association (NGA) Disability Employment Initiative "A Better Bottom Line: Employing People with Disabilities."
4. The State and Governor celebrate and recognize National Disability Employment Awareness Month each October.
5. The State is reaching out to make the most of opportunities coming from the Federal government and other partners, and is blending and braiding those opportunities for maximum results. This practice entails a legitimate process of fiscally mixing funds to create one source, and combining separate accountable sources to provide services.

## **B. Raising Public Awareness and Decreasing Stigma**

1. The Governor uses his or her own time, name and office to reduce stigmas and prejudice against hiring people with disabilities by demonstrating the positive business case aspects of employing PwDs at least once a month, through media opportunities such as personal statements, appearances, op-eds, conferences, and media events.
2. During speeches to business leaders, the Chamber of Commerce and other employer groups, the Governor regularly speaks about the positive business cases of being an inclusive employer.
3. The Governor uses his or her own time, name and office to reduce stigmas and prejudice against hiring PwDs by demonstrating the positive business case aspects of employing PwDs at least once a month, through media opportunities such as personal statements, appearances, op-eds, conferences, and media events.
4. The Governor visits a successful job site in their state at least quarterly that employs PwDs and where it is win-win for employers and employees alike. Media is invited to report about the experience to highlight the business case for employing people with diverse abilities.
5. The Governor is working with public figures/celebrities (i.e. from Hollywood, sports or local news stations) to do public service announcements or events throughout the year to encourage companies to see the advantage of hiring PwDs.

6. During speeches to business leaders, the Chamber of Commerce and other employer groups, the Governor regularly speaks about the positive business cases of being an inclusive employer.
7. The state promotes awareness and inclusive hiring by identifying and publicly praising businesses within the state that are leaders in inclusion through awards, visibility, or other incentives.
8. The Governor hosts disability employment summits, which include businesses that are successful inclusive employers making the business-to-business case for inclusive employment to other employers.

## **II. FIND AND SUPPORT BUSINESSES IN THEIR EFFORTS TO EMPLOY PEOPLE WITH DISABILITIES**

**From the NGA *A Better Bottom Line* report:** *“Businesses are telling policymakers that they are willing to hire people with disabilities, but they need a long-term partner. Government must reorient its strategy from looking to businesses to solve a social service problem to instead understand and solve the challenges businesses face in identifying and recruiting skilled workers. Governors can encourage state agencies to find more such businesses by dedicating staffers who have business expertise to work with employers, working with multiple businesses in a sector, and including small businesses. Governors can provide leadership in building long-term partnerships that support business with actions such as assigning one point of contact from the state to work with employers over the long term, providing skills assessment and training, and navigating the complexities of benefits related to workers with disabilities.”*

### **A. Communication, Staffing, and Support**

1. There is a state-supported centralized agency that distributes information, resources, integrated employment support and training for businesses that hire PwDs, and this agency makes itself known to employers.
2. The state has enables mechanisms and services which enable businesses to effectively include people with disabilities in their workforce.
3. The state is working to build and sustain the capacity of front-line staff across systems to successfully implement evidence-based effective practices in supporting and serving employers who hire individuals with disabilities as well as their employees with disabilities.
4. There are expectations on provider organizations to assure that they are transitioning from predominantly facility-based, segregated service models to market-driven service models focused on the provision of integrated employment supports and other home and community based services.
5. The state has created mechanisms to enable people with disabilities, including veterans with disabilities, to navigate multiple service programs.

6. The state has a special focus on supporting Federal contractors under new mandates from Section 503, including working closely with the United States Business Leadership Council, an organization devoted to supporting inclusive employers, as well as with the National Industry Liaison Group which represents Federal contractors.

### **III. MAKE DISABILITY EMPLOYMENT PART OF THE STATE WORKFORCE STRATEGY**

From the NGA **A Better Bottom Line** Report: *“Make disability employment part of the state workforce development strategy. For many states, the first step has been to prioritize “employment as the first option” when designing policies, programs, and investments to support the employment of people with disabilities. To date, more than 30 states have adopted Employment First strategies, which direct state policies and investments to prioritize employment for people with disabilities. Governors can make Employment First a priority by issuing an executive order or working with the state legislature to enact legislation to support it. Governors can also direct state agencies to align disability programs with workforce and economic development programs, track disability employment outcomes and make sure they are included with current workforce data collection, and focus on the business case when meeting with employers.”*

#### **A. Policy and Legislation**

1. The Governor/state has signed Employment First legislation and/or issued an Executive Order on Employment First.
2. The Governor has made specific and measurable commitments to improve competitive integrated employment for PwDs in this state, and has made it a high priority for his/her Administration.
3. The state is actively working to align policy, practice, and funding across systems to promote integrated employment as the preferred outcome of publicly financed supports and services to individuals with disabilities.

## **B. Communication and Representation**

1. There is a statewide workforce development board that reports directly to the Governor.
2. At least one representative of the disability advocacy community is specifically included in that workforce development taskforce which reports to the Governor.
3. There are online ads, which are 508 compliant; to help PwDs find services to get jobs (i.e. for American Job Centers or Vocational Rehabilitation) before people start receiving benefits.
4. There are online ads, which are 508 compliant; to help employers source talented PwDs (i.e. [www.tabABILITY.org](http://www.tabABILITY.org)).
5. The local, regional, and statewide workforce development boards fully support integrated employment as a winning strategy for workforce development.
6. The state has taken steps to market options like vocational rehab to persons who are contemplating or who have applied for SSI/DI in an effort to assist these individuals to return to work.

## **IV. PREPARING YOUTH WITH DISABILITIES FOR CAREERS THAT USE THEIR FULL POTENTIAL, AND PROVIDING EMPLOYERS WITH A PIPELINE OF SKILLED WORK**

Ensuring that employment of people with disabilities (PwDs) is win-win-win for individuals, businesses, and the state takes persistence, talent, training, preparing and devoted resources. There must be an expectation of work first rather than an outdated system of benefit reliance. Today, many youth with disabilities receive accessible education and degrees, yet they never enter the workforce. Is your state systematically and proactively using best practices to change that outcome and help youth with disabilities transition into work and meaningful careers?

From the NGA *A Better Bottom Line* Report: *“Prepare youth with disabilities for careers that use their full potential, providing employers with a pipeline of skilled workers. Governors can send a strong message to state agencies, educators, business, and parents on the importance of starting early to create the expectation that employment and a career is a goal for everyone, including youth with disabilities, and ensure that career readiness begins in kindergarten through 12th grade education and is supported at colleges and universities and as students transition to work. Research shows that early career awareness and work experience for youth are indicators of positive employment.”*

### **A. PARENTS AND EARLY EDUCATION**

1. The state provides accurate and useful tools and resources for expectant mothers where there is a pre-natal diagnosis of disability so they know that resources will be available for their children to prepare for school and future employment. Those materials are given to health-care providers and are available on the web for free. For example see: <http://www.legis.delaware.gov/LIS/LIS147.NSF/2bede841c6272c888025698400433a04/>

[a86e1f5446f4b2ed85257b82006ea24b?OpenDocument&Highlight=0,Syndrome](https://www.ky.gov/aces/developmental-disabilities/early-infant-toddler-program) and through KY ACEDD see [www.downsyndromediagnosis.org](http://www.downsyndromediagnosis.org)

2. The state provides an early infant and toddler program to all who need it within a reasonable time with an educational component promoting school readiness through pre-language-pre-literacy and numerical skills. The program promotes “Employment First” messages that every person can work and make a difference.

3. The state offers readily available free wrap around services and tools to help parents prepare their children with disabilities for work.

## **B. SCHOOL TO WORK TRANSITIONS**

1. Individual Educational Plans (IEPs) and Individual Learning Plans (ILPs) have an expectation of integrated competitive work as a first-choice option for students with disabilities.

2. The state provides high school degree bound, college, and university students with disabilities with transition services and access to internships, mentorships and work opportunities.

3. The state facilitates and supports performance-based transition apprenticeships for non-degree bound students and young adults (such as Project SEARCH or PROMISE) that offer hands-on career exploration, worksite-based training and support and placement for people with disabilities coming from school to work.

4. High quality (with integrated competitive employment as a goal) resources are readily available to transition-age students and individuals waiting for services and their families to encourage them to choose employment over benefits alone options.

5. If schools have a graduation requirement of community service hours for students, supports are offered and provided to students with disabilities so that they have equal access to integrated community service opportunities.

6. Young people with disabilities (PwDs) are made aware that employment is the first option and made aware of possibilities that would allow them to avoid long-term dependence on Social Security programs (SSI/SSDI), while also having access to the necessary publicly funded systems and supports that enable them to have full and rich adult lives characterized by successful employment.

7. State agencies such as Department of Education, and Vocational Rehabilitation blend and braid funding with formal agreements for performance based programs such as Project SEARCH, or PROMISE as a method of achieving Employment First objectives.

8. The state is confident that it has partnerships and relationships in place to meet the employment needs of all young PwDs transitioning from school to work in any given

year. (For assistance in determining the number of students with PwDs in your state who are transitioning from school to work, go to <http://www.respectabilityusa.org>)

### **C. STATE COMMITMENT TO ACCOMODATIONS, ACCESSIBILITY, AND TRAINING**

Successful employees may have been born with a disability or have acquired disabilities through age, accident, or disease. With reasonable accommodations many can enter and/or remain highly productive in the workforce. Is your state doing what is needed to keep workers with newly acquired or increasing disabilities in the workforce?

1. The state provides assistive and accessible technology training and support to those who need it to get and maintain competitive integrated employment. This program has strong customer service so that PwDs can be employed quickly and appropriately.
2. The state supports the efficient purchase or rental of assistive technologies, services and/or training to ensure competitive integrated employment for PwDs.
3. The state participates in an assistive technology recycling program. (i.e. <http://www2.ed.gov/programs/atsg/at-reuse.html>)
4. The state creates a favorable business environment for the development of innovative assistive technologies to help PwDs succeed in competitive integrated employment.
5. All of the state's American Job Centers are universally accessible: they do not present any physical or virtual barriers for PwDs.
6. State workforce plans identify how Job Centers incorporate veterans' priority of service for veterans with non-service-connected disabilities.
7. Each of these Centers has staff that has been fully trained to work with clients with disabilities so that they can be served in these centers, and not sent to a separate office or operation.
8. The state Vocational Rehabilitation program is fully matched so that wait lists are reduced or the order of selection does not exist.
9. State vocational rehabilitation quickly and appropriately matches the consumer with a rehabilitation counselor working on their job needs and placement.
10. State vocational rehabilitation offers technical assistance to employers so that they may retain workers with disabilities and for workers acquiring new disabilities to enable them to remain in the workforce.

11. The State provides information for medical and healthcare providers to become knowledgeable about the importance of encouraging patients with the onset of disability to stay or return to the workforce as a priority when appropriate.

12. Statewide hiring freezes do not include vocational rehabilitation counselors due to the federal grant that funds a portion of their salary. They are hired if they are needed.

13. In partnership with the Social Security Administration, the state created a Ticket to Work Employment Network model to connect its service systems, improve return-to-work and transition programs, and receives payments from SSA for successful employment outcomes.

14. All Individuals who are eligible for Home and Community Based Services (HCBS) waivers are automatically eligible for employment support under Vocational Rehabilitation Services.

#### **D. SELF-EMPLOYMENT, SMALL BUSINESS OWNERSHIP, AND ENTREPRENEURSHIP**

1. The state ensures that Small Business Centers are accessible and staff are trained to include and service small business owners and self-employed PwDs.

2. The state encourages micro-lending and other lending to PwD owned small businesses and start-ups.

3. The state offers readily available and free services and tools for PwDs who are entrepreneurs or self-employed.

#### **V. BEING A MODEL EMPLOYER BY INCREASING THE NUMBER OF PEOPLE WITH DISABILITIES WORKING IN STATE GOVERNMENT**

In many states the public sector is the largest employer. However, no matter its size, state government has an important role to play as a successful leader as an inclusive employer and through the state's contracted employers. This serves to address both the practical concern of employing more PwDs and the perception problem, by demonstrating best practices and value added to the employer by fostering an inclusive work environment.

According to the NGA *Better Bottom Line* report, being a model employer by increasing the number of people with disabilities working in state government is vital. *“Governors have a wide range of options for increasing the number of people with disabilities they employ, such as creating a fast-track hiring process for people with disabilities, focusing on retention of these employees, and setting hiring goals. A key action governors can take is to set a state goal for hiring people with disabilities through an executive order and hold agencies accountable for achieving that goal.”*

#### **A. STATE EMPLOYMENT OF PEOPLE WITH DISABILITIES**

1. There is a Governor's initiative and identified statewide hiring goal in place for PwDs. (i.e. <http://www.governor.wa.gov/office/execorders/documents/13-02.pdf> and <http://www.dol.gov/ofccp/regs/compliance/section503.htm>)
2. There are people who self-identify as PwDs, or who have visible disabilities, in senior leadership roles in the Administration.
3. Inclusion of employees with disabilities is a part of the human resources evaluation of managers in state government.
4. The Administration/state uses the contracting system to promote the hiring, retention and promotion of PwDs by state contractors. This includes having a state version of the Federal Section 503 (see <http://www.dol.gov/ofccp/regs/compliance/section503.htm>) which requires eligible Federal government contractors to have at least 7% of their employees in all job categories be PwDs.
5. The State encourages entrepreneurship by revising the state's disadvantaged business certification program to include businesses owned by PwDs as certified businesses eligible for a state contracting preference.
6. There is a fast track or selective placement hiring system for PwDs within state government so there is a preference hiring system for PwDs.

## **B. PERFORMANCE GOALS AND METRICS**

1. The state has specific measurable annual performance goals for inclusive employment, similar to Executive Order 13548, which requires federal agencies to have performance targets and numerical goals for employment of individuals with disabilities and sub-goals for employment of individuals with targeted disabilities including veterans with disabilities. (Learn more: [www.whitehouse.gov/the-press-office/executive-order-increasing-federal-employment-individuals-with-disabilities](http://www.whitehouse.gov/the-press-office/executive-order-increasing-federal-employment-individuals-with-disabilities)) There are also requirements under Section 503 of the Rehabilitation Act that require eligible Federal contractors to have at least 7% of their workforces in all job categories be PwDs. (Learn more: [www.dol.gov/ofccp/regs/compliance.section503.htm](http://www.dol.gov/ofccp/regs/compliance.section503.htm))
2. An official team is responsible for measuring performance metrics against annual benchmarks, has the budget to do so, and reports their results directly to the Governor, key stakeholders, and the public.
3. The state uses an anonymous employee engagement survey to determine if employees with disabilities feel discriminated against, are self-identifying, and are getting the accommodations that they need to succeed in their jobs.

## **C. ACCESSIBILITY AND ACCOMODATION**

1. The state provides early tailored supports for Administration/State employees experiencing the onset of worsening or challenging conditions (diseases, impairments, disabilities) to enable them to continue in the workforce.
2. The state's internal website (Intranet) is fully accessible (complies with at least Section 508 Standards).
3. The state's external website is fully accessible, including plain language (complies with at least Section 508 Standards) and the state has adopted similar accessibility standards.
4. The state has an accessible document explaining accommodation procedures for applicants, employees and supervisors.
5. The state utilizes accessible electronic record keeping software, databases, communication, and professional development tools.
6. The state has a centralized fund or other resources for accommodations and assistive technology for its employees with disabilities.
7. The state has a process for employees to confidentially self-identify as having a disability.
8. The state has an accessible emergency policy or procedure in place, inclusive of persons with disabilities along with the necessary tools to implement said policy.
9. The state has and disseminates Self-Identification of Disability Forms.
10. The State reviews proposed terminations to ensure reasonable accommodations were properly considered.

**D. MARKETING OF EMPLOYMENT, EFFORTS, AND SERVICES**

1. There is a statewide written statement of diversity and inclusion, which directly refers to disability that is not an anti-discrimination policy.
2. The state's disability policy, including reasonable accommodation policy, is posted on the state website and is easy for employees and the public to find.
3. The state has an officially recognized disability employee resource group (ERG) or affinity group.
4. The state distributes diversity awareness information, which includes disability, as part of new hire training.

5. The state annually distributes a memorandum to human resource directors providing guidance on effective use of the Self-Identification of Disability Forms during the on-boarding process.

6. The State has developed and implemented an external communication and marketing plans, including social media, career fairs, and job announcements that the state is encouraging qualified applicants with disabilities to apply.

**Additional Feedback**

We are interested in your comments to better understand your state and the obstacles and barriers to advancing towards a more inclusive workforce.

**Appendix A**

**WIOA Definition of “Competitive Integrated Employment”: (pages 571-573 of Statute)**

“(5) COMPETITIVE INTEGRATED EMPLOYMENT.—The term ‘competitive integrated employment’ means work that is performed on a full-time or part-time basis (including self-employment)—

“(A) for which an individual—

“(i) is compensated at a rate that—

“(I)(aa) shall be not less than the higher of the rate specified in section 6(a)(1) of the Fair Labor Standards Act of 1938 (29 U.S.C. 206(a)(1)) or the rate specified in the applicable State or local minimum wage law; and

“(bb) is not less than the customary rate paid by the employer for the same or similar work performed by other employees who are not individuals with disabilities, and who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills; or

“(II) in the case of an individual who is self-employed, yields an income that is comparable to the income received by other individuals who are not individuals with disabilities, and who are self-employed in similar occupations or on similar tasks and who have similar training, experience, and skills; and

“(ii) is eligible for the level of benefits provided to other employees;

“(B) that is at a location where the employee interacts with other persons who are not

individuals with disabilities (not including supervisory personnel or individuals who are providing services to such employee) to the same extent that individuals who are not individuals with disabilities and who are in comparable positions interact with other persons; and  
“(C) that, as appropriate, presents opportunities for advancement that are similar to those for other employees who are not individuals with disabilities and who have similar positions.”

**WIOA - “training and services for employers” section**(<https://www.congress.gov/bill/113th-congress/house-bill/803/text>)

**SEC. 418. TRAINING AND SERVICES FOR EMPLOYERS.**

Section 109 (29 U.S.C. 728a) is amended to read as follows:

**SEC. 109. TRAINING AND SERVICES FOR EMPLOYERS.**

“A State may expend payments received under section 111 to educate and provide services to employers who have hired or are interested in hiring individuals with disabilities under programs carried out under this title, including--

“(1) providing training and technical assistance to employers regarding the employment of individuals with disabilities, including disability awareness, and the requirements of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) and other employment-related laws;

“(2) working with employers to--

“(A) provide opportunities for work-based learning experiences (including internships, short-term employment, apprenticeships, and fellowships), and opportunities for pre-employment transition services;

“(B) recruit qualified applicants who are individuals with disabilities;

“(C) train employees who are individuals with disabilities; and

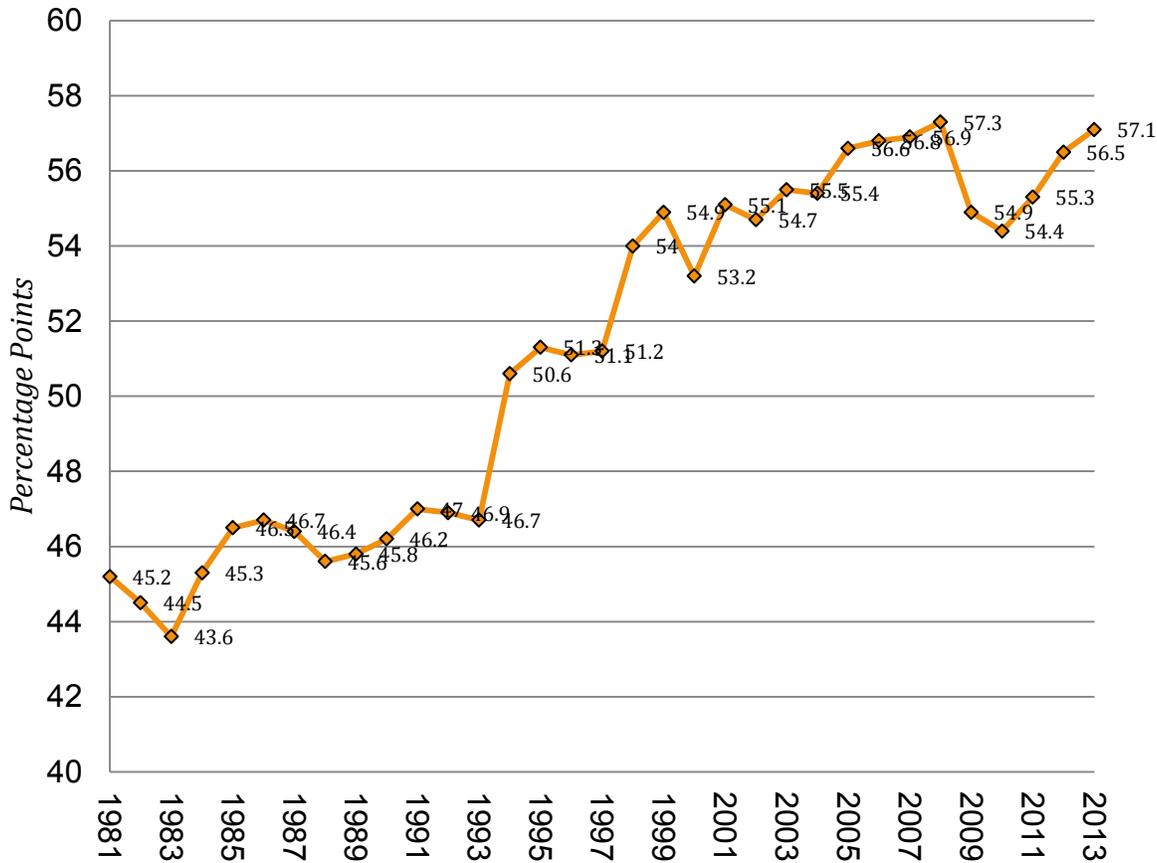
“(D) promote awareness of disability-related obstacles to continued employment;

“(3) providing consultation, technical assistance, and support to employers on workplace accommodations, assistive technology, and facilities and workplace access through collaboration with community partners and employers, across States and nationally, to enable the employers to recruit, job match, hire, and retain qualified individuals with disabilities who are recipients of vocational rehabilitation services under this title, or who are applicants for such services; and

“(4) assisting employers with utilizing available financial support for hiring or accommodating individuals with disabilities.”

## Appendix B

While the ADA and IDEA are necessary and vital laws, they are not sufficient to provide the opportunity outcomes needed by Americans with disabilities. As women and minorities have been able to make significant strides in joining the workforce, the gap in workforce participation between those with and without disabilities, as seen in the adjoining chart, has increased dramatically, as shown below. The increase in workforce participation in 1981 was 45.2%. In 2013 it had only risen to 57.1% -- only a roughly 12% increase in 32 years. Source for chart is the Disabilities Compendium.





It would be nice if VR services would be more pro-active in helping the TANF unemployed gain skills and employment. I realize these clients are more challenging, but they do need assistance in this capacity. I see many who do not meet the criteria for SSI/SSDI, that OVRS has declined to work with. I hear things like “they aren’t motivated, I can’t place that person.” So what can they do. Many are just being recycled through the system.

VR has the resources.

Thanks for listening.