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Mar. 6, 2016

## RespectAbility – Public Comments –Arizona Unified State Plan

*“WHEREAS, Arizona workplaces welcoming of the talents of all residents, including individuals with disabilities, are a critical part of our efforts to build a strong business community and a dynamic, robust economy; and*

*WHEREAS, Arizona stands to benefit from an integrated workforce where people with and without disabilities work side by side earning competitive wages and benefits. Businesses that hire, retain, and include people with disabilities continue to discover that a strong workforce is an inclusive workforce. The perspective and creativity of people with disabilities benefit employers who acknowledge each person's unique strengths and talents; and*

*WHEREAS, Arizona employment broadens the tax base and helps to create an environment where individuals with developmental disabilities are less reliant on government funded programs. Employment provides Arizonans with developmental disabilities the opportunity to be contributing members of society by achieving self-fulfillment, independence, and community inclusion;.” – [Governor Doug Ducey, Disability Employment Awareness Month Proclamation, October 5<sup>th</sup>, 2015.](#)*

RespectAbility is pleased to submit the following comments regarding the current draft of Arizona’s Unified State Plan as required under Section 102 of the Workforce Innovation and Opportunity Act (WIOA). We are pleased to have this opportunity to offer our comments, raise our questions, and provide our suggestions about the content of the state plan.

**Today Arizona has the opportunity to work hard to improve outcomes in terms of competitive, integrated employment for people with disabilities.** Currently, your state ranks 35<sup>th</sup> in the country in terms of their employment rate of people with disabilities. **Only 32.83% of the approximate 160,000 working age Arizonans with disabilities are employed. Further, there are over 23,300 youth ages 16-20 with disabilities and each year a quarter of them will age out of school into an uncertain future.**

**Thanks to WIOA, Arizona has the chance to invest resources in successful models and implement best practices to expand job opportunities for people with disabilities.** Your state has much to learn from other states that have worked hard to achieve improved employment outcomes. Other states have higher than 50% employment rates for their citizens with disabilities. **[States like the Dakotas, Alaska, and Wyoming have achieved increase results by putting best practices into places.](#)** The experience of these states shows ways that Arizona can dramatically improve their outcomes. **Likewise, we are also seeing pockets of excellence around innovative youth programs designed to address disability employment in [Georgia](#), [Nevada](#), and [Kentucky](#).**

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

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

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

Achieving success, especially through the implementation of WIOA, will very much depend on having access to the right data to drive the decision making process. **It is vital that the workforce system and the State Board include the labor force participation rates of people with disabilities on their state dashboards and performance metrics.** Looking at unemployment information in isolation causes decision makers to miss the bigger picture of those individuals with barriers to employment who are not actively seeking work. Additionally, while it is very important to see when and if a person who approaches the workforce system gets a job, it is even better when systems can be created that enable people to get jobs and careers on their own. This compilation contains information derived from the Census Bureau’s American Community Survey that should be valuable to the WIOA work being done in Arizona.

As required by Section 102(b)(1)(B) of WIOA, each state plan must include an analysis of the current workforce, employment and unemployment data, labor market trends, and the educational and skill levels of the workforce, including individuals with barriers to employment (including individuals with disabilities). **While the “Economic, Workforce, and Workforce Development Activities Analysis” starting on page 9 of the Plan provides a great degree of detail, it is lacking on the disability front. This is not a small issue when there are almost 850,000 working age Arizonans with disabilities and only 32.8% of them are currently employed.** As such, we have several revisions to suggest that will strengthen Arizona’s Unified State Plan and provide the insights needed to improve outcomes.

First, we highly recommend that the Economic Analysis be amended to include specific detail on one of the most important data points about the economic situation of the disability community in Arizona. **It is absolutely critical that Arizona’s workforce system include the labor force participation rates (LFPRs) of people with disabilities both in their performance metrics and on their state dashboards.** If performance metrics are limited to things like unemployment statistics, then people who are not actively looking for work are being excluded from the plan’s analysis of the state economy. These rates are the critical lens that is needed to bring clarity to the issue of employment for people with disabilities. **There is a 39.7 point gap in the Labor Force Participation Rates between people with and without disabilities in Arizona. Pushing hard to close this gap will require focused energy and effort.** As an example of how to expand the detail included on this subject, we are including our data presentation for Arizona.

Second, while Arizona only ranks 35th in the nation in terms of the employment rate for people with disabilities, it is still critical to look at the experience of those with disabilities who are succeeding in the world of work. **From the data, we find that only 39.5% of the 30,500 Arizonans who are blind or have vision loss are employed while 45% of the 47,900 Arizonans with hearing differences are also employed.** Given the flexibility and availability of assistive technology solutions, the employment rate for this subgroup should be much higher.

Many people who are blind or deaf have incredible talent potential that can be unleashed by something as simple as a smartphone. **Sadly, we also see that only 20.5% of Arizonans 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 Arizona’s workforce system expands successful school to work transition programs.**

## **2. Busting Stigmas, Myths, and Misconceptions Should Be a Key Part of Arizona’s Workforce Strategy**

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

We are pleased to see that Arizona Employer Coordinators have assisted in the development and facilitation of over 50 events statewide to inform and educate employers on the benefits of collaborating with Arizona Rehabilitation Services and hiring qualified individuals with disabilities. Additionally, we are happy to see that Employment Coordinators organized 20 “Employment Encounters” and Disability and Rehabilitation Employment Awareness Month (D.R.E.A.M.) job fairs throughout the state that provided pre-employment workshops and mock interview for jobseekers. However, these efforts, when integrated into a larger, overall strategy could build momentum around the hiring of people with disabilities.

**As such, we recommend that the Unified State Plan be amended to include a comprehensive, proactive communications/public relations strategy for reducing such stigmas.** The best way to fight stigmas is to let employers see the facts from other employers who are already succeeding by hiring people with disabilities. In terms of potential employer partners, we encourage your state plan to look at [Disability Equality Index that assesses the inclusion and hiring efforts of major employers.](#) It was put together by the United States Business Leadership Network (USBLN) which operates [a network of affiliates across the country that can be an incredible resource for your work.](#) However, it should be a much larger component of Arizona’s planning and implementation of a serious business-to-business PR effort. The companies which scored 100% in the USBLN index can be a great resource. These are Ameren Corporation, AT&T, Booz Allen Hamilton Inc., Capital One Financial Corporation, Comcast, NBCUniversal, Ernst & Young LLP, Florida Blue, Freddie Mac, Highmark Health, JPMorgan Chase & Co., Lockheed Martin Corporation, Northrop Grumman Corporation, Pacific Gas and Electric Company, PricewaterhouseCoopers LLP (PwC), Procter & Gamble, Qualcomm Incorporated, Sprint Corporation, Starbucks Coffee Company, and TD Bank N.A.

Polls and focus groups show that there are three types of messages and audiences that are needed to expand employment for people with disabilities. Serious communications campaigns are needed for all three:

- A. CEOs/business leaders need to understand the value proposition/business case for their specific company as to why they should focus on putting people with disabilities into their talent pipelines.** This is best done through business-to-business success stories. People with disabilities can work successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and be super talents in developing computer

software and engineering solutions. CEOs and business leaders need to know that people with disabilities can be the BEST people to get a job done.

- B. Human resources professionals and on-the-ground supervisors need to understand that hiring people with disabilities is generally easy and inexpensive, and that any costs incurred are more than offset from increased loyalty.** Hiring managers and supervisors are key players who can turn high minded policy and business goals into action at the ground level. However, studies show that many are uninformed about people with disabilities. They are afraid of potential legal action, costs, or other failures. They need supports that will empower them to overcome their own fears and to excel at recruiting, hiring, supervising, or working with teammates who have disabilities. Arizona's VR staff and community agencies can fully support human resources professionals and managers in dealing with their own specific fears and stigmas surrounding hiring people with disabilities, and should do so, given that they are one of the few states who have opted to go for a dual-customer approach at their program centers. Moreover, online and in-person training is readily available to help from a variety of sources. RespectAbility has online webinars, as [does ASKJAN.org](#), USDOL and others. Partners like [the Poses Family Foundation Workplace Initiative](#) can provide training to the workforce staff and volunteers systems-wide as well as to community agencies in supporting companies through messaging efforts around related to fear and stigma. [The National Organization on Disability](#) and [the U.S. Business Leadership Network](#) offer strong resources as well.
- C. People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectation must begin. Arizona needs a public relations campaign that will inspire Arizonans with disabilities to set their hopes high, as low expectations and low self-esteem are a barrier to employment.** For example, Virgin Airways founder Sir Richard Branson and finance wizard Charles Schwab are also dyslexic. Scientist Stephen Hawking and multi-billionaire businessman Sheldon Adelson, like Gov. Greg Abbott of Texas and President Franklin D. Roosevelt before them, are wheelchair/mobility device users. The CEO of Wynn Casinos, Steve Wynn, is legally blind. Arthur Young, co-founder of the giant EY (formerly Ernst & Young) was deaf. Success sells success and that is something the workforce system should seriously utilize in order to motivate and inspire in an intentional manner moving forward.

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

### **3. Strong Sector Strategies**

As required by WIOA Sec. 102(b)(1)(A), Arizona's state plan must and does include a detailed analysis of the economic sectors of the state economy that are growing and are forecasted to grow in the future. The success of WIOA depends on being an employer driven paradigm shift.

Expanding opportunities for people with barriers to employment such as disability requires strong partnerships with employers in those sectors which are rapidly expanding. In terms of prospective employment needs, we suggest focusing on the economic forecasts and projected field growth listed on Tables 2 and 5 on pages 11 and 15. These charts, which show Arizona's current and projected workforce needs, offers a great starting point for improving outcomes. **Specifically, it is important to train and prepare Arizonans with disabilities to pursue careers in the fields listed, as they are most likely to grow in the immediate future and will likely have the greatest chance at success.** This can be accomplished by developing sector specific sector strategies, something your state has already been working diligently on. **Fields relating to healthcare and social assistance are projected to grow in Arizona, as well as Science, Tech, Engineering and Mathematics (STEM) jobs are projected to grow. These are fields where people with disabilities can excel and benefit their employer's bottom line.** People with disabilities represent an untapped labor resource that, with the right training and supports, can meet the diverse talent needs of Arizona's growing job sectors. The job gains in these sectors offer a great opportunity for focused sector strategies sustain and build on employment outcomes being achieved among people with disabilities in Arizona.

#### **A. Health Care**

The State Plan projects job growth in the following fields according to the existing and emerging demands listed on Tables 2 and 5: Psychiatric and substance abuse hospitals, other hospitals, offices of physicians, general medicinal and surgical hospitals, outpatient care centers, and other ambulatory health care services. **People with disabilities can and should be part of the solution to this critical demand in the labor market.** To quote [a 2014 report from the Office of Disability Employment Policy \(ODEP\)](#), “[people with disabilities] not only represent an untapped talent pool, but also offer significant value and insight” in the field of healthcare. It is important for healthcare institutions to reflect their customers, and people with disabilities interface more with the healthcare system. There are [numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living.](#) **Employers working in health and elder care can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities.**

The best way to meet these talents needs is through the type of school to work transition programs embodied by Project Search. For those who are not familiar with it, Project Search is a unique one-year, school-to-work program through 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, integrated employment.

[In 2009, the first Project Search site opened in Arizona thanks to a partnership between Sonoran UCEDD and the University of Arizona Medical Center \(UAMC\).](#) The core partners and professionals that helped to establish Project Search in Arizona should be key collaborators as your state looks to meet increasing healthcare talent needs.

**We recommend that Project Search be significantly expanded as they have done in Wisconsin, Florida and other states. We encourage Arizona to recruit hospitals as worksites for Project Search. We also encourage Arizona to look beyond just hospital settings and consider the potential of placing Project Search interns in either elder care facilities or in hotels.**

We do not make this recommendation lightly. Nationally, Project Search sites overall have been achieving outstanding results for people with disabilities, employers, and taxpayers alike. For example, [the first longitudinal study of the program found “a 68% success rate in transitioning students from high school into competitive employment” and “Project SEARCH sites in Upstate New York that have an impressive 83% success rate overall.”](#) The goal for each program participant is competitive employment.

**We suggest that you look to follow the example set by the state of Wisconsin where they started with just three Project Search sites and are rapidly expanding to 27 worksites by the end of this year.** The experiences of the dedicated state officials, VR counselors, workforce professionals, and special educators who have increased Wisconsin’s Project Search programs offer profound insights in the steps necessary to make rapid expansion a reality. Thinking long-term, investments in Project Search and other such programs will save big money for taxpayers while also strengthening the talent pool for employers.

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

When talking employment opportunities for people with disabilities, careers in the Science, Technology, Engineering and Mathematics (STEM) fields may not immediately come to mind. However, there are significant and exciting opportunities to ensure that people with difference can succeed in this dynamic career field. Indeed, ensuring the accessibility of STEM careers offers Arizona a significant opportunity to innovate and lead. As the State Plan shows in Table 5, scientific research and development services are projected to be added in the coming years. We recommend Arizona look at ways to better train people with disabilities to fill these roles. **As has been documented in many cases, there can be an “Autism Advantage” in the STEM space. Indeed, some people on the Autism spectrum can have the very best skills in science, math and engineering.** [Microsoft, SAP, and Specialisterne](#) have committed themselves to [“provide employment opportunities for people on the autism spectrum in roles such as software testers, programmers, system administrators, and data quality assurance specialists.”](#) [The Israeli Defense Forces recruits and trains their citizens on the Autism spectrum for work in their elite intelligence unit.](#)

Delaware’s Governor Jack Markell is partnering with companies to employ more people on the Autism spectrum in STEM jobs. Such examples need to be implemented by Arizona as well. This issue of STEM and access for student with disabilities is a natural point of partnership between the workforce system and the educational system. That work needs to start young, be matched with high expectations for success, and designed to ensure people with disabilities have the chance to become future scientists, engineers, doctors and mathematicians.

**Ensuring the Accessibility of Science, Technology, Engineering and Mathematics (STEM) Programs and Careers for People with Disabilities, especially Students with IEPs, is vital.** As Carol Glazer of the National Organization on Disabilities wrote in *Huffington Post*, [“America is already lagging when it comes to STEM-skilled workers. The U.S. will have more than 1.2 million job openings in STEM fields by 2018.”](#) Governors in other states have looked at STEM needs and begun to develop solutions. For example, [in New York State Governor Cuomo has ensured that magnet schools for STEM are located near IBM, a major STEM employer in their state.](#) Arizona should follow this model. Together, Arizona’s workforce system and educational system can look to supported-employment programs such as Project Search, Specialisterne, and [the Marriot Foundation's Bridges to Work Program](#) as models for developing

a systematic approach to providing the supports necessary for our students on the autism spectrum to excel in STEM.

### **C. High Turnover Jobs**

Despite not being listed in the emerging and existing demand tables, sectors where there are high turnover rates such as accommodation and food service can still be considered areas of economic development if people with disabilities are given the chance to work in them. Millions of dollars are lost each year due to employee turnover. [For all jobs earning less than \\$50,000 per year, the average cost of replacing one employee is between \\$6,000 and \\$20,000.](#) Research shows that employees with disabilities, when their interests and abilities are aligned with the needs of employers, are more productive and loyal than their non-disabled peers. Company records show that even when the relatively more expensive accommodations were factored in, the overall costs of disability accommodations were far outweighed by the low turnover rates and better tenures of the employees with disabilities.

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

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

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

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

**4. Avoid the Opportunity Costs of Focusing Too Much on One-Stop Centers. Programmatic Accessibility is Critically Important**

Public policy is about the allocation of scarce resources to meet infinite needs. It is vital to invest resources on those points where they can have the greatest effect. **One challenge that we have seen in many states' WIOA plan has been the prioritization of expensive bricks and mortar One-Stops as the primary access point for programs and services under WIOA.** While there is a degree of focus placed on One-Stop Centers, physical infrastructure, and co-locating services in Arizona's state plan, we are pleased to see that there is also a good amount of prioritization placed on programmatic accessibility.

**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. **We are pleased that Arizona has made it a priority to improve the delivery of its Arizona@Work services through means of technology. The strategies listed on page 86, such as the numerous access points with consistent processes, expanded accessibility for rural Arizonans, utilization of technology for virtual or remote access where possible, and strengthening support services, e.g. transportation, are all steps in the right direction.** We also commend Arizona on its strategy to make its workforce design more universal, as listed on page 75. In look at more universal design features, we highly recommend that you look to the experiences of others who have moved the employment services out of the physical One-Stops and into the local community. For example, [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.](#)

**5. Strategic Engagement to Build a Buddy/Mentor System for People Customers of the Workforce System**

While it is good that is good that Arizona includes mentoring in some of its programs like the Youth Program listed on page 39, there is a massive role that can be played by trained and vetted volunteers who are willing to help people with barriers to work find and keep jobs. Faith-based organizations and many others can fill massive gaps. [There is a terrific booklet, Clearing Obstacles to Work, put out by the Philanthropy Roundtable that is rich with potential partners and proven programs.](#) This is a huge missed opportunity as you will see in the booklet we just mentioned above. It's all about teaching people to fish (helping them get and keep a job) rather than just giving them fish.

It is also important to note in terms of the SNAP and TANF programs that too many faith-based programs focus on giving out food without giving out the volunteer support to help people sustain themselves through gainful employment. [In looking to rethinking policies around SNAP funding, we suggest looking at the innovative efforts of the Seattle Jobs Initiative \(SJI\) to realign that funding into more productive, employment outcomes.](#)

**6. Section 503 of the Rehabilitation Act and Federal Contractors offer Arizona the chance to innovate, collaborate, and expand opportunity:**

Arizona's State Plan completely omits any mention of the important rules and opportunities created by Section 503 of the Rehabilitation Act of 1973. The plan lacks any references to the employment opportunities and talent challenges created by the recently



implemented Section 503 regulations regarding federal contractors and subcontractors. Arizona's plan does not discuss at all the new 7% utilization goal set for companies to recruit, hire, and retain qualified individuals with disabilities in all job categories.

Arizona should respond to these newly enacted regulations by adopting a strategy focused on competitive advantage, not just compliance. These regulations and requirements entail far more than just new rules for businesses to play by. Section 503 is an opportunity that could potentially have a broad impact on the employer engagement work of the entire workforce system. The companies who must comply with Section 503 have an opportunity to teach companies not impacted by the regulations how to effectively employ, engage, and retain workers or customers with disabilities. Specific companies that should be included in your outreach efforts include Raytheon, Triwest Healthcare Alliance Corp., Boeing, General Dynamics, and Honeywell International Inc. [More detailed information regarding federal contracts in Arizona can be found here.](#)

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

**There are many online and in person resources to help employers and people with disabilities come together to build success.** However, all the stakeholders need to be educated to know that these resources exist, and that they are free and user-friendly. These resources must also all be accessible. **Arizona needs to make an effort to demonstrate to employers and prospective employees that these services exist.** In the current plan, it is mentioned in section C on page 207 that the services offered by the VR program are not well known and “there is a lack of awareness about the available service available to individuals with disabilities.” Despite this, we are happy to see that Arizona is prioritizing making services easily accessible to individuals who have difficulty attending one-stop locations, as listed in Strategy 4 on page 68.

**However, Arizona should be careful not to waste money trying to re-invent the wheel in creating online resources as [ASKJAN.org](#), [the US Department of Labor's Office of Disability Employment](#) Policy, [our organization and others also offer free toolkits, webinars and training opportunities](#), [Another resource is Understood.org](#).** This is a comprehensive resource to help families and individuals with learning and attention issues build their educational and career plans. It will be helpful to collaborate with those groups however to ensure that the best tools are created to fit the training and information needs on these issues.

#### **8. Prioritize pre-employment training and expand partnerships with VR**

**It is clear that Arizona has the ability to improve employment outcomes for people with disabilities judging from the plans and strategies listed regarding collaboration and partnerships. The commitments detailed on page 38 regarding the sector partnerships, the strategy to continually outreach to employers seeking partnerships in goal 3 on page 64, and the strategy to develop a workforce system and services accessible to all employers and jobseekers, including individuals with barriers to further pre-employment training listed on page 75 are all encouraging.**

We also encourage Arizona to look at other methods of partnerships. Following Florida and Wisconsin's example by working hard to expand the number of Project SEARCH sites is a good starting point, as this program was not mentioned in the plan. Project SEARCH has yielded great results in the locations it has been established, so we advise Arizona to do the same. The school system, vocational rehabilitation, and local workforce boards can build creative, collaborative partnerships with companies that are leading in the disability space.

Arizona would benefit greatly by looking at other models of innovation that are showing great potential to fundamentally improve employment outcomes. To begin with, we would highly recommend that state workforce systems examine how to support disability employment efforts through establishment of public/private partnerships in local communities. These types of partnerships could focus on the “cluster” model, started by Poses Family Foundation that is having tremendous success in diverse states as Nevada, Georgia, and Ohio. [This model depends on “consortium of employers committed to implement or expand programs”, “a public/private partnership to coordinate services for job-seekers with disabilities, with a single point of contact for employers”, and “Connections among employers, public and private agencies, and schools to reach young adults with disabilities who are in transition from school to work.”](#)

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

**Public Transportation and accessibility to methods of transportation for people with disabilities is an issue that needs to be prioritized in Arizona’s state plan. As stated on page 206, participants of the VR survey identified transportation as one of the most critical needs of people with disabilities.** Page 56 of the plan states that 60% of Arizonans live in the Phoenix and Tucson areas, which is where the majority of One-stop centers and resources are physically available. The plan goes on to state that “the lack of resources for clients in rural and remote areas is further exacerbated by geographic isolation or lack of transportation”.

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 transportation routes to places where there are work opportunities. In places where that are not possible, Arizona could look at partnering with UBER, Lyft, and other new transportation solutions. People with disabilities who drive can also provide a way to enter into the workforce with flexible hours. Public sector employers and federal contractors who have Section 503 obligations are key places for apprenticeships and internships and onboarding of talent. It is important for them to play a key role in planning for public transportation. This priority would not only benefit those with disabilities, but also to the large amount of migrant workers in rural communities, as they commonly do not possess reliable forms of transportation.

**10. Order of Selection, Chronic Unemployment, and the importance of investment in youth transitions a.k.a the importance employing a “Jackie Robinson Strategy” in Arizona:**

**It is evident that Arizona wishes to improve transition services, which we are happy to hear. We believe supporting successful transitions for youth with disabilities is the necessary condition for improving outcomes overall.** It is mentioned on page 211 of the state plan that Arizona is using an order of selection when determining individuals to be eligible for VR services. When comparing those with most significant disabilities (priority 1) to those with not as significant (priority 2), 8093 priority 1 VR consumers were served compared to only 326 priority 2 consumers despite the priority 1 costs equaling about \$51 million and the priority 2 costing about \$1.3 million.

VR and the workforce system only have one chance with new employers to make a good impression, so Arizona should be careful when determining how much of their budget will be spent servicing those with the most significant disabilities. It is our perspective that those individuals with disabilities who go into employment need to succeed and that if they are not the right match for the employer, it will undermine the larger, longer term goals of improving

outcomes overall. Other states like Washington have had great success moving beyond Order of Selection and states like Alaska have prioritized resources to supporting youth with disabilities

**We recommend that Arizona adopt a “Jackie Robinson Strategy” to make sure that the right talent gets into the right positions so it is a beneficial opportunity for workers and employers alike.** As the first African-American to play major league baseball, Robinson reduced extensive amounts of discrimination and led the way for other talented and diverse athletes to follow. He was the talent that his employer needed, and contributed to the bottom line. The workforce system should keep such a strategy in mind when looking to place job seekers with disabilities into jobs at potential employees. Stigma and misconceptions still exist for people with disabilities in Arizona. **Helping youth with disabilities to succeed will blaze the trail for people with more significant disabilities to become successfully integrated into the workforce. Once employers understand accommodations and how to maximize the use of talent, they will be more willing to hire those with more specific needs.**

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

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

### **12. Aging workers with acquired disabilities not addressed**

Many older people who have been in the workforce a long time may acquire disabilities before they reach retirement age. Some believe that this is simply the process of aging, and they reach a point where they cannot keep up with the physical demands of their jobs. In Iowa, IVRS works with a major employer, Unity Point Hospital to “re-home” employees to other jobs within the same company when good workers can no longer do physical jobs and need a new assignment. They find that Emergency Room nurses, for example, come to a point where they can no longer keep up with the physical demands of that job. They have a department that works to “re-home” talented and valued employees who either age into a disability or acquire a disability through accident or illness. Empowering youth with disabilities to enter the workforce should be your highest priority, but keeping aging workers in the workforce until retirement age is also important. This will take a specific strategy and effort so that you don’t have massive numbers of people going onto disability rolls and out of the workplace prematurely.

### **13. Disability issues of people in corrections facilities must be addressed**

Successfully reintegrating former offenders into the workforce is a huge challenge for many states. It is good that Arizona is taking steps to help combat this issue. Such methods as the Department of Corrections Initiative listed on page 85, which provides incarcerated individuals with workshops and career portals, is a good way to reduce recidivism. **This shows that Arizona’s workforce system is aligning to improve outcomes for people transitioning out of**

**prison and back into society.** However, **these efforts need to be viewed through the lens of disability.** The reason why is simple.

[According to recently published data from the Bureau of Justice Statistics, “An estimated 32% of prisoners and 40% of jail inmates reported having at least one disability.”](#) This issue is a serious one and it needs to be addressed at the state level. Frequently people are involved in the criminal justice system because they have disability issues, including learning differences, ADHD, executive function, and mental health issues that went undiagnosed and/or unaddressed through childhood and into the school years. Given these statistics from the BJS, it is vital that your state identify how many of the individuals in the ex-offender pipeline have disabilities. Serving ex-offenders is a critical workforce development challenge and one that can only increase when disability is a factor and it is not addressed appropriately. The price paid for ignoring this issue are higher rates of recidivism and greater costs to society. Assessment tools are needed to identify disability issues as people enter the prison system. Doing so creates opportunities to address those issues productively. If people in the corrections system who will be released eventually are to be well served by Arizona’s workforce system, then it is vital that disability issues be identified and addressed in a way that will help work successfully in the future.

## **Conclusion**

As we stated at the beginning of our Public Comments, Arizona can and must do better in terms of jobs for people with disabilities. Arizona only ranks 35<sup>th</sup> in the country in terms of your employment rate for people with disabilities. Such outcomes can be turned around. Failing to properly train and prepare job seekers with disabilities costs your state economy incredible talent and shatters the aspirations of so many Arizonans with disabilities who want to pursue the American Dream, just like everyone else.

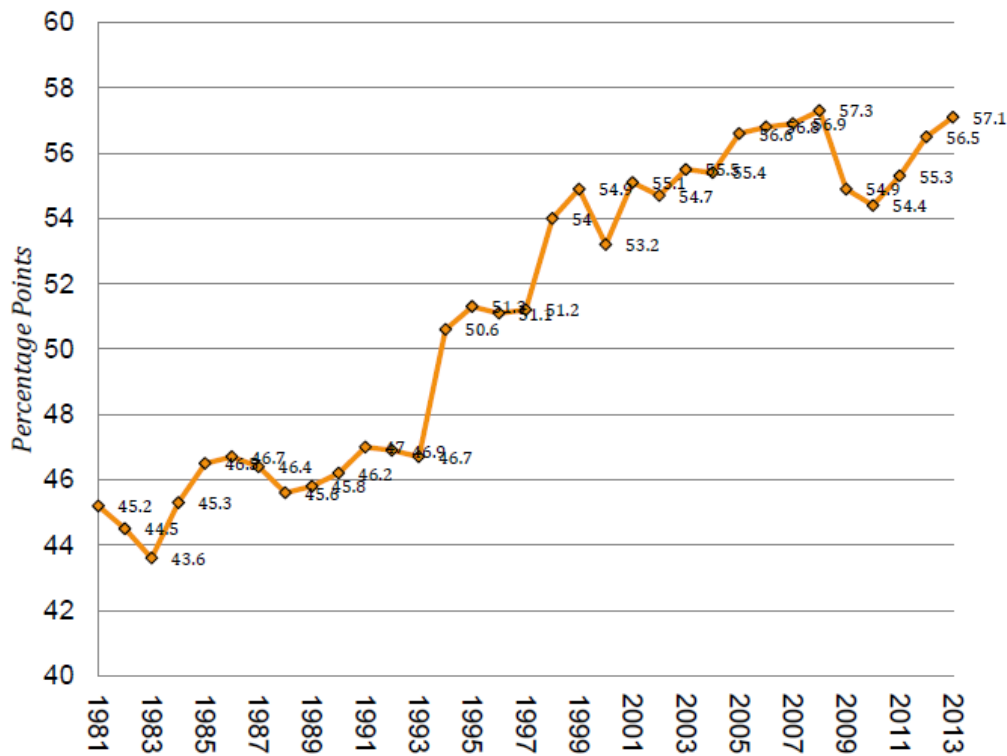
However, thanks to WIOA, Arizona has the chance to lead by example in terms of investing resources in successful models and implementing best practices to expand job opportunities for people with disabilities.

The bottom line is that expanding job opportunities for people with disabilities is win-win-win for employers, taxpayers and people with disabilities alike. It is good for employers because the loyalty, talent, and skills of workers with disabilities contribute to the employers’ bottom line. It is good for the workforce system because improving services and supports for job seeker with disabilities will benefit others with different barriers to employment. It is good for people with disabilities who want the dignity, pride, friendships, independence and income that work provides.

We are happy to answer any questions you have and to help in any way. Thank you for your consideration!

We have included a chart below which looks at the gap in workforce participation between those with and without disabilities nationally over time. As seen in the chart, as women and minorities have been able to make significant strides in joining the workforce, people with disabilities have not. We know that by maximizing the potential of Arizona’s WIOA Plan that all of this can change for the better for the people of our state.

*Chart 1 – The gap nationally in workforce participation rates between people with disabilities and their non-disabled peers.*



Source for chart is the Disabilities Compendium.

Below are two data tables that provide detailed information ranking the states in terms of employment rates for people with disabilities as well as the employment gap between people with and without disabilities. This has been added to show you where Arizona ranks nationally and to showcase several of the data points needed in Arizona’s WIOA State Plan.

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

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

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

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

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

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

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



**Table 2**

From 2012 to 2013, the employment gap closed by one percentage point or more in 22 states.

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

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

**All of the states that experienced reductions greater than one percentage point also experienced increases in employment rate of people with disabilities, so none of these reductions were due to a reduction in the employment rate of people without disabilities.**

**The state that really stands out is South Carolina, with a 2.3 point reduction, while also having a 1.3 point increase in the employment rate of people without disabilities. The big question is whether we can attribute success, like the success in South Carolina to changes in policy or new innovative approaches to employing people with disabilities.**

Working-age population under 1 million
Working-age population over 5 million
Increase in no dis employment

State	2012			2013			Change in Gap		Pop in 2013			Increase in Dis. Emp.	Increase in Non-PWD Emp.
	Dis.	No Dis.	Gap	Dis.	No Dis.	Gap	Pct. Points	Rank	Number	Rank	Size		
AK	39.0	76.3	37.3	47.8	75.2	27.4	-9.9	50	459,776	47	Working-age pop. under 1 million	8.8	-1.1
RI	28.7	77.0	48.3	34.3	76.3	42.0	-6.3	49	668,448	43	Working-age pop. under 1 million	5.6	-0.7
WY	43.9	78.5	34.6	50.7	79.4	28.7	-5.9	48	358,526	50	Working-age pop. under 1 million	6.8	0.9

NH	37.9	80.5	42.6	41.8	80.3	38.5	-4.1	47	842,880	40	Working-age pop. under 1 million	3.9	-0.2
MN	42.1	81.6	39.6	46.0	82.1	36.1	-3.5	46	3,357,171	21		3.9	0.5
NV	35.5	72.2	36.7	39.2	73.1	33.9	-2.8	45	1,719,885	34		3.7	0.9
WI	37.6	79.5	41.9	40.9	80.1	39.2	-2.7	44	3,544,103	20		3.3	0.6
SC	<b>27.0</b>	<b>71.4</b>	<b>44.4</b>	<b>30.7</b>	<b>72.7</b>	<b>41.9</b>	<b>-2.5</b>	<b>42</b>	<b>2,893,842</b>	<b>24</b>		<b>3.7</b>	<b>1.3</b>
NM	33.1	70.4	37.3	35.3	70.1	34.8	-2.5	42	1,243,353	36		2.2	-0.3
IL	<b>33.4</b>	<b>74.6</b>	<b>41.2</b>	<b>36.1</b>	<b>75.0</b>	<b>38.9</b>	<b>-2.3</b>	<b>41</b>	<b>8,010,771</b>	<b>5</b>	Working-age pop. over 5 million	<b>2.7</b>	<b>0.4</b>
IA	42.0	81.4	39.5	44.8	82.1	37.2	-2.3	40	1,868,852	30		2.8	0.7
UT	41.1	77.2	36.1	42.5	76.6	34.1	-2.0	39	1,701,705	35		1.4	-0.6
DE	34.6	75.1	40.6	36.4	75.1	38.7	-1.9	38	565,138	45	Working-age population under 1 million	1.8	0
CO	40.3	77.1	36.8	42.3	77.3	35.0	-1.8	36	3,304,940	22		2.0	0.2
HI	37.3	75.6	38.3	39.1	75.7	36.5	-1.8	36	822,542	42	Working-age population under 1 million	1.8	0.1
NE	43.5	82.2	38.7	45.5	82.6	37.1	-1.6	35	1,125,425	38		2.0	0.4
ND	51.6	83.3	31.7	52.8	83.1	30.2	-1.5	34	451,304	48	Working-age population under 1 million	1.2	-0.2
KS	40.1	78.8	38.7	41.7	79.0	37.3	-1.4	33	1,730,369	33		1.6	0.2
MA	33.0	77.2	44.2	34.9	77.9	42.9	-1.3	31	4,272,843	14		1.9	0.7
OK	34.4	75.1	40.7	35.8	75.2	39.4	-1.3	31	2,295,734	28		1.4	0.1
TN	28.0	73.2	45.2	29.9	74.1	44.1	-1.1	30	3,983,560	16		1.9	0.9
NJ	<b>35.0</b>	<b>74.5</b>	<b>39.5</b>	<b>36.6</b>	<b>75.1</b>	<b>38.5</b>	<b>-1.0</b>	<b>29</b>	<b>5,528,837</b>	<b>11</b>	Working-age pop. over 5 million	<b>1.6</b>	<b>0.6</b>
TX	37.0	73.8	36.9	38.7	74.7	36.0	-0.9	28	#####	2	Working-age pop. over 5	1.7	0.9

FL	28.9	71.4	42.5	30.5	72.2	41.7	-0.8	27	#####	4	million Working-age pop. over 5 million	1.6	0.8
NY	30.9	72.7	41.8	32.2	73.3	41.1	-0.7	26	#####	3	million Working-age pop. over 5 million	1.3	0.6
AL	26.8	70.8	44.0	27.1	70.5	43.4	-0.6	25	2,945,466	23		0.3	-0.3
GA	30.3	70.8	40.5	31.5	71.5	40.0	-0.5	22	6,151,890	8	Working-age pop. over 5 million	1.2	0.7
CT	39.7	76.6	36.9	40.0	76.4	36.4	-0.5	22	2,235,695	29		0.3	-0.2
WV	24.3	70.1	45.8	25.3	70.6	45.3	-0.5	22	1,132,703	37		1.0	0.5
WA	35.7	74.3	38.7	36.4	74.7	38.3	-0.4	21	4,339,199	13		0.7	0.4
PA	33.0	75.1	42.1	33.9	75.6	41.7	-0.4	20	7,849,516	6	Working-age pop. over 5 million	0.9	0.5
MT	38.7	76.4	37.7	39.4	76.8	37.4	-0.3	19	616,125	44	Working-age pop. under 1 million	0.7	0.4
MI	27.9	71.7	43.8	29.9	73.4	43.5	-0.3	18	6,096,761	9	Working-age pop. over 5 million	2.0	1.7
MS	26.4	69.6	43.3	26.3	69.4	43.1	-0.2	17	1,790,746	31		-0.1	-0.2
CA	31.8	70.2	38.5	32.7	71.1	38.4	-0.1	15	#####	1	Working-age pop. over 5 million	0.9	0.9
VA	36.3	76.5	40.1	36.9	76.9	40.0	-0.1	15	5,112,923	12	Working-age pop. over 5 million	0.6	0.4
KY	26.2	72.9	46.7	26.9	73.7	46.8	0.1	14	2,687,179	26		0.7	0.8
<b>OH</b>	<b>32.8</b>	<b>75.1</b>	<b>42.2</b>	<b>33.5</b>	<b>75.9</b>	<b>42.4</b>	<b>0.2</b>	<b>13</b>	<b>7,072,114</b>	<b>7</b>	<b>Workin g-age pop.</b>	0.7	0.8

											over 5 million		
MO	32.2	76.2	44.0	33.0	77.1	44.2	0.2	12	3,666,019	19		0.8	0.9
MD	39.5	77.4	37.9	40.0	78.3	38.2	0.3	11	3,722,201	18		0.5	0.9
IN	33.5	75.5	41.9	33.8	76.0	42.3	0.4	10	4,008,950	15		0.3	0.5
VT	34.3	79.8	45.5	33.3	79.6	46.3	0.8	9	397,726	49	Working-age pop under 1 million	-1.0	-0.2
AZ	34.2	71.0	36.8	33.6	71.3	37.7	0.9	8	3,900,900	17		-0.6	0.3
OR	34.3	72.1	37.8	35.2	73.9	38.8	1.0	7	2,440,752	27		0.9	1.8
NC	30.2	72.2	42.0	30.3	73.5	43.2	1.2	6	6,000,202	10	Working-age pop. over 5 million	0.1	1.3
ID	38.6	74.8	36.2	36.7	75.2	38.5	2.3	5	946,943	39	Working-age pop. under 1 million	-1.9	0.4
ME	33.2	78.1	44.8	31.2	78.8	47.6	2.8	4	825,507	41	Working-age pop. under 1 million	-2.0	0.7
LA	34.4	72.6	38.2	31.3	72.4	41.1	2.9	3	2,825,101	25		-3.1	-0.2
AR	31.4	72.7	41.3	28.2	72.7	44.5	3.2	2	1,759,900	32		-3.2	0
SD	52.0	81.8	29.8	48.1	83.0	34.9	5.1	1	501,769	46	Working-age pop. under 1 million	-3.9	1.2

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