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# RespectAbility - Public Comments - Arkansas WIOA Combined State Plan

"As Governor of the State of Arkansas, I am committed to increasing the state employment of Arkansans with disabilities. I believe that a coordinated effort by the state is needed to reduce dependence on public benefits and to increase economic opportunities for Arkansans with disabilities, including those with significant disabilities. It is important that our state government set the example of this commitment in order to ensure that Arkansans with disabilities are employed in our state agencies, departments, and commissions." – Gov. Asa Hutchinson, Jan. 14, 2016

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

Arkansas has the opportunity to work hard to improve outcomes in terms of competitive, integrated employment for people with disabilities. Currently, your state ranks 45<sup>th</sup> in the country in terms of your employment rate of people with disabilities. Only 29.2%% of the approximate 264,645 working age Arkansans with disabilities are employed. Further, as of 2013, there are over 13,000 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, Arkansas 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. We think Arkansas can do the same. The experience of these states shows ways that Arkansas can dramatically improve their outcomes.

To help 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 <u>Arkansas</u>. That information is also attached to our comments.

We are pleased to see that Arkansas takes employment for people with disabilities seriously, including them in almost every section of its Plan. We are also pleased at Governor Hutchinson's leadership as exemplified by the Workforce Development Board and the Governor's Workforce Cabinet, as well as the executive order we quoted at the beginning of our comments. Arkansas' emphasis on collaboration and cooperation among state agencies is also very encouraging and should be commended.

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

# **<u>1.</u>** It is vital to include the gaps in Labor Force Participation Rates (LFPRs) between people with and without disabilities and other key data on state plans, dashboards and performance metrics.

From our review of the current draft of Arkansas' Combined State Plan we know that you have access to the right data to drive decision making. Tracking unemployment information (which only reflects people actively looking for jobs) and job placements (which only monitors people who interface directly with the workforce system) is necessary, but not sufficient to drive true performance metrics that will create success.

We appreciate the inclusion of people with disabilities in the chart summarizing Arkansas' Labor Force Data on page 12 of your State Plan. We are glad to find that this analysis included the labor force participation rate (LFPR) for people with disabilities alongside the employment and unemployment rate. As we reported at the beginning of our public comments, only 29.2% working age Arkansans with disabilities are employed, compared to the 73.8% employment rate for those without disabilities. This means that there is a 44.6 percentage point gap in the Labor Force Participation Rates (LFPR) between people with and without disabilities. This gap is a critical data point that needs to be included in your Combined State Plan and it needs to drive the development of your state performance metrics. Closing this gap will require the focused energy and effort of your workforce system.

We want to help your state to keep moving in the right direction. However, Arkansas ranks 45<sup>th</sup> in the nation in terms of jobs for people with disabilities. We believe that with more focused work, Arkansas can turn those numbers around and become an example to the rest of the country. Good data is essential for any attempt to increase the number of people with disabilities who are succeeding in competitive, integrated employed. As an example of the data that is needed, below are several charts which show the challenge in your state.

## Figure 1. Arkansas Performance Metrics on Jobs for PWDs

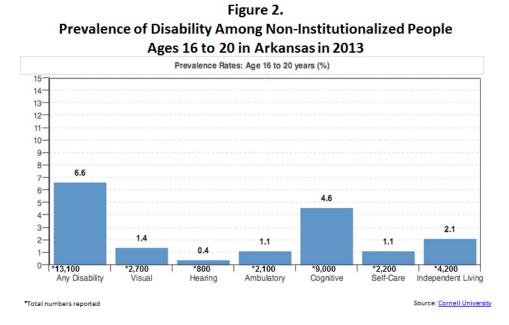


Gov. Asa Hutchinson (R)

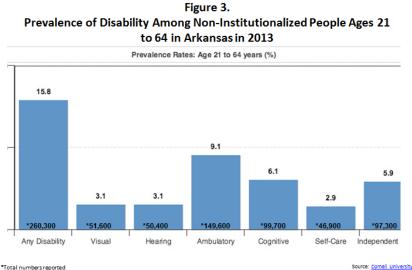
- 73.8% of persons without disabilities aged 18 to 64 are employed.<sup>3</sup>
- 29.2% of PwDs aged 18 to 64 are employed.<sup>3</sup>
- 13,100 persons aged 16 to 20 have a disability.<sup>1</sup>
- Arkansas ranks 45<sup>th</sup> in the nation in terms of employment for PWDs.
- There is a 44.6 percentage point gap in the labor force participation rate (LFPR) between people with and without disabilities.
- 260,300 persons aged 21 to 64 have a disability.<sup>1</sup>
- 493,400 civilians with a disability live in AR.<sup>3</sup>
- The employment gap between people without disabilities and PwDs increased 0.1% between 2013 and 2014.<sup>3</sup>
- 158,604 people in AR received SSDI benefits in 2014.<sup>3</sup>
- Total expenditure of benefits for PwDs in 2014 was \$168,091,000.3
- Voc. Rehab. Received 7,983 general applicants and 643 blind applicants in AR in 2013.<sup>3</sup>
- Voc. Rehab. Obtained 3,244 jobs for PwDs in AR in 2013.<sup>2</sup>
- 1. 2013 Disability Status Report: Arkansas, disabiliystatistics.org
- 2. StateData: The National Report on Employment Services and Outcomes, 2014
- 3. Annual Disability Statistics Compendium

We recommend that the draft plan be revised to include several more data points regarding the disability community in Arkansas. Below are the data points that we believe should be added to your state plan to enhance it:

**a.** Youth with disabilities who are aging in the workforce (ages 16-20). If your state's workforce system is to seriously deliver on the promise to improve transitions to work for youth, it is critical to know how many youth with disabilities will be aging out of school.



**b.** Working age people with disabilities (ages 21-64). According to the most recent available data from the Census Bureau, there are 260,000 working age Arkansans with disabilities between the ages of 21 and 64. It is critical to distinguish between working age people with disabilities and those we acquire disabilities due to the aging process. The chart below shows the diverse range of disabilities experienced in your state.



c. What types of disabilities do youth have who are transitioning into the workforce. This type of information is critical important because youth with vision, mobility and hearing disabilities need specific types of tools and training, but may otherwise be ready for high skill, high wage jobs. For example, page 44 of the State Plan discusses the work being done by the Division of Services for the Blind (DSB). The work they do is very different from the types of support and services needed by people with developmental disabilities. To support the success of youth with cognitive disabilities, it will be critical for Arkansas to provide early work experiences, skill training, and job placements.

	2012	2013
All Disabilities	51,909	52,637
Specific Learning Disability	18,128	12,628
Speech or Language Impairment	12,678	18,058
Intellectual Disability	5,474	5,575
Emotional Disturbance	750	743
Multiple Disability	1,337	1,356
Hearing Impairment	449	439
Orthopedic Impairment	194	184
Other Health Impairment	9,323	9,806
Visual Impairment	189	194
Autism	3,231	3,494
Deaf Blindness	7	4
Traumatic Brain Injury	149	156
Developmental Delay	Omitted	Omitted

Figure 4. Children, ages 6 to 21 Served By IDEA in Arkansas

Source: Annual Disability Statistics Compendium

**d.** Labor Force Participation Rates broken down by disability type. From the data, we often find that people who are blind or have vision loss are employed at higher rates than people with self-care or independent living disabilities. Similarly, we find that people with hearing differences are also employed at higher rates than are people with intellectual or developmental disabilities

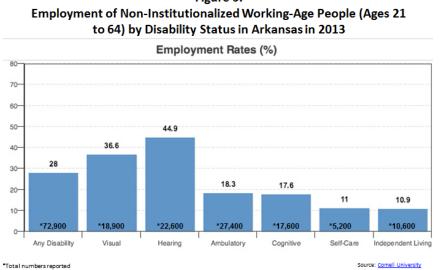


Figure 5.

As we said before we are pleased to see that Arkansas has included labor force participation in its Workforce Analysis section on pages 11-12, and again in its "Services to Disabled Persons" section on page 25. However, these references need to be enhanced with further data points to help the drive for improved outcomes. It is crucial that the final version of your Combined State Plan included the gap in Labor Force Participation between people with and without disabilities in the workforce as a performance metric. Arkansas' Plan shows a commitment to using and sharing data to best achieve its goals. Fulfilling that potential will depend on ensuring that the best, most representative data available is used to measure performance.

# 2. <u>Busting Stigmas, Myths, and Misconceptions Should Be a Key Part of Workforce</u> <u>Strategy:</u>

Low expectations and misconceptions are critical barriers to employment for people with disabilities. <u>A Princeton study shows that while people with disabilities are seen as warm, they are not seen as competent</u>. Similarly, <u>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</u>.

As such, we recommend that Arkansas' Plans 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 order to ensure that such efforts have the biggest possible impact, it needs to be supported by a serious, systematic and ongoing communications campaign that highlights the benefits of inclusive hiring.

Arkansas' Plan demonstrates a commitment to overcoming the barriers facing people with disabilities. However, it is important to understand that the barriers to gaining employment are not only physical. Attitudinal barriers can be just as detrimental as physical inaccessibility. Indeed, the stigmas, myths, misconceptions, and stereotypes that Arkansans with disabilities face are serious barriers that your workforce system needs to address. We are pleased to see the development of business liaison teams in Arkansas, as mentioned on page 46 in the "Coordination, Alignment, and Provision of Services to Individuals" section. We are also pleased to see Arkansas' development of business relationships and commitment to enhancing those relationships, as first mentioned on page 157, are intended to improve services to individuals with disabilities. These business relationships can be used in a PR campaign designed to combat the aforementioned stigmas, myths, and misconceptions that people with disabilities face.

In terms of potential employer partners, we encourage your state plan to look at <u>Disability Equality Index that assesses the inclusion and hiring efforts of major employers.</u> It was put together by the United States Business Leadership Network (USBLN) which operates <u>a</u> network of affiliates across the country that can be an incredible resource for your work.

The companies which scored 100% in the USBLN index can be a great resource. These are Ameren Corporation, AT&T, Booz Allen Hamilton Inc., Capital One Financial Corporation, Comcast, NBC Universal, Ernst & Young LLP, Florida Blue, Freddie Mac, Highmark Health, JPMorgan Chase & Co., Lockheed Martin Corporation, Northrop Grumman Corporation, Pacific Gas and Electric Company, PricewaterhouseCoopers LLP (PwC), Procter & Gamble, Qualcomm Incorporated, Sprint Corporation, Starbucks Coffee Company, and TD Bank N.A.

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

- A. CEOs/business leaders need to understand the value proposition/business case for their specific company as to why they should focus on putting people with disabilities into their talent pipelines. This is best done through business-to-business success stories. People with disabilities can work successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and they can 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. We are pleased to see your initiative to develop a presentation to highlight the benefits of employing people with disabilities, as described on page 164. This is an excellent idea and should be included in your PR campaign.
- B. Human resources professionals and on-the-ground supervisors need to understand that hiring people with disabilities is generally easy and inexpensive, and that any costs incurred are more than offset from increased loyalty. Hiring managers and supervisors are key 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. 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. Arkansas needs a public relations campaign that will inspire Arkansans 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. We are pleased to see that Arkansas understands this and has included it in their

plan in its goal to increase collaboration with businesses. It will not be difficult to incorporate this into a communications strategy.

This type of effort needs to begin at the highest levels of state government. We deeply appreciate Governor Hutchinson's effort to bring media attention to the issue of disability employment, to visit model employers, and to celebrate "workplaces welcoming of the talents of all people, including people with disabilities." The type of visibility is crucial to fighting stigma and expanding opportunity. He follows the example set by governors in others states like Jack Markell of Delaware, Jay Inslee of Washington, and Scott Walker of Wisconsin have all done this extensively. This type of systematic and ongoing communications campaign must continue if you want to maximize your success.

As an example of the power and value of making the business care for hiring people with disabilities, we offer Arkansas the insights gained from our <u>#RespectTheAbility</u> 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. We have profiled diverse employers such as EY, AT&T, and Kwik Trip and we are including a draft profile of Walmart in our comments as an example of this type of work.

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

As required by WIOA Sec. 102(b)(1)(A), State Plans must 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.

We find the clearest statement of these opportunities on page 13 of the Combined State Plan in the section entitled: "Nonfarm Payroll Job Trends." This section clearly states where talent needs have been growing in Arkansas' economy and where sectors have been losing ground. The "seven major industry sectors" that have grown over the past decade include: "Educational and health services", "health care and social assistance", "professional and business", "Leisure and hospitality", and for jobs in state government. As Arkansas' workforce system looks for strategies to create a talent pipeline to meet these demands, we seriously encourage you to include people with disabilities in your thinking process. People with disabilities represent an untapped labor resource that can meet the diverse talent needs of our nation's growing job sectors. The job gains in the sectors discussed above offer a great opportunity for focused sector strategies to achieve improved outcomes.

## a. Health and Elder Care:

The rapid emerging talent needs in health care represent both a challenge and an opportunity for the nation's workforce system. It is challenge propelled by an aging population resulting in increasing demand for qualified workers ready to fill the talent needs of hospitals, assisted living centers, and nursing home. It is opportunity to channel the incredible talents of people with disabilities into the workforce. This is a topic that needs to be examined closely and has implications for people with disabilities who want to work.

The State Plan projects continued growth in the field of "Health Care and Social Assistance." From 2004 to 2014, the Arkansas economy added "29,600 jobs" in this sector. In the years ahead as Baby Boomers age, the demands for healthcare jobs will only increase. **People with disabilities can and should be part of the solution to this demand in the labor market.** A 2014 report from the Office of Disability Employment Policy (ODEP) captured this opportunity clearly, saying that "[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. It is important for healthcare system. There are <u>numerous examples</u> 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.** 

These examples all reflect how the Project SEARCH model is well suited to meeting the growing talent needs in health care across the many states. As such, we recommend that Project SEARCH be significantly expanded as it has been in Wisconsin, Florida and other states. Nationally, each year approximately 2,700 such young people, spread out in 45 states, do a nine month, school-to-work program that takes place entirely at the workplace. This innovative, business-led model features total workplace immersion, which facilitates a seamless combination of classroom instruction, career exploration, and worksite-based training and support. 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.

Arkansas already has a similar program focused on students who are blind or otherwise visually impaired. However, we feel there is room for significant expansion of the Project Search model in your state. We specifically suggest that you focus on this model because of it is cost-effective structure and has achieved outstanding outcomes across the country. As your Jump Start program looks at "Coordination with Education-Related Partners" section beginning on page 193, we hope your state will look at was to expand similar transition effort.

We suggest that you look to follow the example set by the state of Wisconsin where they started with three Project Search sites and are expanding to 27. 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 taxpayers money while also strengthening the talent pool for employers.

#### b. <u>High Turnover Jobs: Hospitality/Accommodations, Food Service, Retail Trade:</u>

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. Furthermore, Arkansas has projected the "Accommodations and Food Services" industry to have experience the second highest right of growth, closely behind "Health Care and Social Assistance."

An outstanding example of the type of work needed is found in Missouri. As part of the Poses Family Foundation's Workplace Initiative, a coalition of employment service providers has launched a successful training and placement program with the hospitality sector in St. Louis. This training runs for up to 12 weeks, and takes place on site at the hotel; all participants are paid by the hotel for the duration of training. Since the summer of 2015, two cohorts of trainees have completed training at the Hyatt Regency. Trainees have gone on to permanent employment at the Hyatt and other hotel partners in a range of departments— culinary; auditing; and customer service. This type of training and Poses' Workplace Initiative could easily be part of your overall Sector Strategies. Likewise, in other states, hotels and other hospitality employers have found Project Search to be an amazing source of talent. The work done by Embassy Suites and David Scott in Omaha, Nebraska offers valuable lessons about how to improve employment outcomes for people with disabilities. State Boards, 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 <u>UPS</u> and <u>OfficeMax have proven records of success</u>. Given the prevalence of Fortune 500 companies headquartered in Arkansas, <u>including Walmart</u>, there are plenty of employment opportunities available for people with disabilities in retail. These companies can be outstanding partners for disability employment as these industries suffer from high turnover rates and people with disabilities are proven to have significantly higher retention rates. It is important to identify more specific opportunities with employers and to cite them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future.

#### c. Science, Tech, Engineering and Mathematics (STEM) and The Autism Advantage:

Even though other sectors are driving the growth of Arkansas' economy, it is still important look at the issue of preparing workers for careers in Science, Technology, Engineering and Mathematics (STEM). 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. This could be a very powerful resource for Arkansas, given that most of the 15 targeted industries on page 2 of the Plan require STEMrelated jobs.

Companies including <u>Microsoft, SAP</u>, and <u>Specialisterne</u> 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." <u>The Israeli</u> <u>Defense Forces recruits and trains their citizens on the Autism spectrum for work in their elite</u> 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 other states. 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. Other states should be looking at ways to follow this model. Together, state 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.

#### d. Jobs with state government can also be sources of opportunity:

While the focus of our comments on the State Plans are around aligning the workforce system to create opportunities for people with disabilities in the private sector, public sector employment should not be neglected. As such, we are incredibly pleased to hear about the commitments made by <u>Governor Hutchinson to increase "state employment of Arkansans</u> with disabilities." In the years ahead, the workforce of Arkansas' state government is likely to be impacted by the cresting wave of Baby Boomers retiring just as other sectors are being shaken.

The importance of such hiring efforts was first discussed in Governor Markell's *Better Bottom Line* Initiative. In Governor Markell's own words, "<u>One key action is to set a state goal</u> for hiring people with disabilities through an executive order and hold agencies accountable for achieving that goal." The untapped potential of people with disabilities is such that a fullspectrum, all-of-the-above-and-more approach is needed. We are pleased to see that Arkansas is making a commitment to expanding public sector opportunities for people with disabilities.

#### e. Agriculture:

Lastly, as with many states, agriculture is a key industry in Arkansas. As such, <u>there is an</u> opportunity to replicate the success of TIAA-CREF's Fruits of Employment project that provides internships and job training to workers with disabilities to prep them for careers in competitive agriculture. Farmers in Georgia have already had success with a program designed to reduce barriers persons with disability face in agricultural fields and it can and should be incorporated into WIOA plans.

# 4. <u>Section 503 of the Rehabilitation Act and Federal Contractors offer Arkansas the chance to innovate, collaborate, and expand opportunity:</u>

Another critical opportunity that needs to be discussed in Arkansas' Combined State Plan is the issue of Section 503 of the Rehabilitation Act. Unfortunately, the current draft of your state plan lacks any references to the disability employment opportunities and talent challenges facing federal contractors. Section 503 regulations have set new 7% utilization goal set for companies to recruit, hire, and retain qualified individuals with disabilities in all job categories.

Arkansas should respond to these 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 General Dynamics, URS Corporation, Tyson Foods INC., Groupe CGI INC, and Allens INC. More detailed information regarding federal contracts in Arkansas can be found here.

# 5. Ensure that the Assurances in Your WIOA Checklist are matched up to a strategy to fully implement them and be successful:

The Common Assurances listed on page 94 of Arkansas' Combined State Plan will be critical factors in the overall implementation and ultimate success of WIOA. As such, it is critical that each assurance is matched up with a strategy fitted to meeting and, if possible, exceeding the requirements of the law.

For example, it is critical that the assurances listed on page 102 for Title 1-B Programs are matched up to specific strategies to achieve the "delivery of career and training services to individuals." Further, the Wagner-Peyser Assurances on page 109 need careful implementation efforts as do the Adult Basic Education Assurances listed on page 127 and the VR assurances on pages 235 through 240.

As a good example of the level of detail needed here, consider WIOA Section 188. The anti-discriminatory rules originally outlined under WIA need to be updated to reflect the steps needed towards making universal access a reality. For example, in seeking to meet Common Assurance #7 listed in the State Plan on page 101, we are directing states to consider the resources made available from the Office of Disability Employment Policy (ODEP). They have recently released a guide that digs deep into what universal accessibility will mean for the workforce system. Further, Common Assurance #10 affirms each state plan's commitment to meeting the requirement that "one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990." However, merely meeting legal requirements should not be the end of this process. Indeed, looking at physical and programmatic accessibility can be an opportunity to invest in a more proactive workforce system very actively committed to collaboration and partnerships. If there is no plan that specifically identifies how the state is going to get to the commitment made in the assurance; the state is facing a serious problem.

# 6. <u>Avoid the Opportunity Costs of Focusing Too Much on One-Stop Centers.</u> <u>Programmatic and Database Accessibility and Privacy Are Critically Important:</u>

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 brick and mortar One-Stops as the primary access point for programs and services under WIOA.

Focusing exhaustively on One-Stop Centers, physical infrastructure, and co-locating services comes at the opportunity cost of losing the chance to improve supports and increase outcomes.

The workforce needs of state economies are evolving rapidly thanks to technology and globalization. Investing excessive resources on physical locations at the expense of improving online delivery of workforce services and supports is an example of looking backwards, not forwards. Moreover, the District of Columbia and others have successfully moved much of their one-stop services to trained staff with laptops that go to schools, hospitals, and community organizations where they are better able to serve the public. Page 97 of the Plan discusses Mobile Workforce Centers. This is an excellent initiative and Arkansas should ensure that these Mobile Centers are fully accessible and available to people with disabilities.

Arkansas has numerous other initiatives, including the Career Pathways Initiative, Arkansas JobLink, and ARWINS. We want to ensure that these programs are inclusive of people with disabilities and are programmatically accessible.

At the same time considerable thought needs to take place around the creation of a unified intake system for the workforce system and government benefits programs. Arkansas JobLink could be used for this. Those shared databases must be fully accessible to people with disabilities who use screen readers or who need captions to understand videos that explain how to use the system. Thought also needs to go into privacy issues as private disability issues should not be shared where it is not needed and appropriate.

# 7. Creating an affiliate chapter of the US Business Leadership Network, and/or working very closely with an existing chapter, is a great tool for effectively engaging employers and reaching the right business audience:

As we stated previously about communicating the business case for hiring people with disabilities, effective employer engagement is a necessary component of achieving improved employment outcomes. One of the most effective means of carrying that message forward is to have a network of engaged businesses whose bottom line has benefitted from the talents of employees with disabilities. Business to business communication can help tear down the misconceptions and stigmas which are barriers to employment.

For those states that do not have an affiliate chapter of the US Business Leadership Network (USBLN), we are recommending to them that they look at developing one. We are pleased that Arkansas has a state Business Leadership Network. However, the lack of a US BLN chapter limits the flexibility and capability of states to engage employers around hiring people with disabilities. As such, we highly recommend that the appropriate staff both in the workforce system and VR work with the employer partners to formalize their intersections through the establishment of an affiliate chapter. Establishing a BLN Chapter in does would help to organize the "knowledge of community outreach, recruiting and interviewing, the accommodation process and barriers" needed to achieve improved outcomes. Currently, VR agencies often have a network of businesses their work closely with in order to place VR clients into jobs. These business partners would certainly benefit from tapping into the national structure of the USBLN and their resources.

In states where there already is an affiliate chapter, that BLN is oftentimes not at the WIOA table. As such, we are encouraging states to look at the successes achieved in Wyoming, which possesses one of the most effective, engaged, and active affiliate chapters in the country. The Wyoming BLN, despite the challenges of a largely rural population and limited resources, has been achieving outstanding employment outcomes. We would be happy to provide Iowa's

WIOA team with an introduction to Lynn Kirkbride the USBLN's Director of Affiliate Relations. She is an incredible asset and has extensive experience around overcoming barriers to employment. Her email is <u>lynn@usbln.org</u> and she can be reached by phone at (307) 631-0894. Her efforts, and those of the Wyoming BLN, offer profound insights into how to effectively engage employers around the business case for hiring people with disabilities.

# 8. Ensure that Apprenticeship Programs are Fully Accessible and Actively Recruiting Young People with Disabilities, Especially with Government Contractors:

One of the often-neglected opportunities for people with disabilities is the training opportunities offered by apprenticeship programs. We are pleased to see that Arkansas values apprenticeship programs, including them in its "Strengths and Weaknesses of the Workforce Development Activities" section on pages 26-27, as well as in its efforts to form and maintain partnerships with employers. This is critical work and it is work that needs to be viewed through the lens of disability.

As your state looks to improve these programs, we highly recommend that the workforce system seriously look at ways to make apprenticeships more accessible to people with disabilities. At the federal level, the Office of Disability Employment Policy has worked hard to generate resources which can open up these exciting programs to "youth and young adults with a full range of disabilities." The regulations related to apprenticeship which have recently come out of the Department of Labor provide states the flexibility them need to refine and design training programs that maximally inclusive of people with diverse talents. We encourage you to invest time and energy to understand the best practices contained in ODEP's apprenticeship toolkit. Further, we would also highly recommend that VR staff connect and collaborate with the Federal officer responsible for apprenticeship programs in your state or region. Such innovative partnerships and improved accessibility are essential elements of realization the full promise of WIOA for people with disabilities.

Further, we would suggest that there is a critical opportunity to look at Section 503 and federal contractors as a partner in expanding apprenticeship programs. Funding to cover training costs could be a very attractive selling point for federal contractors looking to meet their 503 requirement. Further, we would also recommend looking at the intersection of apprenticeships and sector strategies. Not only can apprenticeships be set up in traditional fields such as construction, but they can also incredibly useful in health care and computer jobs. Look at the successes achieved by Project SEARCH at a wide range of employers. As such, we recommend that the workforce system and the State Board investigate how to both open apprenticeship programs to people with disabilities and to create apprenticeship opportunities in new career fields as well.

# 9. Overcome the gap between disability services and career services in Post-Secondary Education:

There is a fundamental disconnect in most post-secondary education programs between disability services and careers. This is not a new issue and it is one that other organizations have raised in the past. However, with the priorities put into place by the implementation of WIOA, there is a historic opportunity to bridge this gap and to improve career and technical education for young people with and without differences. As formulated by the National Organization on Disability, at most educational institutions, "the career services office, which assists students in preparing for" the workforce <u>"lack a strong—or any—</u> 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. Your state has the chance to demonstrate to business that college students with disabilities are on campuses and that they should be actively targeting those with disabilities just as they do all other diversity recruiting on college campuses.

While the statistics cited above are national ones, they have bearing on the work that needs to be done through your community college system. Beyond just WIOA, community colleges are uniquely positioned to innovate in order to expand opportunity. Community colleges are very closely connected to the working world and the specific training requirements of employers. The transition committee of the WIOA Roundtable that Arkansas formed would be a great group to lead this initiative.

### <u>10. Supporting Pre-Employment Transition Services through the Development of Public-</u> <u>Private Partnerships:</u>

We are encouraging your state to follow the example set by Florida and Wisconsin by working hard to expand the number of Project SEARCH sites. However, this is not the only paradigm that you should follow. Your school system, vocational rehabilitation, and local workforce boards can build creative, collaborative partnerships with companies that are leading in the disability space.

As we stated before, we feel that Arkansas' emerging job sectors would benefit from 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. <u>This model depends on "consortium of employers</u> *committed to implement or expand programs*", "a public/private partnership to coordinate <u>services for job-seekers with disabilities, with a single point of contact for employers</u>", and "Connections among employers, public and private agencies, and schools to reach young adults with disabilities who are in transition from school to work."

#### **<u>11. Getting Out the Word on Free and Accessible Services and Resources:</u>**

We are encouraged that Arkansas appreciates the need for outreach and education about available services, as seen in its thorough self-evaluation on pages 26-27.

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. We know that broadband access is a huge issue in rural states. However, it's important to ensure that online resources enhance the effort of your workforce system.

Your state needs to make an effort to demonstrate to employers and prospective employees that these services exist. Doing so by coordinating it with the possible public relations campaign is one way to go about this. For example, the Plan says on page 94 it will provide the public access to various Board meetings, including to people with disabilities. This could be a great resource to people with disabilities trying to gain employment, and they probably don't even know it exists. Also, in the state's Outreach section on page 182, the Plan describes the ARS Expo program. This is a great resource that many people with disabilities probably do not know about.

In addition, your state should be careful not to waste money trying to re-invent the wheel in creating online resources because <u>ASKJAN.org</u>, the US Department of Labor's <u>Office of Disability Employment</u>, our organization and others also offer free toolkits, webinars and training opportunities. It would be helpful to collaborate with these groups however to ensure that the best tools are created to fit the training and information needs on these issues.

#### **<u>12. Nothing About Us Without Us:</u>**

"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."

We are pleased by both the WIOA Roundtable's and on the Arkansas Workforce Development Board' diverse memberships, but we recommend the inclusion of a disability community representative(s) on these boards/groups. Even a non-voting, advising member of a workforce board can bring critical perspectives that improve the system's efforts overall. As such, we recommend that Arkansas look for ways to recruit local community organizations or self-advocates for inclusion on their local boards.

#### **<u>13.</u>** Transportation is a vital component and it must be addressed directly:

One significant reservation that we have regarding many of the state plans that we have reviewed has been the limited attention given to the issue of transportation. This issue is critically important for both people with disabilities and other low-income communities. Many people with disabilities do not drive. Others cannot afford private transportation.

As such, we were very glad to discover that these challenges are address among the strategies in the section on "Evaluation and Reports of Progress: VR and Supported Employment Goals." On page 74, the State Plan mentions the potential for contracts with "Based Organizations (FBO's) and other providers...to provide depth to volunteer employment-related

transportation and other services in rural areas of the state." This is vital work and has a critical role to play as a supplement to public transportation. While this is a potential solution in rural parts of Arkansas, in urban areas, we encourage your workforce system to collaborate with public transportation to ensure that there are bus routes to places where there are internships, apprenticeships and other work opportunities for people with disabilities. We look forward to seeing the results that this strategy should be able to achieve in the future.

However, people with disabilities need transportation solutions now. Public transportation is only part of the solution. **In places where it is not possible to coordinate a bus route, states could look at partnering with Uber, Lyft, or other new transportation solutions.** For people with disabilities who do drive, <u>such companies as Uber and Lyft can also provide a way to enter into the workforce with flexible hours</u>. 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 as well.

# 14. Aging workers and those with recently acquired disabilities must be specifically addressed:

Attention should start BEFORE aging workers and those with recently acquired disabilities lose their job due to aging and/or a newly acquired disability. Many people who have been in the workforce for decades find that before full retirement age they cannot keep up with the physical demands of their jobs. It is vital to start working with them BEFORE they lose their jobs. In Iowa, IVRS works with a major employer, Unity Point Hospital to "re-home" employees to other jobs within the same company when good workers can no longer do physical jobs and need a new assignment. They find that Emergency Room nurses, for example, come to a point where they can no longer keep up with the physical demands of that job. They have a department that works to "re-home" talented and valued employees who either age into a disability or acquire a disability through accident or illness. Empowering youth with disabilities to enter the workforce should be your highest priority, but keeping aging workers in the workforce until retirement age is also important. This will take a specific strategy and effort so that you don't have massive numbers of people going onto disability rolls and out of the workplace prematurely.

#### **<u>15. Strategic Engagement to Build a Mentor System for Customers of the Workforce</u> System:**

Government can't and shouldn't do everything. There is a massive role that can be played by volunteers who are willing to help people with barriers to work, including people with disabilities, find and keep jobs. There is a critical, cooperative role for non-profits and faith-based organizations to play. Local workforce development areas, for example, could be encouraged to recruit volunteers from local faith communities or local non-profits. However, much more can and should be done to work with parents of teens and young adults with disabilities, and to create volunteer mentorships for people with disabilities who are looking for work or need supports to stay employed and/or grow their careers.

Faith-based organizations and many others can fill massive gaps. <u>There is a terrific</u> booklet, <u>Clearing Obstacles to Work</u>, <u>put out by the Philanthropy Roundtable that is rich with</u> <u>potential partners and proven programs</u>. 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.

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

The work being done with this population needs to be viewed through the lens of disability. While Education in the Correctional System in Arkansas is mentioned on page 115, there is no mention of people with disabilities. 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 states identify how many of the individuals in the corrections system and in the ex-offender pipeline have disabilities. Serving people in the corrections system and ex-offenders is a critical workforce development challenge and one that can only increase when disability is a factor and it is not addressed appropriately. The price paid for ignoring this issue are higher rates of recidivism and greater costs to society. Assessment tools are needed to identify disability issues as people enter the prison system and supports are needed as they exit the system back into society. Doing so would create opportunities for states to address those issues productively and proactively.

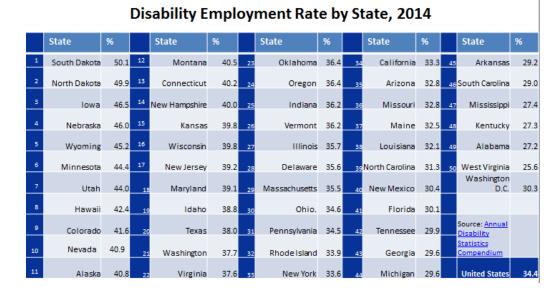
#### Conclusion

The bottom line is that expanding job opportunities for people with disabilities is beneficial to all. 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 people 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. And it is good for taxpayers, because it reduces the amount of funding spent on SSDI and other disability programs in the long run.

In all of our work around WIOA, we have emphasized the fact that this new law represents the intersection of hope and history for people with disabilities. Arkansas's WIOA State Plan demonstrates some of the hard work, dedicated effort, and specific policies needed to realize those hopes. People with disabilities want to pursue the American Dream, just like everyone else. We are encouraged by what we have seen in Arkansas's plan despite the huge challenges facing your state. We are happy to answer any questions you may have. Thank you for your time and consideration. 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 each state ranks nationally.

#### **APPENDIX – Ranking 50 States by Employment Rates and Employment Gap**

Data Source- Chart 1: Table 2.1: Employment—Civilians with Disabilities Ages 18 to 64 Years Living in the Community for the United States and States: 2014 from the Annual Disability Statistics Compendium



Data Source-Chart 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: 2014 Disability Statistics Compendium

# The Difference in the Employment Gap Between Disabled and Non Disabled Adults 2014

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	State	Gap	State	Gap	State	Gap		State	Gap		State	Gap
50	Maine	47.4	39 Mass.	43.5 28	Delaware	40.7	17	Minnesota	38.5	6	Alaska	35.3
49	Kentucky	47.1		43.5 27	New York	40.4	16	Washington	38.3	5	Hawaii	34.2
48	South Carolina	45		43.3 26	Louisiana	40.3	15	Nebraska	37.9	4	South Dakota	33.6
47	Michigan	45		43.1 <mark>25</mark>	Virginia	40	14	Connecticut	37.7	3	Utah	33.5
46 45	West Virginia	44.9	35 N. Carolina 34	43 <mark>24</mark>	Illinois	40	13	Colorado	37.4	2	Nevada	33.4
	Arkansas	44.6	Ohio	42.5 23	Kansas	39.9	12	Texas	37.3	1	North Dakota	32.1
44	Tennessee	44.5		42 22	Arizona	39.7	11	New Jersey	37.3		Washington DC	45.2
43	Missouri	44.4		41.4 21	Oklahoma	39.2	10	Montana	37.3			
42	Vermont	44.2			Maryland	39.1	9	Idaho	37		Source: Annu Disability Stat	
41	Alabama	44.1	30 New Mexico	40.8 19	California	38.9	8	Wyoming	35.9		Compendium	
40	RhodeIsland	43.8	29 Indiana	40.7 18	Oregon	38.5	7	Iowa	35.7		USA	40.3

# Example Profile from our #RespectTheAbility Campaign

**Largest Private Employer in U.S. Committed to Employing People with Disabilities** *Walmart recognizes "work is a beautiful thing"* 

Washington, D.C. – Wal-Mart Stores is not only the largest private employer in the United States, but also pledges to be "inclusive of all people" in its hiring.

"I'm proud of the intentional work we've done over the past decade to broaden our talent pool and diversify our leadership ranks," <u>President and CEO Doug McMillion said</u> in Walmart's 2015 Diversity and Inclusion Report. "Now more than ever, Walmart reflects our diverse customer base, and that makes us a better company."

Wal-Mart Stores, which owns Walmart and Sam's Club, employs roughly 2.2 million people worldwide. While official statistics are not necessarily known, according to Corporate Affairs Senior Manager Russell Shaffer, tens of thousands of people with disabilities work at Walmart. In 2010, Wal-Mart Stores was selected as one of the "50 Best Companies for People of Disabilities" by <u>Careers & the DisABLED Magazine</u>.

Just this year, Wal-Mart Stores scored 80 points on the U.S. Business Leadership Network and the American Association of People with Disabilities' Disability Equality Index (DEI) as a result of their policies and practices to hire people with disabilities. Developed by the DEI Advisory Committee, a diverse group of business leaders, policy experts, and disability advocates, the DEI is a national, transparent benchmarking tool that offers businesses an opportunity to receive an objective score, on a scale of zero to 100, on their disability inclusion policies and practices.

Fully one-in-five Americans have a disability themselves and studies show that most of them want to work. Yet 70 percent of working-age Americans with disabilities are outside of the workforce.

RespectAbility's campaign <u>#RespectTheAbility</u> highlights companies who are doing something to change this statistic. As the largest private employer in the U.S., Walmart has the ability to lead the way for other companies throughout the country.

"Our goal is to educate and inform employers of the benefits of hiring employees with disabilities," said Jennifer Laszlo Mizrahi, president of RespectAbility. "Walmart hires the best talent out there, no matter what package that talent comes in. Their only focus is on their business, and what prospective employees can bring to the table to better the organization. It is time for other employers to look beyond the disability, and understand the true value of these employees."

People with disabilities work in all levels at Walmart. Shaffer, for example, is legally blind. He started working for his local Walmart store prior to college and has been working for the company for more than 10 years. Speaking about Walmart's initiatives to hire people with disabilities, Shaffer said employees will be undergoing unconscious bias training in order for managers to judge an applicant on merits, skill set and capacity to do the job instead of any

unconscious bias toward a disability. These trainings are starting at distribution centers and will later include Sam's Club and Walmart stores.

"People with disabilities are held to the same standards regarding productivity as all of our other employees," Shaffer said in a conversation with RespectAbility staff. "Managers of Walmart stores who hire people with disabilities see these employees as productive, loyal members of the team."

Stores that hire people with disabilities often see higher customer satisfaction scores and a lower turnover rate, enabling the store to be more profitable, Shaffer added.

Walmart has highlighted its diverse employees in a series of accessible videos with captions titled "Work is a Beautiful Thing." One highlights <u>Patrick, an individual with a disability who</u> works for a supplier of Walmart.

"When you're like me, people don't always give you a chance," Patrick said of his childhood. "But I never wanted to be treated any differently."

Talking about his desire for independence, Patrick described how he learned to drive, relearned how to walk, and sought out a job.

"When I wanted to work, I got a job. It's a struggle everyday but I still get up because work makes me feel that I'm reaching my goals. I'm part of a team, and I get to give back to my family."

"People everywhere want a fair shot in life, and they want to see a path up for themselves and their families," <u>McMillion said</u>. "Walmart has a role to play here ... In addition to a path up, we owe our associates a work environment that is inclusive of all people."

RespectAbilityUSA is a national, nonprofit, nonpartisan organization whose mission is to reshape the attitudes of American society so that people with disabilities can more fully participate in and contribute to society, and empower people with disabilities to achieve as much of the American dream as their abilities and efforts permit. <u>www.RespectAbilityUSA.com</u>