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RespectAbility – Public Comments – Colorado Combined State Plan

“WHEREAS, more than 5,774,000 Americans in the labor force have a disability; and WHEREAS, disabled workers are a valuable resource, and the unemployment rate for this sector is almost twice as high as the nondisabled workforce; and WHEREAS, at more than 16 percent, the unemployment rate for Americans with disabilities is reaching record high, and in Colorado, disabled workers face an unemployment rate that is almost twice as high as the rest of the workforce; and WHEREAS, for people with disabilities, getting a job is harder than it should be; and WHEREAS, workers with disabilities are competent, dedicated employees who are willing to go the extra mile to be productive; and WHEREAS, individuals with disabilities are prone to be problem-solvers because they have had to solve serious problems all their lives; and WHEREAS, enhancing and building the diversity of the Colorado labor force is a critical component to workforce development.” – [Governor John Hickenlooper, Disability Employment Awareness Month Proclamation, October 2011.](#)

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

Colorado is already leading the nation in terms of expanding competitive, integrated employment for people with disabilities. According to the most recently, publically available Census data, Colorado ranks 9th in the nation as measured by the employment rate of people with disabilities. **Fully 42.3% of the 267,600 working age people with disabilities are employed in Colorado. Because of your good work, the 15,700 youth with disabilities between the ages of 16 and 21 living in Colorado have increasing chances to successfully transition into the world of work.**

Colorado has achieved these results through hard work and a dedication to best practices. **[It is joined by other states such as the Dakotas, Alaska, and Wyoming who have all achieved incredible results in terms of jobs for people with disabilities.](#)** We are also seeing pockets of excellence around innovative youth programs designed to address disability employment in **[Georgia, Nevada, and Kentucky.](#)**

The bottom line propelling these efforts is that expanding job opportunities for people with disabilities is a win-win-win for employers, taxpayers and people with disabilities alike. **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. Colorado is already implementing many of these 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 Colorado.](#)** That information is attached to our comments.

Overall, there is a lot to commend about the current draft of Colorado’s Combined State Plan. From the strong partnerships with federal contractors around meeting their Section 503 requirements to the critical commitments to accessibility in American Job Centers, Colorado’s state plan engages with many of the most important workforce issues related to expanding

opportunities for people with disabilities. However, no plan is perfect. Upon reviewing the current draft of the state plan there remain a few areas where improvements can be made to achieve the best results possible. **Our public comments on Colorado’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.**

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

As required by WIOA Sec. 102(b)(1)(A) Colorado’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.**

The current draft of the Combined State Plan does a good job of assessing those industries which are the real drivers of Colorado’s economy as well as those emerging career fields which will be critical in years to come. In terms of current talent demands as listed on page 11 of the Combined State Plan, the three largest industries in the Centennial State are “Trade, Transportation, and Utilities”, “Government”, and “Professional and Business Services”. The State Plan then goes on to detail those industries that projected to experience “significant increases in projected statewide job availability.” Those with the largest gains are expected to be: Professional, Scientific, and Technical Services adding over 79,000 jobs, Administrative and Support Services with over 49,000 openings, as well as Ambulatory Health Care Services, Specialty Trade Contractors and Social Assistance. Lastly, on page 13, the Plan discusses “emerging demand occupations” which include: “Healthcare Support Occupations, Healthcare Practitioners and Technical Occupations, Computer And Mathematical Occupations.”

The jobs 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 Colorado. We submit that these are job sectors where people with disabilities can excel and benefit their employer’s bottom line. People with disabilities represent an untapped labor resource that, with the right training and supports, can meet the diverse talent needs of Colorado’s growing job sectors.

A. Health and Elder Care:

The rapid emerging talent needs in health care represent both a challenge and an opportunity for Colorado’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 living in Colorado who want to work.

To quote [a 2014 report from the Office of Disability Employment Policy \(ODEP\)](#), “[people with disabilities] not only represent an untapped talent pool, but also offer significant value and insight” in the field of healthcare. Indeed, it is important for healthcare institutions to reflect their customers, and people with disabilities interface more with the healthcare system. There are [numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living](#). **Employers working in health and elder**

care can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities. There are numerous [examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living.](#)

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

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 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. The future expansion of Project Search in Colorado should be in hospitals, hotels and elder care.

B. State hiring and state contracting can be a source of opportunity:

Given that government represents the second largest industry in Colorado, “employing 417,500 individuals” and “accounting for 16.5% of total employment”, it is critical that these openings be fully accessible to people with disabilities. There are many reasons for addressing this challenge and among them is the fact of demographics. Colorado's state government will likely be impacted by the cresting wave of Baby Boomers retiring just as other sectors are being shaken.

As such, there are several steps that can be taken in order to address these opportunities. First, we would point to example set by other governors in other states who have used executive orders to encourage the hiring of people with disabilities for jobs in state government. [Governor Inslee in Washington](#), [Governor Dayton in Minnesota](#), and [even Governor Snyder in Michigan](#) have looked for ways to get more people with disabilities working in state government. This idea reflects a best practice first discussed in [Governor Markell's Better Bottom Line Initiative](#) and [later in RespectAbility's Disability Employment First Planning Toolkit](#). In Governor Markell's own words, [“One key action is to set a state goal for hiring people with disabilities through an executive order and hold agencies accountable for achieving that goal.”](#)

Direct hiring need not be only way of doing this. We would also recommend that Colorado look at state contracting obligations as another way of encouraging the hiring of people with disabilities. Mirroring the requirements laid out in Section 503 could be a way to ensure diversity in the supply chain and services being supplied to state government. The untapped potential of Coloradans with disabilities is such that a full-spectrum, all-of-the-above-and-more approach is needed. While our priority is on seeing the talents of people with disabilities channeled into the private sector, employment opportunities in the public sectors shouldn't be over looked as part of the state's overall workforce strategy.

C. Leisure, Hospitality, and other high turnover job sectors:

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.

“Leisure and Hospitality” represents a significant slice of Colorado’s economy, accounting for 314,700 jobs as estimated by the Colorado LMI Gateway. Further, “Sales and Related Occupations as well as Food Preparation and Selling Related Occupations account for 11% and 9% of the state’s employment respectively.” All of these jobs tend to have very high turnover rates and numerous studies show that people with disabilities can be outstanding in those fields and have significantly higher employer loyalty. The loyalty, productivity, and retention rates of people with disabilities can significantly contribute to employers’ bottom lines.

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

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

D. Science, Tech, Engineering and Mathematics (STEM), Accessibility, and The Autism Advantage

Lastly and perhaps the most exciting opportunities for improving employment outcomes for people with disabilities is in the fields related to STEM jobs. As the State Plan itself says on page 15, “the occupations identified in Colorado’s “Top Jobs” list, a majority require high levels of one or more STEM (Science, Technology, Engineering and Math) fields.” Further, “the Colorado Talent Pipeline Report found that 62 percent of the occupations are STEM-related.” We are glad to see a focus on creating a pipeline to feed these talent needs and we would like to encourage Colorado’s workforce system not to forget about people with disabilities.

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 Colorado 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.”](#) The need to fill STEM talent goes far beyond just federal contractors. [In New York State Governor Cuomo has ensured that magnet schools for STEM are located near IBM, a major STEM employer in their state.](#) Colorado can and should follow this model. Together, Colorado'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.

2. Busting stigmas, myths, and misconceptions should be a key part of our state's overall workforce strategy:

[Colorado's Governor has spoken with great eloquence and great insight about the need to fight the stigmas associated with mental health differences.](#) Indeed, he has even connected the critical importance of expanding employment opportunities to the wellbeing of people with invisible differences as well as those with developmental disabilities. [“It's especially important that we give them a 9-to-5 job that gives them a framework,” Governor Hickenlooper said at an event early last year, “you're also saving their lives, you're giving them hope.”](#) Given his personal investment and outstanding leadership on these issues, we would encourage Colorado's system to also consider the role of stigma and misconceptions when it comes to getting people with differences into the workplace.

Low expectations and misconceptions are critical barriers to employment for people with disabilities. [A Princeton study shows that while people with disabilities are seen as warm, they are not seen as competent.](#) Similarly, [a study published by Cornell Hospitality Quarterly found that companies share a concern that people with disabilities cannot adequately do the work required of their employees.](#) **We therefore recommend that Colorado's State Plan be amended to include a comprehensive proactive communications/public relations strategy for reducing such stigmas.** Indeed, we know that other groups of Coloradans with barriers to work also face stigmas, especially those leaving the corrections system. Governor Hickenlooper has been fighting the stigmas around mental health differences and his leadership has been critical to raising public awareness around these issues. **His efforts in this area should be mirrored by having a serious, systematic and ongoing communications campaign that highlights the benefits of inclusive hiring.**

Indeed, the best way to fight stigmas is to let employers see the facts from other employers who are already succeeding by hiring people with disabilities. In terms of potential employer partners, we encourage your state plan to look at the [Disability Equality](#)

[Index that assesses the inclusion and hiring efforts of major employers.](#) It was put together by the United States Business Leadership Network (USBLN) which operates [a network of affiliates across the country that can be an incredible resource for your work.](#) However, it should be a much larger component of Colorado'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. While there are few Stephen Hawkings — with or without disabilities — people with disabilities can work highly successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and be super talents in developing computer software and engineering solutions. CEOs and business leaders need to know that people with disabilities can be the BEST people to get a job done.
- B. Human resources professionals and on-the-ground supervisors need to understand that hiring people with disabilities is generally easy and inexpensive, and that any costs incurred are more than offset from increased loyalty.** Hiring managers and supervisors are key implementers who can turn high minded policy and business goals into action at the ground level. However, studies show that many of them are afraid of what they don't know about people with disabilities. They are afraid of potential legal action, costs, or other failures. For them, they need supports that will empower to overcome their own fears and to excel at recruiting, hiring, supervising or working with teammates with disabilities. Colorado's VR staff and community agencies can fully support human resources professionals and managers in dealing with their own specific fears and stigmas surrounding hiring people with disabilities. Moreover, online and in-person training is readily available to help from a variety of sources. RespectAbility has online webinars, as [does ASKJAN.org](#), USDOL and others. Partners like [the Poses Family Foundation Workplace Initiative](#) can provide training to the workforce staff and volunteers systems-wide as well as to community agencies in supporting companies through messaging efforts around related to fear and stigma. [The National Organization on Disability](#) and [the U.S. Business Leadership Network](#) offer strong resources.
- C. People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectations must begin. It is vital to have an PR campaign that will inspire Coloradans with disabilities to reach for the stars.** 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 an intentional manner moving forward.

As example of the power and the value of making the business care for hiring people with disabilities, we offer Colorado the insights gained from our #RespectTheAbility campaign. Our #RespectTheAbility, is a campaign focused on how hiring people with disabilities can make organizations stronger and more successful. The campaign 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. Use the best data points, including the Labor Force Participation Rates of people with disabilities v. those without disabilities, as performance metrics.

On page 19 of the current draft of Colorado’s State Plan, there is a section dedicated to talking about “Individuals with Disabilities.” It begins by discussing how the most “intractable barrier underemployed or unemployed Coloradans with disabilities face is an overemphasis on what is expected that he or she cannot, should not, or is not doing.” This comment reflects the fact that stigma is a critical barrier to employment one very much worth the attention of Colorado’s workforce system. Further, we fully agree that “a focus on functional limitation rather than on the person's talent and ambitions is expensive and wasteful.” Above all, we want the talents of people with disabilities to recognize and channel into the economy. We are also pleased to see the statement that “The workforce development system in Colorado is committed to providing the high quality services necessary to prepare individuals with disabilities to compete for jobs and fully participate in Colorado’s workforce.”

While we are pleased to see stigmas discussed and written commitments made, this section is of very limited utility without extensive statistics on the disability community in Colorado. Precise numbers and clear data is needed if Colorado’s workforce system is to evolve to overcome the barriers to employment created by disabilities. **To quantify the challenge of empowering more people with disabilities through the transformational power of employment, we recommend that this section of Colorado’s Combined State Plan be amended to include some of the most important data points related to disability employment.** For example, beyond just reporting the number of Coloradans with disabilities served by VR, this section could include statistics on the number of youth with disabilities as well as working age people with disabilities. As we reported in the introduction to our public comment, there are 267,600 working age people with disabilities and 15,700 youth with disabilities living in Colorado. Further, there is a 35 point gap between the labor force participation rate of Coloradans with disabilities and those without disabilities.

This then feeds into another critical point of feedback that we have regarding Colorado’s Combined State Plan. **It is vital that Colorado’s workforce system and the State Board include the labor force participation rates of people with disabilities on their state dashboards and performance metrics.** Looking at unemployment information in isolation causes decision makers to miss the bigger picture of those individuals with barriers to employment who are not actively seeking work. Additionally, while it is very important to see when and if a person who approaches the workforce system gets a job, it is even better when systems can be created that enable people to get jobs and careers on their own. [As an example of](#)

[the data that is needed, we are including a link to, and a copy of, the presentation our organization has compiled about employment for Coloradans with disabilities.](#) This

compilation contains information derived from the Census Bureau’s American Community Survey that should be valuable to the WIOA work being done in Colorado.

Further, while Colorado currently ranks 9th 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 48% of the 23,300 Coloradans who are blind or have vision loss are employed while 56.8% of the 36,600 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 27.6% of Coloradans 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 Colorado’s workforce system expands successful school to work transition programs.** Colorado already has some outstanding Project Search sites creating career pathways for youth with disabilities. However, there is a considerable need to expand the number, scope, and diversity of such sites. We have more to say on this point later in our public comments.

4. Employment Engagement around Section 503 will be critical for expanding jobs for Coloradans with disabilities:

While we are critical of the Combined State Plan in terms of the need for precise statistics, there is much to be commended as well. Specifically, we are pleased to see that federal contractors with Section 503 requirement have been prioritized in the employer outreach efforts of Colorado VR Staff. We are very pleased to see that Business Outreach Specialist (BOS) “staff have received training on the 503 changes, have met with the Office of Federal Contractor Compliance Programs, and have responded to Federal contractor inquiries for information on compliance and Affirmative Action planning.” These are all critical steps necessary for ensuring that companies doing business with the federal government not only meet their requirements but also work hard to capitalize on the talents of people with disabilities. We would encourage DVR and the BOS staff to leverage their experiences communicating with federal contractors into further conversations with employers in other job sectors. The lessons, experiences, and insights gained in collaborating around Section 503 can have critical impact in other career fields.

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

There is a fundamental disconnect in most post-secondary education programs between disability services and careers. This is not a new issue and it is one that other organizations have raised in the past. However, with the priorities put into place by the implementation of WIOA, there is a historic opportunity to bridge this gap and to improve career and technical education for young people with and without differences. As formulated by the National Organization on Disability, at most educational institutions, “the career services office, which assists students in preparing for” the workforce [“lack a strong—or any—connection to the office of disabled student services, which ensures proper accessibility and accommodations on campus for students with disabilities.”](#)

The result is a price we pay as a society is twofold. First, it costs employers who are unable to find qualified job candidates. Second, it costs students with disabilities who may be able to graduate with a degree thanks to accommodations but will go on to struggle to succeed in the working world. Nationally, there are 1.3 million young Americans ages 16-20 with disabilities. [They have high expectations to go into the workforce but currently only 53% of college graduates with disabilities are employed](#) as opposed to 84% of graduates with no disability. In total, only about 7% of people with disabilities will earn a college degree and less than half of the 2.3 million with a degree are employed.

[Due to the mandate created by Section 503 of the Rehabilitation Act, federal contractors now have a utilization goal to make sure that 7% of their employees across all job groups be qualified people with disabilities.](#) This regulation is actually a huge opportunity because companies are actively looking to hire recent graduates with disabilities. The first place for new recruits is college and campus recruiting. Colorado has the chance to demonstrate to business that college students with disabilities are on campuses and that they should be actively targeting those with disabilities just as they do all other diversity recruiting on college campuses.

While the statistics cited above are national ones, they have bearing on the work that needs to be done through your community college system. Beyond just WIOA, community colleges are uniquely positioned to innovate in order to expand opportunity. Community colleges are very closely connected to the working world and the specific training requirements of employers. As you look to triangulate between employer needs, skills training, and recruiting workers; you will do well to remember the importance of getting students with disabilities connected to career services and prepared for the workplace early.

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

We are pleased to see that Colorado is seeking to update and improve many of the opportunities offered through apprenticeships. From seeking to improve the Governor's Summer Job Hunt (GSJH) as discussed on page 54 to the collaborative work being carried out between "CDLE, the Office of Economic Development and International Trade (OEDIT), the Department of Higher Ed (DHE), the Colorado Workforce Development Council (CWDC)", apprenticeships offer a wealth of opportunities. However, as with many of the issues that we have raised in our comments, this is an issue that needs to be viewed through a disability lens.

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

7. Prioritize pre-employment training and expand partnerships with VR

As you embark on your new collaborations, we encourage you to explore proven programs such as Amazon, UPS, and Pepsi. The global logistics companies UPS, at one of

their busiest facilities, there is a training program dedicated to preparing youth with disabilities to succeed. Taking place in Louisville, KY, [The Transitional Learning Center is the result of a partnership between an employer, the school system, and vocational rehabilitation.](#) Pre-training programs are great because they offer the opportunity to train youth with disabilities in the soft skills they need to succeed and provide them with a foundation of work experience.

Colorado should also look at other models of innovation that are showing great potential to fundamentally improve employment outcomes. To begin with, we would highly recommend that Colorado 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.”](#)

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

There is a significant note of caution that we will like to add in terms of both the current draft of the Combined State Plan as well as the future of Colorado’s Workforce System. The State Plan should look to innovate beyond simply co-locating services and supports at the One-Stop Centers. **Focusing exhaustively on One-Stop Centers, physical infrastructure, and co-locating services comes at the opportunity cost of losing the chance to improve supports and increase outcomes.** Public policy is about the allocation of scarce resources to meet infinite needs. It is vital to invest resources on those points where they can have the greatest effect.

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

Likewise, Section 188 of WIOA outlines the accessibility requirements that each state must meet as part of this paradigm shift. We are pleased **While physical accessibility is important, ensuring that the workforce system is programmatically accessible is also critically important.** As such, questions around closed captioning of training videos, website access for screen readers, and the availability of assistive technology for job seekers with disabilities are in need of close attention. Devoting resources to improving online resources will be of significant benefit to job seekers with disabilities as well as people with other barriers to employment.

9. Transportation is a critical barrier to employment and it must be addressed directly: [Transportation is a critical issue that limits the employment aspirations of far too many people with disabilities.](#) Many people with disabilities do not drive. Others cannot afford private transportation. It is vital to work with public transportation to ensure that there are bus routes to places where there are internships, apprenticeships and other work opportunities. In places where that are not possible, Colorado could look at partnering with

UBER and other new transportation solutions. Indeed, for PwDs who do drive, such companies as UBER can also provide a way to enter into the workforce with flexible hours. Public sector employers and federal contractors who have 503 obligations are key places for apprenticeships and internships and onboarding of talent. It is important for them to play a key role in planning for public transportation.

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

There are many online and in person resources to help employers and people with disabilities come together to build success. **However, all the stakeholders need to be educated to know that these resources exist, and that they are free and user-friendly.** These resources must also all be accessible. Also, Colorado 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](http://theUSDepartmentofLabor'sOfficeofDisabilityEmployment) Policy, [our organization and others also offer free toolkits, webinars and training opportunities](http://ourorganizationandothersalsoofferfreetoolkits,webinarsandtrainingopportunities). [Another resource is Understood.org](http://AnotherresourceisUnderstood.org). This is a comprehensive resource to help families and individuals with learning and attention issues build their educational and career plans. It will be helpful to collaborate with those groups however to ensure that the best tools are created to fit the training and information needs on these issues.

11. Nothing About Us Without Us:

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

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

Many people who have been in the workforce for decades find that before full retirement age they cannot keep up with the physical demands of their jobs. In Iowa, for example, 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. Utilize a “Jackie Robinson Strategy”:

The workforce system only gets one chance with new employers to make a good impression. By law, policy, and custom, the system looks to serve people with the most

significant disabilities first. However, if the individual with a disability that is placed is not the right match for the employer, it will only undermine our long term goals of making that employer see the value of greatly expanding inclusive employment opportunities. Thus it is vital to also use a “Jackie Robinson Strategy” to make sure that the right talent gets into the right positions so it is win-win for the employer and worker alike. As the first African-American to play major league baseball, Robinson tore down decades of discrimination and blazed a trail for other talented and diverse athletes to follow. He was the talent that his employer needed, and contributed to the bottom line. Because, stigma and misconception remain a critical obstacle and one that Colorado’s workforce system needs to focus on, sometimes the best way to help people with more significant disabilities in the long term is to start with new employers by placing talent with fewer disabilities first.

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

Government can’t and shouldn’t do everything. 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.](#)

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

Another issue in need of a disability lens are educational program and workforce training for people in the corrections system. We are incredibly please to see that DVR recognizes this challenge and state on page 165 of the Plan that “many individuals who are involved with the Colorado corrections system are also individuals with disabilities.” Further, page 153 talks about how “Colorado adult education and family literacy sub-grant recipients use funds, as allowable, to provide educational programs for criminal offenders in correctional institutions and other institutionalized individuals.” These sections of the current draft of Colorado’s Combined State Plan scratch the surface of the disability challenges facing many people in corrections system.

[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

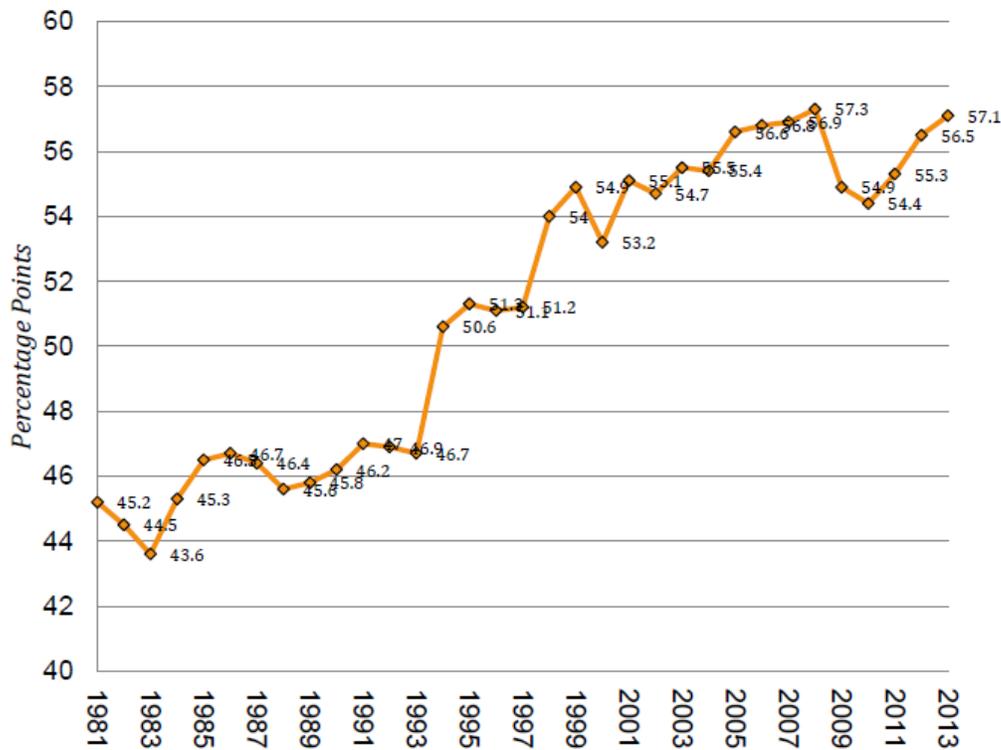
are needed to identify disability issues as people enter the prison system. Doing so creates opportunities to address those issues productively. If people in the corrections system who will be released eventually are to be well served by Colorado's workforce system, then it is vital that disability issues be identified and addressed in a way that will help work successfully in the future.

Conclusion

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

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 Colorado’s WIOA plan, all of this can change for the better for the people of Colorado.

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 Colorado ranks nationally and to showcase several of the data points needed in Colorado’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>

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

24	Illinois	36.1	24	Delaware	36.4	75.1	38.7
25	Oklahoma	35.8	25	Oregon	35.2	73.9	38.7
26	New Mexico	35.3	26	Illinois	36.1	75	38.9
27	Oregon	35.2	27	Wisconsin	40.9	80.1	39.2
28	Massachusetts	34.9	28	Oklahoma	35.8	75.2	39.4
29	Rhode Island	34.3	29	Georgia	31.5	71.5	40
30	Pennsylvania	33.9	30	Virginia	36.9	76.9	40
31	Indiana	33.8	31	Louisiana	31.3	72.4	41.1
32	Arizona	33.6	32	New York	32.2	73.3	41.1
33	Ohio	33.5	33	Florida	30.5	72.2	41.7
34	Vermont	33.3	34	Pennsylvania	33.9	75.6	41.7
35	Missouri	33	35	South Carolina	30.7	72.7	42
36	California	32.7	36	Rhode Island	34.3	76.3	42
37	New York	32.2	37	Indiana	33.8	76	42.2
38	Georgia	31.5	38	Ohio	33.5	75.9	42.4
39	Louisiana	31.3	39	Massachusetts	34.9	77.9	43
40	Maine	31.2	40	Mississippi	26.3	69.4	43.1
41	South Carolina	30.7	41	North Carolina	30.3	73.5	43.2
42	Florida	30.5	42	Alabama	27.1	70.5	43.4
43	North Carolina	30.3	43	Michigan	29.9	73.4	43.5
44	Michigan	29.9	44	Tennessee	29.9	74.1	44.2
45	Tennessee	29.9	45	Missouri	33	77.1	44.1
46	Arizona	28.2	46	Arkansas	28.2	72.7	44.5
47	Alabama	27.1	47	West Virginia	25.3	70.6	45.3
48	Kentucky	26.9	48	Vermont	33.3	79.6	46.3
49	Mississippi	26.3	49	Kentucky	26.9	73.7	46.8
50	West Virginia	25.3	50	Maine	31.2	78.8	47.6

Table 2

From 2012 to 2013, the employment gap closed by one percentage point or more in 22 states. The top four states with the greatest reductions (AK, RI, WY, and NH) were small states-- with working-age populations under one million persons. It is hard to make comments about small states, because these statistics are estimates based on state-level samples. Smaller states have smaller samples and thus have a higher degree of year-to-year variability. I am hesitant to read too much into reductions and expansions in the employment gap for small states.

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

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

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

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

State	2012			2013			Change in Gap		Pop in 2013			Increase in Dis. Emp.	Increase in Non-PWD Emp.
	Dis.	No Dis.	Gap	Dis.	No Dis.	Gap	Pct. Points	Rank	Number	Rank	Size		
AK	39.0	76.3	37.3	47.8	75.2	27.4	-9.9	50	459,776	47	Working-age pop. under 1 million	8.8	-1.1
RI	28.7	77.0	48.3	34.3	76.3	42.0	-6.3	49	668,448	43	Working-age pop. under 1 million	5.6	-0.7
WY	43.9	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	3.9	-0.2

											-age pop. under 1 million		
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	27.0	71.4	44.4	30.7	72.7	41.9	-2.5	42	2,893,842	24		3.7	1.3
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	33.4	74.6	41.2	36.1	75.0	38.9	-2.3	41	8,010,771	5	Workin g-age pop. over 5 million	2.7	0.4
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 populati on 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 populati on 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 populati on 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	35.0	74.5	39.5	36.6	75.1	38.5	-1.0	29	5,528,837	11	Workin g-age pop. over 5 million	1.6	0.6
TX	37.0	73.8	36.9	38.7	74.7	36.0	-0.9	28	#####	2	Working -age pop. over 5 million	1.7	0.9

FL	28.9	71.4	42.5	30.5	72.2	41.7	-0.8	27	#####	4	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	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
OH	32.8	75.1	42.2	33.5	75.9	42.4	0.2	13	7,072,114	7	Working-age pop. over 5 million	0.7	0.8

											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