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RespectAbility – Public Comments – Florida Unified State Plan

“We have made important investments to help people with disabilities receive on-the-job training and internships, as well as eliminate the wait list for individuals with critical needs for two years in a row. More than 44,000 individuals with disabilities have found jobs in Florida over the past four years, and we will keep working to create more opportunities for everyone in our state to succeed.” – [Governor Rick Scott, ADA Awareness Day Proclamation, July, 2015.](#)

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

Florida can and must do better in terms of competitive, integrated employment for people with disabilities. According to Census data from 2014, Florida ranks 41st in the country in terms of the employment gap between people with disabilities and those without. In total, there are 1,116,000 working age Floridians with disabilities. **Only 30.1% of them are employed in Florida compared to the 73.4% employment rate for those without disabilities.** Additionally, there are 58,700 youth with disabilities between the ages of 16 and 21. Each year a quarter of them will age out of school into an uncertain future.

Despite poor performance metrics in the past, Florida has many of the ingredients essential to future success. The state plan includes critical data points, discusses outreach to key businesses, and points to growing sectors. However, such efforts need to be fully aligned if these efforts will succeed at empower more people with disabilities to enter the workforce. Florida has much to learn from other states that have worked hard to achieve improved employment outcomes. Other states have higher than 50% employment rates for their citizens with disabilities. [States like the Dakotas, Alaska, and Wyoming have achieved increase results by putting best practices into places.](#) The experience of these states shows ways that Florida can dramatically improve their outcomes. **Likewise, we are also seeing pockets of excellence around innovative youth programs designed to address disability employment in [Georgia](#), [Nevada](#), and [Kentucky](#).**

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

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

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

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. [The vast majority of people with disabilities want to work, just like anyone else.](#)

There is a good level of detail on page 18 in section about “Individuals with Barriers to Employment.” This section directly states the significant challenge facing the disability community in Florida, namely that “majority of persons with a disability...are not in the labor force.” However, this data is not structured in a way that that would be useful to the different elements of Florida’s workforce system. We hope the Unified State Plan be revised to include the distinction between youth with disabilities, working age people with disabilities and those past retirement. It is essential that the number of youth with disabilities be listed so that the workforce system has a clear view of the challenge moving forward.

Only 30.1% of working age Floridians with disabilities are employed, compared to the 73.4% employment rate for those without disabilities. This means that there is a 43.3 percentage point gap in the Labor Force Participation Rates (LFPR) between people with and without disabilities. Closing this gap will require the focused energy and effort of your state’s workforce system. We want to help your state to keep moving in the right direction. However, Florida ranks 41st in the nation in terms of jobs for people with disabilities. We believe that with more focused work, Florida 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 employment. **As an example of the data that is needed, below are several charts which show the challenge in your state.**

Figure 1.

Florida Performance Metrics on Jobs for PWDs



Gov. Rick Scott (R)

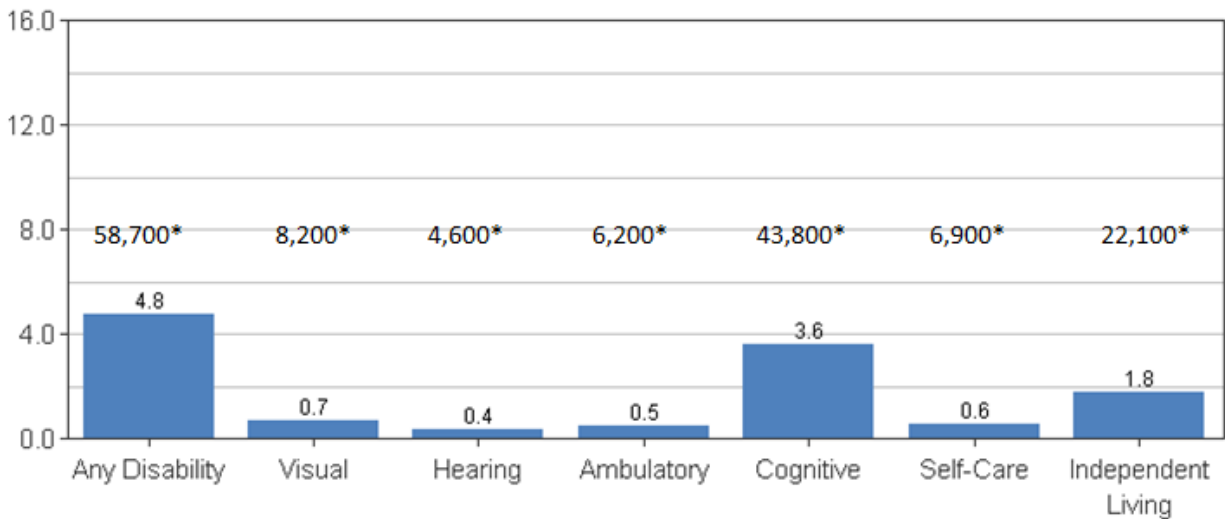
- ❖ 73.4% of Floridians without disabilities aged 18 to 64 are employed.³
- ❖ 30.1% of Floridians with disabilities aged 18 to 64 are employed.³
- ❖ **Florida ranks 41st in the nation for the employment rate for people with Disabilities.**³
- ❖ **There is a 43.3 percent Labor force participation gap between those with and without disabilities.**³
- ❖ 58,700 persons aged 16 to 20 have a disability.¹
- ❖ 1,116,000 persons aged 21 to 64 have a disability.¹
- ❖ 2,619,572 Civilians with a disability live in FL.³
- ❖ The Employment gap between PwDs and non-PwDs increased by 1.5% between 2013-2014.³
- ❖ 626,781 people ages 18-64 in FL received SSDI or SSI benefits in 2014.³
- ❖ Total expenditure on SSDI benefits for PwDs in FL in 2012 was \$7,882,500,000.³
- ❖ Voc. Rehab. obtained 6,793 jobs for PwDs in FL in 2014 (out of 2,109 blind applicants and 31,393 general applicants).³

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

As you move forward with the final revisions to the current draft of your Unified State Plan, we seriously encourage you to track the labor force participation rates of people with and without disabilities as performance metric moving forward. This is crucial information that needs to on the state dashboard of your workforce system.

Figure 2.
Prevalence of Disability Among Non-Institutionalized
People Ages 16 to 20 in Florida in 2012

Prevalence Rates: Age 16 to 20 years (%)



*Total numbers reported

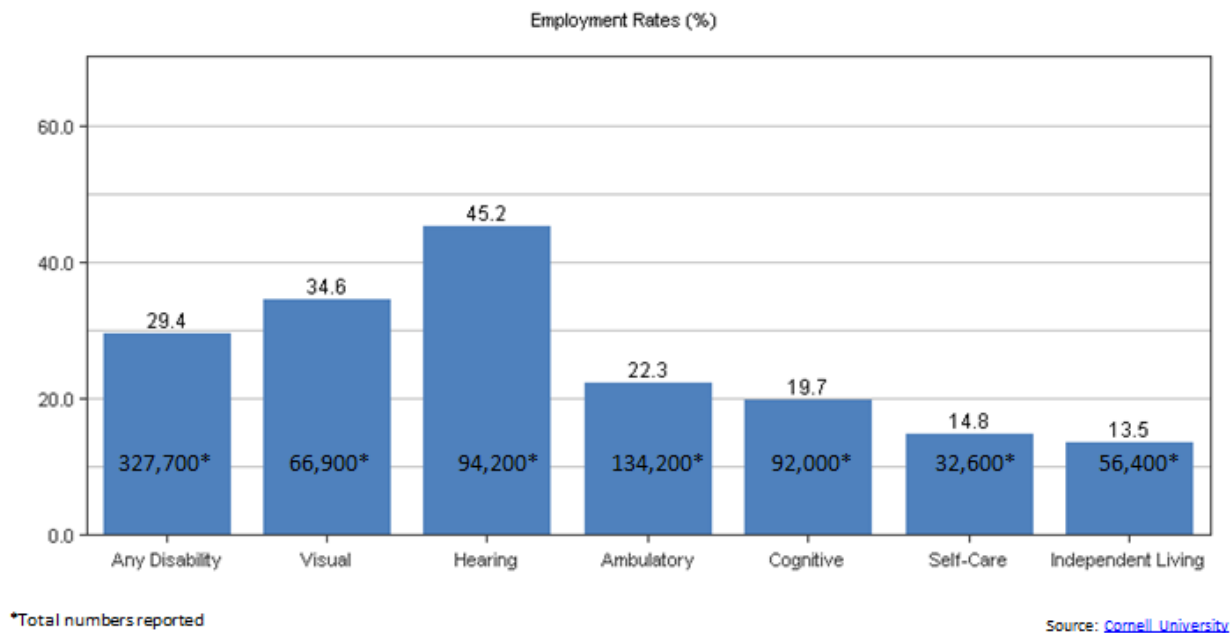
Source: [Cornell University](#)

We encourage Florida policy makers to focus on narrowing the gap between employment of peoples with disabilities and those without disabilities. The best way to do this is to compare the labor force participation rates (LFPR) between people with and people without disabilities. As required by Section 102(b)(1)(B) of WIOA, each state plan must discuss “individuals with barriers to employment, including individuals with disabilities.” Florida does so with a good degree of detail and the survey information given on page 19 about the greatest barriers to employment for peoples with disabilities provides critical information for policy makers.

Additionally, while Florida may only rank 41st in the nation in terms of the employment rate for people with disabilities, it is highly illustrative to look at the experience of those with disabilities who are succeeding in the world of work. **From the 2012 data, we find that only 34.6% of the 66,000 Floridians who are blind or have vision loss are employed while 45.2% of the 94,000 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.

Figure 3.

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



Sadly, we also see that only 19.7% of Floridians 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 Florida’s workforce system expands successful school to work transition programs.** The State Plan does, discuss an effective model for expanding outcomes for this subpopulation. However, the challenge is not addressed with anywhere near enough ambition to move the needle on employment outcomes. We have more to say on this point later in our public comments.

This data will be essential as Florida’s state leaders move forward with WIOA, because there are unique barriers to employment for peoples with disabilities. We hope that this data will be used to develop and implement the performance metrics needed to guide resource investment and workforce programs.

2. Make busting stigmas and misconceptions a key part of Florida's workforce strategy:

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

There are multiple instances in your State Plan where commitments are made to improve employer engagement and to overcome barriers to employment. For example, as discussed on page 54, as a key part of "Recognizing the unique barriers Floridians with disabilities may face in finding a job" your state's workforce system will "continue to lead, invest and participate in several initiatives to connect these individuals to employers who are ready to hire." A critical element of that recognition has to be an understanding of how attitudinal barriers seriously impact people with disabilities who want to enter the workforce.

We therefore recommend that the Florida'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 Floridians with barriers to work also face stigmas, especially those leaving the corrections system.

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. Such a campaign would directly impact your state's effort to move forward on the implementation efforts discussed in the section on Employment First in Florida. After all, the recommendation above mirrors one previously made by the Governor's Commission on Jobs for Floridians with Disabilities. In 2013, the Commission released a report that talked about [the importance of changing perceptions as a key element of overcoming the barriers to employment created by stigma:](#)

The Commission believes the state could do more to effectively communicate with employers on how to find qualified individuals with disabilities to be a part of their workforce. To address misperceptions and other barriers confronting persons with disabilities, the commission recommends the creation of a coalition of state agencies to adopt a long-term joint agency communications plan. The plan must accomplish the following objectives: 1) increase employment opportunities for persons with disabilities by motivating employers to hire; 2) promote a consistent message of awareness among employers about the value persons with disabilities bring to the workforce; and 3) inform employers about the resources that are available to assist their hiring needs, including the single-point of contact. The Commission recommends the coalition be formalized through a cooperative agreement among the agencies to ensure this is a long-term commitment for the state to speak with "one voice" and carry consistent message to employers.

These recommendations discussed have critical implications for Florida's workforce system. If WIOA is to fulfill its core promise to empower people to overcome barriers to employment, then the workforce system needs to focus on strategies that will overcome those barriers. On page 60, the State Plan discusses "Core Program Activities to Implement the State's Strategy" and commits the core partners to "Identify issues, policies, and practices that present systemic barriers." Stigma is a critical issue and one that impacts "individuals with all levels of

disability.” As your core programs look to “develop appropriate resolutions to remove such barriers”, we hope Florida will recognize stigma as a critical barrier to employment. Indeed, we know that other groups of Floridians face similar stigmas, especially those leaving the corrections system.

As such, the current draft of the Unified State Plan would benefit from having a section that focuses on busting stigmas and improving outreach to business communities about the benefits of employing people with disabilities. As you look to finalize your state plan, we encourage you to look at the [Disability Equality Index that assesses the inclusion and hiring efforts of major employers](#). It was put together by the United States Business Leadership Network (USBLN) which operates [a network of affiliates across the country that can be an incredible resource for your work](#). The companies which scored 100% in the USBLN index can be a great resource. These are Ameren Corporation, AT&T, Booz Allen Hamilton Inc., Capital One Financial Corporation, Comcast, 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. Those businesses need to share their success stories and to talk about how people with disabilities can be extremely capable and loyal workers. While there are few Stephen Hawkings — with or without disabilities — people with disabilities can work highly successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and be super talents in developing computer software and engineering solutions. CEOs need to know that people with disabilities can be the BEST employees. to
- 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. Florida’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 [US 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. Florida needs to have a PR campaign that will inspire Floridians with disabilities to reach for the stars. For example, Virgin Airways founder Sir Richard Branson and finance wizard Charles Schwab are dyslexic. Scientist Stephen Hawking and multi-billionaire businessman Sheldon Adelson, like Gov. Greg Abbott of Texas and President Franklin D. Roosevelt before them, are wheelchair/mobility device users. The CEO of Wynn Casinos, Steve Wynn, is legally blind. Arthur Young, co-founder of the giant EY (formerly Ernst & Young) was deaf. Success sells success and that is something the workforce system should seriously utilize in an intentional manner moving forward.

This type of effort needs to begin at the highest levels of state government. In other states, **Governors have been incredible role models on this front – bringing media to best practices of inclusive employment.** Governors Jack Markell of Delaware, Jay Inslee of Washington, and Scott Walker of Wisconsin have all done this extensively. The media appearances made by these Governors have been vital in demonstrating the business case for hiring people with disabilities. **This type of systematic and ongoing communications campaign must continue if you want to maximize your success.**

It is also critical that Florida’s VR staff and community agencies be prepared to support companies in dealing with their specific fears and stigmas. **Partners like the Poses Family Foundation Workplace Initiative can provide training to Florida Rehabilitation Service staff as well as community agencies in supporting Florida companies through messaging efforts around related to fear and stigma.**

3. 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) Florida’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. **Beginning on page 51, the State Plan discusses the state board’s “continuing...focus on sector strategies for healthcare and advanced manufacturing – two key sectors of importance in Florida’s economy.”** These strategies are being addressed through unique initiatives that are helping sustain these pillars of Florida’s economy. The success of these efforts very much depends on investing in a workforce system that provides a pipeline to talent to meet employer needs. **In terms of Expanding opportunities for people with barriers to employment such as disability, we seriously encourage the Statewide Florida Healthcare Workforce Leadership Council (FHWL) discussed on page 52 to consider people with disabilities an untapped labor resource that can meet these growing talent needs.** Further, in other sectors that are expanding, we encourage your workforce system to look at ways of developing career pathways for youth with disabilities.

In terms of thinking about employment for people with disabilities, we suggest focusing on the economic forecasts contained in figure 2.04 on page 9. This chart, which shows Florida’s “Top 15 emerging occupations”, offers a critical point for improving outcomes. Specifically, it will be vital to train and prepare Floridians with disabilities to pursue careers in the fields which are growing in the immediate future. We would submit that the talents of people with disabilities are an untapped resource that can be channel into these “Emerging

Occupations.” This can be accomplished by developing sector specific strategies. Below, we offer our specific ideas where we see the most potential:

A. Health and Elder Care

The State Plan discusses “the increasing demand for healthcare services, driven by population growth and aging, expanding insurance coverage, and technological change.” One of the factors impacting the talent needs of healthcare employers in Florida is the issue of “a relatively high turnover rate” among employees. Figure 2.02 shows 108,035 jobs drive by a 20.7% increase and in nursing assistants, and an astounding 16.4 growth with 196,503 jobs by 2023. **People with disabilities can and should be part of the solution to this critical demand in the labor market.** To quote [a 2014 report from the Office of Disability Employment Policy \(ODEP\)](#), “[people with disabilities] not only represent an untapped talent pool, but also offer significant value and insight” in the field of healthcare. Indeed, it is important for healthcare institutions to reflect their customers, and people with disabilities interface more with the healthcare system. There are [numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living](#). **Employers working in health and elder care can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities.**

We know that your state already has multiple Project Search sites focused on training youth with disabilities to successfully transition from school to work. Despite these successes, the Project Search model receives little attention in the overall context of your Unified State Plan. In particular, Project Search is discussed as an element of Florida Division of Vocational Rehabilitation’s Workforce Development Activities on pages 45, 65, 69, and 156. This model is well suited to meeting the growing talent needs of healthcare employers in Florida.

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. There have been amazing successes with Project SEARCH in Florida. Hospitals such as [All Children’s Hospital near St. Petersburg](#) has been staffed by Project SEARCH interns. Hospital administrators throughout Florida are realizing the benefits offered by employing peoples with disabilities. [Winter Park Memorial Hospital is a good example of how Project SEARCH is positively affecting the attitudes of employers towards peoples with disabilities.](#)

These Project Search sites overall have been achieving outstanding results for people with disabilities, employers, and taxpayers alike. For example, [the first longitudinal study of the program 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. Project Search offers a model that can create a talent pipeline meet the growing talent needs of healthcare employers in Florida Investments in Project Search and other such programs will save big money for taxpayers while also strengthening the talent pool for employers. Project SEARCH in Florida has been a resounding success. We hope that the state will continue to work with Project SEARCH to employ peoples with disabilities and provide employers with dedicated, motivated, and hardworking employees.

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

As has been documented in many cases, there can be an “Autism Advantage” in the STEM space. Indeed, some people on the Autism spectrum can have the very best skills in science, math and engineering. The Unified State Plan includes, “emerging occupations” on page 8. People with autism have the ability to engage in competitive employment for professional service jobs. The State Combined Plan state that by 2023 there will be 108,035 jobs for nursing assistants, 94,055 for accounting, and 196,503 for registered nurses. People with autism can compete with people with autism in these occupations. The unique abilities of people with autism have attracted the attention of some of the largest American corporations. [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 Florida as well. **This issue of STEM and access for student with disabilities is a natural point of partnership between the workforce system and the educational system.** That work needs to start young, be matched with high expectations for success, and designed to ensure people with disabilities have the chance to become future scientists, engineers, doctors and mathematicians.

Ensuring the Accessibility of Science, Technology, Engineering and Mathematics (STEM) Programs and Careers for People with Disabilities, especially Students with IEPs, is vital. As Carol Glazer of the National Organization on Disabilities wrote in *Huffington Post*, “[America is already lagging when it comes to STEM-skilled workers. The U.S. will have more than 1.2 million job openings in STEM fields by 2018.](#)” Governors in other states have looked at STEM needs and begun to develop solutions. For example, [in New York State Governor Cuomo has ensured that magnet schools for STEM are located near IBM, a major STEM employer in their state.](#) Florida should follow this model.

C. High Turnover Jobs: Hospitality, Logistics, and Retail Success Stories:

People’s disabilities have a significant advantage over people without disabilities in that they are more likely to remain in high turnover job sectors. As mentioned before, the state plan talks about the, “emerging occupations” on page 5 of the Unified State Plan. Florida will have an explosion in the number of jobs in high turnover industries such as registered nurses and nursing assistants. People with disabilities are perfectly suited for these high turnover industries, because they are capable of doing the jobs and are typically more loyal. [Project SEARCH has been working with Floridians with autism find employment in these, “emerging occupations” and high turnover occupations. They have had amazing success with connecting dedicated workers with employers.](#) Millions of dollars are lost each year due to employee turnover. [For all jobs earning less than \\$50,000 per year, the average cost of replacing one employee is between \\$6,000 and \\$20,000.](#) Research shows that employees with disabilities, when their interests and abilities are aligned with the needs of employers, are more productive and loyal than their non-disabled peers. Company records show that even when the relatively more expensive accommodations were factored in, the overall costs of disability accommodations were far outweighed by the low turnover rates and better tenures of the employees with disabilities.

A great example of an employment sector where employees with disabilities can be tremendously successful is the hospitality industry. Accommodations and food service are

extremely high turnover jobs and numerous studies show that people with disabilities can be outstanding in those fields and have significantly higher employer loyalty.

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

Likewise, in other states, [hotels and other hospitality 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 Florida to improve employment outcomes for people with disabilities.](#) Florida's state Board, along with other components of the workforce system, should connect with employers in the hospitality sector to begin figuring out how to benefit from these models.

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

D. Jobs with state government and state contracting can also be sources of opportunity

While the focus of our comments on Florida's State Plan are around aligning the workforce system to create opportunities for Floridians with disabilities in the private sector, public sector employment should not be neglected. We know that there has been a concerted effort to ensure a leaner, more efficient state government in Florida. However, in the years ahead, the workforce of Florida's state government is likely to be impacted by the cresting wave of Baby Boomers retiring just as other sectors are being shaken. There reasons for doing so were 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.](#)"

Florida should explore the feasibility of reviewing hiring policies for recruiting people with disabilities for jobs in state government. Additionally, the state could look at ways of expanding state contracting obligations similar to the model we see in Section 503 for federal

contractors. [Likewise, we are also seeing great success with governmental hiring of people with disabilities at the local level in Montgomery County Maryland.](#)

The untapped potential of Floridians 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 overlooked as part of the state's overall workforce strategy.

4. Section 503 of the Rehabilitation Act and Federal Contractors offer Florida the chance to innovate, collaborate, and expand opportunity:

We are pleased to have found that Florida's Unified State Plan directly addressed the challenges and opportunities created by the new regulation around Section 503 of the Rehabilitation Act. This is a unique business opportunity that demands a strategy focused on competitive advantage, not just compliance Unified State Plan discusses the requirements of section 503 on pages 46, 247, 252. As the Unified State Plan states on page 247:

Develop and strengthen employer relationships by providing employer training, support, education and resources related to employing individuals with visual impairment and provide support for employers with compliance with Section 503 regulations.

Further, from our review of the current draft of your State Plan, we have a recommendation in terms of who within your workforce system should be collaborating to support Section 503 outreach efforts. The first and most important partner from Florida's workforce system is "the Business and Workforce Development team at CareerSource Florida" discussed on page 64 of the State Plan. Next, we would suggest that this team coordinate with Florida VR's "Business Relations Program" also discussed on page 64. Together, these partners should focus on specific federal contractors doing business in Florida. Companies such as Lockheed Martin Corporation, Northrop Grumman Corporation, General Dynamics Corporation, Raytheon Company and Harris Corporation are federal contractors, have Section 503 requirements, and have extensive operations in Florida. Moving forward, we hope that Florida VR and other elements of the workforce system will collaborate to build partnerships with these contractors. [Additional information on federal contractors in the Sunshine State can be found here.](#)

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.

5. Beware "Order of Selection" and Utilize a "Jackie Robinson Strategy":

The difficulties created by Orders of Selection, balancing inadequate resources, and waiting lists are familiar issues in the world of Vocational Rehabilitation. These challenges are well addressed in the feedback provided by Florida Rehabilitation Council (FRC). Beginning on page 142 of the State Plan, the FRC tackles many critical issues impacting the VR system in Florida. As reported in this section, we are glad to hear that comments were received concerning such issues as "availability of assistive technology; Order of Selection and wait list concerns; third-party cooperative agreements with school districts; legislative outreach. We echo the

sentiment expressed by the FRC on page 144. We similarly applaud “VR’s efforts to serve over 39,000 people during the SFY 14-15 while on an Order of Selection.”

However, we have a fundamentally different perspective on the issue of Order of Selection and want to offer it to your state here. The largest return on investment that Florida can achieve with its tax dollars will be through employment opportunities for youth with disabilities. The reason why we say this is simple. VR and the workforce system only have one chance with new employers to make a good impression, so Florida should be careful when determining how much of their budget will be spent servicing those with the most significant disabilities. It is our perspective that those individuals with disabilities who go into employment need to succeed and that if they are not the right match for the employer, it will undermine the larger, longer term goals of improving outcomes overall. Other states like Washington have had great success moving beyond Order of Selection and states like Alaska have prioritized resources to supporting youth with disabilities.

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

6. 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 100 of Florida’s Unified 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 113 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 128 need careful implementation efforts as do the Adult Basic Education Assurances listed on page 140 and the VR assurances on pages 208 through 212.

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.

7. 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. Florida 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. For example, we are encouraged by the work that will be done through the Trade Adjustment Assistance Community College and Career Training (TAACCT) Grant discussed on page 62 of the State Plan. 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.**

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 training opportunities offered by apprenticeship programs. **We are pleased that Florida is looking to expand the vital opportunity that apprenticeship training can offer to young people with disabilities.** We are pleased that the Florida State Unified State Plan includes coordination between Florida Education and Training Placement Information Program (FETPIP) and apprenticeship programs as state on page 50. We look forward to seeing future recommendations made by the FETPIP in relation to apprenticeship programs for peoples with disabilities. We are encouraged by the close connection discussed on page 69 between the core WIOA programs, “Florida’s Employment First initiative and the Higher Education Coordinating Council.”

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, something we have found in other states is a gap between VR, VR clients, and the federal officers who support apprenticeship programs in the states. [As such, we highly recommended that your state workforce system close this gap.](#)

Lastly, 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 success achieved by Project SEARCH at a wide range of employers. **As such, we recommend that the workforce system, State Board and FETPIP investigate how to both open apprenticeship programs to people with disabilities and to create apprenticeship opportunities in emerging fields as well.**

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

The VR section of Florida’s Unified State Plan contains a great deal of detail regarding how WIOA will evolve this critical segment of the workforce system. Specifically, we will be watching the VR Transition Youth program closely in the month ahead. **As discussed on page 155, the effort to provide “individualized services to help eligible students with disabilities with a seamless transition from high school” will be critical to achieving improved outcomes in terms of competitive, integrated employment.**

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.

Florida 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 Florida 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.”](#)

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

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

We are pleased to see that address accessibility is one of the State’s Strategies listed on page 251 of the State Plan. We look forward to seeing how Florida will “Increase the provision of accessibility tools, awareness, and regular follow-up with consumers to ensure equality in educational experiences and vocational opportunities.”

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. The State’s Strategies section goes on to talk about “accessibility needs of clients both in construction (universal design) and equipment.” In looking at both aspects, we encourage you to look at the experiences of other states. [The District of Columbia has done some innovative work by successfully transitioning away from physical one-stops by moving trained staff with laptops to provide employment services in schools, hospitals, and community organizations where they are better able to serve the public.](#)

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. 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.

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

Many people with disabilities do not drive. Others cannot afford private transportation. **It is vital to work with public transportation to ensure that there are bus routes to places where there are internships, apprenticeships and other work opportunities.** As mentioned on page 175 in the survey question “Greatest barriers to employment for job seekers with disabilities” one of the greatest barrier to employment was transportation, “job seekers need transportation (personal or public) (76.16%)”

Florida could look at partnering with UBER and other new transportation solutions. Indeed, for people with disabilities who 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.

12. 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. From the FRC Section of the State Plan on page 144, we know that “Increased Information and Referral to transition age youth is built into WIOA” and that “VR continues to work on the information and referral (I&R) processes to enhance our customers’ experience.”

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

13. Nothing About Us Without Us:

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

14. 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, 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.

15. 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 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:

Successfully reintegrating former offenders into the workforce is a huge challenge for many states. **As such, we are encouraged to see that Florida is doing innovative work on this subject, particularly on page 61 where the State Plans talks about "Improving Employment Outcomes for Juvenile Offenders."** The "ongoing partnership" between "Florida Department of Juvenile Justice (DJJ), DEO, CareerSource Florida, and the LWDBs aimed at improving the employment outcomes for juvenile offenders" holds considerable promise. **However, we want to caution your workforce system that the disability lens needs to be applied to this effort.**

[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 that Florida is directly addressing employment outcomes for juvenile offenders, we implore you to ensure that disability issues are identified and addressed.**

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 Florida'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.

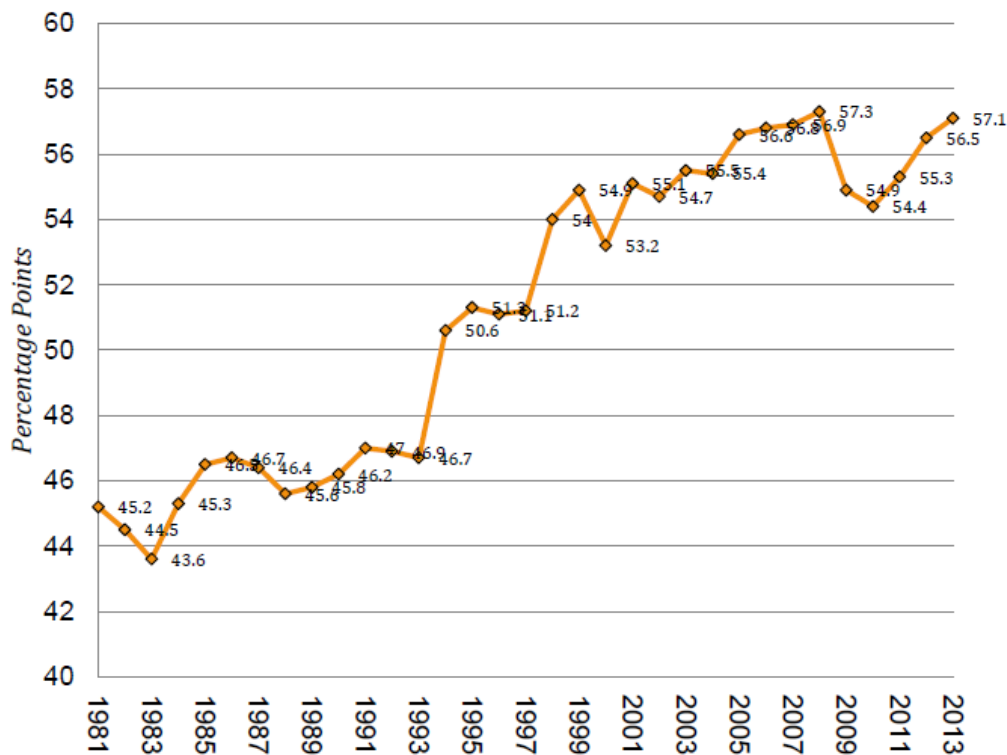
Conclusion:

Florida can and must do better in terms of jobs for people with disabilities. This is an issue that Florida has the opportunity to address because of WIOA and it must be addressed through the State Plan. Failing to properly train and prepare job seekers with disabilities costs your state’s economy incredible talent and shatters the aspirations of so many people with disabilities who want to pursue the American Dream, just like everyone else.

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

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

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



Source for chart is the Disabilities Compendium.

Below are two data tables that provide detailed information ranking the states in terms of employment rates for people with disabilities as well as the employment gap between people with and without disabilities. This has been added to show you where Florida ranks nationally and to showcase several of the data points needed in Florida’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	South Dakota	50.1	1	North Dakota	49.9	82.0	32.1
2	North Dakota	49.9	2	Nevada	40.9	74.3	33.4
3	Iowa	46.5	3	Utah	44.0	77.4	33.5
4	Nebraska	46.0	4	South Dakota	50.1	83.7	33.6
5	Wyoming	45.2	5	Hawaii	42.4	76.6	34.2
6	Minnesota	44.4	6	Alaska	40.8	76.0	35.3
7	Utah	44.0	7	Iowa	46.5	82.2	35.7
8	Hawaii	42.4	8	Wyoming	45.2	81.0	35.9
9	Colorado	41.6	9	Idaho	38.8	75.7	37.0
10	Nevada	40.9	10	Montana	40.5	77.7	37.3
11	Alaska	40.8	11	New Jersey	39.2	76.5	37.3
12	Montana	40.5	12	Texas	38.0	75.3	37.3

13	Connecticut	40.2	13	Colorado	41.6	79.1	37.4
14	New Hampshire	40.0	14	Connecticut	40.2	77.9	37.7
15	Kansas	39.8	15	Nebraska	46.0	83.9	37.9
16	Wisconsin	39.8	16	Washington	37.7	76.0	38.3
17	New Jersey	39.2	17	Minnesota	44.4	82.9	38.5
18	Maryland	39.1	18	Oregon	36.4	74.9	38.5
19	Idaho	38.8	19	California	33.3	72.2	38.9
20	Texas	38.0	20	Maryland	39.1	78.2	39.1
21	Washington	37.7	21	Oklahoma	36.4	75.6	39.2
22	Virginia	37.6	22	Arizona	32.8	72.5	39.7
23	Oklahoma	36.4	23	Kansas	39.8	79.7	39.9
24	Oregon	36.4	24	Illinois	35.7	75.7	40.0
25	Indiana	36.2	25	Virginia	37.6	77.6	40.0
26	Vermont	36.2	26	Louisiana	32.1	72.4	40.3
27	Illinois	35.7	27	New York	33.6	74.0	40.4
28	Delaware	35.6	28	Delaware	35.6	76.3	40.7
29	Massachusetts	35.5	29	Indiana	36.2	77.0	40.7
30	Ohio	34.6	30	New Mexico	30.4	71.2	40.8
31	Pennsylvania	34.5	31	New Hampshire	40.0	81.3	41.3
32	Rhode Island	33.9	32	Wisconsin	39.8	81.1	41.4
33	New York	33.6	33	Pennsylvania	34.5	76.5	42.0
34	California	33.3	34	Ohio	34.6	77.0	42.5
35	Arizona	32.8	35	North Carolina	31.3	74.3	43.0
36	Missouri	32.8	36	Mississippi	27.4	70.4	43.1
37	Maine	32.5	37	Florida	30.1	73.4	43.3
38	Louisiana	32.1	38	Georgia	29.6	73.1	43.5
39	North Carolina	31.3	39	Massachusetts	35.5	79.0	43.5

40	New Mexico	30.4	40	Rhode Island	33.9	77.7	43.8
41	Florida	30.1	41	Alabama	27.3	71.3	44.1
42	Tennessee	29.9	42	Vermont	36.2	80.4	44.2
43	Georgia	29.6	43	Missouri	32.8	77.2	44.4
44	Michigan	29.6	44	Tennessee	29.9	74.4	44.5
45	Arkansas	29.2	45	Arkansas	29.2	73.8	44.6
46	South Carolina	29.0	46	West Virginia	25.6	70.5	44.9
47	Mississippi	27.4	47	Michigan	29.6	74.6	45.0
48	Kentucky	27.3	48	South Carolina	29.0	74.0	45.0
49	Alabama	27.2	49	Kentucky	27.3	74.4	47.1
50	West Virginia	25.6	50	Maine	32.5	79.9	47.4

Table 2

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

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

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

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

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

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

State	2012			2013			Change in Gap		Pop in 2013			Increase in Dis. Emp.	Increase in Non-PWD Emp.
	Dis.	No Dis.	Gap	Dis.	No Dis.	Gap	Pct. Points	Rank	Number	Rank	Size		
AK	39.0	76.3	37.3	47.8	75.2	27.4	-9.9	50	459,776	47	Working-age pop. under 1 million	8.8	-1.1
RI	28.7	77.0	48.3	34.3	76.3	42.0	-6.3	49	668,448	43	Working-age pop. under 1 million	5.6	-0.7
WY	43.9	78.5	34.6	50.7	79.4	28.7	-5.9	48	358,526	50	Working-age pop. under 1 million	6.8	0.9
NH	37.9	80.5	42.6	41.8	80.3	38.5	-4.1	47	842,880	40	Working-age pop. under 1 million	3.9	-0.2
MN	42.1	81.6	39.6	46.0	82.1	36.1	-3.5	46	3,357,171	21		3.9	0.5
NV	35.5	72.2	36.7	39.2	73.1	33.9	-2.8	45	1,719,885	34		3.7	0.9
WI	37.6	79.5	41.9	40.9	80.1	39.2	-2.7	44	3,544,103	20		3.3	0.6
SC	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	Working-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 population under 1 million	1.8	0
CO	40.3	77.1	36.8	42.3	77.3	35.0	-1.8	36	3,304,940	22		2.0	0.2
HI	37.3	75.6	38.3	39.1	75.7	36.5	-1.8	36	822,542	42	Working-age population under 1 million	1.8	0.1
NE	43.5	82.2	38.7	45.5	82.6	37.1	-1.6	35	1,125,425	38		2.0	0.4
ND	51.6	83.3	31.7	52.8	83.1	30.2	-1.5	34	451,304	48	Working-age population under 1 million	1.2	-0.2

KS	40.1	78.8	38.7	41.7	79.0	37.3	-1.4	33	1,730,369	33		1.6	0.2
MA	33.0	77.2	44.2	34.9	77.9	42.9	-1.3	31	4,272,843	14		1.9	0.7
OK	34.4	75.1	40.7	35.8	75.2	39.4	-1.3	31	2,295,734	28		1.4	0.1
TN	28.0	73.2	45.2	29.9	74.1	44.1	-1.1	30	3,983,560	16		1.9	0.9
NJ	35.0	74.5	39.5	36.6	75.1	38.5	-1.0	29	5,528,837	11	Working-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
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