

Dec. 15, 2015

RespectAbility – Public Comments – State of Georgia Unified State Plan

“I am proud to say that we are making progress increasing the number of work opportunities for people with disabilities throughout our state.”

- [Governor Nathan Deal speaking at the Georgia State Capitol on March 5, 2015.](#)

Personal Note

I am pleased and honored to have the chance to submit public comments on Georgia’s draft WIOA plan. As an Emory Graduate with family still living in the Peach State, I am personally invested in seeing Georgia expand employment opportunities for people with disabilities. While I was studying at Emory, I was run over by a car and for a time became a wheelchair user. In those days before the passage of the ADA, ramps and curb cuts didn’t exist. Today, thanks to that law, architecture has improved. However, attitudes have not. I know what it means to have a child with a disability work hard and make honor roll semester after semester, but to know that at the end of the inclusive education that IDEA enabled, that employers are not lining up to hire someone with a disability.

The one in five Americans who have a disability want to pursue the American Dream, just like everyone. WIOA and Georgia’s Unified State Plan will be key to making those dreams a reality. As such, I and my organization, RespectAbility, stand ready to help in any way possible.

Sincerely,

Jennifer Laszlo Mizrahi, President, RespectAbility

Introduction

RespectAbility - on behalf of a coalition of national non-profit and non-partisan disability organizations who are committed to employment, independence and opportunity for Americans with disabilities - is pleased to submit the following comments regarding the current draft of the State of Georgia’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 Georgia’s state plan.

WIOA represents the intersection of hope and history for the 1 in 5 Americans who have a disability. The state plans required under this new law, are part of a paradigm shift in how the workforce system does business with new requirements for the entire system to be accessible to people with disabilities. People with disabilities want to pursue the American Dream, just like everyone else. The choices made by Georgia’s leaders will be embodied in the state plan and shape the opportunities that are made available for all Georgians.

The choices that Georgia make need to be data driven by focusing on workforce participation rates, working hard on employer engagement, and having a “Jackie Robinson

Strategy” of investing resources into empowering youth with disabilities. Our public comments focus on these three key areas and discuss best practices to meeting these vital goals.

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

There are 40,300 Georgians with disabilities between the ages of 16 and 20. Whether they are able to successfully enter the workforce, or become victims of a lifetime of dependency on government benefits, will be the test of Georgia’s efforts to implement the Workforce Innovation and Opportunity Act.

Data-Driven Decision Making

At first glance, the raw data on employment outcomes for people with disabilities in the Peach State is discouraging. **Only three in ten of the state’s 622,600 working age people with disabilities are employed.** Compared to 71.5% of their non-disabled peers, only a meager 31.5% of Georgians with disabilities are employed. Those numbers place Georgia 38th in the nation in terms of the employment, below New York and California but above Louisiana and Maine. **These numbers speak to the hard choices and limited options confronting the state’s 40,300 youth with disabilities.**

These poor outcomes will remain unchanged unless the key decision makers in Georgia’s workforce system make investments in proven models and successful programs. Such investments cannot be made unless those leaders have access to the right data. **The information that Georgia’s leaders need includes far more than just unemployment statistics and wage data.** By looking solely at unemployment information, decision makers are missing the bigger picture of those individuals with barriers to employment who are not actively seeking work. **One of the needed data points is the workforce participation rate of people with disabilities.** [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 Georgians 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 Georgia.

Below, is a list of the specific points in the draft of the State of Georgia’s Unified State Plan that are in need of greater clarity, specificity, and precision in terms of data:

- First, it must be noted that the draft of Georgia’s WIOA plan is far stronger for including the complete Economic and Workforce Analysis. While many of the details are highly technical, such information about Georgia’s economic future and growing occupations are a valuable resource for those committed to getting more people with disabilities into jobs and off of benefits.
- Worth particular attention is Figure 33 on page 33 in Section II,(a)(1)(B)(i). This table showcases data from the American Community Survey and specifically identifies Populations with Barriers to Employment. **This level of detail is important, however, a critical distinction in terms of people with disabilities is missing.** The number listed on the Figure for Georgia’s population of people with disabilities is 1,147,708. **This figure DOES NOT make any distinction between working age people with disabilities and older Americans who age into disability.** Precision is needed when using statistics to

advance policy proposals. **As such, the Figure should be amended in three ways to reflect different categories based on age:**

- **1:** Figure 33 should be rewritten to indicate how many youth between the ages of 16 and 20 have disabilities. According to the most recent public data, there are **38,000 youth with disabilities between ages 16 to 20 in Georgia.**
- **2:** In the next line, Figure 33 should explicitly identify working age people with disabilities between the ages of 21 and 64. **There are 651,600 working age Georgians with disabilities.**
- **3:** Figure 33 should then include a separate line for **the 441,500 Georgians with disabilities age 65 and over.**
- **Sources:** [2013 Disability Status Report: Georgia. Ithaca, NY: Cornell University Employment and Disability Institute \(EDI\).](#) and [Disability Statistics from the 2013 American Community Survey \(ACS\). Ithaca, NY: Cornell University Employment and Disability Institute \(EDI\).](#)
- Page 32 and Figure 34 explicitly discusses the impacts that an aging population is having on the future of Georgia’s economy. This section explicitly identifies two key trends. These trends are the “increase in demand for healthcare professionals, particularly for the elderly and aging populations” and the “high percentage of workers on the verge of exiting the labor force.” The first of these trends is focused on a particular job sector which is growing as Georgia’s population ages and the second is a state-wide need that will only grow more acute in the next few years. **RespectAbility submits that people with disabilities are a natural labor resource that should be tapped to meet these economic trends.** To quote a 2014 report from the Office of Disability Employment Policy (ODEP), “[people with disabilities] not only represent an untapped talent pool, but also offer significant value and insight” in the field of healthcare. **There are [numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elderly care, and in assisted living.](#)** Likewise, the seven out of ten Americans with disabilities who want to work but are not yet working represent an untapped talent pool which should be channeled into the gaps created in the workforce by Baby Boomers. **As such, we recommend that this section be amended to consider what role Georgians with disabilities can play in the future workforce.**
- **Next, we submit that between Figures 35 and Figure 36 is a natural location to include in-depth data on the workforce participation rates of people with disabilities.** As stated before, looking solely at employment rates or unemployment statistics does not yield a complete picture of the economic standing of the state of Georgia. Far too many people with disabilities and other barriers to employment are not actively seeking work. Likewise, this section could also include differences in workforce participation rates among different segments of the disability community. For example, [on slide 7 of our state data presentation, you can find information on the “Employment of Working-Age People \(Ages 21 to 64\) by Disability Status in Georgia in 2012.”](#) **Such distinctions, along with the workforce participation data, provide a clearer view of where Georgia’s workforce system can achieve improved outcomes.**
- Section II,(a)(1)(B)(iii) details the Education and Skill Levels of the Workforce and Figure 39 discusses Educational Attainment. **We suggest that this data on educational attainment misses the chance to discuss the secondary school graduation rate for youth with disabilities.** [Data from the US Department of Education indicates that in](#)

[Georgia, only 35.1% of children with disabilities graduated from high school.](#) Such metrics indicate that more attention is needed on youth with disabilities to successfully channel them through the school system and on to the workforce.

- It is an encouraging sign that the Workforce Development, Education and Training Activities Analysis included an in-depth analysis of Georgia's workforce system as a part of the Unified State Plan. In terms of the types of systematic change like that involved with WIOA, having the right theory of change is vital to improving outcomes. Identifying data, physical, and financial integration as a key weakness of the system means that Georgia will be positioned to address those challenges. **One point of caution in terms of serving people with disabilities throughout the workforce system is not to overemphasize physical integration when there is so much opportunity through technology and online platforms.** Physical accessibility to the One Stop system is indeed important, but less important than ensuring the websites and resources of the system are programmatically accessible to people with visual, hearing, or intellectual differences.
- Page 42 also details work done by the Deputy Commissioner of GDECD/WFD about hearing from the frontline personnel of the Local Workforce Development Areas. Those meetings pointed towards critical issues related to building partnerships, providing technical assistance, and training for local boards. **In looking to respond to those needs, we would emphasize the critical importance of site visits as being a way of approaching best practices in terms of workforce development.** Touring a model employer who is capitalizing on the talents of employees with disabilities can be an eye opening experience. As such, it should be a priority in terms of building the capacity of local boards to serve job seekers with disabilities.
- Page 46, which contains information on Section II (b)(2) and discusses how Georgia will "Utilize Labor Market Information to Inform Workforce Decisions." **Once again, we would reinforce the critical role that workforce participation rate data has to play in helping "to help guide strategic decisions in workforce development."** [There are multiple sources](#), from [universities](#) to [research foundations](#) to [the federal government](#), that provide in-depth data that is freely and publically available. The information sources mentioned in this section and that GDOL's Workforce Statistics and Economic Research Division could easily be amended to include workforce participation rate information for people with barriers to employment.
- What gets measured gets done. As such, WIOA puts a great emphasis on performance metrics, data sharing, and accountability. Section II (b)(2) of Georgia's draft Unified State Plan discusses how the state will meet the "primary indicators of performance described in section 116(b)(2)(A) of WIOA." **RespectAbility would like to suggest that tracking people with disabilities entering the workforce system and entering the workforce be part of the metrics used for each of the core programs' six performance measures.** At face value, measuring the percentage of participants is a great metric, but identifying how many within that number are people with disabilities is absolutely vital.
- On pages 49 and 50, Section II(c) of the draft Unified State Plan discusses Labor Market Information and its role in state strategy. **The language here could easily be amended to ensure that the workforce participation rate of people with disabilities and other barriers to employment is included on the state dashboards.**

Employer Engagement and Problematic Omissions.

When dealing with a dramatic policy change like the Workforce Innovation and Opportunity Act, it can sometimes be difficult to see the ultimate goal towards which all of the stakeholders involved are working towards. With WIOA, the goal is an employer driven paradigm shift. Yes there are new rules and regulations, but this law is fundamentally about spurring innovation and expanding opportunity. Expanding opportunities for people with barriers to employment such as disability requires strong partnerships with employers. There is a great deal of language and policy implications in terms of employer engagement written throughout this draft of Georgia's Plan. However, there are multiple areas where greater detail is needed.

While multiple sections discuss employer engagement, none explicitly address federal contractors with new requirements to hire qualified individuals with disabilities thanks to changes in Section 503 of the Rehabilitation Act. These omissions and other details need greater attention if Georgia is to spur innovation in the workforce system and expand opportunities for people with disabilities to get into rewarding jobs.

Below are the specific points that we identified as being in need of expansion if the State of Georgia Unified State Plan is to be fully successful in terms of employer engagement:

- **The first page of the draft plan, in Section II,(a)(1)(A)(1), rightly points to Governor Deal's leadership and hard work on making his state a better place to do business.** One of the statistics that is showcased here is that "in Fiscal Year 2014, 374 companies relocated to Georgia", a strong sign of the Peach State's commitment to economic growth. This shows that the Workforce Division can achieve great precision in terms of real-time labor market information. It would be incredibly useful for the state plan to cross reference how many of those companies which are relocating to Georgia currently possess federal contracts. **Federal contractors can be a significant partner in expanding employment opportunities for people with disabilities thanks to the new Section 503 rules.** [The new requirement that companies should have up to 7% of their workforce be composed of qualified individuals with disabilities is a huge opportunity to tap into the talents that people with differences](#) bring to employers.
- On Page 2, Figure 1 indicates the Top Industry Sectors in Georgia and points towards those occupations which are set to grow in the future. Specifically, the draft plan identifies that "the top in-demand employment sectors" are "Health Care & Social Assistance, Professional, Scientific & Technical, and Retail Trade" along with increasing demand "Transportation & Warehousing, Manufacturing and Finance & Insurance." **We submit that these are all job sectors where people with disabilities can be excel and benefit the bottom lines of their employers.** Project SEARCH sites across the country prove that young people with intellectual and developmental disabilities can succeed in jobs helping seniors. [Several hospitals in the state of Georgia have already benefitted from the pipeline of talent created by Project SEARCH's business model.](#) Youth who have gone through this system have proven themselves to incredible assets in settings such as [the Northeast Georgia Medical Center](#) and [the Hamilton Center](#). **In terms of WIOA planning, Project SEARCH should not be solely focused on expanding into more hospitals.** In other states, [Project SEARCH interns have done incredible work with senior citizens in nursing homes.](#) Likewise, [other states have had great successes with Project SEARCH sites in hotels and resorts.](#) **While the hospitality sectors are not a primary focus of Georgia's economy, it should still be considered in terms of expanding opportunities for youth**

with disabilities. Shifting to the sectors of transportation and logistics, distribution centers for huge companies like [Walgreens](#), [OfficeMax](#), and [UPS](#) show ways to fully integrate people with differences into dynamic jobs. Likewise, [companies like SAP](#) and [Specialisterne show that people on the Autism spectrum](#) can be incredible assets to their employers and directly improve the bottom line. As such, **Georgia’s workforce system needs to look at other states that have been successfully channeling the diverse talents of employees with disabilities into growing job sectors.**

- Our comments above spoke to the need to look at ways to tap into the talents of people with disabilities to fill the vacuum created by retiring Baby Boomers. Similarly, Section II,(a)(1)(A)(ii) on page 12 warns that “A shortage of skilled talent also exists in the manufacturing industry.” **While manufacturing is growing ever more automated and requiring ever more specialized skills, it is important to think about attracting, training, and sustaining young people with disabilities in these types of jobs.** [Employers in other states have demonstrated that people with disabilities can be trained to succeed in this type of skilled talent need.](#)
- Page 18 gives voice to the continuing employer challenge of attracting more and more students in STEM careers. **As the workforce system in Georgia looks to teach younger students STEM skills and to encourage older students to think about STEM careers, it is vital that people with disabilities not be forgotten.** People with disabilities bring unique characteristics and talents to workplaces that benefit employers and organizations. For example, Stephen Hawking is a genius who happens to use a wheelchair and Charles Schwab, who has dyslexia, is a financial wizard. **If the state of Georgia is going to be serious about developing STEM careers, it needs to look at ways of getting students with disabilities into the STEM pipeline.**
- **Perhaps the most conspicuous absence of references to Section 503 requirements are in the sections of the Georgia state plan which talk about the Aerospace and Defense sectors.** The Peach State is right to be proud of having a “robust aerospace industry that generated an economic output of \$30.7 billion” and a “robust defense industry with eight of the top ten U.S. defense contractors operating in the state.” **Both of those sectors involved federal contracts worth billions of dollars that [are now subject to 7% utilization goal for hiring qualified individual with disabilities.](#)** Even if employers face challenges finding the talent they need, **Section 503 is an opportunity to start thinking about ways to attracting the diverse talents that people with disabilities bring to the workplace.** Both of these sections of the draft Unified State Plan could easily be amended to include language pointing employers towards Section 503 requirements. Likewise, these new requirements need to be the catalyst which spurs both the workforce system and educational system to look at ways of channeling more and more young people with diverse background and physical differences into STEM.
- Page 24 of the draft points shows that “an increasing number of healthcare and life science companies are doing business in Georgia.” From RespectAbility’s perspective this is a very promising area to see more jobs for people with disabilities. At these types of companies, millions of dollars are lost each year due to employee turnover. For all jobs earning less than \$50,000 per year, [the average cost of replacing one employee is between \\$6,000 and \\$20,000.](#) **Research shows that employees with disabilities are more productive and loyal than their non-disabled peers.** Company records show that even when the relatively more expensive accommodations were factored in, the overall costs of accommodations

were far outweighed by the low turnover rates and better tenures of the employees with disabilities. **Furthermore, Section 418 of WIOA “Training and Services for Employers,” establishes that the State can finance training to educate employers, as well as provide services for employers who have hired or are interested in hiring people with disabilities.** This includes working with employers to provide work-based learning experiences (including short term employment, internships, etc.), pre-employment transition services (recruitment, employee training, and awareness promotion), providing consultation, technical assistance, accommodations, assistive technology, etc. **Elsewhere the State Plan talks about expanding Project SEARCH, however, we would flag this particular section as being a natural place to include language support work getting people with disabilities jobs at “healthcare and life science companies.”**

- Page 30 discussed the very exciting work being done through the “Georgia WorkSmart” initiative. Youth with disabilities can benefit enormously from the work done through this program. **[This is especially important thanks to the many new resources out there from the Office of Disability Employment Policy which discuss practical ways of getting young people with disabilities into the workforce through apprenticeships.](#)**
- Page 55 talks extensively of the role of the Business Services Unit (BSU) within the Georgia Department of Labor. The BSU is an absolutely essential partner in terms of expanding employment opportunities for Georgians with disabilities, especially for youth. There are two key points to be made here about how they can best showcase the business imperative for employing people with disabilities. **As above, companies based in Georgia that have federal contracts and are subject to Section 503 requirements should be a priority for the BSU’s work.** **[There are multiple sources of information which can connect BSU staff to these vital and dynamic employers.](#)** The second point to be made is that there is a powerful tool which can point toward those corporate leaders which are already capitalizing on the talents of people with disabilities. The U.S. Business Leadership Network (USBLN) and the American Association of People with Disabilities (AAPD) have developed something called the Disability Equality Index (DEI). **The DEI is a national benchmarking tool that offers businesses an opportunity to receive an objective score, on a scale of zero to 100, on their disability inclusion policies and practices.** All of the companies that scored 80 points or above should be in on the contact list of the BSU in terms of learning best practices and showcasing the business imperative for hiring people with disabilities.
- As stated before, **one of the important best practices that encourage innovative thinking and engagement around jobs for people with disabilities is conducting site visits to successful disability employment.** As stated on page 57, the Workforce Division is planning to host “a statewide symposium at the end of the 2015 Program Year.” We offer two important points about this symposium. **First, we would highly encourage that disability employment issues are on the agenda of that symposium. Second, we always highly recommend that WFD look to the local area to see if there are locations that would be willing to host site visits of model employers and outstanding programs where people with disabilities are being employed.** As a part of our mission to empower people with disabilities to pursue the American Dream, RespectAbility would be more than happy to help facilitate such visits.
- We are very encouraged by the work being done in Georgia both around increasing participation in the workforce by people with barriers to employment as well as the focus

on career pathways, especially for youth. **Collaboration and cooperation are factors that will make a huge difference for sustaining the type of paradigm shift that WIOA is supposed to precipitate.** As the Career Pathways initiative moves forward in the state of Georgia, there are several elements that will be critical to ensuring that young people with disabilities benefit from the integration, innovation, and services being planned. **First and foremost, better integration between educational institutions and community businesses are essential.** Integration in terms of skill development, learning opportunities, and work experiences can make the difference for youth with disabilities between spending their life on benefits and being independent through employment. **As the Career Pathways initiative moves forward, they should direct attention to ways of integrating work experiences into the Individual Education Plans of students with disabilities.** Next, high expectations are motivational factors that can support the ultimate entry of a student with disabilities into the workforce. For far too long people with disabilities have faced stigmas, myths, and misconceptions about their capacity to work, to become independent, and to pursue careers. **Setting high expectations for success needs to begin in the schools and there are many examples of how this can be done successfully.** We would recommend that Georgia look closely at the innovation work being done through [the Promoting Readiness of Minors in Supplemental Security Income \(PROMISE\) grant](#). This model offers valuable lessons applicable to the Career Pathways initiative. In terms of the Accelerated Opportunity program and for adult education efforts in general, **we would also suggest looking for ways to screen for learning disabilities among out-of-school youth and adult learners.**

Georgia's Focus on Youth - Embodying the "Jackie Robinson Strategy"

The Workforce Innovation and Opportunity Act invests considerable resources into better serving youth of all kinds and addressing barriers to employment. Some of the most fundamental barriers to employment that far too often prevent young people with disabilities from pursuing employment is the issue of stigma. Myths, and misconceptions about people with disabilities are a critical obstacle in the push for improved employment outcomes. [Our perspective as an organization is that the barriers created by stigma will be broken by using what we call a "Jackie Robinson Strategy."](#) As the first African-American to play major league baseball, Robinson tore down decades of discrimination and blazed a trail for other talented and diverse athletes to follow. He helped his team win games and his success as a player helped to sell tickets. He was the talent that his employer needed, and contributed to the bottom line. That is how we, in the disability community, can also break down barriers and achieve success. We can do it by being the people that others will be proud to call co-workers and friends

What this means for workforce development and public policy is that strategic triage is needed. While it is important to have pathways to success for people who have been unemployed long-term or participate in sheltered workshops, we also need to achieve early wins. To break down barriers and stigmas, the people with disabilities that go into competitive, integrated employment need to succeed in their jobs. Doing so means that the greatest focus and largest efforts need to be where there will be a serious return on investment for employers. The "low hanging fruit" will be in helping young people with disabilities to successfully transition into the workforce. Indeed, by focusing on empowering youth with disabilities and people with work experience who acquire disabilities later in life to blaze a trail, we will create a path for those who may have a greater need for employment supports to also succeed. If employers see their

bottom line improved by the talents of the initial employees with disabilities they hire, then they will be more likely hire others with more significant barriers to work.

We see this strategy mirrored in the language and elements involved with the current draft of Georgia's Unified State Plan. In particular, we agree fundamentally with the proposition found in the priorities under Goal 2 on page 172 of the plan. There, GVRA resources are directed "to focus primarily on youth and students with disabilities based on the principle that serving this population will have a greater impact on the entire population of individuals with disabilities in the long-term." This is the "Jackie Robinson strategy" in action.

While we feel that Georgia is approaching the fundamental challenge in the right ways, there are still topics to be discussed and best practices to be integrated into the state plan.

Below are a list of specific points, both good and bad, that touch on how Georgia will expand opportunities for young people with disabilities to enter the workforce:

- Section III(a)(2)(C) discusses in great detail how the evolved workforce system will provide services to individuals with barriers to employment. **The section dealing with Youth with Disabilities shows great promise and we will be watching this work closely to see its outcomes.** In terms of how "to braid existing and new resources" we would encourage the state of Georgia to look at what other states have done to succeed in this area. **We particularly want to direct your attention to the work being done in Iowa, Delaware, Wisconsin, and the Dakotas around blending and braiding funding sources to support the employment success of students with disabilities.** Collaboration with programs like the High Demand Career Initiative (HDCI) and the commitment of VR resources "to ensure responsiveness to the known workforce demands" are prime examples of making the state plan an employer driven paradigm shift. In terms of "the provision of pre-employment transition services," we would emphasize the importance of having the GDOL's BSU as a key partner in this process. **Using WIOA resources to cover the costs of an internship or an apprenticeship or training program for students with disabilities can be an incredible asset to businesses looking for talent.** Such collaboration is good for businesses, good for taxpayers, and good for people with disabilities. This section also discusses the involvement of employers in the model design and the use of social media to connect with youth. Both of these efforts will be vital to expand opportunities for youth with disabilities to succeed. Employers need to see stories of where other business have succeeded in employing youth with disabilities, and youth need new, innovative ways to connect to the workforce system.
- Starting on page 66 and running through page 70, section (D) identifies the Coordination, Alignment and Provision of Services to Employers. Around the work of GVRA, there are several critical topics that need to be explicitly identified if real outcomes are to be achieved. **We applaud the creation of "a 'Business Division' to create a single focused approach and strategy to engage employers."** Having a single point of contact to build relationships with community and state businesses is critical. **One of the subsets of employers that need to be an early focus for the Business Division are federal contractors doing business in Georgia.** While such contractors do tend to cluster in the aerospace and defense sectors (both of which are well represented in Georgia), many diverse businesses do business with the Federal government. **All of them now have Section 503 requirements and have outstanding talent needs that youth with disabilities can be trained to fill.** Another target audience for the work of the Business

Division are the hiring managers, who will be the key implementers of any serious push for expanding employment opportunities. This cohort has many doubts and fears about their own abilities to successfully accommodate and manage people with disabilities. Hiring managers need to see themselves as able to excel at recruiting, hiring, supervising or working with teammates with disabilities. Real training and confidence building is needed. So is ensuring that large companies have a central address where hiring managers can seek help on accommodations or legal issues as they arise. All are topics that natural fall under the area of operations for GVRA.

- More than ever, supporting the successful transitioning of students with disabilities into the workforce require VR and education to work together. **As such, having a collaborative plan around workforce transition will make a considerable difference for youth with disabilities.** We hope that the “consultation and technical assistance services” provided on the score emphasize ways that youth with disabilities can be incredible assets to employers and create continuity from school to work.
- Section (8) on page 90 of the draft state plan discusses in detail how the One-Stop Delivery System will meet the accessibility requirement from Section 188 of WIOA. While all of this detail is important and shows how Georgia’s workforce system will evolve, there is an important note of caution. **While physical accessibility is important, ensuring that the workforce system is programmatically accessible will have a broader impact.** 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 critical topics in need of close attention.
- Section (2) Registered Apprenticeship on page 103, discusses how Georgia will expand apprenticeship programs as a part of the WorkSmart effort. **In terms of resources and ensuring that youth with disabilities can pursue these tremendous job openings, we direct your attention to ODEP’s apprenticeship initiative.** This effort from the Office of Disability Employment Policy has resulted in a collection of resources and best practices that can support “youth and young adults with a full range of disabilities” through “apprenticeship training.” [We suggest that Georgia’s workforce system take full advantage of such resources.](#)
- Among the many positive signs that we see in Section IX and the work that GVRA is doing, one in particular is very encouraging. Specifically, we celebrate the appointment of a “Director of Transition Services.” **Intervening to support youth with disabilities succeed before they leave high school will require the dedication and passionate of true champion for change.** We look forward to seeing what this Director can accomplish and figuring out ways that we as a national coalition of disability organizations can support them.
- Section (D) concerns the interactions between GVRA and the state department of education. While we’re confident there is good work being done around the development of “a collaborative plan to enhance transition services”, there are several critical issues that need to be raised in terms of disability and education. Expanding transition services and supports is a noble effort and hopefully one which will support successful outcomes. **However, linking students with disabilities to employment while they are still students is absolutely essential. Something that should a core point of agreement between GVRA and GaDOE is ensuring that a student’s Individual Educational Plan include a work experience component.** [Youth with disabilities won’t begin to develop work skills](#)

[unless they have the chance experience the world of work while still students. Even unpaid internships or volunteer experience can help a student with a disability](#) begin to develop the confidence and capability needed to ultimately enter the workforce. **Secondary school is a critical window of opportunity for young people. It is a window where early work experiences, high expectations, and family engagement can make a difference that will last a lifetime.** [These elements are key factors in the successes achieved through the PROMISE Grant project](#) and they should be critical elements of GVRA and GaDOE's new transition plan. There is a different factor at play when it comes to discussing the role of VR services in post-secondary schools. The factor that needs to be discussed in the collaborative plan is the fundamental dysfunction between disability and career services in post-secondary educational settings.

- As we stated before, employer engagement is a critical factor in the ultimate success of WIOA in Georgia. As such, we are particularly pleased to see the work GVRA is doing through the Employer Engagement Panel. **We know that every business benefits when they align the interests and talents of people with disabilities with their needs.** Georgia Aquarium is a jewel of this region and there are other employers who understand the competitive advantages brought by employees with disabilities. **Whether it's Emory University, Hartsfield International, Home Depot, the Atlanta Braves, or Publix, there are Georgia companies that have tapped into the talents of people with disabilities.** We hope that GVRA and the Employer Engagement Panel will work to build on their effort by eventually [joining the US Business Leadership's Affiliate Network](#). As stated by the USBLN itself, "affiliates engage in networking discussions to increase their knowledge of community outreach, recruiting and interviewing, the accommodation process, and barriers to employment." Such activities match the Employer Engagement Panel's existing work and we hope Georgia will reap the fruits of deeper collaboration.
- One topic which is vital to supporting employment for people with disabilities is assistive technology. Section IX of the draft Unified State Plan touches on the role of AT but not to any substantive degree. **While we are encouraged that VR closely cooperates with the Georgia Assistive Technology Act Program, the lack of a formal cooperative agreement is surprising.** While the Tools for Life loan program sounds like a great tool for supporting the technology needs of people with disabilities, we encourage GVRA to think of ways to leverage simple tools like smartphones to support people in employment. In terms of newer, inventive ways to get technology into the hands of people that need it, we seriously encourage GVRA to approach the various elements of the One-Stop System in Georgia. Some of the regulations around WIOA imply that assistive technology count as a part of an AJC's infrastructure costs. We encourage GVRA to partner with the One Stop system to see how to formalize such a process.
- RespectAbility is thrilled with the commitment made by GVRA in Section IX (b) of the State Plan to expand Project SEARCH sites in Georgia. **The outcomes achieved at Project SEARCH sites across the country for young people with intellectual and developmental disabilities speak for themselves.** As GVRA and its collaborators look to add more partners and job sites across the state, strategic thinking is needed and careful planning is required. **First, we highly encourage Georgia to learn lessons from other states that have worked very hard to expand the jobs and opportunities created by Project SEARCH.** [Wisconsin in particular has worked very hard to increase the number of work sites in their state.](#) The experiences of the dedicated state officials, VR counselors,

workforce professionals, and special educators who have increased Wisconsin's Project SEARCH programs to 27 sites offer profound insights in the practical, tactical, and strategic steps necessary to make rapid expansion a reality. **Hospitals and medical centers are natural first steps in terms of new partners.** The healthcare sector is one with continuing workforce needs as evidenced by the Economic Analysis included in the draft Plan. **Next, GVRA would do well to look at assisted living, nursing homes, and other elder care facilities as employers with growing talent needs induced by senior population increases.** Lastly, while hospitality is not as central to the Georgia economy as to other states, hotels should be another area of partner recruitment. Common features in each of these categories of employers and their needs can be very well met by the pipeline of young talent that Project SEARCH represents. **We look forward to seeing Georgia's commitment to Project SEARCH be matched up with hard work and dedication.** The economic consequences of failure in collaboration and communication are well documented by a [report prepared by the National Organization on Disability called *Bridging the Employment Gap for Students with Disabilities*](#). We hope the GVRA and GaDOE will study this critical issue and work to prevent such failures costing students with disabilities the chance to pursue the American Dream.

Conclusion

As stated in our introduction, there are many encouraging signs written throughout the current draft of Georgia's Unified State Plan. From the focus on youth with disabilities to the strong support for employer engagement, we are very encouraged that Georgia is working to make WIOA's promise of expanded opportunity a reality.

As discussed in our comments above, there are many areas where the language, investments, and priorities of the Unified State Plan can improve to expand job opportunities for people with disabilities. With its strong aerospace and defense sectors, Georgia should be leading the nation in the hiring of qualified individuals with disabilities by federal contractors to meet Section 503 requirements. Section 503 needs to be directly addressed in the state plan, as does the use of workforce participation data to inform the decision making process.

We hope that our comments provide the resources and inform the efforts being made in Georgia to empower more people with disabilities to pursue the American Dream. In closing, below we offer a copy of the state data presentation that we prepared for decision makers in Georgia. This presentation contains extensive data about disability, employment, workforce participation, and resources that can be used to empower people with disabilities.



RESPECTABILITY

Georgia and Jobs for PwDs

Jennifer Laszlo Mizrahi, President

www.RespectAbilityUSA.org

Georgia

- ❖ **Governor Nathan Deal (GA)** [committed to focus on employment for PwDs at a rally with the Georgia Council on Developmental Disabilities.](#)



Gov. Nathan Deal (R)

- ❖ 71.5% of persons without disabilities aged 18 to 64 are employed.³
- ❖ 31.5% of PwDs aged 18 to 64 are employed.³
- ❖ 40,300 persons aged 16 to 20 have a disability.¹
- ❖ 622,600 persons aged 21 to 64 have a disability.¹
- ❖ 1,211,831 civilians with disabilities live in GA.³
- ❖ The employment gap between PwDs and people without disabilities has decreased by 0.5% between 2010 and 2011.³
- ❖ 313,442 people 18 - 64 received SSDI or SSI benefits in 2012.³
- ❖ The total expenditure on SSDI benefits in GA in 2012 was \$4,069,512,000.³
- ❖ Voc. Rehab. obtained 5,120 jobs (out of 15,689 applicants) for PwDs in GA in 2012.²

1. 2012 Disability Status Report: Georgia, disabiliystatistics.org
2. StateData: The National Report on Employment Services and Outcomes, 2013
3. [35th Annual Report to Congress on the Implementation of the Individuals with Disabilities Education Act, 2013.](#)

Georgia

		People with Disabilities (%)		People without Disabilities (%)	
		2012	2013	2012	2013
Poverty ¹	US	29.2	28.7	13.6	13.6
	GA	30.1	29.7	15.9	16.1
Smoking ¹	US	26.0	25.4	16.9	16.2
	GA	26.4	25.1	18.8	17.1
Obesity ¹	US	39.1	40.1	24.5	25.0
	GA	37.2	40.7	27.1	27.6
Employment ¹	US	32.7	33.9	73.6	74.2
	GA	30.3	31.5	70.8	71.5

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

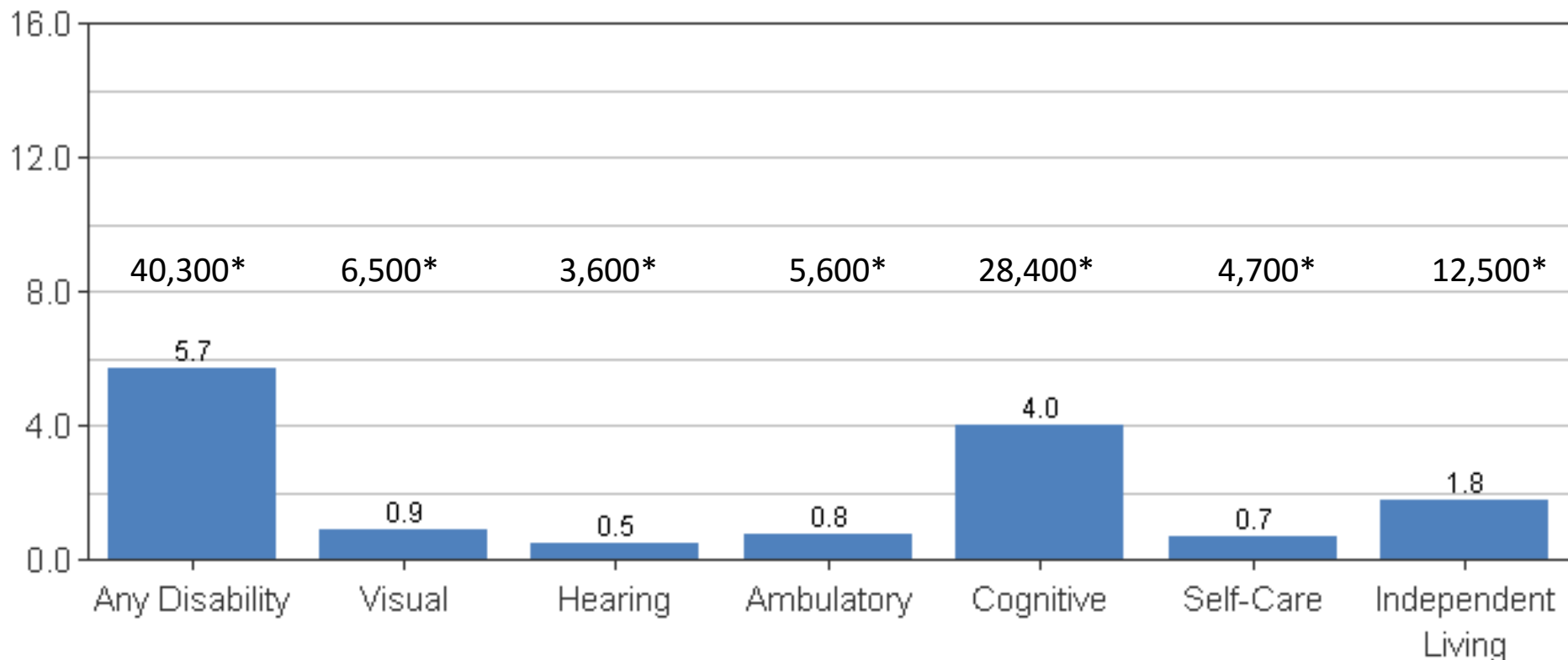
Ages 6 to 21 IEPs by Category in GA

	2011	2012
All Disabilities	162,884	167,642
Specific Learning Disability	55,481	58,581
Speech or Language Impairment	23,678	23,660
Intellectual Disability	17,257	16,903
Emotional Disturbance	14,538	13,692
Multiple Disability	-----	-----
Hearing Impairment	1,697	1,673
Orthopedic Impairment	849	812
Other Health Impairment	25,854	26,705
Visual Impairment	707	730
Autism	11,638	12,765
Deaf-Blindness	21	25
Traumatic Brain Injury	433	418
Developmental Delay	10,731	11,741

Source: [Annual Disability Statistics Compendium](#)

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

Prevalence Rates: Age 16 to 20 years (%)

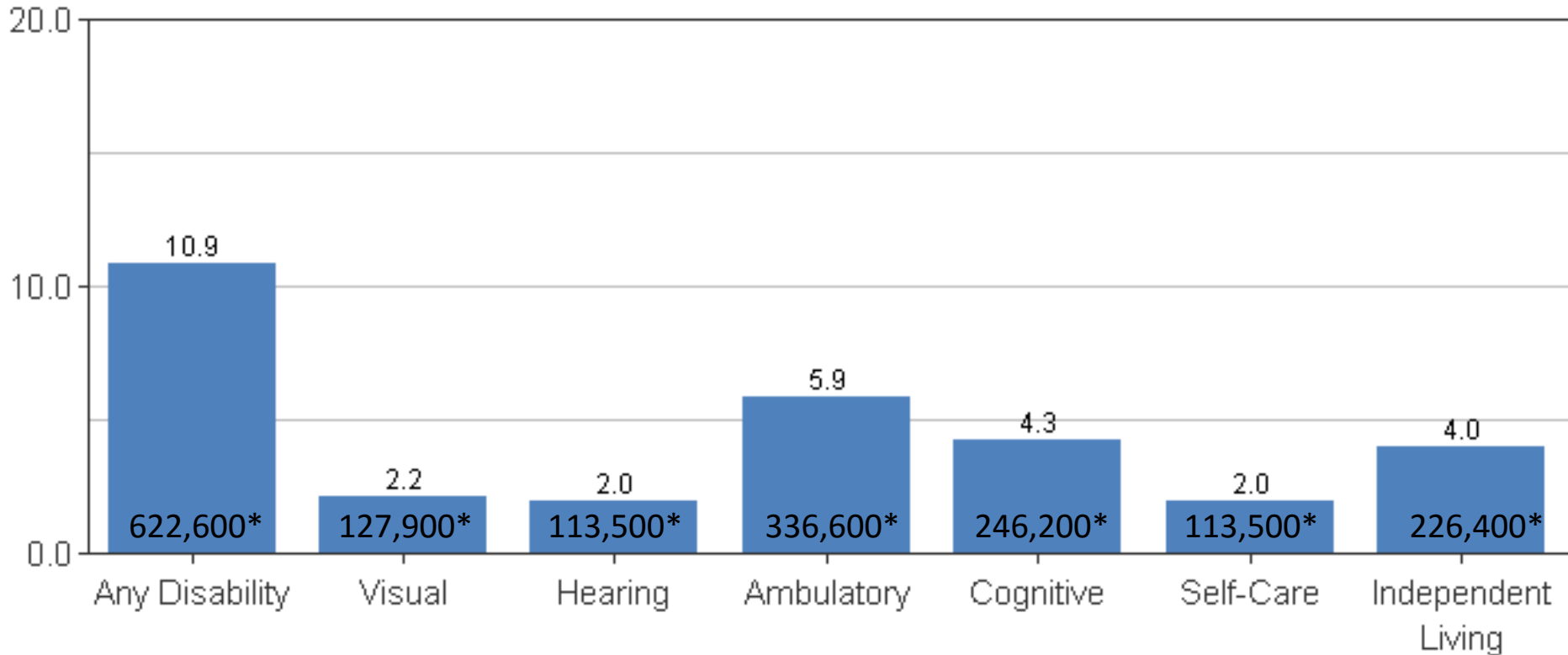


*Total numbers reported

Source: [Cornell University](#)

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

Prevalence Rates: Age 21 to 64 years (%)

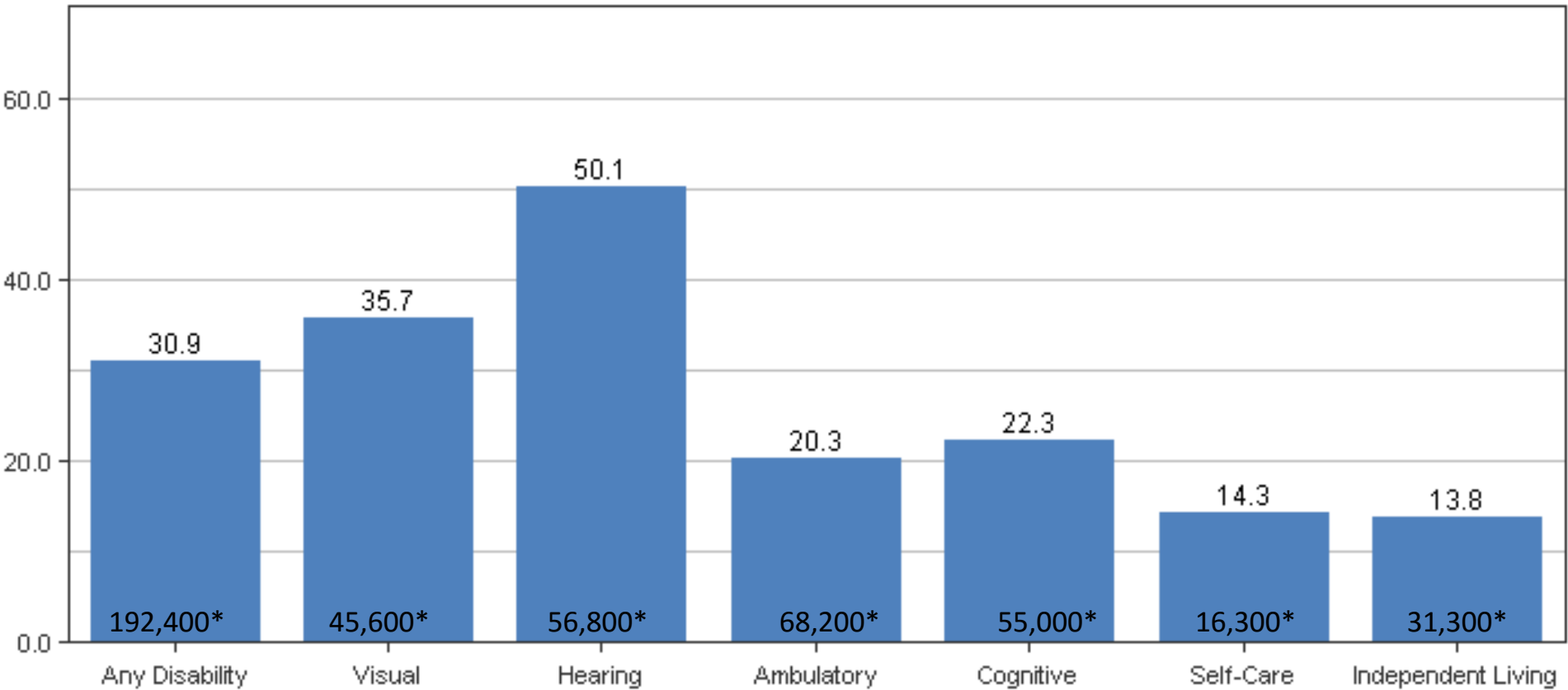


*Total numbers reported

Source: [Cornell University](#)

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

Employment Rates (%)



*Total numbers reported

Source: [Cornell University](#)

Georgia Project SEARCH Sites

- ❖ Archbold Medical Center/John D. Archbold Memorial Hospital, Thomasville
- ❖ Candler Hospital, Savannah
- ❖ Cartersville Medical Center, Cartersville
- ❖ Coffee Country Regional Medical Center, Douglas
- ❖ Colquitt Regional Medical Center, Moultrie
- ❖ Dorminy Medical Center, Fitzgerald
- ❖ Effingham Health Systems, Springfield
- ❖ Emory Midtown Hospital/Emory Healthcare, Atlanta
- ❖ Grady Health System, Atlanta
- ❖ Hamilton Medical Center, Dalton
- ❖ North Fulton Hospital/Children's Healthcare of Atlanta at Scottish Rite, Roswell
- ❖ Northeast Georgia Health System, Inc./Northeast Georgia Medical Center, Gainesville
- ❖ Phoebe Putney Memorial Hospital, Albany
- ❖ Satilla Regional Medical Center, Waycross
- ❖ Shaw Industries, Dalton
- ❖ St. Joseph's Hospital, Savannah
- ❖ Walton Regional Medical Center, Monroe

Project SEARCH: www.projectsearch.us
Contact Erin Riehle at Erin.Riehle@cchmc.org

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

❖ Top contractors:

- Lockheed Martin Corp.
- General Dynamics Corp.
- Georgia Tech Research Corp.
- Kipper Tool Company
- Northrup Grumman Corp.

For complete list go to the [Fedspending website](#)

http://www.fedspending.org/fpds/fpds.php?stateCode=GA&sortp=r&detail=-1&datatype=T&reptype=p&database=fpds&fiscal_year=2012&submit=GO

Resources for federal contractors include:

[Job Accommodation Network](#)

<https://askjan.org/>

[US Business Leadership Network](#)

www.usbln.org

Jobs in Georgia

❖ Georgia's top industries:

- Aerospace, Agribusiness, Arts, Automotive, Contact Centers, Data Centers, Defense, Energy and Environment, Entertainment, Headquarters, Financial Services, Food Processing, Information Technology, Life Sciences, Logistics & Transportation, Manufacturing, and Tourism.
- [Click for your Workforce Development Plan](http://workforceinvestmentworks.com/workforce_board_info.asp?st=GA)
http://workforceinvestmentworks.com/workforce_board_info.asp?st=GA
- [Click for your Workforce Development Board](http://workforceinvestmentworks.com/workforce_board_info.asp?st=GA)
http://workforceinvestmentworks.com/workforce_board_info.asp?st=GA

Resources

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

Let Us Know If We Can Help!

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

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