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RespectAbility – Public Comments – Maine Unified State Plan

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

Maine can and must do better in terms of competitive, integrated employment for people with disabilities. Only 31.2% of the 117,607 working age Mainers with disabilities are employed. Further, there are over 9,300 youth with disabilities and each year a quarter of them will age out of school into an uncertain future.

Maine has been viewed by some as a model state because it has Employment First policies enshrined both in executive order and in state legislation. **However, when you look at the gap between the employment rate of people with disabilities and those without disabilities, Maine comes dead last in the country.**

Government action alone—through executive orders, legislative decisions, and regulatory oversight—is insufficient. The necessary condition for achieving greater competitive, integrated employment for individuals with disabilities is engaging employers, meeting their talent needs and addressing stigmas that are barriers to work.

Thanks to WIOA, Maine has the opportunity to work hard to do exactly that by implementing the best possible WIOA plan focused on competitive, integrated employment for people with disabilities. The Pine Tree State has much to learn from other states that have worked hard to achieve improved employment outcomes. Other states have higher than 50% employment rates for their citizens with disabilities. [States like the Dakotas, Alaska, and Wyoming have achieved results by putting best practices into places.](#) The experience of these states shows ways that Maine 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 Maine.](#) That information is attached to our comments.

From our review of Maine's Unified State Plan, we are deeply concerned that too many elements of the workforce system remain segmented and lack the lens of disability issues needed to better align programs. For example, the recommendations included in Appendix III "Regarding Services to People with Disabilities" offer substantive points where the workforce system can empower people to overcome the employment barriers created by disability. **However, we are concerned that because these ideas were included in an appendix, they do not reflect a workforce system preparing to help job seekers with barriers to employment. Further, we are concerned that the right data points around Maine's disability community are not integrated into the planning process as key performance metrics moving forward.** While the State Plan includes the labor force

participation rate of people with disabilities and people with disabilities as a percentage of the population, there are no precise numbers around youth with disabilities. Nor are there any discussions around preparing youth with disabilities to succeed in growing and emerging sectors of Maine's economy. **There is no discussion, for example, around expanding Project Search to meet the talent needs of the tourism industry or health or elder care. Likewise, Section 503 is absent from the text of the State Plan despite other parts that talk about "defense-dependent industries."** As Maine moves beyond the current draft of the Unified State Plan and looks to finalize WIOA implementation, there is a critical need to ensure the disability lens is applied to the work of the workforce system as a whole.

As such, our public comments on Maine'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 the Pine Tree State push hard to see improved integrated employment outcomes for Mainers 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:

As we expressed in our introduction, Maine can and must do better in terms of jobs for people with disabilities. Your state is dead last in the country in terms of the gap in labor force participation rate between those with and without disabilities. What gets measured gets done – and you are not currently measuring the most important performance metric.

It is vital that the workforce system and the State Board include the labor force participation rates of people with disabilities on their state dashboards and performance metrics. Looking at unemployment information or job placements alone is not enough. Decision makers are missing the bigger picture of those individuals with barriers to employment who are not actively seeking work. **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 Mainers with disabilities.** Collected from Census Bureau data, this collection should be valuable to the WIOA work being done in Maine.

From the text of Maine's Unified State Plan, it is clear that there is access to good data around labor force participation rates. For example, in the "Labor Market Trends" section in the "Economic and Workforce Analysis" on page 14, the Plan notes "The 25 to 54 age cohort has the highest rates of labor force participation, nearly 85 percent, but it has been declining since 2000." Further in terms of employment and disability, the Plan references the key data point directly. In the section on INDIVIDUALS WITH EMPLOYMENT BARRIERS, the Plan reports that the "Labor force participation of adults with disabilities averaged just 32 percent, half the rate of those with no disability from 2011 to 2013." This is critical data that is needed to inform the planning process. As such, we recommend that the State Plan be revise to include the labor force participation rates of people with disabilities as a key performance metric of the workforce system in the years ahead.

Getting Mainers with disabilities interfacing with the workforce system and trained to enter the workforce system is critical for very clear reasons. As APPENDIX III states, "People with disabilities make up 14% of Maine's working age population" and that "this is a large and potential labor force." Yet this powerful statement about the worth and value of people with disabilities could easily be ignored having been buried in an appendix on page 180 of the plan.

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

As we stated above, there is a significant gap in the labor force participation rates between people with and without disabilities. Only 31.2% of people with disabilities in Maine are employed while 78.8% of their non-disabled peers are employed results in a 47.6 point gap. The most effective way of beginning to close that gap will be to train and prepare people with disabilities for careers in those sectors of Maine's economy that are rapidly expanding and/or where there is high turnover. After all, WIOA is supposed to be an employer-driven paradigm shift and expanding the opportunities needed to overcome barriers to employment requires strong partnerships with employers in growing industries.

From the analysis of "Current Job Demand and Outlook" it is clear where those partnerships should be built. As found on page 18, "A recent survey of employers on job vacancies...found that 80 percent of job vacancies occurred in five sectors: healthcare and social assistance, retail trade, administrative and waste services, accommodation and food services, and construction." Further State Plan goes into greater detail around specific sectors where demand exists now and demand continues to grow.

The jobs gains in these sectors offer a great opportunity for focused sector strategies improve employment outcomes among people with disabilities in Maine. We submit that these are job sectors where people with disabilities can excel and benefit their employer's bottom line. People with disabilities represent an untapped labor resource that, with the right training and supports, can meet the diverse talent needs of Maine's growing job sectors. Below, we offer our specifics ideas on how to implement such efforts:

A. Health and Elder Care

The State Plan makes clear that healthcare is one of the greatest areas of growing demand in the economy of Maine. Specifically, on page 20, line 1, the Plan states that "Healthcare is the largest sector in Maine, accounting for 17 percent of jobs." This is an industry only expected to grow in the years ahead. The current draft of the plan goes on to state that "Of the net job growth expected through 2022, most is expected in this sector."

As with many states, the growing talent needs of employers in this sector is propelled by demographics and aging. "Maine has the lowest share of youths and highest share of people in their upper 50s and 60s in the nation." This fact will only make the demand for workers in the field of health care more acute as Baby Boomers age. This is at once a challenge for Maine's workforce system and an opportunity for Maine's disability community. **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.**

Despite the incredible success that other states have experienced creating training programs for young people with disabilities, Maine lacks any Project Search sites. This is a critical gap and one that should be corrected immediately through the Unified State Plan. Nationally, each year approximately 2,700 young people with disabilities, spread out in 45 states, do a nine-month, school-to-work Project Search 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.

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, which was conducted in upstate New York, found “a 68% success rate in transitioning students from high school into competitive employment” and “Project SEARCH sites...New York that have an impressive 83% success rate overall.”](#) The goal for each program participant is competitive employment.

Given the funding and service imperatives in WIOA around youth, disabilities, and sector strategies, Maine has an opportunity to invest heavily in the Project Search model. It could be a great channel for collaborative energies of the workforce system to coalesce around meeting a growing labor need with an untapped labor resource. As such, we highly recommend that Maine look to learn from other states that have had rewarding experiences with Project Search. While Maine has to start small, there is no reason to think small in the planning stage. We highly encourage you to learn from Wisconsin which has rapidly expanded its network of Project Search sites. The experiences of the dedicated state officials, VR counselors, workforce professionals, and special educators from Wisconsin offer profound insights into how make this cost-effective model a success. We encourage Maine to look at Project Search and other such programs which will save big money for taxpayers while also strengthening the talent pool for employers.

B. Tourism and Hospitality as a sector for employees with disabilities to shine:

What Maine lacks in population, it makes up for in physical beauty. It is no surprise then that Tourism is a critical industry in several different regions of Maine. For example, tourism is a big economic cluster in the Coastal Counties Region, Cumberland County is focused “on tourism and seasonal, recreational-based economics”, and the “Boothbay/Damariscotta hub features a strong tourist industry.” One of the critical operating costs of employers in this industry is 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.

As such, we encourage Maine’s workforce system to look at ways to train people with disabilities to be successful in 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 Maine to improve employment outcomes for people with disabilities](#). Maine’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.

C. Capitalize on the Autism Advantage in IT jobs:

As reported on page 20, line 5, “Information technology (IT) is expected to continue to increase in importance across every sector of” Maine’s economy. The labor demands of this industry are “fast changing requiring a flexible, adaptable workforce” and it is challenging workforce systems to prepare for the 21st century. While this sector puts a primary on post-secondary education and technical proficiencies, there is no reason to exclude people with disabilities from this talent pipeline. **In fact, as has been documented in many cases, disability can sometime be a real asset in the STEM space. There can be an “Autism Advantage” in the STEM space. Indeed, some people on the Autism spectrum can have the very best skills in science, math and engineering.** [Microsoft, SAP, and Specialisterne](#) have committed themselves to “[provide employment opportunities for people on the autism spectrum in roles such as software testers, programmers, system administrators, and data quality assurance specialists](#).” [The Israeli Defense Forces recruits and trains their citizens on the Autism spectrum for work in their elite intelligence unit](#). As Carol Glazer said, writing earlier this year 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.](#)”

Federal contractors and other employers have huge demands for STEM qualified talents. However, many schools place their best supports for students with disabilities in schools that do not have strong STEM training. This is a huge loss as people on the Autism Spectrum, for example, can have the very best skills in science, math and engineering. [Microsoft, SAP, and Specialisterne](#) have committed themselves to “[provide employment opportunities for people on the autism spectrum in roles such as software testers, programmers, system administrators, and data quality assurance specialists](#).” These experiences and partnerships offer insights into how to challenge employer perceptions, recruit diverse talent, and ultimately put peoples to work. Delaware’s Governor Jack Markell has led the way in partnering with companies to employ more people on the autism spectrum. Such examples need to be implemented by Maine. **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 work to ensure people with disabilities have the chance to become future scientists, engineers, and mathematicians.**

Partnerships should be created with federal contractors who have 503 requirements and talent shortages. Being a small state puts Maine’s workforce system at an advantage in terms of

building partnerships and coordinating resources. On the Section 503 front, several cities in Maine play host to the operations of General Dynamics Corp., Martin's Point Health Care Inc., OWL Companies, Source for Native American Products LLC, and Ameresco Inc. Through WIOA, Maine has the opportunity to really innovate in helping these dynamic businesses meet and exceed their Section 503 requirements.

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

While the focus of our comments on Maine's Unified State Plan are around aligning the workforce system to create opportunities for Mainers with disabilities in the private sector, public sector employment should not be neglected. In the year ahead, the workforce of Maine's state government is likely to be impacted by the cresting wave of Baby Boomers retiring just as other sectors are being shaken.

As discussed in the Unified State Plan, government jobs are critical to several of the regional economies in Maine. For example, as discussed on page 29, lines 1, 2, and 3, "Central/Western region represents 30 percent of Maine's land area, 28 percent of the population and one quarter of the state's jobs" and a large segment are government jobs. To put that in perspective, as reported on line 25, page 33, in Kennebec County "15 percent of county jobs" are "jobs in state government."

As such, adopting affirmative actions to hire people with disabilities could be a solution to this coming challenge. Other states have adopted such steps as an opportunity measure in their state hiring policies. This was 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.](#)"

Maine should explore the feasibility of Affirmative Action hiring of people with disabilities for jobs in state government plus expanding state contracting obligations similar to the model we see in Section 503 for Federal contractors. [Governor Inslee in Washington State](#) and [Governor Dayton in Minnesota](#) have been working to implement such measures for people with disabilities through executive orders. [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 Mainers with disabilities is such that a full-spectrum, all-of-the-above-and-more approach is needed. While our priority is on seeing the talents of people with disabilities channeled into the private sector, employment opportunities in the public sectors shouldn't be over looked as part of the state's overall workforce strategy.

3. Make busting stigmas, myths, and misconceptions a key part of Maine's workforce strategy:

Low expectations and misconceptions are critical barriers to employment for people with disabilities. [A Princeton study shows that while people with disabilities are seen as warm, they are not seen as competent.](#) Similarly, [a study published by Cornell Hospitality Quarterly found that companies share a concern that people with disabilities cannot adequately do the work required of their employees.](#) **We therefore recommend that Maine's Unified State Plan be amended to include a comprehensive proactive communications/public relations strategy for reducing such stigmas.** Indeed, we know that other groups of Mainers with barriers to work also face stigmas, especially those leaving the corrections system.

Indeed, the best way to fight stigmas is to let employers see the facts from other employers who are already succeeding by hiring people with disabilities. In terms of potential employer partners, we encourage your state plan to look at the [Disability Equality Index that assesses the inclusion and hiring efforts of major employers](#). It was put together by the United States Business Leadership Network (USBLN) which operates [a network of affiliates across the country that can be an incredible resource for your work](#). The companies which scored 100% in the USBLN index can be a great resource. These are Ameren Corporation, AT&T, Booz Allen Hamilton Inc., Capital One Financial Corporation, Comcast, NBC Universal, Ernst & Young LLP, Florida Blue, Freddie Mac, Highmark Health, JPMorgan Chase & Co., Lockheed Martin Corporation, Northrop Grumman Corporation, Pacific Gas and Electric Company, PricewaterhouseCoopers LLP (PwC), Procter & Gamble, Qualcomm Incorporated, Sprint Corporation, Starbucks Coffee Company, and TD Bank N.A.

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

- A. CEOs/business leaders need to understand the value proposition/business case for their specific company as to why they should focus on putting people with disabilities into their talent pipelines.** This is best done through business-to-business success stories. 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 and business leaders need to know that people with disabilities can be the BEST people to get a job done. You have a Business Leadership Network in ME that can and should play a leadership role in this. Procter & Gamble has been very involved in this in the past.
- 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. Maine's VR staff and community agencies can fully support human resources professionals and managers in dealing with their own specific fears and stigmas surrounding hiring people with disabilities. Moreover, online and in-person training is readily available to help from a variety of sources. RespectAbility has online webinars, as [does ASKJAN.org](#), USDOL and others. Partners like [the Poses Family Foundation Workplace Initiative](#) can provide training to the workforce staff and volunteers systems-wide as well as to community agencies in supporting companies through messaging efforts around related to fear and stigma. [The National Organization on Disability](#) and [the U.S. Business Leadership Network](#) offer strong resources.
- C. People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectations must begin. Maine's Employment First**

efforts need to be supported by a PR campaign that will inspire Mainers 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 Maine 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 Maine VR staff as well as community agencies in supporting Maine companies through messaging efforts around related to fear and stigma.**

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

While there is a great deal of detail in the current draft of Maine's Unified State Plan, there is also an omission. **Specifically, the State Plan lacks explicit references to the employment opportunities and talent challenges created by the Section 503 regulations and federal contractors.** [Maine's Plan does not discuss at all the new 7% utilization goal set for companies to recruit, hire, and retain qualified individuals with disabilities in all job categories.](#)

Maine needs to respond to the opportunity created by Section 503 with a strategy focused on competitive advantage, not just compliance. These regulations and requirements entail far more than just new rules for businesses to play by. **Section 503 is an opportunity that could potentially have a broad impact on the employer engagement work of the entire workforce system.** The companies who must comply with Section 503 have an opportunity to teach companies not impacted by the regulations how to effectively employ, engage, and retain workers or customers with disabilities.

5. Effective employer engagement depends on the BLN and others as you focus on the right business audience:

Improving employment outcomes in Maine very much depends on being an employer driven paradigm shift. As we mentioned above, it is vital to emphasize the business case for hiring people with disabilities again and again for a simple reason. Government action alone--even through vocation rehabilitation -- is insufficient to improve employment outcomes for people with disabilities. The necessary condition for achieving greater competitive, integrated

employment for individuals with disabilities is engaging employers and meeting their talent needs.

As such we very disappointed to see limit attention given to one of the most important assets that Maine has in terms of making the business case for hiring people with disabilities. [Maine Business Leadership Network is an affiliate chapter of the national BLN](#) and we are disappointed to see that it is not yet at the WIOA table. To quote the USBLN's affiliate website, "Affiliates engage in networking discussions to increase their knowledge of community outreach, recruiting and interviewing, the accommodation process and barriers to employment" and equip employer to learn "learn how to leverage their organizations for success."

The State Plan does mention the role of the Bureau of Rehabilitation Services in "connecting Maine employers to the national Business Leadership Network" in line 30 on page 62. However, the absence of any discussions of the local affiliate chapter neglects on of the key building block needed for improved outcomes. Engaging the Maine BLN, which brings together inclusive employers whose bottom lines have benefits from employees with disabilities, will be critical to the WIOA process moving forward.

6. 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. Maine has the chance to demonstrate to business that college students with disabilities are on campuses and that they should be actively targeting those with disabilities just as they do all other diversity recruiting on college campuses.

While the statistics cited above are national ones, they have bearing on the work that needs to be done through your community college system. Beyond just WIOA, community colleges are uniquely positioned to innovate in order to expand opportunity. Community colleges are very closely connected to the working world and the specific training requirements of

employers. As you look to triangulate between employer needs, skills training, and recruiting workers; you will do well to remember the importance of getting students with disabilities connected to career services and prepared for the workplace early.

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

We are pleased to see that Maine’s apprenticeship programs are closely tied to the major industry sectors of the Pine Tree State. As discussed on page 63 in lines 27, 28, 29, “Currently apprenticeship works jointly with the Maine Community College System to package training and education resources” in both “precision manufacturing” and “with Adult Education for the healthcare industry.” Further, in line 20, the Plan states that Apprenticeship is a “targeted outcome for WIOA participants” and commits on line 21 “to expand the 20 apprenticeship services presently available through State general funds.” These are critical steps and are steps that need to be fully accessible to people with disabilities in Maine.

Indeed, people with disabilities can be incredibly successful employees in such dynamic fields if given the structure, supports, and training an apprenticeship can offer. As such, we would direct your attention to two recommendations.

First, we highly encourage the workforce system in Maine to look at the hard work done by the federal Office of Disability Employment Policy around apprenticeships as a career pathway for young people with disabilities. ODEP has studied the challenges and generated resources which can open up these exciting programs to “youth and young adults with a full range of disabilities.” The regulations related to apprenticeship which have recently come out of the Department of Labor provide states the flexibility they need to refine and design training programs that maximally inclusive of people with diverse talents. [We encourage you to invest time and energy to understand the best practices contained in ODEP’s apprenticeship toolkit.](#)

Second, if they are not yet conversant on these issues, we highly recommend that the staff of Maine’s Vocational Rehabilitation be trained on the specifics of apprenticeship programs. [Further, we would also highly recommend that VR staff connect and collaborate with the Federal officer responsible for apprenticeship programs in Maine.](#)

Third, because “apprenticeship works jointly with the Maine Community College System” there is a critical chance to recruit students with disabilities. As discussed in the section about the gap in the educational system, students with disabilities need to be better fitted to transition into the world of work. Apprenticeships, especially industry-driven programs in a community college, could be a great way of doing that. As such, we would direct the State Plan to encourage these programs to actively recruit community college students with disabilities.

Such innovative partnerships and improved accessibility are essential elements of realizing the full promise of WIOA for people with disabilities.

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

There are critical roles to be played by disparate elements of the system as a whole in Maine. As much as we would encourage Maine to invest WIOA funds in establishing Project Search programs to channel students with disabilities into health care and hospitality jobs, this is not the only paradigm that you should follow. The school system, vocational rehabilitation, and local workforce boards can build creative, collaborative partnerships with companies that are leading on disability.

As you embark on your new strong 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.

Maine 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 Maine examine how to support disability employment efforts through establishment of public/private partnerships in local communities. These types of partnerships could focus on the “cluster” model, started by Poses Family Foundation that is having tremendous success in diverse states as Nevada, Georgia, and Ohio. [This model depends on “consortium of employers committed to implement or expand programs”, “a public/private partnership to coordinate services for job-seekers with disabilities, with a single point of contact for employers”, and “Connections among employers, public and private agencies, and schools to reach young adults with disabilities who are in transition from school to work.”](#)

9. 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.

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

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

There are many online and in person resources to help employers and people with disabilities come together to build success. However, all the stakeholders need to be educated to know that these resources exist, and that they are free and user-friendly. These resources must also all be accessible. **Also, Maine should be careful not to waste money trying to re-invent the wheel in creating online resources as** [ASKJAN.org](#), [the US Department of Labor’s Office of Disability Employment](#) Policy, [our organization and others also offer free toolkits, webinars and training opportunities.](#) [Another resource is Understood.org.](#) This is a comprehensive resource to help families and individuals with learning and attention issues build their educational and career plans. It will be helpful to collaborate with those groups however to ensure that the best tools are created to fit the training and information needs on these issues.

11. Nothing About Us Without Us:

“Nothing About Us without Us” has long been a rallying cry for the one in five American who have a disability and it has implications for the workforce system. Even a non-voting member of a WIB can bring critical perspectives that improve the WIB’s efforts. As much as we pleased to find that the American Council of the Blind of Maine, there is still yet more room for additional voices to offer their perspectives on disability and employment. **As such we recommend that your state plan look at adopting language which would include the placement of a representative from the disability community and a representative of your state’s VR system on your State Board.** Further, there is an additional opportunity for the Unified State Plan to direct local workforce boards to connect with local community organizations to recruit self-advocates to add their perspectives. A “focus on delivering greater value to customers of the WDS” is listed as a key state strategy on page 52, line 18 of the State Plan. As such, it is critical that the perspectives of job seekers with disabilities be integrated into the governances of WIOA in Maine.

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

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

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

There are several points where the current draft of Maine’s Unified State Plan addresses the unique workforce challenges facing ex-offenders as they attempt to reenter society. On page 85, lines 25 & 26, the State Plan reports that the corrections system in Maine “received a total of 1,218 prisoners from the courts.” On line 27, the Plan states that “DOC anticipates releasing approximately 1,200 prisoners this year.” The Plan makes a clear statement in line 30 saying that “From the moment someone enters into the corrections system, efforts should be underway to provide them with the education and skills needed to prepare for employment.” We applaud these commitments and agree with the sentiment. **However, for these efforts to be maximally effective, this work needs to be viewed through the lens of disability. The reason is simple.** [According to recently published data from the Bureau of Justice Statistics, “An estimated 32% of prisoners and 40% of jail inmates reported having at least one disability.” This issue is a serious one and it needs to be addressed at the state level.](#) Frequently people are involved in the criminal justice system because they have disability issues, including learning differences, ADHD, executive function, and mental health issues that went undiagnosed and/or unaddressed through childhood and into the school years. Given these statistics from the BJS, it is vital that your state identify how many of the individuals in the ex-

offender pipeline have disabilities. Serving ex-offenders is a critical workforce development challenge and one that can only increase when disability is a factor and it is not addressed appropriately. The price paid for ignoring this issue are higher rates of recidivism and greater costs to society. Assessment tools are needed to identify disability issues as people enter the prison system. Doing so creates opportunities to address those issues productively. If people in the corrections system who will be released eventually are to be well served by Maine'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.

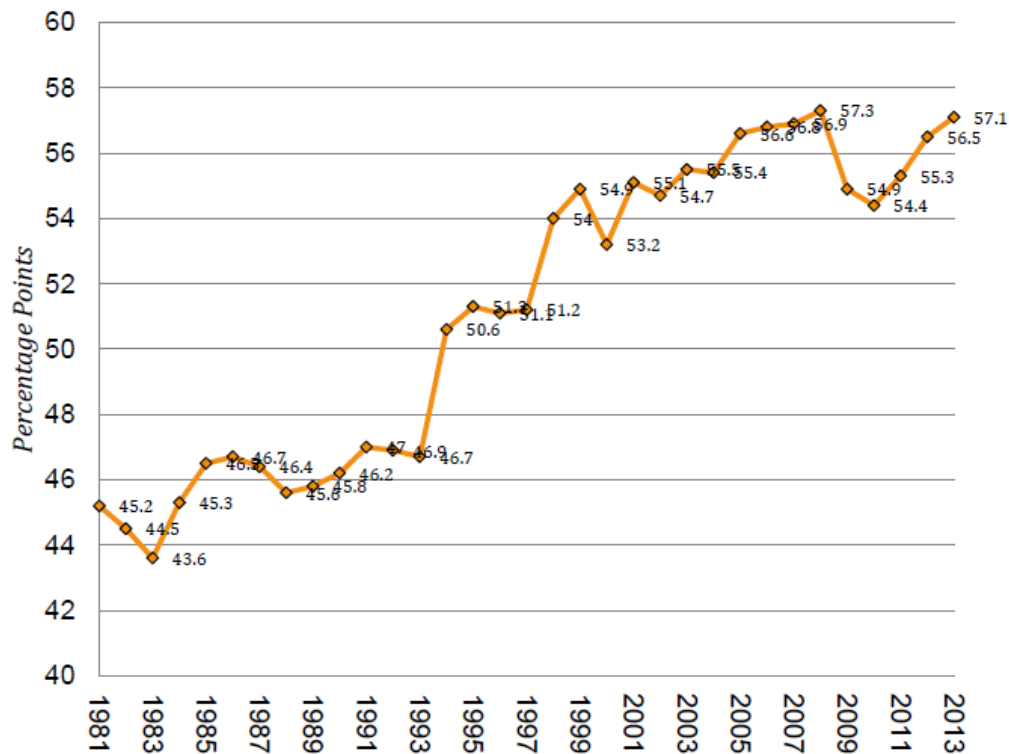
CONCLUSION

Maine "talks the talk" but do not yet "walk the walk" on inclusive employment. It ranks last in the country on employment of people with disabilities. It can and must do better. This is an issue that Maine 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 our 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 the potential of Maine's WIOA 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 Maine ranks nationally and to showcase several of the data points needed in Maine's WIOA State Plan.

Table 1 Ranking 50 States by Employment Rates and Employment Gap

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

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

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

Column 1 Ranking of States by Employment Rate of People with Disabilities			Column 2 Ranking of States by the Employment Gap between People with disabilities and people without disabilities				
#	State	% of PWDs Employed	#	State	% of PWDs Employed	% of People without Disabilities Employed	Employment Gap as a %
1	North Dakota	52.8	1	Alaska	47.8	75.2	27.4
2	Wyoming	50.7	2	Wyoming	50.7	79.4	28.7
3	South Dakota	48.1	3	North Dakota	52.8	83.1	30.3
4	Alaska	47.8	4	Nevada	39.2	73.1	33.9
5	Minnesota	46	5	Utah	42.5	76.6	34.1
6	Nebraska	45.5	6	New Mexico	35.3	70.1	34.8
7	Iowa	44.8	7	South Dakota	48.1	83	34.9
8	Utah	42.5	8	Colorado	42.3	77.3	35
9	Colorado	42.3	9	Texas	38.7	74.7	36
10	New Hampshire	41.8	10	Minnesota	46	82.1	36.1
11	Kansas	41.7	11	Connecticut	40	76.4	36.4
12	Wisconsin	40.9	12	Hawaii	39.1	75.7	36.6
13	Connecticut	40	13	Nebraska	45.5	82.6	37.1
14	Maryland	40	14	Iowa	44.8	82.1	37.3
15	Montana	39.4	15	Kansas	41.7	79	37.3
16	Nevada	39.2	16	Montana	39.4	76.8	37.4
17	Hawaii	39.1	17	Arizona	33.6	71.3	37.7
18	Texas	38.7	18	Maryland	40	78.3	38.3
19	Virginia	36.9	19	Washington	36.4	74.7	38.3
20	Idaho	36.7	20	California	32.7	71.1	38.4
21	New Jersey	36.6	21	Idaho	36.7	75.2	38.5
22	Delaware	36.4	22	New Hampshire	41.8	80.3	38.5
23	Washington	36.4	23	New Jersey	36.6	75.1	38.5
24	Illinois	36.1	24	Delaware	36.4	75.1	38.7
25	Oklahoma	35.8	25	Oregon	35.2	73.9	38.7
26	New Mexico	35.3	26	Illinois	36.1	75	38.9
27	Oregon	35.2	27	Wisconsin	40.9	80.1	39.2
28	Massachusetts	34.9	28	Oklahoma	35.8	75.2	39.4

29	Rhode Island	34.3	29	Georgia	31.5	71.5	40
30	Pennsylvania	33.9	30	Virginia	36.9	76.9	40
31	Indiana	33.8	31	Louisiana	31.3	72.4	41.1
32	Arizona	33.6	32	New York	32.2	73.3	41.1
33	Ohio	33.5	33	Florida	30.5	72.2	41.7
34	Vermont	33.3	34	Pennsylvania	33.9	75.6	41.7
35	Missouri	33	35	S. Carolina	30.7	72.7	42
36	California	32.7	36	Rhode Island	34.3	76.3	42
37	New York	32.2	37	Indiana	33.8	76	42.2
38	Georgia	31.5	38	Ohio	33.5	75.9	42.4
39	Louisiana	31.3	39	Massachusetts	34.9	77.9	43
40	Maine	31.2	40	Mississippi	26.3	69.4	43.1
41	South Carolina	30.7	41	N. Carolina	30.3	73.5	43.2
42	Florida	30.5	42	Alabama	27.1	70.5	43.4
43	North Carolina	30.3	43	Michigan	29.9	73.4	43.5
44	Michigan	29.9	44	Tennessee	29.9	74.1	44.2
45	Tennessee	29.9	45	Missouri	33	77.1	44.1
46	Arizona	28.2	46	Arkansas	28.2	72.7	44.5
47	Alabama	27.1	47	W. Virginia	25.3	70.6	45.3
48	Kentucky	26.9	48	Vermont	33.3	79.6	46.3
49	Mississippi	26.3	49	Kentucky	26.9	73.7	46.8
50	West Virginia	25.3	50	Maine	31.2	78.8	47.6

Table 2

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

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

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

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

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

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

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

NH	37.9	80.5	42.6	41.8	80.3	38.5	-4.1	47	842,880	40	Working -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	Workin g-age pop. over 5 million	2.7	0.4
IA	42.0	81.4	39.5	44.8	82.1	37.2	-2.3	40	1,868,852	30		2.8	0.7
UT	41.1	77.2	36.1	42.5	76.6	34.1	-2.0	39	1,701,705	35		1.4	-0.6
DE	34.6	75.1	40.6	36.4	75.1	38.7	-1.9	38	565,138	45	Working -age populati on under 1 million	1.8	0
CO	40.3	77.1	36.8	42.3	77.3	35.0	-1.8	36	3,304,940	22		2.0	0.2
HI	37.3	75.6	38.3	39.1	75.7	36.5	-1.8	36	822,542	42	Working -age populati on under 1 million	1.8	0.1
NE	43.5	82.2	38.7	45.5	82.6	37.1	-1.6	35	1,125,425	38		2.0	0.4
ND	51.6	83.3	31.7	52.8	83.1	30.2	-1.5	34	451,304	48	Working -age populati on under 1 million	1.2	-0.2
KS	40.1	78.8	38.7	41.7	79.0	37.3	-1.4	33	1,730,369	33		1.6	0.2
MA	33.0	77.2	44.2	34.9	77.9	42.9	-1.3	31	4,272,843	14		1.9	0.7
OK	34.4	75.1	40.7	35.8	75.2	39.4	-1.3	31	2,295,734	28		1.4	0.1
TN	28.0	73.2	45.2	29.9	74.1	44.1	-1.1	30	3,983,560	16		1.9	0.9
NJ	35.0	74.5	39.5	36.6	75.1	38.5	-1.0	29	5,528,837	11	Workin g-age pop. over 5 million	1.6	0.6
TX	37.0	73.8	36.9	38.7	74.7	36.0	-0.9	28	#####	2	Working -age pop. over 5	1.7	0.9

FL	28.9	71.4	42.5	30.5	72.2	41.7	-0.8	27	#####	4	million Working -age pop. over 5 million	1.6	0.8
NY	30.9	72.7	41.8	32.2	73.3	41.1	-0.7	26	#####	3	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	Workin g-age pop.	0.7	0.8

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