Jan. 29, 2016
RespectAbility – Public Comments – Maryland Unified State Plan

"Governor Hogan has directed Maryland's workforce agencies to jointly develop the State's workforce plan. For the first time, Maryland's Department of Labor, Licensing and Regulation, the Department of Human Resources, the Maryland State Department of Education, the Governor's Workforce Investment Board, and local workforce partners joined to develop the operational components of Maryland's plan…The agencies were further encouraged to collaborate and innovate to ensure that Maryland's citizens have access to quality workforce training and employment opportunities." – WIOA draft plan, page 8

RespectAbility, a Maryland-based national non-profit organization, is delighted that the Workforce Innovation and Opportunity Act (WIOA) creates new hope for people with disabilities and other barriers to employment to achieve the American dream.

There are 321,409 Marylanders with disabilities who are between the ages of 18-64. Additionally, there are 22,000 Marylanders ages 16-20 with disabilities. More than 90,000 Maryland students have individual education plans (IEPs). However, many Marylanders with disabilities have not yet received a disability diagnosis, and thus are not yet receiving the school accommodations and/or supports/accommodations that they need to succeed. Many students who might need support to succeed academically instead find themselves trapped into a lifetime of poverty or flowing down the school to prison pipeline.

Today Maryland has the opportunity to work hard to improve outcomes in terms of competitive, integrated employment for people with disabilities. Currently only 40% of working age Marylanders with disabilities are employed compared to 78% of those without disabilities. However, looking at the topline numbers of Maryland alone can be misleading**. According to the US Census Bureau's 2010-2012 American Community Survey, fully 47.97% of working age people with disabilities in Montgomery County is employed. However, in Baltimore city, only 26.5% are employed.** Of those Marylanders with disabilities who are working, many are working only part time or at sub-minimum wages in sheltered workshops. **While these statistics are better than the national average, fully 56,600 working age Marylanders with disabilities are living on government benefits**. This costs close to $2 billion a year in SSDI benefits alone.

According to the current draft of Maryland's State Plan, 3,000 Marylanders with disabilities are on waiting lists to receive the supports that they need in order to successfully become employed. This waiting period can last up to 18 months, critical time in which their job readiness and work skills can degrade from inactivity. Additionally, in 2012 Maryland's vocational rehabilitation only obtained jobs for 2506 Marylanders. While the Division of Rehabilitative Services (DORS) is doing some good work, we need to see greater returns to scale and we are eager to see Maryland improve outcomes for its citizens with disabilities.

From our review of the current draft of the Unified State Plan, we are extremely pleased to see that Maryland wants to make the most of the opportunities that WIOA presents. Because of this paradigm shift in how the workforce system operates, Maryland will be able to pool resources and talents from across agencies to invest in best practices. Aligning systems in this

way will be critical to expanding competitive, integrated employment so that people with disabilities can achieve the American dream. **RespectAbility has been working on WIOA implementation across America**. **However, no state is more important to us than our home state of Maryland.** Thus, we are pleased to have the opportunity to submit public comments regarding the challenges and opportunities created by Maryland's State Plan as required by Section 102 of the Workforce Innovation and Opportunity Act (WIOA). We offer our state's leaders our comments, questions, and suggestions on how to strengthen this draft. We want win-win-win solutions for people with disabilities, employers and taxpayers alike.

We are optimistic that significant progress can be made relatively quickly by aligning the workforce system properly with the needs of employers and the talents of our population. One of the most important facets of WIOA is that it "*raises expectations for youth with disabilities and assists states to provide them with the supports they need to ensure success*." Indeed, as Maryland's Baby Boomers retire and our state's economy evolves, employers are starting to experience increasing talent shortage. Marylanders with disabilities are an untapped resource that can be trained to bridge that gap. Indeed, a recent detailed study by the Kessler Foundation and the University of New Hampshire shows the 70% of working age people with disabilities (PwDs) are striving for work.

Evidence shows that people with disabilities can provide a wonderful solution to companies and other employers that want to succeed. The diverse skills, greater loyalty, and higher retention rates of people with disabilities are already starting to meet employer talent needs in increasing numbers around America. With WIOA, Maryland can benefit from that progress if it truly breaks down silos within government agencies and partners, and lets innovation, based on evidence-based practices, take place.

We offer your team feedback to the draft plan plus ideas, recommendations, and insights to achieve the best results possible. 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.

In terms of our reaction to the Maryland draft WIOA plan, there is a lot to absorb. First, there are many outstanding elements in the Maryland draft WIOA plan, especially at the start of the plan when it outlines a significant number of new agreements between different government agencies and stakeholders to work together. It is outstanding to point out on page 8 that "workforce initiatives must be driven by industry...Businesses must function as partners and customers of the workforce system". On page 9, the draft plan covers the laudable fact that 500 companies have participated in EARN Maryland. However, it offers no real specifics of how success is created and can be expanded there or elsewhere in the plan. Specifics are needed.

Page 11 states that "As Maryland's youth exit the K-12 system and enter into post-secondary opportunities, the transition must be seamless." We could not agree more with this statement or the statement on page 12 that "Providing career opportunities for those who are currently incarcerated is key to reducing recidivism." Page 13 states that "All aspects of the workforce development systems including state partner agencies will coordinate to effectively achieve employment outcomes for Marylanders with disabilities." We agree 100% with these goals. The question, however, is how to get there?

On page 14 of the Maryland Draft WIOA plan it says that "Just because something was previously done a certain way does not mean that it must continue to be done that way." **However, while there are some very good strategies on pages 16-17 and elsewhere in the**

document, the bulk of the plan reads as if different agencies wrote their own plans and then stapled them together. Collaboration, cooperation and innovation are hard to achieve. Much more work must be done on the Maryland WIOA plan if real positive change is to be achieved and the full intent of the law is to be realized.

The process of issuing a draft plan for public comments is such that the key stakeholders and the public can review the work that has been done and offer insights into what can be done better. Below, we articulate what we believe to be some of the biggest opportunities that exist to strengthen Maryland's State Plan. The Plan, once it is finalized, will guide the Old Line State's workforce system for years to come. Thousands of lives, as well as the growth of Maryland's economy, depend on the success or failure of the final version of the WIOA Plan.

1. <u>**We have deep concerns about one of the key components of the plan, "Placing people before performance" as people are best served when there are clear performance goals and accountability.**</u>

First, we want to express our deep reservations regarding one of the central propositions of the current draft of Maryland's Unified State Plan. Specifically, we are concerned with the idea, introduced on page iii, of "Placing people before performance." We understand the humanitarian commitment that it embodies, however, performance measures drive outcomes and help the system to evolve and evaluate what is working. This idea of "people before performance" is woven throughout the plan much to our surprise and dismay. On page 96 of the draft plan it says "As Maryland's workforce system is dedicated to placing people before performance measures, the WIOA partners are dedicated to taking the first two years of implementation of the Act to develop a baseline of performance. During that time, all areas will be considered as "performing successfully," as long as it is demonstrated that they are truly serving individuals with barriers to employment". Despite this commitment, there remain several performance metrics, for example on pages 174, 175, 176, and 178. However, our impression is that these are weak measures of limited utility to the goal of improving Maryland's workforce system overall.

We NEED to set goals and measure against them. In the past, performance goals tilted the system towards serving those who had the easiest barriers to overcome. **However, WIOA provides an opportunity to take barriers into account and set performance measures that encourage a better allocation of resources and help the harder to serve.** Without performance measures, we may expect the same old same old – services directed towards the easiest to serve and mediocre outcomes. **Performance metrics and a clear dashboard that can be tracked over time are vital. If you don't know where you are going, how will you know how to get there?** For example, Maryland is not achieving its full potential when Vocational Rehabilitation (VR) is only able to directly enable 2,506 people to gain employment in a year, and there is a waiting list of up to 18 months for 3,000 people who need assistance to gain employment. That is especially true as high staff turnover impacts the system, raises are rare, and vacant positions are not allowed to be filled due to hiring freezes. While such hiring freezes may seem penny wise, that is only until you realize the opportunity costs of keeping these people with disabilities who want to work and be independent on government entitlement programs and out of the workforce.

On the other hand, the Labor Force Participation Rate (LFPR) for people with disabilities (PwDs) is higher in Maryland overall than many other states, which is good. But it is drastically uneven across the state. As mentioned above, people with disabilities in Montgomery County are

in the workforce at a rate twice as high as those in the city of Baltimore. See the charts attached at the bottom of our public comments.

Another key measure of success is to ensure that the disability issues of people with barriers to work are addressed throughout the entire workforce system, and not just in VR. Indeed, by addressing disability issues and using that lens throughout the system, every aspect of the workforce system can be dramatically more successful. This includes Wagner-Peyser Act Programs, Adult Education and Literacy Programs, Correctional Education, Temporary Assistance for Needy Families (TANF), Jobs for Veterans, and Reintegration of Ex-Offenders Programs and more. However, while there are some exceptions, those sections of this plan are woefully missing the disability lens. Therefore, they will not gain the benefits that they can achieve for the people they serve unless that lens is added to this plan and its implementation. More detail on this point will be offered in later sections of our comments. **Meanwhile, it's vital to use the best data points, especially the Labor Force Participation Rates (LFPR) of people with disabilities v. those without disabilities, as performance metrics.**

Part of the fundamental paradigm shift that is needed in terms of WIOA in Maryland is to shift from a reactive workforce system to a more proactive one. To illustrate our point, consider the following. It is easy and tempting to measure success simply by counting customers who directly interact with the workforce system through an American Job Center or through DORS, and then measuring how long it takes for that individual to get a job and keep a job. While such baselines are important and must be a part of the performance metrics, this is a REACTIVE way of doing business. The biggest success for Maryland will come when we create a PROACTIVE system where most adults do not need to come to the workforce system as out of work adults for one-on-one help in the first place. **We need to create an environment where employers see the talents and abilities of job seekers, and not just the packages (race, disability status, criminal background) that they bring with them.**

Proactive success requires exemplary leadership. This can and should be led by Governor Hogan and highly respected employers. However, Governor Hogan was elected after [the National Governor's Association Better Bottom Line: Employing People with Disabilities initiative](#) was completed. That initiative spent an entire year giving other governors, through the National Governors Association, an intensive education in best practices around disability employment. Moreover, Governor has been dealing with his own significant health issues. We are delighted that his cancer treatments have gone so well, and are eager for him to be actively involved in the WIOA efforts going forward. Creating the type of PROACTIVE success needed must begin at the highest levels of state government so it is vitally important for him to visit best practices in our state and learn about these issues first hand.

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 proactive media appearances made by these Governors have been vital in demonstrating the business case for hiring people with disabilities as well as others with barriers to work. They have also gathered the leading employers in their states to share best practices on inclusive employment and how it can help the bottom lines of employers. We address the importance of such leadership later when discussing stigma as a critical barrier to employment.

Additionally, modern workforce system requires virtual one-stop shops, something that is mentioned in passing in the plan on page 54, but needs even more of a focus. However, online

services (i.e. for job listings, training, tools etc.) and employer outreach should be a rising tide that lifts all ships.

The highest priority in terms of disability and Maryland's State Plan should be to ensure that the right data points, such as Labor Force Participation Rates, are guiding the WIOA process so that large scale change can be achieved. If we are looking solely as things like unemployment statistics, we will miss the bigger picture of those individuals with barriers to employment who are not actively seeking work. Additionally, it is important to break down the LFPR's for Marylanders with disabilities by race, gender, age, geographical region as well as category of disability.

Disparities within and across Maryland are also clear from page 163 of the plan which discusses SSI/SSDI recipients and Special Education Students across different segments of Maryland. Students in Baltimore City account for only 13.6% of the state's total of Special Education Students while students in Montgomery County and Prince George's County account for 31% of the state total. At the same time, Baltimore City accounts for 24.4% of Maryland's SSI/SSDI recipients. Clearly students with disabilities in Baltimore are not getting the IEPs, early interventions, high expectations, and transition supports they need to succeed. Maryland taxpayers can pay a little now with early intervention and good transitions from school to work now, or pay much more at a future date in terms of either government benefits or school to prison pipeline costs.

In terms of performance metrics where the Maryland WIOA Plan looks at the incidence rate of disabilities, it is vital to distinguish between the different age categories of people with disabilities. For example, the numbers of young people with disabilities aged 16-20 who are coming into the workforce for the first time need to be a discrete data point as do the statistics of those ages 21-64 who are already working age and may be either long-term unemployed or facing a newly acquired disability. Lastly, it is also vital to separate out older Marylanders with disabilities who are no longer in the workforce. Some of this is contained in the plan. However, data sets such as those in the narrative on page 26 and the chart on page 28 should also break it down by type of disability as that data is already publicly collected, and will help you in your implementation. The chart on page 30 should also have regional differences.

Data on needed accommodations should also be readily available for people being served by Adult Education, Corrections, and TANF programs as well. The common application form that you identify on page 49 should help dramatically on that front. **It is also vital to monitor the employment rates of young people with disabilities by type of disability.** For example, because of dramatic breakthroughs in assistive technology, employment rates for people who are hearing and or sight impaired, can dramatically improve if focuses on empowering them to succeed through assistive technology. For example, pages 104, 107 and 108 discuss assessing the skills of youth. However, do they look at how assistive technologies and/or other accommodations can make a difference in employment outcomes? Other states have developed plans for that, including privacy protections, much more fully in their state plans. Maryland should do so as well.   Attached to these comments are several charts that can help.

2. Busting stigmas, myths, and misconceptions should be a key part of our state's overall 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 the Maryland's State Plan be amended to include a comprehensive proactive communications/public relations strategy for reducing such stigma**s. Indeed, we know that other groups of Marylanders with barriers to work also face stigmas, especially those leaving the corrections system.

Currently pages 132 and 197 of the draft plan mention a DORS Facebook page that is "liked" by 952 people. This is a good Facebook page, but it alone does not nearly make a communications strategy. **A serious, systematic and ongoing communications campaign that highlights the benefits of inclusive hiring must begin if Maryland wants to maximize its success. Further, such a communications strategy needs to focus on the competitive advantages to non-traditional hiring**. In practical terms, this means hiring people with diverse backgrounds and disabilities, hiring women for male dominated careers, hiring from zip codes that they don't usually consider, and potentially revising some of their educational requirements,

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. Page 142 of the state plan mentions the Business Leadership Networks in passing. But it should be a much larger component of Maryland's planning and implementation of a serious business-to-business PR effort. The companies which scored 100% in the USBLN index can be a great resource. These are Ameren Corporation, AT&T, Booz Allen Hamilton Inc., Capital One Financial Corporation, Comcast, NBCUniversal, Ernst & Young LLP, Florida Blue, Freddie Mac, Highmark Health, JPMorgan Chase & Co., Lockheed Martin Corporation, Northrop Grumman Corporation, Pacific Gas and Electric Company, PricewaterhouseCoopers LLP (PwC), Procter & Gamble, Qualcomm Incorporated, Sprint Corporation, Starbucks Coffee Company, and TD Bank N.A. The Maryland State Plan should talk about these employers and other success stories, especially those taking place in Maryland due perhaps to EARN or the VR Business Liaisons. Maryland has affiliate chapter of the US Business Leadership Network on the Eastern Shore, and there is a chapter in the greater Washington area. Both should be at the WIOA table.

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. Lockheed Martin, Northrup Grumman, Walgreens, Giant Foods, the National Institute of Health and other Maryland employers have seen that people with disabilities can be extremely capable and loyal workers. While there are few Stephen Hawking — with or without disabilities — people with disabilities can work highly

successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and be super talents in developing computer software and engineering solutions. CEOs and business leaders need to know that people with disabilities can be the BEST people to get a job done.

B. **Human resources professionals and on-the-ground supervisors need to understand that hiring people with disabilities is generally easy and inexpensive, and that any costs incurred are more than offset from increased loyalty.** Hiring managers and supervisors are key implementers who can turn high minded policy and business goals into action at the ground level. However, studies show that many of them are afraid of what they don't know about people with disabilities. They are afraid of potential legal action, costs, or other failures. For them, they need supports that will empower to overcome their own fears and to excel at recruiting, hiring, supervising or working with teammates with disabilities. Maryland's VR staff and community agencies can fully support human resources professionals and managers in dealing with their own specific fears and stigmas surrounding hiring people with disabilities. Moreover, online and in-person training is readily available to help from a variety of sources. RespectAbility has online webinars, as does ASKJAN.org, USDOL and others. Partners like the Poses Family Foundation Workplace Initiative can provide training to the workforce staff and volunteers systems-wide as well as to community agencies in supporting companies through messaging efforts around related to fear and stigma. The National Organization on Disability and the U.S. Business Leadership Network offer strong resources.

C. **People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectations must begin. It is vital to have an "Employment First" Policy and PR campaign that will inspire Marylanders 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.

We have a communications campaign, #RespectTheAbility, which shows success. However, this can be done relatively inexpensively by having Governor Hogan showcase success stories when he speaks to Chambers of Commerce and other employer groups. He should also host a specific summit, as have the governors of many other states. We would be happy to assist on a summit of best practices that uses the business case to expand disability employment.

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

As required by WIOA Sec. 102(b)(1)(A) Maryland's state plan must and does include a detailed analysis of the economic sectors of the state economy that are growing and are forecasted to grow in the future. The success of WIOA depends on being an employer driven paradigm shift. **Expanding opportunities for people with barriers to employment such as disability requires strong partnerships with employers in those sectors which are rapidly expanding.** Page 102 talks about smart strategies on using EARN for customized training. Pages 136 and 141 cover the Supported Business Enterprise at DORS. These are good programs which have proven to work in other states such as Iowa and Wisconsin. **While the draft plan does have a lot of detail about what sectors exists, it does not yet provide the needed strategy for looking at which opportunities are good for whom** There are some references to Career Pathways however the Plan's language about this approach is vague. This is a missed opportunity to consider what job sectors are good fit for the talents of people with different categories of barriers. **In summary, there is a significant opportunity here to improve outcomes by focusing on successful sector strategies for people with disabilities**. Below, we offer our specific ideas where we see the most potential:

A. Health and Elder Care

As the headquarters for the National Institutes of Health, John Hopkins, Kennedy Krieger and other outstanding healthcare and scientific organizations, Maryland is a world leader in science and healthcare. 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.**

While it is briefly mentioned already in the plan on page 184, Project Search should be significantly expanded as they have done in Wisconsin, Florida and other states. Nationally, each year approximately 2,700 such young people, spread out in 45 states, do a nine-month, school-to-work program that takes place entirely at the workplace. This innovative, business-led model features total workplace immersion, which facilitates a seamless combination of classroom instruction, career exploration, and worksite-based training and support. Project Search already exists in Maryland at the Anne Arundel Medical Center, Hilton BWI, Medstar Union Memorial Hospital, Montgomery County Government, National Institutes of Health, University of Maryland and University of Maryland Medical Center. Likewise, the Smithsonian Institution is another proud Project SEARCH partner, hosting interns as a result of collaboration across the DC-Maryland border. These Project Search sites overall have been achieving outstanding results for people with disabilities, employers, and taxpayers alike. For example, the first longitudinal study of the program found "a 68% success rate in transitioning students from high school into competitive employment" and "Project SEARCH sites in Upstate New York that have an impressive 83% success rate overall." The goal for each program participant is competitive employment.

We suggest that you look to follow the example set by the state of Wisconsin. The experiences of the dedicated state officials, VR counselors, workforce professionals, and special educators who have increased Wisconsin's Project Search programs offer profound insights in the steps necessary to make rapid expansion a reality. The future expansion of Project Search in Maryland should take place in hospitals, elder care, hotels, government offices and contractors.

Maryland's terrific large-scale healthcare and scientific institutions have also created an extremely large cottage industry of private therapists (speech, OT, PT etc.) in our state.

B. <u>Science, Tech, Engineering and Mathematics (STEM) and The Autism Advantage</u>

As has been documented in many cases, there can be an "Autism Advantage" in the STEM space. Indeed, some people on the Autism spectrum can have the very best skills in science, math and engineering. Microsoft, SAP, and Specialisterne have committed themselves to "provide employment opportunities for people on the autism spectrum in roles such as software testers, programmers, system administrators, and data quality assurance specialists." The Israeli Defense Forces recruits and trains their citizens on the Autism spectrum for work in their elite intelligence unit.

Delaware's Governor Jack Markell is partnering with companies to employ more people on the Autism spectrum in STEM jobs. Such examples need to be implemented by Maryland as well. This issue of STEM and access for student with disabilities is a natural point of partnership between the workforce system and the educational system. That work needs to start young, be matched with high expectations for success, and designed to ensure people with disabilities have the chance to become future scientists, engineers, doctors and mathematicians.

Montgomery County has the largest number of Maryland students on the Autism Spectrum, as well as students who are "twice-exceptional" (highly gifted plus have disabilities). Their program overall, which serves more than 1200 students, is outstanding. Despite the overall excellence of educational services and supports for students on the autism spectrum in Montgomery County, these supports often do not allow for the inclusion of diploma-bound students on the spectrum in STEM academic programs. Montgomery County schools offer a range of college and career-readiness programs that would suit the specialized skills of autistic students. The nationally-known Science, Mathematics, and Computer Science magnet programs at Montgomery Blair and Poolesville High Schools, as well as the Information Technology career program at Thomas Edison High School of Technology, are two programs that could help students on the spectrum maximize their "autism advantage." **Unfortunately, a lack of integrated supports to accommodate autistic students' special needs prevents all but a very few of them from enrolling in these programs. High school students on the autism spectrum are often segregated into special education programs, with little opportunity to pursue their natural talents within the public education system.** Given the immense talent needs of Northrup Grumman, Lockheed, CRC, General Dynamics and others, the Maryland State Department of Education (MSDE) should develop mechanisms for aligning the talents of students on the autism spectrum with increased inclusive supports in STEM high school programs. **Ensuring the Accessibility of Science, Technology, Engineering and Mathematics (STEM) Programs and Careers for People with Disabilities, especially Students with IEPs, is vital.** As Carol Glazer of the National Organization on Disabilities wrote in *Huffington Post*, "America is already lagging when it comes to STEM-skilled workers. The U.S. will have more than 1.2 million job openings in STEM fields by 2018." Many of those STEM needs are federal contractors in Maryland but it also goes far broader. In New York State Governor Cuomo has

ensured that magnet schools for STEM are located near IBM, a major STEM employer in their state. Maryland should follow this model. STEM magnet. Those schools should put the necessary supports in place in order to welcome and serve students who are "twice exceptional". MSDE can look to supported-employment programs such as Project Search, Specialisterne, and the Marriot Foundation's Bridges to Work program as models for developing a systematic approach to providing the supports necessary for our students on the autism spectrum to excel in the STEM space.

C. Government Jobs

Page 20 of Maryland's draft WIOA plan shows that 19% of Marylanders are employed in the public sector. As both the Federal government and Montgomery County have affirmative action for hiring people with disabilities, Maryland's plan should explore these opportunities. Other states have initiated similar 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."

Maryland should explore the feasibility of Affirmative Action hiring of people with disabilities for jobs in state government plus expanding state contracting obligations around 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. People with disabilities can be a successful solution, especially in high turnover jobs. Lastly, as shown by Delaware and Montgomery County, having a fast track or selective placement hiring system for people with disabilities can create more jobs.

D. High Turnover Jobs: Accommodations/hotels, Distribution/supply chain/Retail

Millions of dollars are lost each year due to employee turnover. For all jobs earning less than $50,000 per year, the average cost of replacing one employee is between $6,000 and $20,000. Research shows that employees with disabilities, when their interests and abilities are aligned with the needs of employers, are more productive and loyal than their non-disabled peers. Company records show that even when the relatively more expensive accommodations were factored in, the overall costs of disability accommodations were far outweighed by the low turnover rates and better tenures of the employees with disabilities.

A **great example of an employment sector where employees with disabilities can be tremendously successful is the hospitality industry, which according to page 22 already employs 216,000 Marylanders**. 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 Maryland to improve employment outcomes for people with disabilities. Maryland's state Board, along with other components of the workforce system, should connect with employers in the hospitality sector to begin figuring out how to benefit from these models.

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

The untapped potential of Marylanders with disabilities is such that a full-spectrum, all-of-the-above-and-more approach is needed. Maryland should be working to get more people with disabilities employed in the public service, STEM fields, hospitality and health and eldercare, supply chains distribution sectors and others fields. We recommend this given the incredible work we have seen by employer who are making employees with disabilities part of their talent acquisition strategy to become more efficient, productive, and competitive.

E. Government Contractors

Situated next to the nation's capital, Maryland's economy, particularly in the I-495 corridor, is largely dependent on government contractors who are now subject to the new Section 503 affirmative action requirements to hire people with disabilities. Indeed, Maryland's state plan should have specific references to the new 7% utilization goal set for federal contractors to recruit, hire, and retain qualified individuals with disabilities in all job categories. Maryland has an extremely high concentration of federal contractors, including Lockheed Martin Corporation, Computer Sciences Corporation, Northrop Grumman Corporation, John Hopkins, General Dynamics Corporations and many others, who have new inclusive hiring obligations under Section 503. Given the priority placed on Sector Strategies by WIOA and the vast number of employers doing business with the Federal government, this is a huge opportunity to achieve great outcomes for people with disabilities. You can find the list of our states federal contractors at www.Fedspending.org.

Maryland should respond to the opportunity created by Section 503 with a strategy focused on competitive advantage, not just compliance. Section 503 is an opportunity that could potentially have a broad impact on the employer engagement work of your entire

workforce system. The companies who must comply with Section 503 have an opportunity to teach companies not impacted by the regulations how to effective employ, engage, and retain workers or customers with disabilities.

4. **Improve School to Work Transitions for Young People With Disabilities**

As we pointed out earlier, there is a significant opportunity for Maryland to expand Project Search to train, prepare, and transition more young people with disabilities into the workforce. However, Project Search is not the only solution. **The Maryland plan also mentions PROMISE on page 136.** However, that section should have been expanded to detail the program. Its high standards for young people starting at age 14, model with partnering with parents, guardians and other natural supports, is a platform for success. Likewise, **Bridges to Work**, which we don't see mentioned, is an evidence based program led by the Marriott Foundation which should be expanded. Already approximately 3000 young people around the country are in Bridges to Work. The section on the **Technology Assistance Program**, as the transitions programs on pages 137-139, outline important programs. However, more meat and performance metrics are needed along with case studies/examples.

The section on **adult education** talks about needs of students on page 166. But while page 167 specifically states that there is a need for "mental health services for students….and tutoring by state with specific expertise in working with students with disabilities", it does not offer a solution for the challenges in recruiting, training and managing the trainers/educators so they are ready to properly meet the needs of adult learners with disabilities and/or mental health issues. The same is true of individuals working with involved in the criminal justice system.

Page 183 talks about assistive technology for participants in DORS. But do they service the entire workforce system? Page 184 focuses on evidence based practices

5. **Overcome the gap between disability services and career services in Post-Secondary Education and Beware Maryland's Private School Challenges**

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. Maryland 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.

Maryland also has an extremely large number of private schools that cater exclusively to children with disabilities. Many of them are outstanding. We do believe, however, that students with disabilities should be included with typically developing peers in the least restrictive environment possible. There is also a significant problem that many of Maryland's elite private schools repeatedly deny access to highly qualified students with disabilities. Many of these private schools are pipelines to Ivy League and other elite colleges, as well as key roles in public and private leadership. If the students at high level private schools do not have qualified classmates with disabilities, they will grow up with the misperception that people with disabilities are not capable. This significantly contributes to ongoing stigmas that can undermine our efforts for generations to come.

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

We are pleased that Maryland is looking to expand the vital opportunity that apprenticeship training can offer to young people with disabilities. At the federal level, the Office of Disability Employment Policy has worked hard to generate resources which can open up these exciting programs to "youth and young adults with a full range of disabilities." The regulations related to apprenticeship which have recently come out of the Department of Labor provide states the flexibility them need to refine and design training programs that maximally inclusive of people with diverse talents. **We encourage you to invest time and energy to understand the best practices contained in ODEP's apprenticeship toolkit.**

Partnerships for apprenticeships and internship should be created with federal contractors who have 503 requirements and talent shortages. Too many of Maryland's apprenticeship eggs are in the constructions trade basket (page 103) compared to STEM and other fields. Maryland should identify federal contractors with Section 503 requirements and have talent acquisition needs for partnership opportunities that can be win-win-win for employers, people with disabilities and taxpayers alike. Placing programs like the highly successful Project SEARCH program at Federal contractors can be worthwhile for non-STEM jobs as well.

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

We are delighted with the commitments detailed on page 135 to increase collaboration of agencies on youth transition issues. As much as we would encourage your state to follow Florida and Wisconsin's example by working hard to expand the number of Project SEARCH sites, 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 in the disability space.

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 the 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.

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

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

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](#).

Likewise, Section 188 of WIOA outlines the accessibility requirements that each state must meet as part of this paradigm shift. While physical accessibility is important, ensuring that the workforce system is programmatically accessible is also critically important. As such, questions around closed captioning of training videos, website access for screen readers, and the availability of assistive technology for job seekers with disabilities are in need of close attention. Devoting resources to improving online resources will be of significant benefit to job seekers with disabilities as well as people with other barriers to employment. Page 89 of the plan states that everything in the system must be done with universal access and there is a very strong nondiscrimination policy outlined. But the steps on how to implement this are missing on page 129 in areas such as adult education. Page 112 does have some good steps for Wagner-Peyser.

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

Pages 133 and 176 of the draft plan mention the new Business Services Brand of DORS. Improving employment outcomes in Maryland 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 we stated before, both the Eastern Shore BLN (structured within the Salisbury Chamber of Commerce) and the DC Metro BLN should be critical partners in this process.

10. **Models for Improving the Program Design of Adult Basic Education and Adult Literacy:**

Outcomes among adults served through existing GED and Adult Basic Education programs are suboptimal. Sadly, the current draft of Maryland's WIOA State Plan directs out-of-school youth to these same programs without any real modification to them. The Old Line State needs better approaches in order to achieve better outcomes. In addition to the Maryland Integrated Basic Education and Skills Training (MI-BEST) mentioned in the State Plan, DLLR & the state Board should consider other models like the highly effective Excel Center based Indianapolis, Indiana. Such models are that are designed more specifically for opportunity youth and other intensive, cohort-based contextualized learning models.

Returning to the state plan, on page 125-126, it states: "Sector partners, including the EARN grantees will update partners on labor market and training needs and guide the development of programs that will prepare workers to fill industry skills gaps. Adult education and workforce programs will coordinate initial assessments of literacy, numeracy and English language skills and selection of testing instruments to facilitate co-enrollment and referrals between programs." This is a helpful start that can and should be developed further.

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

Page 133 mentions a transportation policy but much more must be detailed. Many people with disabilities do not drive. Others cannot afford private transportation. It is vital to work with public transportation to ensure that there are bus routes to places where there are internships, apprenticeships and other work opportunities. In places where that are not possible, Maryland could look at partnering with UBER and other new transportation solutions. Indeed, for PwDs who do drive, such companies as UBER can also provide a way to enter into the workforce with flexible hours. Public sector employers and federal contractors who have 503 obligations are key places for apprenticeships and internships and onboarding of talent. It is important for them to play a key role in planning for public transportation.

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

There are many online and in person resources to help employers and people with disabilities come together to build success. However, all the stakeholders need to be educated to know that these resources exist, and that they are free and user-friendly. These resources must also all be accessible. Also, Maryland 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.

13. <u>Nothing About Us Without Us:</u>

"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 such we recommend that your state plan look at adopting language which would include the placement of a representative from the disability community and a representative of your state's VR system on your State Board. Second, the State Plan could also direct local workforce boards to connect with local community organizations to recruit self-advocates to add their perspectives.

14. <u>Aging workers and those with recently acquired disabilities must be specifically addressed in the plan:</u>

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

15. <u>Utilize a "Jackie Robinson Strategy":</u>

The workforce system only gets one chance with new employers to make a good impression. By law, policy, and custom, the system looks to serve people with the most significant disabilities first. This is detailed on page 180 of the plan. However, if the individual with a disability that is placed is not the right match for the employer, it will only undermine our long term goals of making that employer see the value of greatly expanding inclusive employment opportunities. Thus it is vital to also use a "Jackie Robinson Strategy" to make sure that the right talent gets into the right positions so it is win-win for the employer and worker alike. As the first African-American to play major league baseball, Robinson tore down decades of discrimination and blazed a trail for other talented and diverse athletes to follow. He was the talent that his employer needed, and contributed to the bottom line. Because, stigma and misconception remain a critical obstacle and one that Maryland's workforce system needs to focus on, sometimes the best way to help people with more significant disabilities in the long term is to start with new employers by placing talent with fewer disabilities first. Once they understand accommodations and how to maximize the use of talent, they will be ready to more broadly open their employment "tents".

16. **Service Learning Hours As a Way to Build Job Skills and Experience**

  Every diploma-bound public school student in Maryland must complete student service learning (SSL) hours in order to graduate. However, because accommodations are not offered for students with disabilities to complete these service hours, and many nonprofits will not accept students with disabilities as volunteers without needed supports, there is a critical need to fill gaps. Students with disabilities should be able to serve the public and strengthen the success of our state, just like anyone else. Moreover, by providing supports for service learning hours Maryland can help young people with disabilities gain critical job skills and contacts. **This does not have to be done with paid staff. Vocational Rehabilitation and/or other parts of the workforce system can and should look to build natural supports for these students through partnerships with nonprofits.** Best Buddies, agencies for Senior Citizens that do volunteer mentor work are ideal for this. For example, the Jewish Council for the Aging in Rockville Maryland has a wonderful program for intergenerational partnerships where seniors can be volunteer mentors and transportation can be provided.

  In addition, MSDE should carefully examine the research completed by Dr. Erik Carter of Vanderbilt University and his associates regarding the efficacy of peer support strategies for students with disabilities. The peer supports model provides an evidence- based framework within which non-disabled students provide academic and social supports to their peers with IEPs. This model has been incorporated in a number of schools in Tennessee, Michigan, Kentucky, and Wisconsin and could be easily adapted to suit the needs of diploma-bound students with disabilities working on their SSL graduation requirements. Positive early exposures to the working world are critical to bridging the gap between high school graduation and transition into the post-graduate world for students with disabilities. The SSL experience is one way for Maryland to bridge that gap; we need to exploit it to its fullest potential.

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

  Government can't and shouldn't do everything. There is a massive role that can be played by trained and vetted volunteers who are willing to help people with barriers to work find and keep jobs. Faith-based organizations and many others can fill massive gaps. There is a terrific booklet, Clearing Obstacles to Work, put out by the Philanthropy Roundtable that is rich with potential partners and proven programs. This is a huge missed opportunity as you will see in the booklet we just mentioned above. It's all about teaching people to fish (helping them get and keep a job) rather than just giving them fish.

  It is also important to note in terms of the SNAP and TANF programs that too many faith-based programs focus on giving out food without giving out the volunteer support to help people sustain themselves through gainful employment. In looking to rethinking policies around SNAP funding, we suggest looking at the innovative efforts of the Seattle Jobs Initiative (SJI) to realign that funding into more productive, employment outcomes.

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

  Page 253 scratches the surface in talking about re-integration of Ex-Offenders. Much more complete planning must be put forward and it needs a disability lens. 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 Maryland'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.

19. Examine the Gap in Performance Metrics between Maryland and other states like Alaska, the Dakotas, Wyoming, and Iowa.

Other states facing a variety of challenges have higher than 50% employment rates for their citizens with disabilities. States like the Dakotas, Alaska, and Wyoming have achieved incredible results by putting best practices into places. Fully 52% of North Dakotans with disabilities are employed, as are 50% of Wyomingites with disabilities and 48% of South Dakotans with disabilities. Montgomery County has an extremely good rate compared to other parts of Maryland. These outcomes show that Maryland can dramatically improve their outcomes with the right choices. Likewise, we are also seeing pockets of excellence around innovative youth programs designed to address disability employment in Georgia, Nevada, and Kentucky.

Conclusion

As stated at the beginning of our Public Comments, Maryland can and must do better in terms of jobs for people with disabilities. This is an issue that Maryland 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.

However, we have the chance to lead by example in terms of investing resources in successful models and implement best practices to expand job opportunities for people with disabilities. Our public comments discuss multiple ways that your state can significantly improve outcomes and we hope see them implemented soon.

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 Maryland's WIOA plan's potential that all of this can change for the better for the people of our state.

Chart 1 – The gap nationally in workforce participation rates between people with disabilities and their non-disabled peers.
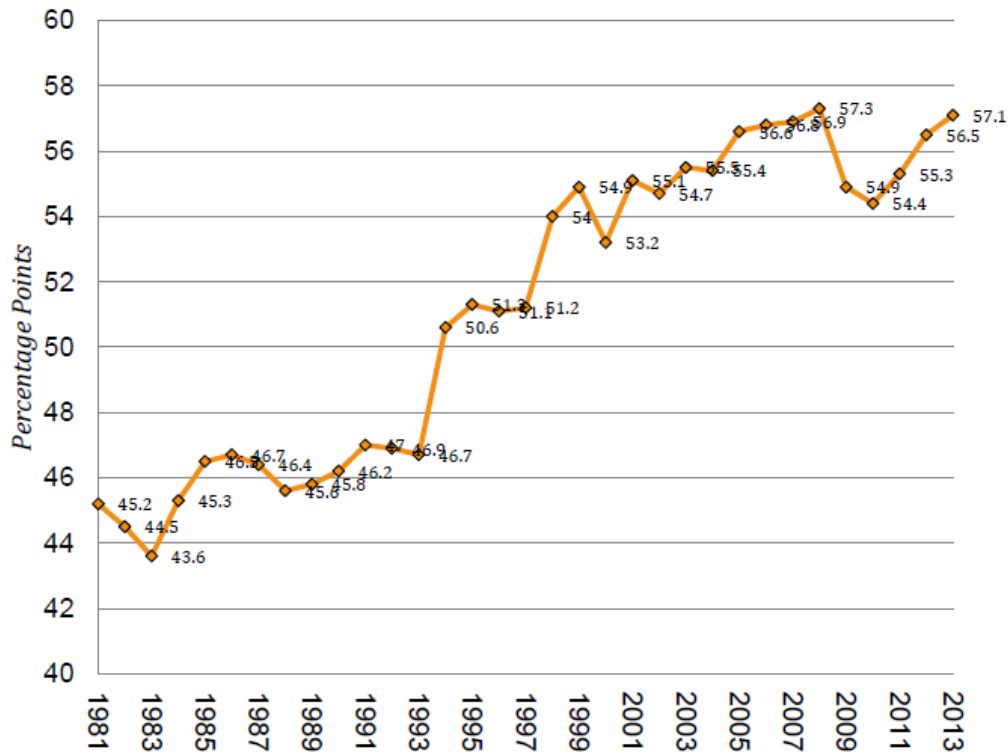
Source for chart is the Disabilities Compendium.

Below are two data tables that provide detailed information ranking the states in terms of employment rates for people with disabilities as well as the employment gap between people with and without disabilities. This has been added to show you where Maryland ranks nationally and to showcase several of the data points needed in Maryland's WIOA State Plan.

Table 1 Ranking 50 States by Employment Rates and Employment Gap

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

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

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

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

18	Texas	38.7	**18**	**Maryland**	**40**	**78.3**	**38.3**
19	Virginia	36.9	19	Washington	36.4	74.7	38.3
20	Idaho	36.7	20	California	32.7	71.1	38.4
21	New Jersey	36.6	21	Idaho	36.7	75.2	38.5
22	Delaware	36.4	22	New Hampshire	41.8	80.3	38.5
23	Washington	36.4	23	New Jersey	36.6	75.1	38.5
24	Illinois	36.1	24	Delaware	36.4	75.1	38.7
25	Oklahoma	35.8	25	Oregon	35.2	73.9	38.7
26	New Mexico	35.3	26	Illinois	36.1	75	38.9
27	Oregon	35.2	27	Wisconsin	40.9	80.1	39.2
28	Massachusetts	34.9	28	Oklahoma	35.8	75.2	39.4
29	Rhode Island	34.3	29	Georgia	31.5	71.5	40
30	Pennsylvania	33.9	30	Virginia	36.9	76.9	40
31	Indiana	33.8	31	Louisiana	31.3	72.4	41.1
32	Arizona	33.6	32	New York	32.2	73.3	41.1
33	Ohio	33.5	33	Florida	30.5	72.2	41.7
34	Vermont	33.3	34	Pennsylvania	33.9	75.6	41.7
35	Missouri	33	35	South Carolina	30.7	72.7	42
36	California	32.7	36	Rhode Island	34.3	76.3	42
37	New York	32.2	37	Indiana	33.8	76	42.2
38	Georgia	31.5	38	Ohio	33.5	75.9	42.4
39	Louisiana	31.3	39	Massachusetts	34.9	77.9	43
40	Maine	31.2	40	Mississippi	26.3	69.4	43.1
41	South Carolina	30.7	41	North Carolina	30.3	73.5	43.2
42	Florida	30.5	42	Alabama	27.1	70.5	43.4
43	North Carolina	30.3	43	Michigan	29.9	73.4	43.5
44	Michigan	29.9	44	Tennessee	29.9	74.1	44.2
45	Tennessee	29.9	45	Missouri	33	77.1	44.1
46	Arizona	28.2	46	Arkansas	28.2	72.7	44.5
47	Alabama	27.1	47	West Virginia	25.3	70.6	45.3

48	Kentucky	26.9	48	Vermont	33.3	79.6	46.3
49	Mississippi	26.3	49	Kentucky	26.9	73.7	46.8
50	West Virginia	25.3	50	Maine	31.2	78.8	47.6

Table 2

From 2012 to 2013, the employment gap closed by one percentage point or more in 22 states. The top four states with the greatest reductions (AK, RI, WY, and NH) were small states-- with working-age populations under one million persons. It is hard to make comments about small states, because these statistics are estimates based on state-level samples. Smaller states have smaller samples and thus have a higher degree of year-to-year variability. I am hesitant to read too much into reductions and expansions in the employment gap for small states.
Looking at large states-- with working-age populations over 5 million persons--Illinois (a 2.3 percentage point reduction) and New Jersey (a 1 percentage point reduction) stand out. These are two large industrial states

All of the states that experienced reductions greater that 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

23

NV	35.5	72.2	36.7	39.2	73.1	33.9	-2.8	45	1,719,885	34		3.7	0.9
WI	37.6	79.5	41.9	40.9	80.1	39.2	-2.7	44	3,544,103	20		3.3	0.6
SC	**27.0**	**71.4**	**44.4**	**30.7**	**72.7**	**41.9**	**-2.5**	**42**	**2,893,842**	**24**		**3.7**	**1.3**
NM	33.1	70.4	37.3	35.3	70.1	34.8	-2.5	42	1,243,353	36		2.2	-0.3
IL	**33.4**	**74.6**	**41.2**	**36.1**	**75.0**	**38.9**	**-2.3**	**41**	**8,010,771**	**5**	Working-age pop. over 5 million	**2.7**	**0.4**
IA	42.0	81.4	39.5	44.8	82.1	37.2	-2.3	40	1,868,852	30		2.8	0.7
UT	41.1	77.2	36.1	42.5	76.6	34.1	-2.0	39	1,701,705	35		1.4	-0.6
DE	34.6	75.1	40.6	36.4	75.1	38.7	-1.9	38	565,138	45	Working-age population under 1 million	1.8	0
CO	40.3	77.1	36.8	42.3	77.3	35.0	-1.8	36	3,304,940	22		2.0	0.2
HI	37.3	75.6	38.3	39.1	75.7	36.5	-1.8	36	822,542	42	Working-age population under 1 million	1.8	0.1
NE	43.5	82.2	38.7	45.5	82.6	37.1	-1.6	35	1,125,425	38		2.0	0.4
ND	51.6	83.3	31.7	52.8	83.1	30.2	-1.5	34	451,304	48	Working-age population under 1 million	1.2	-0.2
KS	40.1	78.8	38.7	41.7	79.0	37.3	-1.4	33	1,730,369	33		1.6	0.2
MA	33.0	77.2	44.2	34.9	77.9	42.9	-1.3	31	4,272,843	14		1.9	0.7
OK	34.4	75.1	40.7	35.8	75.2	39.4	-1.3	31	2,295,734	28		1.4	0.1
TN	28.0	73.2	45.2	29.9	74.1	44.1	-1.1	30	3,983,560	16		1.9	0.9
NJ	**35.0**	**74.5**	**39.5**	**36.6**	**75.1**	**38.5**	**-1.0**	**29**	**5,528,837**	**11**	Working-age pop. over 5 million	**1.6**	**0.6**
TX	37.0	73.8	36.9	38.7	74.7	36.0	-0.9	28	#######	2	Working-age pop. over 5 million	1.7	0.9
FL	28.9	71.4	42.5	30.5	72.2	41.7	-0.8	27	#######	4	Working-age pop. over 5 million	1.6	0.8
NY	30.9	72.7	41.8	32.2	73.3	41.1	-0.7	26	#######	3	Working-age pop. over 5 million	1.3	0.6
AL	26.8	70.8	44.0	27.1	70.5	43.4	-0.6	25	2,945,466	23		0.3	-0.3
GA	30.3	70.8	40.5	31.5	71.5	40.0	-0.5	22	6,151,890	8	Working-age pop. over 5 million	1.2	0.7
CT	39.7	76.6	36.9	40.0	76.4	36.4	-0.5	22	2,235,695	29		0.3	-0.2
WV	24.3	70.1	45.8	25.3	70.6	45.3	-0.5	22	1,132,703	37		1.0	0.5
WA	35.7	74.3	38.7	36.4	74.7	38.3	-0.4	21	4,339,199	13		0.7	0.4

State												
PA	33.0	75.1	42.1	33.9	75.6	41.7	-0.4	20	7,849,516	6	Working-age pop. over 5 million	0.9	0.5
MT	38.7	76.4	37.7	39.4	76.8	37.4	-0.3	19	616,125	44	Working-age pop. under 1 million	0.7	0.4
MI	27.9	71.7	43.8	29.9	73.4	43.5	-0.3	18	6,096,761	9	Working-age pop. over 5 million	**2.0**	**1.7**
MS	26.4	69.6	43.3	26.3	69.4	43.1	-0.2	17	1,790,746	31		-0.1	-0.2
CA	31.8	70.2	38.5	32.7	71.1	38.4	-0.1	15	#######	1	Working-age pop. over 5 million	0.9	0.9
VA	36.3	76.5	40.1	36.9	76.9	40.0	-0.1	15	5,112,923	12	Working-age pop. over 5 million	0.6	0.4
KY	26.2	72.9	46.7	26.9	73.7	46.8	0.1	14	2,687,179	26		0.7	0.8
OH	**32.8**	**75.1**	**42.2**	**33.5**	**75.9**	**42.4**	**0.2**	**13**	**7,072,114**	**7**	**Working-age pop. over 5 million**	0.7	0.8
MO	32.2	76.2	44.0	33.0	77.1	44.2	0.2	12	3,666,019	19		0.8	0.9
MD	39.5	77.4	37.9	40.0	78.3	38.2	0.3	11	3,722,201	18		0.5	0.9
IN	33.5	75.5	41.9	33.8	76.0	42.3	0.4	10	4,008,950	15		0.3	0.5
VT	34.3	79.8	45.5	33.3	79.6	46.3	0.8	9	397,726	49	Working-age pop under 1 million	-1.0	-0.2
AZ	34.2	71.0	36.8	33.6	71.3	37.7	0.9	8	3,900,900	17		-0.6	0.3
OR	34.3	72.1	37.8	35.2	73.9	38.8	1.0	7	2,440,752	27		0.9	1.8
NC	30.2	72.2	42.0	30.3	73.5	43.2	1.2	6	6,000,202	10	Working-age pop. over 5 million	0.1	1.3
ID	38.6	74.8	36.2	36.7	75.2	38.5	2.3	5	946,943	39	Working-age pop. under 1 million	-1.9	0.4
ME	33.2	78.1	44.8	31.2	78.8	47.6	2.8	4	825,507	41	Working-age pop. under 1 million	-2.0	0.7
LA	34.4	72.6	38.2	31.3	72.4	41.1	2.9	3	2,825,101	25		-3.1	-0.2
AR	31.4	72.7	41.3	28.2	72.7	44.5	3.2	2	1,759,900	32		-3.2	0
SD	52.0	81.8	29.8	48.1	83.0	34.9	5.1	1	501,769	46	Working-age pop. under 1 million	-3.9	1.2