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## RespectAbility – Public Comments – Mississippi Combined State Plan

*“Whereas, my administration is committed to supporting policies under which agencies that provide services to persons with disabilities and/or provide employment, economic development, or other related services explore employment in an integrated setting as the first priority option for persons with disabilities who are of working age.” – [Governor Phil Bryant, Executive Order 1335, January 14, 2014.](#)*

### **Introduction:**

RespectAbility is pleased to submit the following comments regarding the current draft of the State of Mississippi’s Combined State Plan as required under Section 102 of the Workforce Innovation and Opportunity Act (WIOA). We are pleased to have this opportunity to offer our comments, raise our questions, and provide our suggestions about the content of the state plan. We know that Mississippi was the first state to turn their plan into the government. Now there is enough time to refine it to a stronger level and to re-submit with an even stronger draft.

Today, Mississippi has the opportunity to work hard to seriously improve in terms of competitive, integrated employment for people with disabilities. **According to Census Data from 2014, Mississippi ranks 47<sup>th</sup> in the country in terms of the state’s employment rate for people with disabilities. Only 27.4% of the 267,593 working age Mississippians with disabilities are employed. Further, there are over 13,800 youth with disabilities between the ages of 16 and 20. Each year, one quarter of them will age out of the school system and into an uncertain future.**

Under Governor Phil Bryant, Mississippi has taken several initial steps to reorient policies and resources to prioritize employment opportunities for people with disabilities. [In 2014, he issued an executive order committing Mississippi to become an Employment First state.](#) We have met with the Governor and we know that he cares deeply about ensuring the development of economic opportunities his citizens with disabilities. **However, these efforts have not yet moved the needle on jobs for people with disabilities in Mississippi. There remains a staggering 43.1 percentage point gap in the labor force participation rates (LFPR) between people with and without disabilities.** This gap will not be closed unless resources are committed to best practices and cost-effective models.

**Other states, operating under similar conditions created by limited resources and rural communities, have had success in employing upwards of 50% of their citizens with disabilities. [The Dakotas, Alaska, and Wyoming have achieved increased results by putting best practices into places.](#)** The experience of these states shows ways that Mississippi 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 Mississippi. That information is also attached to our comments.

The fact that Mississippi has worked hard to be the first state to submit their WIOA State Plan to the Department of Labor is a testament to the state's commitment to the issue of workforce development. **However, there remain several critical gaps, omissions, and oversights when it comes to empowering more Mississippians with disabilities to pursue the American Dream.** As such, we are submitting the comments below to suggest ways to add the disability lens to the continuing efforts of your state's workforce system. **Solutions to the common challenges of disabilities need to be integrated throughout your state plan and not just be limited to the sections concerning Mississippi's VR system.** For example, your state's sector strategies need to address how to approach people with disabilities as an untapped labor resource ready to be part of the talent pipeline. **Despite growing talent needs in the sectors of healthcare and accommodation/isolation, there is no strategy to training youth with disabilities for careers in these fields.** Additionally, there needs to be a holistic approach to assess potential disability issues among consumers who are involved in Adult Education or Wagner-Peyser programs as well as educational programs in the corrections system. **Lastly, there is a fundamental need to ensure that the right data points around disability and labor force participation rates are included not only in the text of the State Plan but also inform the design of Mississippi's performance metrics.** As such, we have developed the comments below to help enhance the work being done by your state's workforce system and to ensure maximum opportunities for Mississippians with disabilities.

**1. PERFORMANCE METRICS: Ensure that the great data included in Mississippi's Combined State Plan are used as performance metrics moving forward:**

As we expressed in our introduction, Mississippi can and must do better in terms of jobs for people with disabilities. We know that your state has key leaders who understand the issues of expanding opportunities for people with disabilities and overcoming barriers to employment. However, Mississippi consistently ranks among the states with the lowest employment rates for its citizens with disabilities. **Presently, Mississippi ranks 47<sup>th</sup> in the country in terms of the employment rate for people with disabilities and it ranks 36<sup>th</sup> when you look at the gap in labor force participation rate between those with and without disabilities.** We need to look to the future in order to press for better outcomes. Achieving improved outcomes in terms of jobs for people with disabilities very much depends on having the right performance metrics in place.

**It is vital that the workforce system and the State Board include the labor force participation rates (LFPR) 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 Mississippians with disabilities.**

From our review of the current draft of the Combined State Plan, it is clear that good data on labor force participation rates are available to the workforce system in Mississippi. For example, on page 327 of the State Plan, Appendix E: CHARACTERISTICS OF INDIVIDUALS WITH EMPLOYMENT BARRIERS contains a great deal of demographic data on the disability community in Mississippi. The table contained in this section reflects the complex composition of Mississippians with disabilities, TANF recipients, SNAP participants, and ex-offenders. **However, this information is not structured in a way that would be useful to the different**

**elements of Mississippi's workforce system.** Greater precision is needed for the workforce system to evolve to tap into the labor resource that the disability community represents.

RespectAbility is glad to see the extensive treatment given to workforce participation rates in the Combined State Plan. As the Plan states on page 10: "Mississippi faces some vulnerabilities that provide challenges for its progress" despite an improving economic future. In particular, youth between 16 to 19 and young adults aged 20 to 24, have low workforce participation rates at only 24.6% and 58.8% respectively. However, as shown on page 14 in Table 5: Unemployment & Workforce Participation Rates of Vulnerable Populations, Mississippians with disabilities have an even lower participation rate. Using data from the Current Population Survey, the Combined State Plan reports an Unemployment Rate of 29.0% and a meager 33.2% Workforce Participation Rate for people with disabilities in Mississippi.

This type of data brings clarity to understanding the complexity of the labor force in Mississippi. **As such, it is essential that the labor force participation rate of people with disabilities be included in the performance metrics used by your state.** It is clear that the Combined State Plan was written to bring attention to the challenge of encouraging greater participation in the workforce by diverse elements of Mississippi's population. After all, building a workforce for the future is one of the key aspirations of WIOA.

**The staggering 43.1 point gap in the Labor Force Participation Rates between people with and without disabilities in Mississippi needs to be directly addressed.** This gap has critical implications for the WIOA work being done in your state. **We recommend to you that the labor force participation rate of people with disabilities should be a performance metric of Mississippi's workforce system and any gains in LFPR should be included as a performance metric moving forward.** There is also an additional caution we would like to add. As we said previously, unemployment statistics only include people who are actively seeking work. Counter intuitive though it may be, a minor uptick in the unemployment rate might actually be a sign that more people with disabilities are trying to get into the workforce.

Despite ranking 47<sup>th</sup> in the nation in terms of the employment rate for people with disabilities, it is still critically important for Mississippi to look at the experience of those with disabilities who are succeeding in the world of work as there are some success stories. **From the data, we find that only 32% of the 19,400 Mississippians who are blind or have vision loss are employed as are 42.2% of the 22,500 with hearing differences. Sadly, we also see that only 16.4% of people with intellectual or developmental disabilities are employed in Mississippi** In particular, we hope that Mississippi will look closely at ways to improve outcomes for constituents with intellectual or developmental disabilities. **For this population, there will be a considerable return on investment if Mississippi's workforce system expands successful school to work transition programs such as Project SEARCH.** The State Plan as submitted includes an MOU establishing only one Project Search. This is a good starting point, but will have limited capacity to serve youth with disabilities as it is too small. After all, Project Search works best with class sizes limited to around 12 students with disabilities per year. However, other states such as Wisconsin are very rapidly expanding the number of worksites by rapidly recruiting new employer partners and collaborating with stakeholders. As such, we hope that Mississippi will look to expand the number, scope, and diversity of such sites. We have more to say on how to address disability as a part of the sector strategy process later in our public comments.

**2. Ensure that Mississippi’s Sector Strategies identify Mississippians with disabilities as an untapped labor resource:**

As required by WIOA Sec. 102(b)(1)(A), Mississippi’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.

In terms of the planning elements of Mississippi’s Combined State Plan, we would emphasize the critical importance of ensuring the people with disabilities are viewed as an untapped labor resource ready to be trained to meet Mississippi’s current and growing talent needs. For example, as reported on page 5 of the State Plan, “Healthcare and accommodation/leisure are two of the largest sectors in the state, accounting for approximately 15 and 12 percent of total state employment, respectively.” However, the Combined State Plan does not discuss any methods or means whereby the workforce system can provide a pipeline of talent to meet this labor market need. As such, we would submit that Mississippi look for ways to channel the talents and skills of people with disabilities into such sectors and to do so in a strategic, deliberate way. People with disabilities represent an untapped labor resource that can meet the diverse talent needs of Mississippi’s growing job sectors. The jobs gains in these sectors offer a great opportunity for focused sector strategies sustain and to achieve improved employment outcomes for people with disabilities in Mississippi.

**a. Healthcare, Social Assistance, and the need to rapidly expand Project Search in Mississippi:**

The Combined State Plan discusses in close detail many of the opportunities that are opening up in the healthcare sector for workers in Mississippi. In “the Southcentral Mississippi Works area” for example, healthcare “accounts for 36 percent of the sector’s employment in the state.” Further, as reported on page 8, the “healthcare support sector accounts for approximately 13,000 jobs.” Later, in the section on Labor Market Trends on page 15, the Plan reports the projection that “More than 2,000 jobs are expected to be created in the next 10 years in the healthcare support industry.”

The State Plan also mentioned the economic factor driving this growing need. As state on page 204, “As Mississippi population ages, the need for quality, accessible medical care will increase.” This growing demand means that more and more employers need “Direct Service Workers in both patient care and ancillary healthcare jobs from housekeeping to medical records.” **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] represent an untapped talent pool [and] offer significant value and insight” in the field of healthcare. It is important for healthcare institutions to reflect their customers, and people with disabilities interface more with the healthcare system. There are [numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living](#). **Employers working in health and elder care can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities.**

**We recommend you look into implementing additional Project Search sites in Mississippi.** In reviewing the Combined State Plan, we were pleased to see that “MDRS and the

Institute for Disability Studies (IDS) at the University of Southern Mississippi” are collaborating to “operate a High School Project SEARCH Transition program.” However, this pilot project is the only reference made to this cost effective model in Mississippi’s Combined State Plan. Despite resource constraints and bureaucratic complexities, there is a considerable need for even more Project Search sites in your state. Other states, through careful planning and strategic action, have rapidly expanded Project Search bringing together new employer partners to host worksites for ever more students with disabilities. We emphasize the value and utility of this model as a cost-effective means to meet Mississippi’s growing labor market needs for health care workers.

Nationally, each year approximately 2,700 such young people, spread out in 45 states, do a nine month, school-to-work program that takes place entirely at the workplace. This innovative, business-led model features total workplace immersion, which facilitates a seamless combination of classroom instruction, career exploration, and worksite-based training and support. Nationally, Project Search sites overall have been achieving outstanding results for people with disabilities, employers, and taxpayers alike. For example, [the first longitudinal study of the program found “a 68% success rate in transitioning students from high school into competitive employment” and “Project SEARCH sites in Upstate New York that have an impressive 83% success rate overall.”](#) The goal for each program participant is competitive employment.

We suggest that you look to follow the example set by the state of Wisconsin where they started with three Project Search sites and are expanding to 27. The experiences of the dedicated state officials, VR counselors, workforce professionals, and special educators who have increased Wisconsin’s Project Search programs offer profound insights in the steps necessary to make rapid expansion a reality. Thinking long-term, investments in Project Search and other such programs will save big money for taxpayers while also strengthening the talent pool for employers.

**b. Accommodation, Leisure, and Tourism:**

Beyond healthcare, tourism is another employment sector of increasing importance to Mississippi’s state economy. As reported on Page 8 of the State Plan, the “tourism sector provides economic opportunities to more than 187,000 people in the state.” The growth of this sector is important and figuring out ways to get people with disabilities tourism jobs is a critical step Mississippi can take to improve outcomes.

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

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

**c. Other High Turn Over Jobs such as Wholesale and Retail Trade:**

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.

These facts have critical implications for Mississippi and its workforce system. As reported by the Plan, the “wholesale and retail trade employs the highest number of people in Mississippi at 170,000” accounting for “15.4 percent of total state employment.” Turnover in these occupations are significant cost driver for businesses in this sector.

Many companies, including [UPS](#), [Wal-Mart](#), and [OfficeMax](#) have proven records of success. [Walgreens has demonstrated that workers with disabilities in their distribution centers are as productive, safer, and turn over less when compared to peers without disabilities.](#) These efforts have taken the logistics sector by storm with [Lowe's](#), [OfficeMax](#), [Pepsi](#), as well as [P&G](#) are all launching their own successful disability hiring initiatives. For example, [as reported by the National Organization on Disability, “Lowe’s hired more than 150 new workers with disabilities in the first year, and an additional 250 workers in the following 18-month period.”](#) They can be outstanding partners for disability employment as these industries suffer from high turnover rates and people with disabilities are proven to have significantly higher retention rates. It is important to identify more specific opportunities with employers and to cite them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future.

**d. Don’t Neglect the Autism Advantage as it relates to STEM jobs in Mississippi**

Even though other sectors are driving the growth of Mississippi’s economy, it is still important look at the issue of preparing workers for careers in Science, Technology, Engineering and Mathematics (STEM). 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 South Dakota well. This issue of STEM and access for student with disabilities is a natural point of partnership between the workforce system and the educational system. That work needs to start young, be matched with high expectations for success, and designed to ensure people with disabilities have the chance to become future scientists, engineers, doctors and mathematicians.

**Ensuring the Accessibility of Science, Technology, Engineering and Mathematics (STEM) Programs and Careers for People with Disabilities, especially Students with IEPs, is vital.** As Carol Glazer of the National Organization on Disabilities wrote in *Huffington Post*, [“America is already lagging when it comes to STEM-skilled workers. The U.S. will have more than 1.2 million job openings in STEM fields by 2018.”](#) The need to fill STEM talent goes far

beyond just federal contractors. [In New York State Governor Cuomo has ensured that magnet schools for STEM are located near IBM, a major STEM employer in their state.](#) South Dakota should follow this model. Together, Mississippi's workforce system and educational system can look to supported-employment programs such as Project Search, Specialisterne, and [the Marriot Foundation's Bridges to Work program](#) as models for developing a systematic approach to providing the supports necessary for our students on the autism spectrum to excel in STEM.

### **3. Busting stigmas, myths, and misconceptions must be a key part of Mississippi'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.](#)

**There is a need for a sustained, comprehensive, proactive communications/public relations strategy for reducing the stigmas and barriers identified by VR in Mississippi. We recommend that Mississippi's Combined State Plan should be amended to include a comprehensive public relations campaign that educates public and employers about people with disabilities and communicate to people the benefits of hiring those with disabilities.** Indeed, we know that other groups of Mississippians 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. For example, Gov. Bryant

himself is dyslexic and was held back in the 3<sup>rd</sup> grade. He is now a wonderful role model of what people with disabilities can achieve.

- 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. Mississippi'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. Mississippi's efforts need to be supported by a PR campaign that will inspire Mississippians 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.

As example of the power and the value of making the business care for hiring people with disabilities, we offer Mississippi our insights gained from our #RespectTheAbility campaign. Our #RespectTheAbility campaign is a social media effort focused on how hiring people with disabilities can make organizations stronger and more successful. The campaign highlights the benefits to employers that look beyond the disability and imagine the possibility when hiring talented employees with disabilities. Our profiles of diverse employers such as [EY](#), [AT&T](#), and [Kwik Trip](#) offer insight in how to implement such a multilayered approach.

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

Mississippi's State Plan fails to mention important rules surrounding the Rehabilitation Act of 1973. The State Plan lacks any references to the employment opportunities and talent challenges created by the recently implemented Section 503 regulations regarding federal contractors and subcontractors. Mississippi'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. Mississippi should respond to these newly enacted regulations by adopting 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. Specific companies that should be included in your outreach efforts include Northrop Grumman Corporation, Huntington Ingalls Industries Inc., L-3 Communications Holdings Inc., Navistar International Corporation, and Lockheed Martin Corp. [More detailed information regarding federal contracts in Mississippi can be found here.](#)

**5. Standing up an affiliate chapter of the US Business Leadership Network could be a critical tool for effectively engaging employers and reaching the right business audience:**

As we stated previously about communicating the business case for hiring people with disabilities, effective employer engagement is a necessary component of achieving improved employment outcomes. One of the most effective means of carrying that message forward is to have a network of engaged businesses whose bottom line has benefitted from the talents of employees with disabilities. Business to business communication can help tear down the misconceptions and stigmas which are barriers to employment.

Currently, Mississippi does not have an affiliate chapter of the US Business Leadership Network (USBLN). This limits the flexibility and capability of Mississippi to engage employers around hiring people with disabilities. As such, we highly recommend that the appropriate staff both in the workforce system and VR work with the employer partners to formalize their intersections through the establishment of an affiliate chapter. Establishing a BLN Chapter in does would help to organize the “knowledge of community outreach, recruiting and interviewing, the accommodation process and barriers” needed to achieve improved outcomes. Currently, VR in Mississippi has a network of businesses their work closely with in order to place VR clients into jobs. These business partners would certainly benefit from tapping into the national structure of the USBLN and their resources.

Additionally, we would direct Mississippi attention to the successes achieved in Wyoming, which possesses one of the most effective, engaged, and active affiliate chapters in the country. The Wyoming BLN, despite the challenges of a largely rural population and limited resources, has been achieving outstanding employment outcomes. We would be happy to provide Iowa’s WIOA team with an introduction to Lynn Kirkbride the USBLN’s Director of Affiliate Relations. She is an incredible asset and has extensive experience around overcoming barriers to employment. Her email is [lynn@usbln.org](mailto:lynn@usbln.org) and she can be reached by phone at (307) 631-0894. Her efforts, and those of the Wyoming BLN, offer profound insights into how to effectively engage employers around the business case for hiring people with disabilities.

**6. 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. **Mississippi needs to make an effort to demonstrate to employers and**

prospective employees that these services exist. Doing so by coordinating it with the possible public relations campaign is one way to go about this. Also, Mississippi 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.

## **7. Strategic Engagement to Build a Mentor System for Customers of the Workforce**

### **System:**

**Government can't and shouldn't do everything. There is a massive role that can be played by volunteers who are willing to help people with barriers to work, including people with disabilities, find and keep jobs. There is a critical, cooperative role for non-profits and faith-based organizations to play.** Local workforce development areas, for example, could be encouraged to recruit volunteers from local faith communities or local non-profits. However, much more can and should be done to work with parents of teens and young adults with disabilities, and to create volunteer mentorships for people with disabilities who are looking for work or need supports to stay employed and/or grow their careers.

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](#).

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

**There are several points where the current draft of Mississippi Combined State Plan addresses the unique workforce challenges facing ex-offenders as they attempt to reenter society. However, these efforts need to be viewed through the lens of disability.** The reason why 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 Mississippi 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:**

As we stated at the beginning of our Public Comments, Mississippi can and must do better in terms of jobs for people with disabilities. Mississippi ranks 47<sup>th</sup> in the country in terms of their employment rate of people with disabilities. Such poor outcomes can be turned around. Failing to properly train and prepare job seekers with disabilities costs the Mississippi economy incredible talent and shatters the aspirations of so many Mississippians with disabilities who want to pursue the American Dream, just like everyone else.

However, thanks to WIOA, Mississippi has the chance to lead by example in terms of investing resources in successful models and implementing best practices to expand job opportunities for people with disabilities.

The bottom line is that expanding job opportunities for people with disabilities is 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.

**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>

| <b>Column 1 Ranking of States by Employment Rate of People with Disabilities (PWDs)</b> |               |                           | <b>Column 2 Ranking of States by the Employment Gap between People with disabilities and people without disabilities</b> |              |                           |  |                              |
|---|---------------|---------------------------|--|--------------|---------------------------|--|------------------------------|
| <b>#</b>  | <b>State</b>  | <b>% of PWDs Employed</b> | <b>#</b>   | <b>State</b> | <b>% of PWDs Employed</b> | <b>% of People without Disabilities Employed</b> | <b>Employment Gap as a %</b> |
| 1   | South Dakota  | 50.1                      | 1  | North Dakota | 49.9                      | 82.0   | 32.1                         |
| 2   | North Dakota  | 49.9                      | 2  | Nevada       | 40.9                      | 74.3   | 33.4                         |
| 3   | Iowa          | 46.5                      | 3  | Utah         | 44.0                      | 77.4   | 33.5                         |
| 4   | Nebraska      | 46.0                      | 4  | South Dakota | 50.1                      | 83.7   | 33.6                         |
| 5   | Wyoming       | 45.2                      | 5  | Hawaii       | 42.4                      | 76.6   | 34.2                         |
| 6   | Minnesota     | 44.4                      | 6  | Alaska       | 40.8                      | 76.0   | 35.3                         |
| 7   | Utah          | 44.0                      | 7  | Iowa         | 46.5                      | 82.2   | 35.7                         |
| 8   | Hawaii        | 42.4                      | 8  | Wyoming      | 45.2                      | 81.0   | 35.9                         |
| 9   | Colorado      | 41.6                      | 9  | Idaho        | 38.8                      | 75.7   | 37.0                         |
| 10  | Nevada        | 40.9                      | 10   | Montana      | 40.5                      | 77.7   | 37.3                         |
| 11  | Alaska        | 40.8                      | 11   | New Jersey   | 39.2                      | 76.5   | 37.3                         |
| 12  | Montana       | 40.5                      | 12   | Texas        | 38.0                      | 75.3   | 37.3                         |
| 13  | Connecticut   | 40.2                      | 13   | Colorado     | 41.6                      | 79.1   | 37.4                         |
| 14  | New Hampshire | 40.0                      | 14   | Connecticut  | 40.2                      | 77.9   | 37.7                         |
| 15  | Kansas        | 39.8                      | 15   | Nebraska     | 46.0                      | 83.9   | 37.9                         |
| 16  | Wisconsin     | 39.8                      | 16   | Washington   | 37.7                      | 76.0   | 38.3                         |

|    |                |      |           |                    |             |             |             |
|----|----------------|------|-----------|--------------------|-------------|-------------|-------------|
| 17 | New Jersey     | 39.2 | 17        | Minnesota          | 44.4        | 82.9        | 38.5        |
| 18 | Maryland       | 39.1 | 18        | Oregon             | 36.4        | 74.9        | 38.5        |
| 19 | Idaho          | 38.8 | 19        | California         | 33.3        | 72.2        | 38.9        |
| 20 | Texas          | 38.0 | 20        | Maryland           | 39.1        | 78.2        | 39.1        |
| 21 | Washington     | 37.7 | 21        | Oklahoma           | 36.4        | 75.6        | 39.2        |
| 22 | Virginia       | 37.6 | 22        | Arizona            | 32.8        | 72.5        | 39.7        |
| 23 | Oklahoma       | 36.4 | 23        | Kansas             | 39.8        | 79.7        | 39.9        |
| 24 | Oregon         | 36.4 | 24        | Illinois           | 35.7        | 75.7        | 40.0        |
| 25 | Indiana        | 36.2 | 25        | Virginia           | 37.6        | 77.6        | 40.0        |
| 26 | Vermont        | 36.2 | 26        | Louisiana          | 32.1        | 72.4        | 40.3        |
| 27 | Illinois       | 35.7 | 27        | New York           | 33.6        | 74.0        | 40.4        |
| 28 | Delaware       | 35.6 | 28        | Delaware           | 35.6        | 76.3        | 40.7        |
| 29 | Massachusetts  | 35.5 | 29        | Indiana            | 36.2        | 77.0        | 40.7        |
| 30 | Ohio           | 34.6 | 30        | New Mexico         | 30.4        | 71.2        | 40.8        |
| 31 | Pennsylvania   | 34.5 | 31        | New Hampshire      | 40.0        | 81.3        | 41.3        |
| 32 | Rhode Island   | 33.9 | 32        | Wisconsin          | 39.8        | 81.1        | 41.4        |
| 33 | New York       | 33.6 | 33        | Pennsylvania       | 34.5        | 76.5        | 42.0        |
| 34 | California     | 33.3 | 34        | Ohio               | 34.6        | 77.0        | 42.5        |
| 35 | Arizona        | 32.8 | 35        | North Carolina     | 31.3        | 74.3        | 43.0        |
| 36 | Missouri       | 32.8 | <b>36</b> | <b>Mississippi</b> | <b>27.4</b> | <b>70.4</b> | <b>43.1</b> |
| 37 | Maine          | 32.5 | 37        | Florida            | 30.1        | 73.4        | 43.3        |
| 38 | Louisiana      | 32.1 | 38        | Georgia            | 29.6        | 73.1        | 43.5        |
| 39 | North Carolina | 31.3 | 39        | Massachusetts      | 35.5        | 79.0        | 43.5        |
| 40 | New Mexico     | 30.4 | 40        | Rhode Island       | 33.9        | 77.7        | 43.8        |
| 41 | Florida        | 30.1 | 41        | Alabama            | 27.3        | 71.3        | 44.1        |
| 42 | Tennessee      | 29.9 | 42        | Vermont            | 36.2        | 80.4        | 44.2        |
| 43 | Georgia        | 29.6 | 43        | Missouri           | 32.8        | 77.2        | 44.4        |

|           |                    |             |    |                |      |      |      |
|-----------|--------------------|-------------|----|----------------|------|------|------|
| 44        | Michigan           | 29.6        | 44 | Tennessee      | 29.9 | 74.4 | 44.5 |
| 45        | Arkansas           | 29.2        | 45 | Arkansas       | 29.2 | 73.8 | 44.6 |
| 46        | South Carolina     | 29.0        | 46 | West Virginia  | 25.6 | 70.5 | 44.9 |
| <b>47</b> | <b>Mississippi</b> | <b>27.4</b> | 47 | Michigan       | 29.6 | 74.6 | 45.0 |
| 48        | Kentucky           | 27.3        | 48 | South Carolina | 29.0 | 74.0 | 45.0 |
| 49        | Alabama            | 27.2        | 49 | Kentucky       | 27.3 | 74.4 | 47.1 |
| 50        | West Virginia      | 25.6        | 50 | Maine          | 32.5 | 79.9 | 47.4 |

**Table 2**

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

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

**All of the states that experienced reductions greater than one percentage point also experienced increases in employment rate of people with disabilities, so none of these reductions were due 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. | 8.8                   | -1.1                     |

|           |             |             |             |             |             |             |             |           |                  |           |  |            |            |
|-----------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-----------|------------------|-----------|--|------------|------------|
| RI        | 28.7        | 77.0        | 48.3        | 34.3        | 76.3        | 42.0        | -6.3        | 49        | 668,448          | 43        | under 1 million 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        | <b>27.0</b> | <b>71.4</b> | <b>44.4</b> | <b>30.7</b> | <b>72.7</b> | <b>41.9</b> | <b>-2.5</b> | <b>42</b> | <b>2,893,842</b> | <b>24</b> |  | <b>3.7</b> | <b>1.3</b> |
| NM        | 33.1        | 70.4        | 37.3        | 35.3        | 70.1        | 34.8        | -2.5        | 42        | 1,243,353        | 36        |  | 2.2        | -0.3       |
| <b>IL</b> | <b>33.4</b> | <b>74.6</b> | <b>41.2</b> | <b>36.1</b> | <b>75.0</b> | <b>38.9</b> | <b>-2.3</b> | <b>41</b> | <b>8,010,771</b> | <b>5</b>  | <b>Working-age pop. over 5 million</b>           | <b>2.7</b> | <b>0.4</b> |
| 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        |
| <b>NJ</b> | <b>35.0</b> | <b>74.5</b> | <b>39.5</b> | <b>36.6</b> | <b>75.1</b> | <b>38.5</b> | <b>-1.0</b> | <b>29</b> | <b>5,528,837</b> | <b>11</b> | <b>Working-age pop. over 5 million</b>           | <b>1.6</b> | <b>0.6</b> |
| TX        | 37.0        | 73.8        | 36.9        | 38.7        | 74.7        | 36.0        | -0.9        | 28        | #####            | 2         | Working-   | 1.7        | 0.9        |

|    |      |      |      |      |      |      |      |    |           |    |  |      |      |
|----|------|------|------|------|------|------|------|----|-----------|----|--|------|------|
| FL | 28.9 | 71.4 | 42.5 | 30.5 | 72.2 | 41.7 | -0.8 | 27 | #####     | 4  | age pop.<br>over 5<br>million<br>Working-<br>age pop.<br>over 5<br>million | 1.6  | 0.8  |
| NY | 30.9 | 72.7 | 41.8 | 32.2 | 73.3 | 41.1 | -0.7 | 26 | #####     | 3  | Working-<br>age pop.<br>over 5<br>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-<br>age pop.<br>over 5<br>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-<br>age pop.<br>over 5<br>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-<br>age pop.<br>under 1<br>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-<br>age pop.<br>over 5<br>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-<br>age pop.<br>over 5<br>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-<br>age pop.<br>over 5<br>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-<br>age pop.<br>over 5<br>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-<br>age pop  | -1.0 | -0.2 |



|    |      |      |      |      |      |      |     |   |           |    |                                  |      |      |
|----|------|------|------|------|------|------|-----|---|-----------|----|----------------------------------|------|------|
|    |      |      |      |      |      |      |     |   |           |    | under 1 million                  |      |      |
| 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  |

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