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RespectAbility – Public Comments – Missouri Combined State Plan

Moving forward, we must continue providing individuals with disabilities the services they need to improve their quality of life, contribute to their community and have every opportunity to find a job they enjoy. - [Governor Jay Nixon, May 9, 2014.](#)

Introduction

RespectAbility is pleased to submit the following comments regarding the current draft of the state of Missouri'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 Missouri's plan.

Because of WIOA, the Show Me State has the opportunity to significantly improve employment outcomes for people with disabilities. **There are 449,600 Missourians with disabilities between the ages of 21 to 64 and only 33% of them are employed.** This number contrasts with the 77.1% of people without disabilities in Missouri who are working. **There are 26,200 such youths with disabilities in the Show Me State and each year a quarter of them will age out of school and into an uncertain future.**

Other states facing a variety of challenges have higher than 50% employment rates for citizens with disabilities. [States like the Dakotas, Alaska, and Wyoming have achieved incredible results by putting best practices into places.](#) These states show that Missouri can dramatically improve their outcomes with the right choices. **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 cost effective to implement and have incredibly succeeded at employing people with disabilities.

There are several key topics related to employment for people with disabilities that need to be improved in terms of WIOA, Missouri, and the Combined State Plan. These issues are:

- **Committing Missouri to a “Jackie Robinson Strategy” of focusing on youth with disabilities.** Proper strategy formulation requires the right data points, such as the labor force participation rates of people with disabilities. The focus of such decision making needs to be focused on empowering youths with disabilities to succeed.
- **A greater focus on Sector Strategies is needed to channel young people with disabilities into growing sectors of Missouri's labor market.**
- . To implement the above strategy and meet employer talent needs, the State Plan needs to focus on training youths with disabilities for jobs in healthcare and other sectors with high turnover costs.
- **Prioritize employer engagement to ensure businesses in Missouri understand how employees with disabilities benefit the bottom line.** Several critical employer partners, notably contractors with Section 503 requirements, and the Missouri Business Leadership Network are not at the table of the state plan. They need to be engaged and involved.
- **Making the most of limited resources.** Review opportunities for federal support as well as the possibility of public-private partnerships to support jobs for people with disabilities.

Whether Missourians with disabilities, especially young people, who successfully enter the workforce will be the ultimate test of the Show Me State's efforts to implement the Workforce Innovation and Opportunity Act. Those efforts will depend on improving the integration, alignment, and data used throughout the workforce system as well as investing resources on successful transitions for youths with disabilities and employer engagement. Our comments below focus on those areas, and we look forward to seeing improved outcomes that will result from Missouri's hard work on WIOA.

Committing Missouri to a “Jackie Robinson Strategy” of focusing on youths with disabilities

Our perspective as an organization is that most important investments that can be made under WIOA are those which empower young people with disabilities to successfully transition into the workforce. Some of the barriers that keep young people with differences from pursuing the American Dream are attitudinal. Myths and misconceptions about people with disabilities are a critical obstacle in the push for improved employment outcomes. The barriers created by stigma will be broken by using what we call a “Jackie Robinson Strategy.” As the first African-American to play major league baseball, Robinson tore down decades of discrimination and blazed a trail for other talented and diverse athletes to follow. He helped his team win games and his success as a player helped sell tickets. He was the talent that his employer needed, and contributed to the bottom line. That is how we, in the disability community, can also break down barriers and achieve success. We can do it by being the people that others will be proud to call co-workers and friends.

What this means for workforce development and public policy is that strategic triage is needed. While it is important to have pathways to success for people who have been unemployed long-term or participate in sheltered workshops, we also need to achieve early wins. To break down barriers and stigmas, the people with disabilities that go into competitive integrated employment need to succeed in their jobs. Doing so means that the greatest focus and largest efforts need to be a serious return on investment for employers. The “low hanging fruit” will be in helping young people with disabilities to successfully transition into the workforce. If employers see their bottom line improved by the initial employees with disabilities they hire, then they will be more likely to hire others with more significant barriers. Our comments below focus on how Missouri can implement this type of strategy:

- **The necessary first condition for creating, preparing, and implementing strategy is to have the right data to inform the decisions that are being made.** From our review of Missouri's Combined State Plan, we are deeply concerned that Show Me State leaders seem to lack the right data to make the best decisions in terms of promoting improved employment outcomes for Missourians with disabilities. **Specifically, we are worried that the absence of any discussion of the labor participation rates means that WIOA in Missouri will miss the main chance to improve outcomes for people with disabilities.** There is extensive discussion about unemployment rates and other labor market data points but the absence of labor participation rates prohibits the workforce system from having a complete view of Missouri's economy. **Unemployment rates only count people actively seeking work, while far too many people with disabilities and other barriers to employment are not actively seeking work. That means they are not counted in the state.**

- To restate the challenge once again, **there are 449,600 Missourians with disabilities between the ages of 21 to 64 and only 33% of them are employed.** These poor outcomes will remain unchanged unless the key decision makers in Missouri’s workforce system make investments in proven models and successful programs. Such investments cannot be made unless those leaders have access to the right data. **The information that Missouri’s leaders need includes far more than just unemployment statistics and wage data.** By looking solely at unemployment information, decision makers are missing the bigger picture of those individuals with barriers to employment who are not actively seeking work. **One of the needed data points is the workforce participation rate of people with disabilities.** [As an example of the data that is needed, we are including a link to, and a copy of, the presentation our organization has compiled about employment for Missourians with disabilities.](#) This compilation contains information derived from the Census Bureau’s American Community Survey that should be valuable to the WIOA work being done in the Show Me State.
- While we are deeply concerned about the issue of absent data, there are multiple points which show an awareness of the need to prioritize energy and effort around preparing succeeding generations to enter the workforce. For example, on page 24, the Combined State Plan talks about the projected growth in the need for post-secondary training or “long-term On-the-Job Training (OJT)”. Both are areas critically important for the future of Missouri’s economy *and* people with disabilities need to be a part of this planning process. **Models such as Project SEARCH and Bridges from School to Work demonstrate the lasting benefit of on the job training for people with disabilities.** Likewise, as Missouri’s workforce system evolves to train and prepare more workers for growing occupations, people with disabilities need to be viewed as an untapped talent pool to fill those jobs. The approximately 26,000 youths with disabilities living in the Show Me State need to be regarded as a potential talent pipeline and trained for the growth openings.
- WIOA is ideally a perfect opportunity for the workforce system to tear down barriers and to overcome silos that keep too many people from entering the workforce. **One of the critical ways that this can be done is better coordination between employer needs, workforce programs, and the education system.** On page 99, Missouri’s Combined State Plan addressed MVR to coordinate with education officials. The points articulately here are promising and reflect the full spectrum approach needed to improve outcomes. **The key here, in RespectAbility’s view, is that services such as “pre-employment transition services” or “work-based learning experiences” should be focused on channeling youths with disabilities into the growth occupations in Missouri.** Grasping that opportunity will depend critically on partnership.
- **Collaboration and cooperation are factors that will make a huge difference for sustaining the type of paradigm shift that WIOA is supposed to precipitate.** As the workforce system evolves in Missouri, there are several elements that will be critical to ensuring that young people with disabilities benefit from the integration, innovation, and services being planned. **First and foremost, better integration between educational institutions and community businesses are essential.** Integration in terms of skill development, learning opportunities, and work experiences can make the difference for youths with disabilities between spending their life on benefits and being independent through employment. **MVR should direct attention to ways of integrating work experiences into the Individual Education Plans of students with disabilities.** Next,

high expectations are motivational factors that can support the ultimate entry of a student with disabilities into the workforce. For far too long, people with disabilities have faced stigmas, myths, and misconceptions about their capacity to work, to become independent, and to pursue careers. **Setting high expectations for success needs to begin in the schools and there are many examples of how this can be done successfully.** We would recommend that Missouri look closely at the innovation work being done through [the Promoting Readiness of Minors in Supplemental Security Income \(PROMISE\) grant](#). This model offers valuable lessons applicable to the Show Me State.

- It does seem that the right team with right focus is in place already. Specifically, we are encouraged by what the Combined State Plan has to say about the Missouri Interagency Transition Team (MITT). Page 102 mentions that the Team “was formed through the Office of Special Education and includes members representing state-level agencies.” That is a great example of building partnerships. **However, we would note that it is also critically important to ensure that both local disability organizations are involved with that team and that there is at least one employer representative present. The disability community and the business community have a vested personal and economic interest in improving employment outcomes.** As such, they need to be involved in the transition planning process.
- Lastly, we would comment that the mention of Project Search and other “Employer-Based Transition Training Programs” is a very promising sign. **The outcomes achieved at Project SEARCH sites across the country for young people with intellectual and developmental disabilities speak for themselves.** As MVR and its collaborators look to add more partners and job sites across the state, strategic thinking is needed and careful planning is required. **First, we highly encourage Missouri to learn lessons from other states that have worked very hard to expand the jobs and opportunities created by Project SEARCH.** [Wisconsin in particular has worked very hard to increase the number of work sites in their state.](#) The experiences of the dedicated state officials, VR counselors, workforce professionals, and special educators who have increased Wisconsin’s Project SEARCH programs to 27 sites offer profound insights in the practical, tactical, and strategic steps necessary to make rapid expansion a reality. **Hospitals and medical centers are natural first steps in terms of new partners.** The healthcare sector is one with continuing workforce needs as evidenced by the labor market analysis included in the draft Plan. **Next, MVR would do well to look at assisted living, nursing homes, and other elderly care facilities as employers with growing talent needs induced by senior population increases.** Common features in each of these categories of employers and their needs can be very well met by the pipeline of young talent that Project SEARCH represents. **We look forward to seeing Missouri’s commitment to Project SEARCH be matched up with hard work and dedication.** Such efforts will reflect the full investment in adopting a “Jackie Robinson Strategy” for Missouri.

A greater focus on Sector Strategies is needed to channel young people with disabilities into growing sectors of Missouri’s labor market.

When dealing with a dramatic policy change like the Workforce Innovation and Opportunity Act, it can sometimes be difficult to see the ultimate goal towards which all of the stakeholders involved are working towards. With WIOA, the goal is an employer driven paradigm shift. **Yes there are new rules and regulations, but this law is fundamentally about**

spurring innovation and expanding opportunity. Improving outcomes for people with barriers to employment such as disability requires preparing, training, and channeling job seekers with differences into the growing sectors of Missouri's economy. **To do that, the Show Me State's efforts need to focus on what works, what is cost-effective, and has been proven to work in other states.** In our comments below, we point to areas where this can be done in Missouri.

- Page 8 of Missouri's Combined State Plan contains a detail industry demand analysis from November 2014 through October 2015. From RespectAbility's perspective the results of that analysis show great promise for empowering more Missourians with disabilities to pursue the American Dream: like everyone else. The draft of the Combined State Plan specifically mentions that "the Healthcare Industry (Hospitals and Ambulatory Health Care Services) was a top job advertisement." Growth and job postings in these sectors are followed by "Professional, Scientific, and Technical Services along with Insurance Carriers and Related Activities" Lastly, "Educational Services rounded out the top five".

RespectAbility submits that people with disabilities are a natural labor resource that should be tapped to meet these economic trends. Particularly in terms of jobs in

healthcare, people with disabilities, especially youths with differences, are an untapped talent pool. This idea is backed up by the extensive work done by the Office of Disability Employment Policy (ODEP) and a report from 2014 that said "[\[people with disabilities\] not only represent an untapped talent pool, but also offer significant value and insight](#)" in the [field of healthcare](#). Likewise, other states have been blazing a trail in terms of training and preparing youths with disabilities to go into careers in healthcare. **There are [numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elderly care, and in assisted living](#).** One quarter of Missouri's 26,200 young people with disabilities will age into the workforce every year. With the right support and adequate training, this population could easily become a talent pipeline to meet the growing healthcare needs of Missouri. In particular, young people with disabilities should be trained and channeled into the gaps created in the workforce by Baby Boomers. **As such, we recommend that this section be amended to consider what role Missourians with disabilities can play in the future workforce.**

- Missouri already has a tremendous example of how young people with disabilities can excel in the field of healthcare and benefit the bottom line of their employers. For example, [Barnes-Jewish St. Peters Hospital \(BJSPH\) is the first Project SEARCH site in Missouri](#) and has been a great example of our recommendation in action. [Youths who have gone through this program have proven themselves as incredible assets to their employer](#). At a minimum, we would encourage Missouri to look to expand the number of Project SEARCH sites in hospitals. However, WIOA planning is all about innovation and opportunity. We encourage Missouri to look at Project SEARCH in other areas as well. In other states, [Project SEARCH interns have done incredible work with senior citizens in nursing homes](#). Likewise, [other states have greatly succeeded with Project SEARCH sites in hotels and resorts](#). **While the hospitality sectors are not a primary focus of Georgia's economy, it should still be considered in terms of expanding opportunities for youths.**
- Achieving improved employment outcomes for Missourians with disabilities is a challenge that demands an "all of the above" and "even more" approach. Any job sector where employers lose money due to high turnover rates among their employees could be an avenue for employing people with disabilities. As the Combined State Plan's industry demand analysis articulates "a few of the industries, such as Food Services, General

Merchandise Stores and Administrative Services have high turnover rates” reflecting “the need to refill positions.” From RespectAbility’s perspective, these are all industries where we would like to see more Missourians with disabilities employed. At these types of companies, millions of dollars are lost each year due to employee turnover. For all jobs earning less than \$50,000 per year, [the average cost of replacing one employee is between \\$6,000 and \\$20,000](#). **Research shows that employees with disabilities are more productive and loyal than their non-disabled peers.** Company records show that even when the relatively more expensive accommodations were factored in, the overall costs of accommodations were far outweighed by the low turnover rates and better tenures of the employees with disabilities. **Furthermore, Section 418 of WIOA “Training and Services for Employers,” establishes that the State can finance training to educate employers, as well as provide services for employers who have hired or are interested in hiring people with disabilities.** This includes working with employers to provide work-based learning experiences (including short term employment, internships, etc.), pre-employment transition services (recruitment, employee training, and awareness promotion), providing consultation, technical assistance, accommodations, assistive technology, etc. **Elsewhere the State Plan talks about expanding Project SEARCH; however, we would flag this particular section as being a natural place to include language support work getting people with disabilities jobs at “healthcare and life science companies.”**

- Likewise, page 49 of the Combined State Plan talks about how “Title I is creating new initiatives to develop apprenticeship opportunities.” Youths with disabilities can benefit enormously from the work done through these types of programs. [This is an especially important thanks to the many new resources out there from the Office of Disability Employment Policy which discuss practical ways of getting young people with disabilities into the workforce through apprenticeships.](#)

Prioritize employer engagement to ensure businesses in Missouri understand how employees with disabilities benefit the bottom line.

We were disappointed to discover that certain critical employer partners are not explicitly identified in the current draft of Missouri’s Combined State Plan. Most notably, the Combined State Plan does not discuss Missouri employers doing business with the federal government that are now subject to Section 503 hiring requirements nor is the Missouri Business Leadership Network discussed. These are the types of partners who need to be at the table in order to ensure that the Combined State Plan creates the most opportunities for people with barriers to employment such as disability. Our comments below discuss those specific points where more work and focused effort are needed to recruit, engage, and collaborate to expand employment opportunities for people with disabilities in Missouri:

- **The most glaring omission and critical gap in terms of employer engagement in Missouri’s WIOA plan is the complete absence of any discussion of federal contractors.** Their absence from the current draft of the Combined State Plan is a huge missed opportunity and one that should be corrected immediately. **This omission is particularly frustrating because there is a huge opportunity to train and prepare people with disabilities to help companies doing business with the federal government to satisfy the new hiring goals set by Section 503 of the Rehabilitation Act.** [According to these regulations, federal contractors now have a 7% utilization goal to recruit, hire, and retain qualified individuals with disabilities in all job categories.](#) Even if employers face

challenges finding the talent they need, Section 503 is an opportunity to start thinking about ways to attracting the diverse talents that people with disabilities bring to the workplace.

Likewise, these new requirements need to be the catalyst which spurs both the workforce system and educational system to look at ways of channeling more and more young people with diverse backgrounds and physical differences into STEM.

Engaging with these employers should be a high priority for staff from across Missouri.

- **In terms of the specifics of Missouri’s Combined State Plan, we would encourage the draft be revised to include language around Section 503 and federal contractors.**

There are [multiple sources for information regarding what Missouri based businesses hold federal contracts and what job sectors those contractors represent](#). For example, starting on page 42, where the plan discusses strategies to “Utilize Partnerships to Provide High-Quality Customer Service” and “Updated Missouri Job Center Activities”, outreach to contractors with Section 503 could be added as a goal. Likewise, on page 42 where the plan discusses “Strategy #3 - Develop Career Pathways”, figuring out ways to channel people with disabilities into jobs at federal contractors to meet Section 503 could easily be added as a goal. Lastly, starting on page 52, Missouri’s plan commits to “Identifying and Meeting the Needs of Business.” **Federal contractors are a diverse group of employers with considerable talent needs and new requirements created by Section 503. Both VR and Business Services teams in Missouri should be concentrating on building partnerships with these companies.** Such efforts need to be guided by explicit language in the Plan.

- Next, in terms of business partners omitted from Missouri’s Combined State Plan, is the Missouri Business Leadership Network. The MOBLN needs to have a seat at the WIOA table and leverage their connections with employers in order to facilitate expanded job opportunities for Missourians with disabilities. As stated in their own words, [“Missouri Business Leadership Network \(MOBLN\) champions opportunities to create productive and supportive partnerships among people with disabilities, private businesses, and governmental and community agencies.”](#) [This state affiliate can be a source of information, resources, and best practices, tailored to meet the disability inclusion needs of business partners in the Show Me State.](#) **As such, the Combined State Plan should be amended to direct both Missouri Vocational Rehabilitation and the Business Services Teams in each workforce area to partner with the BLN in order to identify employers who understand the competitive advantage of hiring people with disabilities, identify opportunities to tailor job training resources to meet specific employer needs, and to facilitate the breaking down barriers to employment.** WIOA is fundamentally about creating an employer driven paradigm shift and the MOBLN can be a key driver in that effort. As such, it needs to be included in the guidelines set in the Combined State Plan.
- Other sections of the Show Me State’s Combined State Plan discuss and direct resources around how to evolve the workforce system to meet WIOA’s new requirements. Our comments have previously discussed how stigmas and misconceptions are critical barriers to employment for many, but especially for people with disabilities. As Missouri’s workforce system evolves, America Job Centers reach out to businesses, and local workforce boards work to establish training programs for people with barriers to employment. RespectAbility would like to emphasize several points about messaging and communications. **Government action alone—through executive orders, legislative decisions, and regulatory oversight— are insufficient.** The necessary condition for achieving greater competitive, integrated employment for individuals with disabilities is

engaging employers and meeting their talent needs. **Employer engagement will only be effective if it impacts the right audience, in the right way, with the right message.** The core employer audience is twofold and has two distinct communications challenges. **The first is to reach both CEOs and hiring managers to showcase the abilities of people with disabilities and the benefits of hiring and promoting them.** This includes the talents PwDs bring, the data which shows better retention and loyalty of workers with disabilities, and how reflecting the potential customer base, especially in a country with 56 million Americans with disabilities, can make an organization stronger. But the second challenge is just as vital. **Hiring managers, who will be the key implementers of any serious push for expanding employment opportunities, have doubts and fears about their own abilities to successfully accommodate and manage PwDs.** These must also be addressed. Hiring managers need to see themselves as able to excel at recruiting, hiring, supervising or working with teammates with disabilities. **Real training and confidence building is needed, so is ensuring that large companies have a central address where hiring managers can seek help on accommodations or legal issues as they arise.** WIOA creates the opportunity for Missouri's workforce system to evolve to meet these challenges. Moving forward, we hope that the Show Me State's workforce system embrace these challenges and commit efforts to engaging employers on the above points.

Making the most of limited resources.

As easy as it is to focus on the aspiration and elements of the Workforce Innovation and Opportunity Act, it is important to be realistic. In many ways, WIOA represents a host of new requirements for states to meet and workforce systems to grapple with, while at the same providing limited additional resources. This gap is particularly felt in terms of vocational rehabilitation, where new directives around pre-employment training services, youth outreach, and other issues demand more and more of limited resources.

As an example, just last year the Show Me State gave back \$2,000,000 to Washington that could have been used to enable people with disabilities in Missouri to get jobs. Failing to pull down the state full federal match of Vocational Rehabilitation funding creates tremendous burdens on VR staff, impacts the ability of many Missourians with disabilities to get jobs, and limits the ability of Missouri to focus on best practices or implement a "Jackie Robinson Strategy." As such, this is a critical topic that needs to be addressed from the Governor's Office on down. RespectAbility has met multiple times with Governor Jay Nixon, and he expressed interest in working on these issues. However, the challenge of Ferguson has occupied his attention. There is hope yet that he will make creating jobs for people with disabilities a priority in Missouri. On the following points, we suggest ways in which Missouri can make the most of limited resources:

- **We would offer our [Disability Employment First Planning Tool](#) as a resource that can help to overcome the restrictions created by limited resources.** This toolkit contains a wide array of recommendations many of which have limited costs to implement. For example, in terms of stigma reduction, leadership by the Governor and state to reduce this stigma is vital before broad progress can be made. **Things like Governor's Awards for inclusive business or positive press coverage of model employers who is hiring people with disabilities can help win hearts and minds.** Likewise, it is vital the state leaders continuously review opportunities for federal support and the possibility of partnerships with federal agencies and the private and nonprofit sectors. [In terms of accessing more](#)

[resources, leaders in the workforce system in Missouri should look at connecting with private-sector and philanthropic resources to complement public-sector funding with short-term pilots, innovative ideas, or evaluations and studies.](#) Successful models in Delaware, [Nevada](#), and [other states show how improved employment outcomes can be achieved through collaboration and cooperation](#) with philanthropy.

- **Likewise, we would highly encourage state leaders in Missouri to connect with several incredible champions of change in the state of Iowa.** The Hawkeye State offers numerous examples of overcoming barriers, engaging employers, and innovating in ways that can help improve opportunities in Missouri. **Iowa is an example of a state that had initially failed to spend its full federal match but has since worked to maximize available resources. In 2014, Iowa failed to spend \$2,314,114 for its general population and \$596,085 for blind individuals. However, with strong leadership from Governor Branstad and David Mitchell, Director of Iowa Vocational Rehabilitation, things are looking up. Iowa is now receiving full federal funding.** Iowa should serve as a model for the rest of the nation on how utilizing resources is a win-win-win for states, taxpayers and people with disabilities. In Iowa, their vocational rehabilitation agency has even experienced success in employing people with vision impairment at 82% which is the second in the nation. Speaking about his state's efforts, David Mitchell said that his agency had "...worked collaboratively with the Governor's Office and the legislative branch and are expected to draw down full federal funds for this budget cycle." Iowa VR's success built upon support from a "a multi-system effort occurring leveraging funds and resources through various efforts to provide financial and technical assistance to community providers and direct service staff across the state promoting employment and a better bottom line for business." Missouri's leaders have the chance to learn and work hard to improve outcomes even with limited resources.

Ferguson and Missouri's Future

It was inevitable that the explosion of pent up frustration witnessed in Ferguson, Missouri would receive some discussion in the Combined State Plan. As the Plan rightly states, "the release of the Ferguson Commission report" puts "unprecedented considerations and challenges" before the Show Me State's workforce system. **The outpouring of anger seen on the streets can be traced back to the same appalling conditions of poverty, low expectations, and lack of opportunity that the disability community experiences on a daily basis.** The intersectionality of these issues also means that answering the Commission's "signature calls to action" will require "creating viable and flexible talent development pipelines." **The greatest anti-poverty measure that a state or society can take is to empower individuals, both with and without disabilities, through the transformative power of a job.** It is our dearest hope, that Missouri will use both the experience of Ferguson and the opportunity to WIOA to improve the lives of all Missourians.

Conclusion: We hope that our comments provide needed resources and inform the efforts being made in Missouri to empower more people with disabilities to pursue the American Dream. In closing, below we offer both a copy of our data presentation for Missouri as well as a copy of Disability Employment First Toolkit. As Missouri moves forward to finalize your State Plan, we hope you will make use of these resources and do everything that your state can to empower people with disabilities.