

Jan. 4, 2015

RespectAbility – Public Comments – New Hampshire Combined State Plan

*Every time we bring in people from the margins and fully include them in the heart and soul of our communities, we get stronger. **Businesses that welcome the talents of all people see an increase in participation and productivity, as well as improvement for all employees.** As we recognize Disability Employment Month, renewing our commitment to inclusiveness will strengthen our businesses, communities and economy."*

- [Governor Hassan Proclaims October Disability Employment Awareness Month in New Hampshire, October 10, 2013.](#)

Introduction

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

New Hampshire already has much to be proud of in terms of competitive, integrated employment for people with disabilities. **41% of New Hampshire's 77,800 working-age people with disabilities are employed. These numbers indicate that there is cause for optimism for the Granite State's 5,900 youth with disabilities between the ages of 16 and 20.** Each year, one quarter of that number will age out of school every year.

Maggie Hassan has made her commitment to the economic inclusion of people with disabilities clear throughout her tenure as New Hampshire's Governor. [As she said upon making her state the first to ban sub-minimum wages for people with disabilities, ensuring "that people who experience disabilities can fully participate in our communities and achieve greater economic independence... is critical to the strength of our society, our democracy and our economy."](#) Turning such rhetoric into reality will very much depend on the priorities set by New Hampshire's Combined State Plan.

While New Hampshire has already done much for people with disabilities, WIOA gives the Granite State greater flexibility to break down siloes in order to empower more people with disabilities and sustain positive employment outcomes. **Our comments focus on those areas related to youth with disabilities and employer engagement where New Hampshire can have an even bigger impact.** Likewise, these public comments conclude with copies of [our state data presentation for New Hampshire](#) as well as [our Disability Employment First Planning Tool](#). As ever, RespectAbility and our partner organizations stand ready to provide any support or resources that we can in order to empower more New Hampshire residents with disabilities to pursue the American Dream.

Continue Focusing on Youth with Disabilities – Sustaining a “Jackie Robinson Strategy”

As the letter of the law makes clear, improving job training and employment outcomes for youth is a critical priority for the states as they work to implement the Workforce Innovation and Opportunity Act. The efforts that states make and the resources they invest in this area will have long term impacts on creating a pipeline of talent to meet employer needs. While we hope that WIOA will improve employment opportunities and training for all youth, it is especially critical for youth with disabilities.

As the New Hampshire workforce system evolves and adapts to the paradigm shift created by WIOA, we hope they will seriously examine how attitudinal barriers, stigma, myths, and misconceptions about people with disabilities are a critical obstacle in the push for improved employment outcomes. [Our perspective as an organization is that the barriers created by stigma will be broken by using what we call a “Jackie Robinson Strategy.”](#) As the first African-American to play major league baseball, Robinson tore down decades of discrimination and blazed a trail for other talented and diverse athletes to follow. The Jackie Robinson strategy suggests that strategic triage is needed. The greatest focus and largest efforts need to be where there will be a serious return on investment for employers. **Helping young people with disabilities to successfully transition into the workforce will create a path for those who may have a greater need for employment supports to also succeed.** New Hampshire can do this by focusing WIOA resources on what works best – [early interventions](#), [inclusive internships](#), [connecting youth with apprenticeships](#), [job coaching](#), and other best practices. In our comments below, we identify the specific sections of the Combined State Plan that can have an even greater impact on the opportunities available to youth with disabilities in New Hampshire:

- **First and foremost, as much good as there is in the Combined State Plan as written, the omission of the issue of stigma is troubling.** The myths and misconceptions that far too many people have about the talents of people with disabilities is a serious problem that prevents many from entering the workforce. **Attitudinal barriers, as much as physical barriers, are a factor that the New Hampshire workforce system needs to engage with in order to improve outcomes.**
- While the issue of misconceptions about people with disabilities is absent from New Hampshire’s Combined State Plan, there is a wealth of economic data informing the current draft. **In particular, we commend the state plan for looking at more than just unemployment statistics.** Looking at those numbers alone excludes people who aren’t actively seeking work which can include people with disabilities. **To get a more accurate assessment of the health of a state economy, it is important to look at the labor force participation rates to see the trends throughout that state’s labor market.** We also commend the state of New Hampshire for including more detailed information about the labor force participation of people with disabilities “in Appendix A, Tables 9 and 10.”
- Pages 7 through 14 of New Hampshire’s Combined State Plan contain vital information needed to satisfy the requirements from Section II,(a)(1)(B)(i) of WIOA. As much good as has already been accomplished in New Hampshire, the current draft looks the challenge of improved outcomes straight in the eye. As noted, “Only 24.1 percent of persons 16 years of age and older with a disability were in the labor force, compared to 74.7 percent of persons of those ages without a disability.” Of particular note is the fact that “of those disabled young persons in the age 16 to 19 group, only 12.1 percent were employed compared with 43.7 percent for their non-disabled counterparts.” This core

group of transition age youth with disabilities are where New Hampshire can have the biggest impacts and make the smartest investments. **This cohort of young people who are on the verge of aging out of the school system and into the workforce are where the greatest share of resources need to be placed.** Elsewhere in the Combined State Plan, New Hampshire VR writes about their experiences and successes with Project SEARCH programs supporting transition age youth with intellectual and developmental disabilities. Specific employers mentioned later in the state plan include: “St Joseph Hospital (Nashua), Catholic Medical Center (Manchester), Concord Hospital (Concord), Cheshire Medical Center (Keene), Portsmouth Regional Hospital (Seacoast region), and Dartmouth-Hitchcock Medical Center (Lebanon).” Together, these two points of the Plan show that there is an awareness of where more work needs to be done. **We hope that moving forward, New Hampshire’s workforce system will prioritize efforts and resources so that youth with disabilities will more easily be able to enter the workforce.**

- Beyond the focus and investments in youth, WIOA also makes focusing on sector strategies a key element of developing the future workforce. **Collaboration between growing job sectors, developing the talent pipeline, and training cohorts of skilled workers requires a clear focus on those sectors most in need of future talent.** In the section concerning “Sector-Based Initiatives” on Page 26, the Combined State Plan identifies several sectors where initial work is being done. These sectors include: “Healthcare, Hospitality & Tourism, and Information Technology sectors.” Likewise, this section also references Governor Hassan’s declaration that [2015 to be “A Year of STEM” focusing on “efforts to help students develop the skills and innovative thinking needed for good jobs in the 21st century economy.”](#) **These are all important steps forward with significant promise for people with disabilities, if the right steps are taken.** In terms of the sectors where initiatives have been launched, these are all job sectors where people with disabilities can excel and benefit the bottom lines of their employers. We submit that **people with disabilities are a natural labor resource that should be tapped to meet these economic trends.**
- In terms of the Healthcare sector in New Hampshire, there are several points to keep in mind. To quote a 2014 report from the Office of Disability Employment Policy (ODEP), “[[people with disabilities](#)] [not only represent an untapped talent pool, but also offer significant value and insight](#)” in the field of healthcare. There are numerous [examples of young people with disabilities doing incredible work in the fields of healthcare, elderly care, and in assisted living](#). With the right training and early work experiences, youth with differences can both help to care for aging Baby Boomers and to fill the gaps created in the workforce by retiring seniors. **To meet these employer needs, the Granite State, should look to rapidly expand the number of Project SEARCH sites. We highly encourage New Hampshire 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 diligently 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.

- Likewise, “Hospitality & Tourism” is another sector where the talents needs of employers can be successfully met by training and preparing youth with disabilities. **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 New Hampshire to improve employment outcomes for people with disabilities.](#)** The various professionals of Granite State’s workforce system should connect with employers in the hospitality sector to begin figuring out how to benefit from this cost-effective model.
- **As New Hampshire and the many states work towards the development of a 21st Century workforce system, responsive to the shifting demands of a global economy and rapid technological change, it is vital the people with disabilities be part of the conversation.** While we emphasize the importance of cost-effective training models like Project SEARCH, we also recognize that this model is not a perfect fit for employers with more involved and technology-oriented talent needs. **The heterogeneity of disability means that a full-spectrum approach is needed in terms of disability employment policy.** [Some of the world’s largest and most innovative technology companies-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 experiences and partnerships generated by this effort offers profound insights into how to challenge employer perceptions, recruit diverse talent, and ultimately put peoples’ diverse abilities to work. [Likewise, Delaware’s Governor Jack Markell has led the way in partnering with technology companies to employ more people on the autism spectrum.](#) Such partnerships prove that careers in dynamic, cutting edge fields need not be beyond the grasp of people with disabilities. Moving forward, **we hope the Granite State will grapple with the challenge of preparing young people with disabilities for careers in the field of STEM.** This particular issue offers a window of opportunity for New Hampshire to innovate, experiment, and succeed.
- Technology at the individual level is also a critical component of empowering people with barriers to employment such as disability to enter the workforce. Several elements of the Measurement plan and the goals set for NH Vocational Rehabilitation talk about ways to better integrating assistive technology throughout the rehabilitation process. We would submit that this is a natural point of collaboration between VR and the “designated American Job Centers called NHWORKS.” Some of the regulations around WIOA imply that assistive technology count as a part of an AJC’s infrastructure costs. We encourage NHVR to partner with NHWORKS to see how to formalize such a process. Lastly, in terms of supporting the technology needs of people with disabilities, **we also encourage thinking of ways to leverage simple tools like smartphones, to support employment.**
- Lastly, certain sections make it clear the NH Vocational Rehabilitation has a clear view of what works and what challenges they face. As an example, on page 20 in the section dealing with the NH Department of Education, NHVR states that they operate “under the awareness that collaboration with other agencies, community groups, and employers is what makes their services most meaningful for their customers.” RespectAbility would hasten to add that **site visits are of critical importance to raising awareness and building collaborations between employers, job placement agencies, and job seekers with disabilities** Touring a model employer who is capitalizing on the talents of

employees with disabilities can be an eye opening experience. As such, it should be a priority in terms of building the capacity of local boards to serve job seekers with disabilities.

Enhancing Employer Engagement and Addressing the Education Gap in the Granite State

While developing a state plan, improving the components of the workforce system, and implementing WIOA is a complex challenge, there is a simple truth underpinning this entire process. The success of this law depends on being an employer driven paradigm shift. Yes there are new rules and regulations, but WIOA is fundamentally about spurring innovation and expanding opportunity. Expanding opportunities for people with barriers to employment such as disability requires strong partnerships with employers. From certain elements of the current draft of New Hampshire's Combined State Plan, it is clear that productive employer partnerships already exist. However, there are several areas and ways in which those existing partnerships can be improved and collaborations can be expanded. Our comments below touch on those points:

- **The biggest gap in terms of employer engagement and New Hampshire's Combined State Plan is the omission of references to Section 503 of the Rehabilitation Act.** [Federal contractors can be a significant partner in expanding employment opportunities for people with disabilities thanks to the new Section 503 rules.](#) Even if employers face challenges finding the talent they need, this new regulation is an opportunity to start thinking about ways of attracting the diverse talents that people with disabilities bring to the workplace. As required by WIOA section 101(d)(3)(B),(D), a state's WIOA plan must include an extensive discussion of what strategy it will adopt in order to achieve its goals. **The language in several of these goals could easily be amended so that effort and resources are spent to build partnerships with employers subject to Section 503 requirements.** For example, under GOAL 1 STRATEGY 1.2 on page 34 of the state plan, language could be added to direct "the Interagency Business Team's (IBT)" to allocate resources to outreach to federal contractors. Likewise, under GOAL 2, STRATEGY 2.1, in looking at ways to "leverage knowledge/experience from industry-driven sector partnerships to inform career pathways", partnerships with companies doing business with federal government could be discussed. The first step is to identify which employers in New Hampshire are doing business with the Federal government and to engage these employers around meeting Section 503 requirements.
- There is already clear evidence of a strong relationship between Vocational Rehabilitation and the business community in New Hampshire. As stated on page 120 of the Combined State Plan, New Hampshire VR won the "2012 Business Assistance Organization of the Year" from Business New Hampshire Magazine and the NH Association of Chambers of Commerce. The paragraph goes on to mention that "the nomination process" gave NHVR the chance to "highlight the extensive number of employers the agency works with to achieve successful employment opportunities for customers with disabilities." **This experience underscores the hard truth about employment for people with disabilities that government action alone is insufficient. The necessary condition for achieving greater competitive, integrated employment for individuals with disabilities is engaging employers and meeting their talent needs.**
- Likewise, on page 144 where the Plan talks about Strategies to achieve State Goals, NHVR commits to "using innovative marketing strategies, targeting businesses, to promote employment outcomes for persons with disabilities." **Implementing this**

strategy 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 people with disabilities 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 people with disabilities.** These must be also 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.

- Moving forward, there are several steps that NHVR can take. **First, it can begin by meeting with and collaborating with the Business Services Teams working under NHWORKS.** Such collaboration will help to break down existing siloes and point to where employers have talent needs. **Second, NHVR should capitalize on existing partnerships with employers by working to coordinate site visits which showcase the business benefits to hiring people with disabilities.** Touring a model employer who is capitalizing on the talents of employees with disabilities can be an eye opening experience. As such, it should be a priority in terms of recruiting new business partners to hire job seekers with disabilities. **These steps, taken together through the Combined State Plan, can have a significant impact on employment outcomes.**
- Page 160 also talks about the efforts of NHVR in partnership with CSAVR. This is a partnership that has clearly been a factor in the improving employment outcomes for people with disabilities in New Hampshire. As stated in the plan, “links are being established between NHVR customers and our national business community.” The next connection to make in order to enhance these links is to look at ways of getting more businesses to partner with each other around hiring people with disabilities. **Specifically, RespectAbility would argue that the groundwork has already been laid by NHVR for a US Business Leadership Network affiliate to be established in New Hampshire.** As stated by the USBLN itself, [“affiliates engage in networking discussions to increase their knowledge of community outreach, recruiting and interviewing, the accommodation process, and barriers to employment.”](#) Such activities resonate with the existing work of NHVR and would result in even greater employment outcomes for people with disabilities in the Granite State.
- Beyond employer engagement, improving the alignment between employer needs and the educational system is another area of the Combined State Plan that needs to be addressed. While it may seem an indirect approach, there is a significant challenge that needs to be addressed in order to open more career pathways to New Hampshire residents with disabilities. **The issue we have in mind is the fundamental disconnect in most post-secondary education programs between disability services and careers.** This is not a new issue and it is one that other organizations have raised in the past. However, with the priorities put into place by the implementation of WIOA, there is a historic opportunity to bridge this gap and to improve career and technical education for young people with and without

differences. As formulated by the National Organization on Disability, at most educational institutions, “the career services office, which assists students in preparing for” the workforce [“lack a strong—or any—connection to the office of disabled student services, which ensures proper accessibility and accommodations on campus for students with disabilities.”](#) The result is a price we pay as a society is twofold. **First, it costs employers who are unable to find qualified job candidates. Second, it costs students with disabilities who may be able to graduate with a degree thanks to accommodations but will go on to struggle to succeed in the working world.** Nationally, there are 1.3 million young Americans ages 16-20 with disabilities. They have high expectations to go into the workforce but currently only 53% of college graduates with disabilities are employed as opposed to 84% of graduates with no disability. In total, only about 7% of people with disabilities will earn a college degree and less than half of the 2.3 million with a degree are employed. These are national statistics, but they have bearing on the work that needs to be done through New Hampshire and especially its community college system. **Beyond just WIOA, community colleges are uniquely positioned to innovate in order to expand opportunity.** Unlike four-year institutions, community colleges are more closely connected to the working world and the specific training requirements of employers. This intersection should be of great interest to the components of New Hampshire’s workforce system. As **the Granite State looks to triangulate between employer needs, skills training, and recruiting workers; it will do well to remember the importance of getting students with disabilities connected to career services and prepared for the workplace.**

Conclusion

As stated at the beginning of our public comments, New Hampshire already has reason to be proud. [Ranking in the top 10 states with the highest employment rates of people with disabilities](#), the Granite State has accomplished much in terms of competitive, integrated employment for people with disabilities. However, WIOA and the Combined State Plan offer the chance to build on those successes and sustain a brighter future. Our public comments address those areas related to focusing on youth with disabilities and employer engagement where even more can be done. The 77,800 working-age people with disabilities who live in New Hampshire want to pursue the independence and income that employment provides, just like everyone else. For those that have yet to enter the workforce, WIOA represents the intersection of hope and history. We trust that the dedicated professionals working on WIOA in New Hampshire will do everything that can to deliver on those hopes. We conclude our comments by attaching copies of [our state data presentation for New Hampshire](#) as well as [our Disability Employment First Planning Tool](#). As ever, we stand ready to provide any support or resources that we can in order to empower more New Hampshirites with disabilities to pursue the American Dream.



RESPECTABILITY

New Hampshire and Jobs for PwDs

Jennifer Laszlo Mizrahi, President
www.RespectAbilityUSA.org

New Hampshire



Gov. Maggie Hassan
(D)

- ❖ 80.3% of persons without disabilities aged 18 to 64 are employed.³
- ❖ 41.8% of PwDs aged 18 to 64 are employed.³
- ❖ 166,258 persons in NH have a disability.³
- ❖ 5,900 persons aged 16 to 20 have a disability.¹
- ❖ 77,800 persons aged 21 to 64 have a disability.¹
- ❖ 16,700 PwDs aged 18 to 64 receive benefits.¹
- ❖ Voc. Rehab. received 3,071 applicants in NH in 2012.³
- ❖ Voc. Rehab. obtained 1,087 jobs for PwDs in NH in 2012.³
- ❖ In 2012, NH's total expenditure on SSDI benefits was \$696,012,000.³

1. 2012 Disability Status Report: New York, disabilitystatistics.org
2. StateData: The National Report on Employment Services and Outcomes, 2013
3. [Annual Disability Statistics Compendium](#)

New Hampshire Data

		People with Disabilities (%)		People without Disabilities (%)	
		2012	2013	2012	2013
Poverty ¹	US	29.2	28.7	13.6	13.6
	NH	22.8	21.9	7.5	7.5
Smoking ¹	US	26.0	25.4	16.9	16.2
	NH	23.1	26.9	15.4	13.3
Obesity ¹	US	39.1	40.1	24.5	25.0
	NH	38.0	39.2	24.2	23.5
Employment ¹	US	32.7	33.9	73.6	74.2
	NH	37.9	41.8	80.5	80.3

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

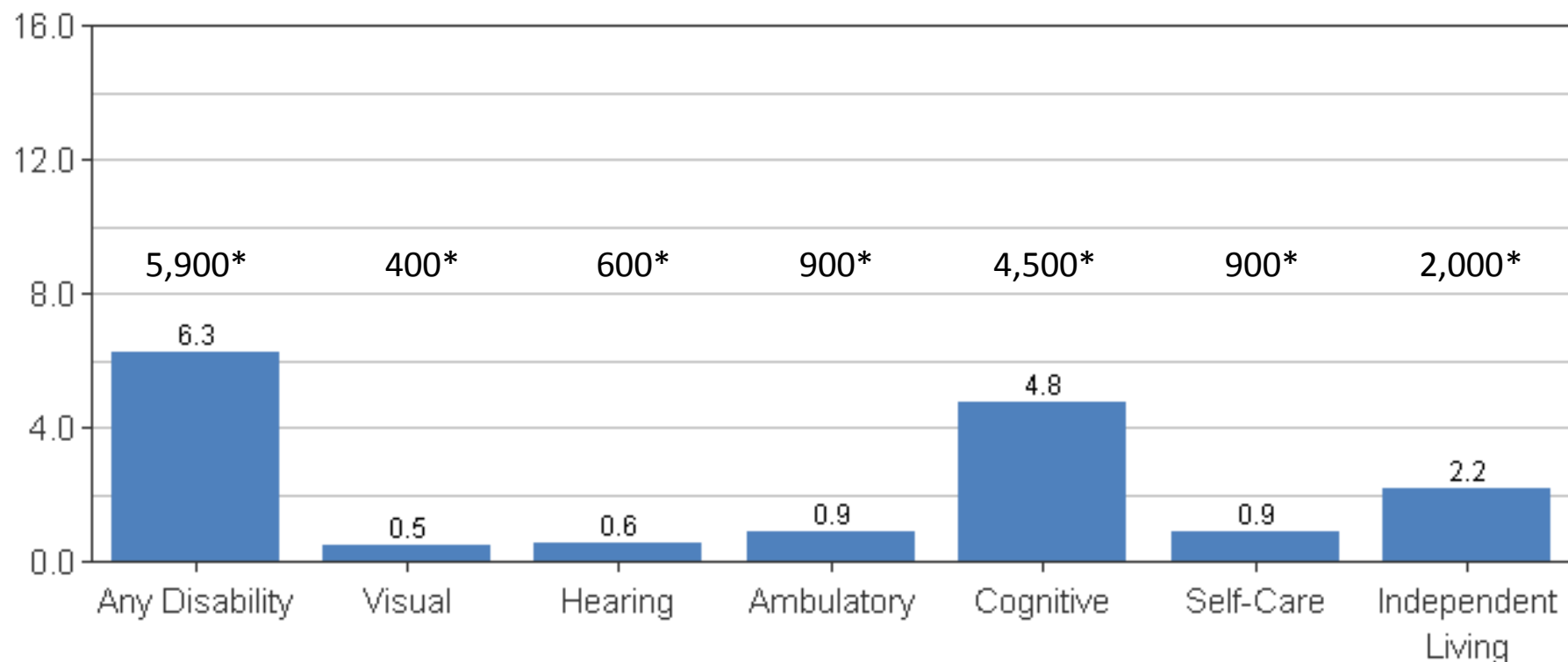
NH Ages 6 to 21 Served Under IDEA

	2011	2012
All Disabilities	26,264	26,102
Specific Learning Disability	10,743	10,365
Speech or Language Impairment	3,648	3,456
Intellectual Disability	787	762
Emotional Disturbance	2,263	2,192
Multiple Disability	365	368
Hearing Impairment	215	206
Orthopedic Impairment	77	71
Other Health Impairment	4,906	5,067
Visual Impairment	93	93
Autism	1,703	1,923
Deaf Blindness	7	7
Traumatic Brain Injury	64	67
Developmental Delay	1,393	1,525

Source: [Annual Disability Statistics Compendium](#)

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

Prevalence Rates: Age 16 to 20 years (%)

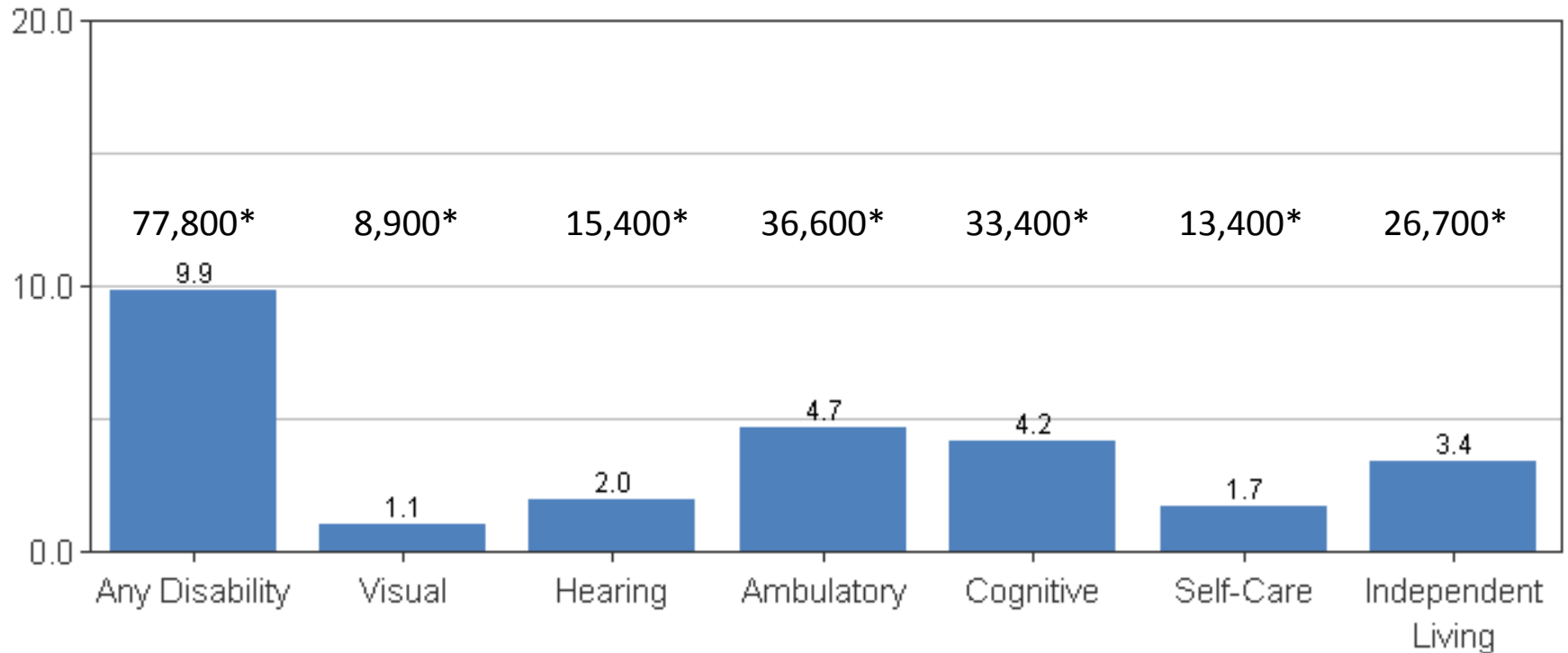


*Total numbers reported

Source: [Cornell University](#)

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

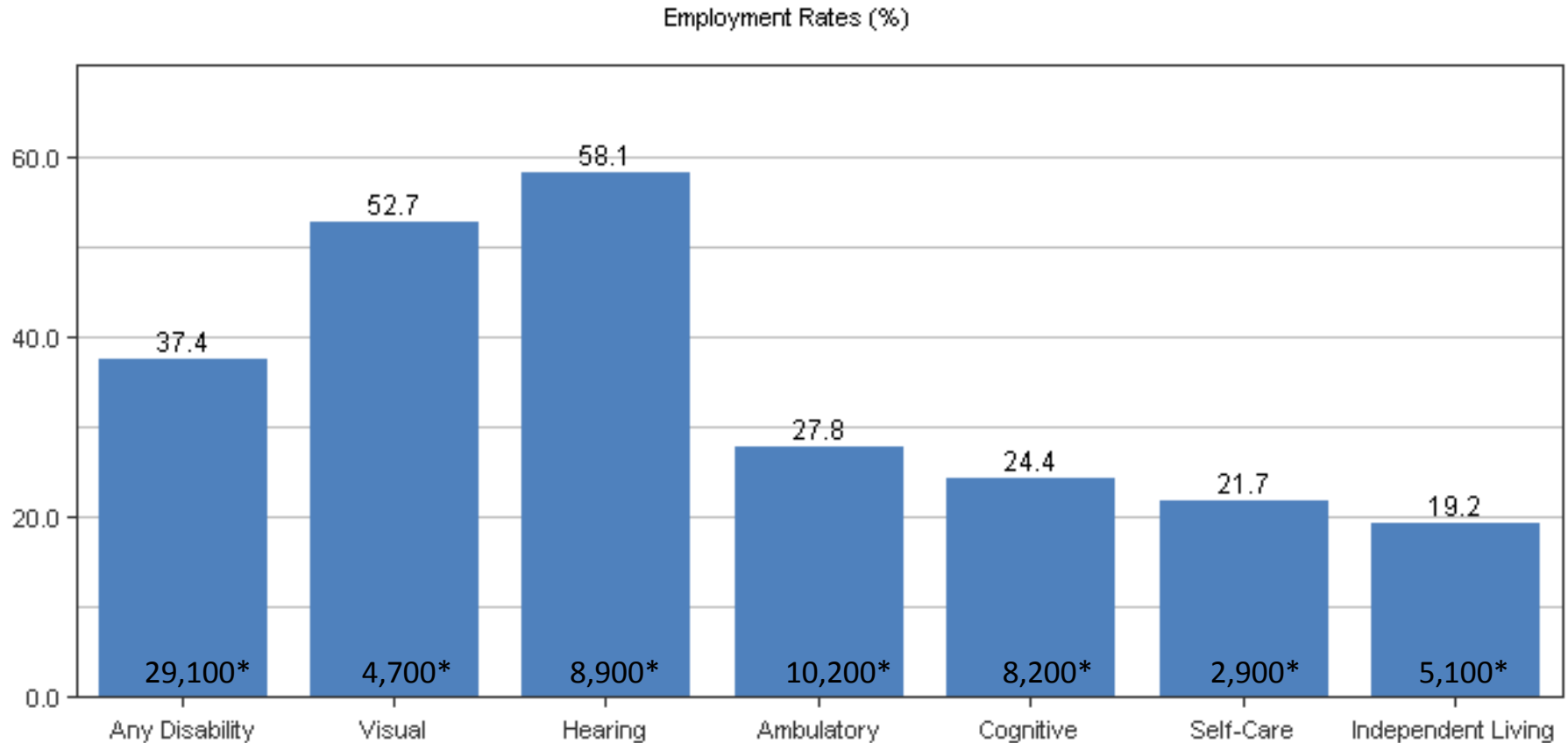
Prevalence Rates: Age 21 to 64 years (%)



*Total numbers reported

Source: [Cornell University](#)

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



*Total numbers reported

Source: [Cornell University](#)

New Hampshire Project SEARCH Sites

- ❖ Catholic Medical Center, Manchester
- ❖ Cheshire Medical Center/Dartmouth Hitchcock, Keene
- ❖ Concord Hospital, Concord
- ❖ Dartmouth Hitchcock Medical Center, Lebanon
- ❖ Portsmouth Regional Hospital-HCA, Portsmouth
- ❖ St. Joseph Hospital, Nashua

Project SEARCH: www.projectsearch.us

Contact Erin Riehle at Erin.Riehle@cchmc.org

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

❖ Top employers

- BAE Systems PLC
- L-3 Communications Holdings INC.
- Environmental Chemical Corp.
- Cityside Management Corp.
- Serco Group PLC

-For the complete list see the [fed spending website](http://www.fedspending.org/fpds/fpds.php?stateCode=NH&sortp=r&detail=-1&datatype=T&reptype=p&database=fpds&fiscal_year=2012&submit=GO)

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

- Complete federal lists of 2006-2013 → [Federal Procurement Data System website](https://www.fpds.gov/fpdsng_cms/index.php/en/reports/62-top-100-contractors-report3.html)

https://www.fpds.gov/fpdsng_cms/index.php/en/reports/62-top-100-contractors-report3.html

- How to get started: Job Accommodation Network → <https://askjan.org/>

US Business Leadership Network → <http://usbln.org/>

Jobs in New Hampshire

- ❖ Three major occupational groups are projected to substantially increase their share of employment from 2008 to 2018: healthcare practitioners and technical occupations, healthcare support occupations, and personal care and service occupation

http://workforceinvestmentworks.com/workforce_board_info.asp?st=NH

- ❖ Click for your Workforce Investment [Board](#)

http://workforceinvestmentworks.com/workforce_board_info.asp?st=NH

- ❖ Click for your Workforce Investment [Plan](#)

<http://www.doleta.gov/Performance/results/AnnualReports/annual-report-10.cfm>

Resources

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

Let Us Know If We Can Help!

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

RespectAbilityUSA

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Disability Employment First Planning Tool

Created by RespectAbility,
Best Buddies, The National Association
of Councils on Developmental
Disabilities (NACDD), National Council
on Independent Living (NCIL), Paralyzed
Veterans of America (PVA) and National
Organization on Disability (NOD).

Questions? Contact Jennifer Laszlo Mizrahi at
202 365 0787 or JenniferM@RespectAbilityUSA.org

Disability Employment First Planning Tool

Dear Governors, Workforce Development Board and Agencies,
Vocational Rehabilitation Agencies and others devoted to enabling
people with disabilities to get jobs,

Our nation was founded on the principle that anyone who works hard should be able to get ahead in life. People with disabilities deserve to be able to work to achieve the American dream, just like anyone else. Companies like Walgreens, E.Y., AMC Theaters, Lowe's and others have shown that employees with disabilities are loyal, successful and help them make more money. If we find the right jobs for the right people it can and does increase the bottom line of companies, while enabling people with disabilities to achieve dignity and independence.

We stand ready to help governors, states, workforce development boards and agencies, vocational rehabilitation and others in their efforts to enable people with disabilities to get competitive integrated employment. Thus, we have created this **"Disability Employment First Planning Tool"** as a resource for your state, workforce development boards and agencies. It is organized around the key recommendations from the National Governors Association's report, ***A Better Bottom Line: Employing People with Disabilities***¹. The pages that follow are taken from best practices and can really help you in your work to create win-win-win solutions for people with disabilities, employers and taxpayers alike. The key areas are:

- Making the best of limited resources
- Finding and supporting businesses in their efforts to employ people with disabilities
- Making disability employment a part of the state workforce strategy
- Preparing youth with disabilities for careers that use their full potential, and providing employers with a pipeline of skilled workers
- Being a model employer by increasing the number of people with disabilities working in state government

There is full bipartisan support² in Washington and around the nation for employment for people with disabilities. The National Governors Association initiative ***A Better Bottom Line: Employing People with Disabilities***³ was a significant milestone. The **Workforce Innovation and Opportunity Act (WIOA)**⁴ and **ABLE Act**⁵ recently became law.

According to section 102 of WIOA, each state will now have to create a "Unified Plan" before March 2016. We recognize that this is not an easy task, and that there is not a lot of time. Until now, tens of billions of dollars of tax money has been wasted on failed programs, while evidence shows that there are better programs and practices that work⁶. Our goal is to ensure that each state puts forward an excellent plan based on best practices — one that will create the most integrated job opportunities that pay competitive wages for people with disabilities possible, while meeting the talent needs of employers. Thus, the pages following will give you a list of best practices that you can replicate in your own work.

1. bit.ly/1vb4Ib9

2. bit.ly/1wYGgtc

3. bit.ly/1vb4Ib9

4. <http://www.doleta.gov/wioa>

5. bit.ly/1w39Iy9

6. bit.ly/1xV9Wvm

This month Section 503⁷ came online to ask federal contractors to take affirmative action to recruit, hire, promote, and retain individuals with disabilities. For the first time, they also have a 7% utilization goal for qualified individuals with disabilities in each of their job groups (including management). Moreover, all of their staff, including those with disabilities, must be paid at least \$10.10 an hour. Another regulation, VEVRAA⁸, requires similar obligations on contractors to hire veterans, including veterans with disabilities. Policies are changing fast and we stand ready to help.

We have already met with 33 governors on employment for people with disabilities and real progress is being made. The initial efforts of Governors Jack Markell (DE), Terry Branstad (IA), Scott Walker (WI), Dennis Daugaard (SD), Phil Bryant (MS), Jay Inslee (WA) and others have been stellar.

Please go through all the policies outlined in the following pages. We also have created separate documents for each state as resources. They include statistics, planning data, and a wealth of information. It even has links to lists of all the federal contractors in your state that, due to Section 503, must now become inclusive employers.

Please contact JenniferM@RespectAbilityUSA.org or at 202-365-0787 if you have any questions. We are here to help you succeed in opening the doors to success for the twenty million working age Americans with disabilities, most of whom want to work.

Sincerely,

Jennifer Laszlo Mizrahi
President, RespectAbilityUSA.org

Lisa Derx, Vice President
Best Buddies

Donna Meltzer,
President, The National Association of Councils
on Developmental Disabilities (NACDD)

Kelly Buckland
President, National Council on Independent Living (NCIL)

Susan Prokop
Advocacy Director, Paralyzed Veterans of America (PVA)

Carol Glazer
President, National Organization on Disability (NOD)

7. usa.gov/1BLnZ72

8. <http://www.dol.gov/ofccp/regs/compliance/vevraa.htm>

Disability Employment First Planning Tool

Created by RespectAbility, Best Buddies, The National Association of Councils on Developmental Disabilities (NACDD), National Council on Independent Living (NCIL), Paralyzed Veterans of America (PVA) and National Organization on Disability (NOD).

Welcome to the ***Disability Employment First Planning Tool***, organized around the five areas from the NGA report ***A Better Bottom Line: Employing People with Disabilities***. This tool is meant to be a guide and internal document for you and your state, workforce development boards and agencies, vocational rehabilitation and others. It will help you better understand what a holistic plan for integrated competitive employment for people with disabilities would entail, as well as to see where there are current gaps. Throughout this planning tool, all “jobs” and “employment” refer to jobs that are either competitive integrated employment as defined by WIOA or self-employment. (Please see full WIOA definition of competitive integrated employment in Appendix A.)

This tool is written to provide specific and measurable steps that can be taken to achieve the overall goal of integrated employment of people with disabilities. As you consider these steps and goals we ask that you consider where your state is on the path to achieving each of these. We have provided space to note the state’s progress based on the following:

- N** Not Yet Started or Considered
- B** Beginning to Progress Towards Goal
- D** Developing Steadily Toward Goal (i.e. you have a model program in part of the state but it is only available to a small number of the people with disabilities and employers who need it)
- M** Met Goal
- E** Exceeds Goal and is Exemplar for Other States

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I. MAKING THE BEST OF LIMITED RESOURCES

One of the most cost effective things that you can do to successfully integrate disability employment into the state workforce strategy is to reduce the barriers caused by negative stigmas surrounding employment for people with disabilities (PwDs). Indeed, efforts that do not cost any taxpayer dollars but rather demonstrate leadership can make a significant difference in lowering barriers to entry into the workforce and to changing the landscape for people with disabilities, employers and taxpayers alike.

A Princeton study shows that while people with disabilities (PwDs) 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. Thus, leadership by the Governor and state to reduce this stigma is vital before broad progress can be made.

Ensuring that there is an expectation by employers that employees with disabilities can succeed, and by PwDs that they can work successfully is critical to better outcomes for people with disabilities, businesses, and the state. This is especially true for young people with disabilities and for those with newly acquired disabilities who were previously in the workforce. This section gathers data regarding your leadership and efforts to address and reduce stigmas and other barriers to employment in your state and make disability employment a part of the state workforce strategy.

Additionally, in making the best use of limited resources to advance employment opportunities for people with disabilities, the NGA ***A Better Bottom Line*** (bit.ly/1vb4Ib9) report highlights that *“Governors can act to secure resources by directing agency heads to continuously review opportunities for federal support and the possibility of partnerships with federal agencies and the private and nonprofit sectors. Areas for governors to consider include: (1) capitalizing on the numerous federal programs, particularly in the U.S. Department of Education Office of Special Education (OSERS), which oversees the Rehabilitation Services Administration (RSA); the U.S. Department of Labor’s Office of Disability Employment Policy (ODEP); and the U.S. Health and Human Services (HHS) Administration on Community Living; (2) connecting with private-sector and philanthropic resources to complement public- sector funding with short-term pilots, innovative ideas, or evaluations and studies; and (3) maximizing the efforts of disability experts in their state, including advocacy organizations, research institutions, and universities that are engaged in similar activities as state agencies to advance opportunities for people with disabilities, such as recruitment, assessment, services, outreach, and awareness campaigns.”*

A. Internal Issue Awareness and Commitment

1. The Governor has taken the time to personally understand the issues surrounding the expansion of competitive integrated employment for people with disabilities (PwDs) in this state.
2. The executive director of the state workforce board and agency, and other key state leaders such as the vocational rehabilitation director, special education director and others have taken the time to personally understand the issues surrounding the expansion of competitive integrated employment for people with disabilities (PwDs) in this state.
3. The Governor has openly pledged his/her support and commitment to the National Governor's Association (NGA) Disability Employment Initiative "A Better Bottom Line: Employing People with Disabilities."
4. The State and Governor celebrate and recognize National Disability Employment Awareness Month each October.
5. The State is reaching out to make the most of opportunities coming from the Federal government and other partners, and is blending and braiding those opportunities for maximum results. This practice entails a legitimate process of fiscally mixing funds to create one source, and combining separate accountable sources to provide services.

B. Raising Public Awareness and Decreasing Stigma

1. The Governor uses his or her own time, name and office to reduce stigmas and prejudice against hiring people with disabilities by demonstrating the positive business case aspects of employing PwDs at least once a month, through media opportunities such as personal statements, appearances, op-eds, conferences, and media events.
2. During speeches to business leaders, the Chamber of Commerce and other employer groups, the Governor regularly speaks about the positive business cases of being an inclusive employer.
3. The Governor uses his or her own time, name and office to reduce stigmas and prejudice against hiring PwDs by demonstrating the positive business case aspects of employing PwDs at least once a month, through media opportunities such as personal statements, appearances, op-eds, conferences, and media events.
4. The Governor visits a successful job site in their state at least quarterly that employs PwDs and where it is win-win for employers and employees alike. Media is invited to report about the experience to highlight the business case for employing people with diverse abilities.
5. The Governor is working with public figures/celebrities (i.e. from Hollywood, sports or local news stations) to do public service announcements or events throughout the year to encourage companies to see the advantage of hiring PwDs.

6. During speeches to business leaders, the Chamber of Commerce and other employer groups, the Governor regularly speaks about the positive business cases of being an inclusive employer.
7. The state promotes awareness and inclusive hiring by identifying and publicly praising businesses within the state that are leaders in inclusion through awards, visibility, or other incentives.
8. The Governor hosts disability employment summits, which include businesses that are successful inclusive employers making the business-to-business case for inclusive employment to other employers.

II. FIND AND SUPPORT BUSINESSES IN THEIR EFFORTS TO EMPLOY PEOPLE WITH DISABILITIES

From the NGA *A Better Bottom Line* report: *“Businesses are telling policymakers that they are willing to hire people with disabilities, but they need a long-term partner. Government must reorient its strategy from looking to businesses to solve a social service problem to instead understand and solve the challenges businesses face in identifying and recruiting skilled workers. Governors can encourage state agencies to find more such businesses by dedicating staffers who have business expertise to work with employers, working with multiple businesses in a sector, and including small businesses. Governors can provide leadership in building long-term partnerships that support business with actions such as assigning one point of contact from the state to work with employers over the long term, providing skills assessment and training, and navigating the complexities of benefits related to workers with disabilities.”*

A. Communication, Staffing, and Support

1. There is a state-supported centralized agency that distributes information, resources, integrated employment support and training for businesses that hire PwDs, and this agency makes itself known to employers.
2. The state has enables mechanisms and services which enable businesses to effectively include people with disabilities in their workforce.
3. The state is working to build and sustain the capacity of front-line staff across systems to successfully implement evidence-based effective practices in supporting and serving employers who hire individuals with disabilities as well as their employees with disabilities.
4. There are expectations on provider organizations to assure that they are transitioning from predominantly facility-based, segregated service models to market-driven service models focused on the provision of integrated employment supports and other home and community based services.
5. The state has created mechanisms to enable people with disabilities, including veterans with disabilities, to navigate multiple service programs.

6. The state has a special focus on supporting Federal contractors under new mandates from Section 503, including working closely with the United States Business Leadership Council, an organization devoted to supporting inclusive employers, as well as with the National Industry Liaison Group which represents Federal contractors.

III. MAKE DISABILITY EMPLOYMENT PART OF THE STATE WORKFORCE STRATEGY

From the NGA **A Better Bottom Line** Report: *“Make disability employment part of the state workforce development strategy. For many states, the first step has been to prioritize “employment as the first option” when designing policies, programs, and investments to support the employment of people with disabilities. To date, more than 30 states have adopted Employment First strategies, which direct state policies and investments to prioritize employment for people with disabilities. Governors can make Employment First a priority by issuing an executive order or working with the state legislature to enact legislation to support it. Governors can also direct state agencies to align disability programs with workforce and economic development programs, track disability employment outcomes and make sure they are included with current workforce data collection, and focus on the business case when meeting with employers.”*

A. Policy and Legislation

1. The Governor/state has signed Employment First legislation and/or issued an Executive Order on Employment First.
2. The Governor has made specific and measurable commitments to improve competitive integrated employment for PwDs in this state, and has made it a high priority for his/her Administration.
3. The state is actively working to align policy, practice, and funding across systems to promote integrated employment as the preferred outcome of publicly financed supports and services to individuals with disabilities.

B. Communication and Representation

1. There is a statewide workforce development board that reports directly to the Governor.
2. At least one representative of the disability advocacy community is specifically included in that workforce development taskforce which reports to the Governor.
3. There are online ads, which are 508 compliant; to help PwDs find services to get jobs (i.e. for American Job Centers or Vocational Rehabilitation) before people start receiving benefits.
4. There are online ads, which are 508 compliant; to help employers source talented PwDs (i.e. www.tabABILITY.org).
5. The local, regional, and statewide workforce development boards fully support integrated employment as a winning strategy for workforce development.
6. The state has taken steps to market options like vocational rehab to persons who are contemplating or who have applied for SSI/DI in an effort to assist these individuals to return to work.

IV. PREPARING YOUTH WITH DISABILITIES FOR CAREERS THAT USE THEIR FULL POTENTIAL, AND PROVIDING EMPLOYERS WITH A PIPELINE OF SKILLED WORK

Ensuring that employment of people with disabilities (PwDs) is win-win-win for individuals, businesses, and the state takes persistence, talent, training, preparing and devoted resources. There must be an expectation of work first rather than an outdated system of benefit reliance. Today, many youth with disabilities receive accessible education and degrees, yet they never enter the workforce. Is your state systematically and proactively using best practices to change that outcome and help youth with disabilities transition into work and meaningful careers?

From the NGA *A Better Bottom Line* Report: *“Prepare youth with disabilities for careers that use their full potential, providing employers with a pipeline of skilled workers. Governors can send a strong message to state agencies, educators, business, and parents on the importance of starting early to create the expectation that employment and a career is a goal for everyone, including youth with disabilities, and ensure that career readiness begins in kindergarten through 12th grade education and is supported at colleges and universities and as students transition to work. Research shows that early career awareness and work experience for youth are indicators of positive employment.”*

A. PARENTS AND EARLY EDUCATION

1. The state provides accurate and useful tools and resources for expectant mothers where there is a pre-natal diagnosis of disability so they know that resources will be available for their children to prepare for school and future employment. Those materials are given to health-care providers and are available on the web for free. For example see: <http://www.legis.delaware.gov/LIS/LIS147.NSF/2bede841c6272c888025698400433a04/>

[a86e1f5446f4b2ed85257b82006ea24b?OpenDocument&Highlight=0,Syndrome](https://www.ky.gov/kyacedd/a86e1f5446f4b2ed85257b82006ea24b?OpenDocument&Highlight=0,Syndrome) and through KY ACEDD see www.downsyndromediagnosis.org

2. The state provides an early infant and toddler program to all who need it within a reasonable time with an educational component promoting school readiness through pre-language-pre-literacy and numerical skills. The program promotes “Employment First” messages that every person can work and make a difference.

3. The state offers readily available free wrap around services and tools to help parents prepare their children with disabilities for work.

B. SCHOOL TO WORK TRANSITIONS

1. Individual Educational Plans (IEPs) and Individual Learning Plans (ILPs) have an expectation of integrated competitive work as a first-choice option for students with disabilities.

2. The state provides high school degree bound, college, and university students with disabilities with transition services and access to internships, mentorships and work opportunities.

3. The state facilitates and supports performance-based transition apprenticeships for non-degree bound students and young adults (such as Project SEARCH or PROMISE) that offer hands-on career exploration, worksite-based training and support and placement for people with disabilities coming from school to work.

4. High quality (with integrated competitive employment as a goal) resources are readily available to transition-age students and individuals waiting for services and their families to encourage them to choose employment over benefits alone options.

5. If schools have a graduation requirement of community service hours for students, supports are offered and provided to students with disabilities so that they have equal access to integrated community service opportunities.

6. Young people with disabilities (PwDs) are made aware that employment is the first option and made aware of possibilities that would allow them to avoid long-term dependence on Social Security programs (SSI/SSDI), while also having access to the necessary publicly funded systems and supports that enable them to have full and rich adult lives characterized by successful employment.

7. State agencies such as Department of Education, and Vocational Rehabilitation blend and braid funding with formal agreements for performance based programs such as Project SEARCH, or PROMISE as a method of achieving Employment First objectives.

8. The state is confident that it has partnerships and relationships in place to meet the employment needs of all young PwDs transitioning from school to work in any given

year. (For assistance in determining the number of students with PwDs in your state who are transitioning from school to work, go to <http://www.respectabilityusa.org>)

C. STATE COMMITMENT TO ACCOMODATIONS, ACCESSIBILITY, AND TRAINING

Successful employees may have been born with a disability or have acquired disabilities through age, accident, or disease. With reasonable accommodations many can enter and/or remain highly productive in the workforce. Is your state doing what is needed to keep workers with newly acquired or increasing disabilities in the workforce?

1. The state provides assistive and accessible technology training and support to those who need it to get and maintain competitive integrated employment. This program has strong customer service so that PwDs can be employed quickly and appropriately.
2. The state supports the efficient purchase or rental of assistive technologies, services and/or training to ensure competitive integrated employment for PwDs.
3. The state participates in an assistive technology recycling program. (i.e. <http://www2.ed.gov/programs/atsg/at-reuse.html>)
4. The state creates a favorable business environment for the development of innovative assistive technologies to help PwDs succeed in competitive integrated employment.
5. All of the state's American Job Centers are universally accessible: they do not present any physical or virtual barriers for PwDs.
6. State workforce plans identify how Job Centers incorporate veterans' priority of service for veterans with non-service-connected disabilities.
7. Each of these Centers has staff that has been fully trained to work with clients with disabilities so that they can be served in these centers, and not sent to a separate office or operation.
8. The state Vocational Rehabilitation program is fully matched so that wait lists are reduced or the order of selection does not exist.
9. State vocational rehabilitation quickly and appropriately matches the consumer with a rehabilitation counselor working on their job needs and placement.
10. State vocational rehabilitation offers technical assistance to employers so that they may retain workers with disabilities and for workers acquiring new disabilities to enable them to remain in the workforce.

11. The State provides information for medical and healthcare providers to become knowledgeable about the importance of encouraging patients with the onset of disability to stay or return to the workforce as a priority when appropriate.
12. Statewide hiring freezes do not include vocational rehabilitation counselors due to the federal grant that funds a portion of their salary. They are hired if they are needed.
13. In partnership with the Social Security Administration, the state created a Ticket to Work Employment Network model to connect its service systems, improve return-to-work and transition programs, and receives payments from SSA for successful employment outcomes.
14. All Individuals who are eligible for Home and Community Based Services (HCBS) waivers are automatically eligible for employment support under Vocational Rehabilitation Services.

D. SELF-EMPLOYMENT, SMALL BUSINESS OWNERSHIP, AND ENTREPRENEURSHIP

1. The state ensures that Small Business Centers are accessible and staff are trained to include and service small business owners and self-employed PwDs.
2. The state encourages micro-lending and other lending to PwD owned small businesses and start-ups.
3. The state offers readily available and free services and tools for PwDs who are entrepreneurs or self-employed.

V. BEING A MODEL EMPLOYER BY INCREASING THE NUMBER OF PEOPLE WITH DISABILITIES WORKING IN STATE GOVERNMENT

In many states the public sector is the largest employer. However, no matter its size, state government has an important role to play as a successful leader as an inclusive employer and through the state's contracted employers. This serves to address both the practical concern of employing more PwDs and the perception problem, by demonstrating best practices and value added to the employer by fostering an inclusive work environment.

According to the NGA *Better Bottom Line* report, being a model employer by increasing the number of people with disabilities working in state government is vital. *"Governors have a wide range of options for increasing the number of people with disabilities they employ, such as creating a fast-track hiring process for people with disabilities, focusing on retention of these employees, and setting hiring goals. A key action governors can take is to set a state goal for hiring people with disabilities through an executive order and hold agencies accountable for achieving that goal."*

A. STATE EMPLOYMENT OF PEOPLE WITH DISABILITIES

1. There is a Governor's initiative and identified statewide hiring goal in place for PwDs. (i.e. <http://www.governor.wa.gov/office/execorders/documents/13-02.pdf> and <http://www.dol.gov/ofccp/regs/compliance/section503.htm>)
2. There are people who self-identify as PwDs, or who have visible disabilities, in senior leadership roles in the Administration.
3. Inclusion of employees with disabilities is a part of the human resources evaluation of managers in state government.
4. The Administration/state uses the contracting system to promote the hiring, retention and promotion of PwDs by state contractors. This includes having a state version of the Federal Section 503 (see <http://www.dol.gov/ofccp/regs/compliance/section503.htm>) which requires eligible Federal government contractors to have at least 7% of their employees in all job categories be PwDs.
5. The State encourages entrepreneurship by revising the state's disadvantaged business certification program to include businesses owned by PwDs as certified businesses eligible for a state contracting preference.
6. There is a fast track or selective placement hiring system for PwDs within state government so there is a preference hiring system for PwDs.

B. PERFORMANCE GOALS AND METRICS

1. The state has specific measurable annual performance goals for inclusive employment, similar to Executive Order 13548, which requires federal agencies to have performance targets and numerical goals for employment of individuals with disabilities and sub-goals for employment of individuals with targeted disabilities including veterans with disabilities. (Learn more: www.whitehouse.gov/the-press-office/executive-order-increasing-federal-employment-individuals-with-disabilities) There are also requirements under Section 503 of the Rehabilitation Act that require eligible Federal contractors to have at least 7% of their workforces in all job categories be PwDs. (Learn more: www.dol.gov/ofccp/regs/compliance.section503.htm)
2. An official team is responsible for measuring performance metrics against annual benchmarks, has the budget to do so, and reports their results directly to the Governor, key stakeholders, and the public.
3. The state uses an anonymous employee engagement survey to determine if employees with disabilities feel discriminated against, are self-identifying, and are getting the accommodations that they need to succeed in their jobs.

C. ACCESSIBILITY AND ACCOMMODATION

1. The state provides early tailored supports for Administration/State employees experiencing the onset of worsening or challenging conditions (diseases, impairments, disabilities) to enable them to continue in the workforce.
2. The state's internal website (Intranet) is fully accessible (complies with at least Section 508 Standards).
3. The state's external website is fully accessible, including plain language (complies with at least Section 508 Standards) and the state has adopted similar accessibility standards.
4. The state has an accessible document explaining accommodation procedures for applicants, employees and supervisors.
5. The state utilizes accessible electronic record keeping software, databases, communication, and professional development tools.
6. The state has a centralized fund or other resources for accommodations and assistive technology for its employees with disabilities.
7. The state has a process for employees to confidentially self-identify as having a disability.
8. The state has an accessible emergency policy or procedure in place, inclusive of persons with disabilities along with the necessary tools to implement said policy.
9. The state has and disseminates Self-Identification of Disability Forms.
10. The State reviews proposed terminations to ensure reasonable accommodations were properly considered.

D. MARKETING OF EMPLOYMENT, EFFORTS, AND SERVICES

1. There is a statewide written statement of diversity and inclusion, which directly refers to disability that is not an anti-discrimination policy.
2. The state's disability policy, including reasonable accommodation policy, is posted on the state website and is easy for employees and the public to find.
3. The state has an officially recognized disability employee resource group (ERG) or affinity group.
4. The state distributes diversity awareness information, which includes disability, as part of new hire training.

5. The state annually distributes a memorandum to human resource directors providing guidance on effective use of the Self-Identification of Disability Forms during the on-boarding process.

6. The State has developed and implemented an external communication and marketing plans, including social media, career fairs, and job announcements that the state is encouraging qualified applicants with disabilities to apply.

Additional Feedback

We are interested in your comments to better understand your state and the obstacles and barriers to advancing towards a more inclusive workforce.

Appendix A

WIOA Definition of “Competitive Integrated Employment”: (pages 571-573 of Statute)

“(5) COMPETITIVE INTEGRATED EMPLOYMENT.—The term ‘competitive integrated employment’ means work that is performed on a full-time or part-time basis (including self - employment)—

“(A) for which an individual—

“(i) is compensated at a rate that—

“(I)(aa) shall be not less than the higher of the rate specified in section 6(a)(1) of the Fair Labor Standards Act of 1938 (29 U.S.C. 206(a)(1)) or the rate specified in the applicable State or local minimum wage law; and

“(bb) is not less than the customary rate paid by the employer for the same or similar work performed by other employees who are not individuals with disabilities, and who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills; or

“(II) in the case of an individual who is self-employed, yields an income that is comparable to the income received by other individuals who are not individuals with disabilities, and who are self-employed in similar occupations or on similar tasks and who have similar training, experience, and skills; and

“(ii) is eligible for the level of benefits provided to other employees;

“(B) that is at a location where the employee interacts with other persons who are not

individuals with disabilities (not including supervisory personnel or individuals who are providing services to such employee) to the same extent that individuals who are not individuals with disabilities and who are in comparable positions interact with other persons; and
“(C) that, as appropriate, presents opportunities for advancement that are similar to those for other employees who are not individuals with disabilities and who have similar positions.”

WIOA - “training and services for employers” section(<https://www.congress.gov/bill/113th-congress/house-bill/803/text>)

SEC. 418. TRAINING AND SERVICES FOR EMPLOYERS.

Section 109 (29 U.S.C. 728a) is amended to read as follows:

“SEC. 109. TRAINING AND SERVICES FOR EMPLOYERS.

“A State may expend payments received under section 111 to educate and provide services to employers who have hired or are interested in hiring individuals with disabilities under programs carried out under this title, including--

“(1) providing training and technical assistance to employers regarding the employment of individuals with disabilities, including disability awareness, and the requirements of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) and other employment-related laws;

“(2) working with employers to--

“(A) provide opportunities for work-based learning experiences (including internships, short-term employment, apprenticeships, and fellowships), and opportunities for pre- employment transition services;

“(B) recruit qualified applicants who are individuals with disabilities;

“(C) train employees who are individuals with disabilities; and

“(D) promote awareness of disability-related obstacles to continued employment;

“(3) providing consultation, technical assistance, and support to employers on workplace accommodations, assistive technology, and facilities and workplace access through collaboration with community partners and employers, across States and nationally, to enable the employers to recruit, job match, hire, and retain qualified individuals with disabilities who are recipients of vocational rehabilitation services under this title, or who are applicants for such services; and

“(4) assisting employers with utilizing available financial support for hiring or accommodating individuals with disabilities.”

Appendix B

While the ADA and IDEA are necessary and vital laws, they are not sufficient to provide the opportunity outcomes needed by Americans with disabilities. As women and minorities have been able to make significant strides in joining the workforce, the gap in workforce participation between those with and without disabilities, as seen in the adjoining chart, has increased dramatically, as shown below. The increase in workforce participation in 1981 was 45.2%. In 2013 it had only risen to 57.1% -- only a roughly 12% increase in 32 years. Source for chart is the Disabilities Compendium.

