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Feb. 16, 2016

RespectAbility – Public Comments – South Dakota Unified State Plan

“WHEREAS, the State of North Carolina encourages people with disabilities to maximize their potential through employment; and ...

WHEREAS, the State of North Carolina recognizes the potential of individuals with disabilities and promotes their full integration into the workforce and community”

– [Governor Pat McCrory, Disability Employment Awareness Month, October, 2015.](#)

Introduction:

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

While North Carolina has made strides under the leadership of Governor Pat McCrory, the Old North State must do better in terms of competitive, integrated employment for people with disabilities. Only 30.36% of the 658,900 working age North Carolinians with disabilities are employed. Further, there are over 36,600 youth with disabilities and each year a quarter of them will age out of school into an uncertain future. As the labor force in North Carolina is starting to experience talent shortages, North Carolinians with disabilities can offer valued and needed talent that can help grow North Carolina’s economy overall. **As such, North Carolina needs to look at innovative ways to close the 43 percentage point gap in the labor force participation rates (LFPR) of people with and without disabilities.**

However, thanks to WIOA, North Carolina opportunity to do exactly that and to improve outcomes in terms of competitive, integrated employment for people with disabilities. North Carolina has much to learn from other states that have worked hard to achieve improved employment outcomes. Other states have higher than 50% employment rates for their citizens with disabilities. [States like the Dakotas, Alaska, and Wyoming have achieved increase results by putting best practices into places.](#) The experience of these states shows ways that North Carolina can dramatically improve their outcomes. **Likewise, we are also seeing pockets of excellence around innovative youth programs designed to address disability employment in Georgia, Nevada, and Kentucky.**

To help the states succeed in this process we developed a resource called the [Disability Employment First Planning Tool.](#) This document details best practices and effective models. This toolkit contains models that are proven to work, be cost effective to implement, and be successful. [We have developed an extensive collection of data on disability and employment in North Carolina.](#) That information is also attached to our comments.

Many of the critical issues that we raise in our comments concern the need for a disability lens on the overall work of North Carolina workforce system and the need to better align programs.

1. PERFORMANCE METRICS: Ensure that the great data included in North Carolina’s Unified State Plan are used as performance metrics moving forward:

As we expressed in our introduction, North Carolina can and must do better in terms of jobs for people with disabilities. The state ranks 39th in country in terms of the employment rate of people with disabilities and it ranks 35th when you look in terms of the gap in labor force participation rate between those with and without disabilities. What gets measured gets done – and you are not currently measuring the most important performance metric.

It is vital that the workforce system and the State Board include the labor force participation rates of people with disabilities on their state dashboards and performance metrics. Looking at unemployment information or job placements alone is not enough. Decision makers are missing the bigger picture of those individuals with barriers to employment who are not actively seeking work. **As an example of the data that is needed, we are including a link to, and a copy of, the presentation our organization has compiled about employment for North Carolinians with disabilities.**

There is a 43 point gap in the Labor Force Participation Rates between people with and without disabilities in North Carolina. This gap has critical implications for the WIOA work being done in your state. **Not only does this data need to be included directly in the Workforce Analysis sections of the State Plan, but such data also needs to propel the design of your performance metrics.**

The level of detail and attention to data given to people with disabilities in the current draft of North Carolina’s Unified State Plan is inconsistent and could result in too many people being ignored by the workforce system. As such, we have several recommendations on improving the alignment of data and ensure the workforce system is better tracking people with disabilities.

On page 5, in the section on “Labor Market Trends”, the State Plan discusses the overall “labor force participation trends” seen in the state’s economy. While the discussion goes on to talk about the impact of an aging population creating gaps in the workforce and the priority given to education by many youth, this section indicates that clear data on labor force participation rates is readily available to the workforce system.

In the “Economic and Workforce Analysis” section, the State Plan discusses the size, educational attainment, and labor participation of the disability community in North Carolina. However, the structure and data points included in this section do not provide the clarity needed for the workforce system to adequately plan to serve this population. Our reasons for saying this are as follows.

First, there references made to the U.S. Census Bureau’s American Community Survey and its disability information is not structured in a way to inform the efforts of the workforce system in North Carolina. Specifically, on page 4, the State Plan reports that there are “over 1.1 million noninstitutionalized individuals in North Carolina aged 16 and over with a disability.” While this data point shows the scope of the challenge of disability, it does not define the challenge in such a way that the workforce system can create solutions. **As such, we recommend that the State Plan be revised to reflect the different age groups that comprise this number. Instead of this single data point, this section need to distinguish between youth with disabilities between the ages of 16 and 20, working age people with disabilities between ages 21 and 64, and lastly aging American with disabilities over the age of 65.**

As we reported in the introduction to our public comments, there are 36,600 youth with disabilities living in North Carolina. Next, this section needs to include a discrete data point about the 658,900 working age North Carolinians with disabilities. Once these two sub-population have been identified, this section of the State Plan can report the number of North Carolinians with disabilities over age 65, many of whom no longer want to be in the workforce and acquired their disabilities as they aged.

We make this recommendation to ensure that North Carolina has a clear view of the challenge. Given the priority of resources and services for youth in WIOA, North Carolina needs to look at expanding school to work transition programs and align systems to channel these youth into the workforce. The system needs to know how many youth with disabilities are leaving the school system in order to ensure they don't end up spending their lifetimes trapped by the benefits system.

We commend the current draft of the Unified State Plan for including details regarding level of educational attainment for people with disabilities in North Carolina. We are glad to see that this topic is discussed in the State Plan. However, we hope that it will not distract from looking more closely at the labor force participation of people with disabilities.

Looking at unemployment information in isolation causes decision makers to miss the bigger picture of those individuals with barriers to employment who are not actively seeking work. Additionally, while it is important to see when and if a person who approaches the workforce system gets a job, it is even better when systems can be created that enable people to get jobs and careers on their own **There is a 43-point gap in the Labor Force Participation Rates between people with and without disabilities in North Carolina. Pushing hard to close this gap will require focused energy and effort.** We have more to say on how this should be done later in our comments.

Additionally, while North Carolina may only rank 39th in the nation in terms of the employment rate for people with disabilities, it is highly illustrative to look at the experience of those with disabilities who are succeeding in the world of work. **From the data, we find that only 31.8% of the 41,600 North Carolinians who are blind or have vision loss are employed while 47.9% of the 63,100 with hearing differences are also employed. Sadly, we also see that only 22.3% of North Carolinians with intellectual or developmental disabilities are employed.** For this demographic, workforce solutions may take more time and resources. **However, there will be a considerable return on investment if North Carolina's workforce system expands successful school to work transition programs.** North Carolina already has several such programs but there is a considerable need to expand the number, scope, and diversity of such sites. We have more to say on this point later in our public comments.

Busting stigmas, myths, and misconceptions must be a key part of North Carolina's overall workforce strategy: Low expectations and misconceptions are critical barriers to employment for people with disabilities. [A Princeton study shows that while people with disabilities are seen as warm, they are not seen as competent.](#) Similarly, [a study published by Cornell Hospitality Quarterly found that companies share a concern that people with disabilities cannot adequately do the work required of their employees.](#)

As such, we were pleased to see the discussion on page 306 in the DVR section of the State Plan regarding "Negative perceptions towards people with disabilities." The feedback form VR staff reflects one of the greatest challenges affecting their work. As reported in the State Plan

“public and employer perceptions of individuals with disabilities were a major barrier” and that “VR consumers with an obvious disability who can’t get past human resources.” These anecdotes reflect the empirical research and on the bottom of page 306, DVR recommends a solution. Extending to page 307, DVR talks about the need for “Having an outreach plan...for employers and the community,” “Marketing VR to employers” through old and new means such as “social media”, and “Increasing outreach capacity through counselors and business relations representatives.” These are all critical steps and the State Plan is stronger for their inclusion. However, the truths discussed here need not be confined to DVR and need to inform the efforts of the overall workforce system.

There is a need for a sustained, comprehensive, proactive communications/public relations strategy for reducing the stigmas and barriers identified by DVR. We recommend that North Carolina’s Unified State Plan should be amended to include a comprehensive public relations campaign that educates public and employers about people with disabilities and communicate to people the benefits of hiring those with disabilities. Indeed, we know that other groups of North Carolinians with barriers to work also face stigmas, especially those leaving the corrections system.

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

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

- A. CEOs/business leaders need to understand the value proposition/business case for their specific company as to why they should focus on putting people with disabilities into their talent pipelines.** This is best done through business-to-business success stories. Those businesses need to share their success stories and to talk about how people with disabilities can be extremely capable and loyal workers. While there are few Stephen Hawkings — with or without disabilities — people with disabilities can work highly successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and be super talents in developing computer software and engineering solutions. CEOs and business leaders need to know that people with disabilities can be the BEST people to get a job done. [You already have a Business Leadership Network in North Carolina that can and should play a leadership role in this](#). Further, General Dynamics and Sodexo have both been making serious efforts around inclusive hiring.
- B. Human resources professionals and on-the-ground supervisors need to understand that hiring people with disabilities is generally easy and inexpensive, and that any**

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

- C. People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectations must begin. North Carolina's efforts need to be supported by a PR campaign that will inspire North Carolinians with disabilities to reach for the stars.** For example, Virgin Airways founder Sir [Richard Branson](#) and finance wizard [Charles Schwab](#) are dyslexic. Scientist Stephen Hawking and multi-billionaire businessman Sheldon Adelson, like Gov. Greg Abbott of Texas and President Franklin D. Roosevelt before them, are wheelchair/mobility device users. The CEO of Wynn Casinos, Steve Wynn, is legally blind. Arthur Young, co-founder of the giant EY (formerly Ernst & Young) was deaf. Success sells success and that is something the workforce system should seriously utilize in an intentional manner moving forward.

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

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

As required by WIOA Sec. 102(b)(1)(A), North Carolina's state plan must and does include a detailed analysis of the economic sectors of the state economy that are growing and are forecasted to grow in the future. The success of WIOA depends on being an employer driven paradigm shift. Expanding opportunities for people with barriers to employment such as disability requires strong partnerships with employers in those sectors which are rapidly expanding.

In terms of prospective employment needs, we suggest focusing on the economic forecasts and projected field growth listed in Table X on page 10. This chart, which shows North Carolina's Emerging/Long-Term In-Demand Industries, offers a great starting point for improving outcomes. Specifically, it is important to train and prepare North Carolinians with disabilities to pursue careers in the fields listed, as they are most likely to grow in the immediate future and will likely have the greatest chance at success. This can be accomplished by developing sector specific strategies. The sectors of Healthcare & social assistance, accommodation & food service, Scientific and Technical Services, and retail trade are job sectors where people with disabilities can excel and benefit their employer's bottom line. People with disabilities represent an untapped labor resource that, with the right training and supports, can meet the diverse talent needs of North Carolina's growing job sectors. The jobs gains in these sectors offer a great opportunity for focused sector strategies sustain and build on employment outcomes being achieved among people with disabilities in North Carolina.

A. Health and Elder Care:

The State Plan projects extensive job growth in the fields of "Health Care & Social Assistance." This sector is projected to have a 31% increase in growth with a projected 166,543 jobs added by 2022, the largest projected increase of any sector in North Carolina. **People with disabilities can and should be part of the solution to this critical demand in the labor market.** To quote [a 2014 report from the Office of Disability Employment Policy \(ODEP\)](#), "[people with disabilities] not only represent an untapped talent pool, but also offer significant value and insight" in the field of healthcare. It is important for healthcare institutions to reflect their customers, and people with disabilities interface more with the healthcare system. There are [numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living](#). **Employers working in health and elder care can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities.**

While it is briefly mentioned on page 256, we suggest that North Carolina indeed continue with increasing the number of Project Search sites as they have done in Wisconsin, Florida and other states. Nationally, each year approximately 2,700 such young people, spread out in 45 states, do a nine month, school-to-work program that takes place entirely at the workplace. This innovative, business-led model features total workplace immersion, which facilitates a seamless combination of classroom instruction, career exploration, and worksite-based training and support. Nationally, Project Search sites overall have been achieving outstanding results for people with disabilities, employers, and taxpayers alike. For example, [the first longitudinal study of the program found "a 68% success rate in transitioning students from high school into competitive employment" and "Project SEARCH sites in Upstate New York that have an impressive 83% success rate overall."](#) The goal for each program participant is competitive employment. We suggest that you look to follow the example set by the state of Wisconsin where they started with three Project Search sites and are expanding to 27. The experiences of the dedicated state officials, VR counselors, workforce professionals, and special educators who have increased Wisconsin's Project Search programs offer profound insights in the steps necessary to make rapid expansion a reality. Thinking long-term, investments in Project Search and other such programs will save big money for taxpayers while also strengthening the talent pool for employers.

B. Science, Tech, Engineering and Mathematics (STEM) and The Autism Advantage:

Exciting opportunities for improving employment outcomes for people with disabilities lay in the fields related to STEM jobs. As the State Plan shows in Table X on page 10, the sectors projected to grow; many require high levels of one or more STEM (Science, Technology, Engineering and Math) fields.

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

Delaware’s Governor Jack Markell is partnering with companies to employ more people on the Autism spectrum in STEM jobs. Such examples need to be implemented by North Carolina as well. This issue of STEM and access for student with disabilities is a natural point of partnership between the workforce system and the educational system. That work needs to start young, be matched with high expectations for success, and designed to ensure people with disabilities have the chance to become future scientists, engineers, doctors and mathematicians. **Ensuring the Accessibility of Science, Technology, Engineering and Mathematics (STEM) Programs and Careers for People with Disabilities, especially Students with IEPs, is vital.** As Carol Glazer of the National Organization on Disabilities wrote in *Huffington Post*, “[America is already lagging when it comes to STEM-skilled workers. The U.S. will have more than 1.2 million job openings in STEM fields by 2018.](#)” Governors in other states have looked at STEM needs and begun to develop solutions. For example, [in New York State Governor Cuomo has ensured that magnet schools for STEM are located near IBM, a major STEM employer in their state.](#) North Carolina should follow this model. Together, North Carolina’s workforce system and educational system can look to supported-employment programs such as Project Search, Specialisterne, and [the Marriot Foundation's Bridges to Work Program](#) as models for developing a systematic approach to providing the supports necessary for our students on the autism spectrum to excel in STEM. The Research Triangle Park, with UNC, NC State and Duke, and some magnet high school programs for STEM offer ground ripe for success.

C. High Turnover Jobs: Hospitality/Accommodations, Food Service, Retail Trade:

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

A great example of an employment sector where employees with disabilities can be tremendously successful is the hospitality industry. Accommodations and food service are extremely high turnover jobs and numerous studies show that people with disabilities can be outstanding in those fields and have significantly higher employer loyalty. An outstanding example of the type of work needed is found in Missouri. As part of the Poses Family Foundation’s Workplace Initiative, a coalition of employment service providers has

launched a successful training and placement program with the hospitality sector in St. Louis. This training runs for up to 12 weeks, and takes place on site at the hotel; all participants are paid by the hotel for the duration of training. Since the summer of 2015, two cohorts of trainees have completed training at the Hyatt Regency. Trainees have gone on to permanent employment at the Hyatt and other hotel partners in a range of departments—culinary; auditing; and customer service. This type of training and Poses’ Workplace Initiative could easily be part of your overall Sector Strategies. Likewise, in other states, [hotels and other hospitality employers have found Project SEARCH to be an amazing source of talent](#). [The work done by Embassy Suites and David Scott](#) in Omaha, Nebraska offers [valuable lessons that can enable North Carolina to improve employment outcomes for people with disabilities](#). North Carolina’s state Board, along with other components of the workforce system, should connect with employers in the hospitality sector to begin figuring out how to benefit from these models.

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

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

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

As such, adopting affirmative actions to hire people with disabilities could be a solution to this coming challenge. Other states have adopted such steps as an opportunity measure in their state hiring policies. This was first discussed in Governor Markell’s *Better Bottom Line* Initiative and later in RespectAbility’s *Disability Employment First Planning* Toolkit. In Governor Markell’s own words, “[One key action is to set a state goal for hiring people with disabilities through an executive order and hold agencies accountable for achieving that goal.](#)”

North Carolina should explore the feasibility of Affirmative Action hiring of people with disabilities for jobs in state government plus expanding state contracting obligations similar to the model we see in Section 503 for Federal contractors. [Governor Inslee in Washington State](#) and [Governor Dayton in Minnesota](#) have been working to implement such measures for people with disabilities through executive orders. [Likewise, we are also seeing great success with governmental hiring of people with disabilities at the local level in Montgomery County Maryland.](#) The untapped potential of North Carolinians with disabilities is such that a full-spectrum, all-of-the-above-and-more approach is needed. While our priority is on seeing the talents of people with disabilities

channeled into the private sector, employment opportunities in the public sectors shouldn't be overlooked as part of the state's overall workforce strategy.

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

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

As such we are disappointed to see the only limited attention given to one of the most important assets that North Carolina has in terms of making the business case for hiring people with disabilities. [The North Carolina Business Leadership Network is an affiliate chapter of the national BLN and we are disappointed to see that it is not yet at the WIOA table.](#) To quote the affiliate chapter's Mission Statement, the NC BLN exists to the "support the business community with information and resources to: source, hire and promote people with disabilities; to do business with organizations owned and operated by people with disabilities; and to market their products and services in an accessible manner to people with disabilities, across the State of North Carolina."

The State Plan obliquely discusses the NC BLN in Strategy 1.1, Objective 1.3.2, in Goal 1.3 on page 356. This strategy commits DVR staff to "expanding participation in forums to include US and NC Business Leadership Networks" among other steps. We are glad to see this commitment; however we would like to see it extended to other elements of the workforce system. A state BLN is one of most important building blocks needed for improve outcomes. As such, we hope that the workforce system will increasingly engage the BLN by bringing together inclusive employers whose bottom lines have benefits from employees with disabilities.

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

North Carolina's State Plan fails mention important rules surrounding the Rehabilitation Act of 1973. Besides the mention of consultation on Section 503 compliance by the DVRS, the State Plan lacks any references to the employment opportunities and talent challenges created by the recently implemented Section 503 regulations regarding federal contractors and subcontractors. North Carolina's plan does not discuss at all the new 7% utilization goal set for companies to recruit, hire, and retain qualified individuals with disabilities in all job categories.

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

5. Ensure that the Assurances in Your WIOA Checklist are matched up to a strategy to fully implement them and be successful:

The Common Assurances required of the entire workforce system and the program specific Assurances outlined in the State Plan are critical factors in the overall implementation and ultimate success of WIOA. As such, it is critical that each assurance is matched up with a strategy fitted to meeting and, if possible, exceeding the requirements of the law.

As a good example of the level of detail needed here, consider WIOA Section 188. The anti-discriminatory rules originally outlined under WIA need to be updated to reflect the steps needed towards making universal access a reality. On this particular point and Common Assurance #7 listed on page 161 of the State Plan, we would direct North Carolina to consider the resources made available from the Office of Disability Employment Policy (ODEP.) [They have recently released a guide that digs deep into what universal accessibility will mean for the workforce system.](#) Further, Common Assurance #10 affirms North Carolina's satisfaction of the requirement that "one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990." However, merely meeting legal requirements should not be the end of this process. Indeed, looking at physical and programmatic accessibility can be an opportunity to invest in a more proactive workforce system very actively committed to collaboration and partnerships.

However, if there is no plan that specific identifies how the state is going to get to the commitment made in the assurance; the state is facing a serious problem. As such, we hope that the Assurances made on pages 161, 181, 196, and 234 are matched with a strategy focused on improving the competitive, integrated employment outcomes of North Carolinians with disabilities.

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

Public policy is about the allocation of scarce resources to meet infinite needs. It is vital to invest resources on those points where they can have the greatest effect. **One challenge that we have seen in many states WIOA plan has been the prioritization of expensive bricks and mortar One-Stops as the primary access point for programs and services under WIOA.** Focusing exhaustively on One-Stop Centers, physical infrastructure, and co-locating services comes at the opportunity cost of losing the chance to improve supports and increase outcomes. North Carolina's focus on this aspect, as well as its decision to create further training and informational services could be detrimental to the allocation of its budget, as many other resources which aid people with disabilities already exist.

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

7. Ensure that North Carolina benefits from having a “Jackie Robinson Strategy”:

It is mentioned on page 342 of the plan that the state government does not have, and does not plan to implement any sort of order of selection. Despite this, North Carolina should be careful with their listed priority of increasing the number and proportion of individuals with significant or most significant disabilities exiting the VR program in employment after services. While it is important for these individual to become employed, if they are not the right match for the employer, it will only undermine their long term goals.

We recommend using a “Jackie Robinson Strategy” to make sure that the right talent gets into the right positions so it is a beneficial opportunity for workers and employers alike. As the first African-American to play major league baseball, Robinson reduced extensive amounts of discrimination and led the way for other talented and diverse athletes to follow. He was the talent that his employer needed, and contributed to the bottom line. Employers should adopt the same strategy with potential employees.

Stigma and misconceptions still exist for people with disabilities in North Carolina, so a probable way to best go about implementing this strategy would be to try getting those with less significant disabilities and/or more significant abilities (which can be someone with significant disabilities such as Stephen Hawking) hired first. Once employers understand accommodations and how to maximize the use of talent, they will be more willing to hire those with more significant disabilities.

8. Transportation is a critical barrier to employment for many North Carolinians, especially those with disabilities:

Public Transportation and accessibility to methods of transportation for people with disabilities is an issue that needs to be prioritized in North Carolina’s state plan. As stated on page 304, 45.6% of VR staff identified transportation as the most critical need for people with disabilities. North Carolina’s lack of depth in public transportation in cities and the absence of it in rural areas is a massive barrier to employment for people with disabilities. This should be one of North Carolina’s top priorities in its state plan. Many people with disabilities do not drive. Others cannot afford private transportation. It is vital to work with public transportation to ensure that there are transportation routes to places where there are work opportunities. In places where that are not possible, North Carolina could look at partnering with UBER, Lyft, and other new transportation solutions. People with disabilities who drive can also provide a way to enter into the workforce with flexible hours.

Public sector employers and federal contractors who have 503 obligations are key places for apprenticeships and internships and onboarding of talent. It is important for them to play a key role in planning for public transportation. This priority would not only benefit those with disabilities, but also to the large amount of migrant workers in rural communities, as they commonly do not possess reliable forms of transportation.

9. Nothing About Us, Without Us:

“Nothing About Us without Us” has long been a rallying cry for the one in five American who have a disability and it has implications for the workforce system. Even a non-voting member of a WIB can bring critical perspectives that improve the WIB’s efforts. As such we recommend that your state plan look at adopting language which would include the placement of a representative from the disability community and a representative of

your state’s VR system on your State Board. Second, the State Plan could also direct local workforce boards to connect with local community organizations to recruit self-advocates to add their perspectives.

10. Aging Workers with Acquired Disabilities Not Addressed

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

11. Expand More on Disability Issues of People Involved in the Corrections System:

While it is very good that North Carolina has made this issue one of its goals in their state plan, it is imperative that more resources and data are contributed in order to further address this problem, as it is a massive barrier to employment for many trying to enter the workforce. There are various instances where the North Carolina’s state plan addresses the unique challenges facing ex-offenders as they attempt to reenter society and the workforce. For example, page 69 discusses the “Former Offenders Initiative”, so it is evident that the state government is taking strides to further combat this issue. Despite this, there is not enough clarity in the state plan about how they are going to address helping people with disabilities and a criminal background reach employment. [According to recently published data from the Bureau of Justice Statistics, “An estimated 32% of prisoners and 40% of jail inmates reported having at least one disability.”](#)

This issue is a serious one and it needs to be addressed at the state level. Frequently people are involved in the criminal justice system because they have disability issues, including learning differences, ADHD, executive function, and mental health issues that went undiagnosed and/or unaddressed through childhood and into adulthood. Judging by the lack of data regarding this topic, it is critical the North Carolina gather more statistics to determine just how many former offenders have disabilities. This is an issue that must be prioritized higher, as roughly a third of the former offender demographic have extensive difficulty finding work.

12. Additional Feedback on the challenges and opportunities in North Carolina:

For all of the issues raised by our comments, on balance, North Carolina has many of the ingredients for success that are needed in order to improve employment outcomes for the state’s citizens with disabilities. We are impressed with the level of attention given to the activities of the state’s Vocational Rehabilitation system and the scope of work being done by North Carolina’s Workforce Development Programs. The Plan as written will do much to make individuals with disabilities a key factor considered in the workforce system’s planning.

However, no plan is perfect and as such, there are several additional issues that we wish to address in our public comments. These issues reflect opportunities identified by colleagues of our working at the state level in North Carolina and are very much worth repeating.

- While we discussed the disability community in North Carolina as a whole, we would also encourage the workforce system to seriously consider the differences within the community itself. Disability is a diversity experience and the workforce needs of people with intellectual or developmental disabilities (I/DD) are very different from people on the Autism spectrum. We feel that an aggressive expansion plan for Project Search would do well to offer people with I/DD a pathway to independence and employment. However, the workforce system also needs to plan for those with mental health and substance abuse issues receive much more attention in the plan. Specific unified plans for the individuals with I/DD should be addressed and not just mentioned in the VR section. The NC Council on Developmental Disabilities can help develop these plans.
- Other states have used WIOA as a platform for addressing the implementation of Employment First Policies. For example, New York's state plan details several critical steps and partnerships as does Pennsylvania's state plan. [We hope that North Carolina, from the Governor's Office on down to the local WIBs, will look at the experiences of the over 30 other states who have committed to Employment First policies and practices.](#) **Employment First should become the accepted policy that drives unified funding and practices to increase employment and careers for individuals with disabilities in North Carolina. The NC ODEP initiative should be used to help establish Employment First policies.**
- While our comments are very much focused on the employer side barriers to employment such as stigma and misconceptions, it is also important that North Carolina look at the barriers created by the benefits system itself. This is especially important when doing transition planning for youth with disabilities who might be eligible for SSI or aging workers who might ultimately receive SSDI. These benefits often impede individuals to seek full time employment and cause employers to consider candidates who do not have benefit restrictions. No plans to address this issue are apparent in the plan although NC has benefit counselors that assist individuals. Far too often the experience in other states is that the role of benefit counselors is to maximize benefits effectively undercutting people's ability to use benefits to promote independence and self-sufficiency. **New training of benefit counselors to change the expectations and use of benefits as a bridge toward independence should be incorporated in the WIOA plan.**
- Several sections of the Unified State Plan talks about having a "Dual Customer Approach", especially in the sections dealing with DVR. This is important work, recognizing both the needs of VR consumers and outreach to employers. As such, we have a two-sided recommendation that could enhance the work accomplished on both counts. The workforce system is a complex undertaking with multiple programs and different pathways to receive training and enter the workforce. **As such, would it be possible to include an organizational chart be drawn from the perspective of an individual with a disability seeking services?** For example, the organizational chart on 130 could be amended to include a logic chart showing how a job seeker with a disability will interface with North Carolina's workforce system and received needs skills training. Further,

another chart could be developed from the employer perspective regarding how training programs can meet their talent needs.

- **Implementation of the Plan**, if it is to fully provide employment and careers for individuals with disabilities, requires a specific unified executive focus on the plans and outcomes for this population at both the state and local levels. **While the assessment and continuous improvement of the WIOA Plan is clearly the responsibility of the NC Works Commission through a WIOA Steering Council, this agency could also explore the possibility of creating an advisory inter-agency Employment First Executive Policy Team. This team would meet regularly and focus on policy and practices that would significantly improve the employment participation rate of individuals with disabilities in North Carolina. Local Workforce Development Board should also consider establishing an advisory committee to provide input to and assessment of the plans for inclusion of individuals with disabilities into the competitive, integrated workforce.**
- The current draft of North Carolina's Unified State Plan is a very comprehensive and detailed report on the state's myriad of workforce programs and services. It clocks in at 400 pages! It is a clear illustration of the need for unification and collaboration. The system is extremely difficult to understand and navigate both from a potential employee's perspective and from an employer's perspective. It would be helpful to provide an "executive" overview of the current system and key elements of the plan at the beginning of the document.
- The **core participant's priorities, goals, and objectives** in the WIOA Plan do not appear to fully align. **It would be helpful if there were specific, aligned objectives in each agency's plan that address employment and careers for individuals with disabilities. This should result in a truly unified approach to address this population.**
- The foundation for employment and careers for individuals with disabilities is built in their elementary and secondary school experience – often in the **Exceptional Children's programs within DPI**. Historically, there have been low expectations and planning to prepare these individuals for employment and careers, including those in the Occupational Course of Study. Transition expectations are softened to expect transition to "adulthood". Expectations of individuals, parents and teachers need to be elevated to promote independence, productivity, and choice through employment and careers. **Since this is the foundation for inclusion in the future workforce, does the WIOA Plan specifically address how these expectations will be changed? This is probably the most significant change that can occur for full inclusion of individuals with disabilities in the state's economic development and workforce. How will this cultural change occur?**

Conclusion:

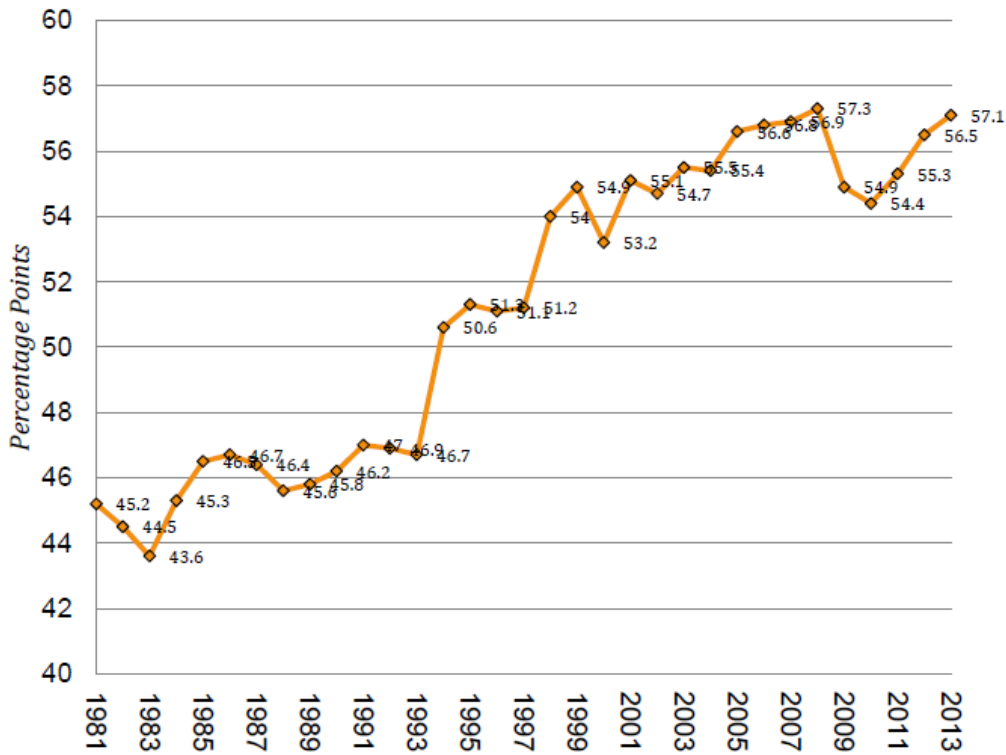
As we stated at the beginning of our Public Comments, North Carolina has the opportunity to do much better on jobs for people with disabilities. From the language of the Unified State Plan, there is a lot of innovative and dedicated work being done on workforce development in North Carolina. Thanks to WIOA, North Carolina has an opportunity to invest resources in successful models and implement best practices to expand job opportunities for people with disabilities. We remain concerned with the lack of detail and coordination we have

found in certain sections of North Carolina state plan. However, there is some good as well. Our public comments are focus on several critical factors that can help North Carolina to significantly improve outcomes and we hope see them implemented soon.

The bottom line is that expanding job opportunities for people with disabilities is win-win-win for employers, taxpayers and people with disabilities alike. It is good for employers because the loyalty, talent, and skills of workers with disabilities contribute to the employers' bottom line. It is good for the workforce system because improving services and supports for job seeker with disabilities will benefit others with different barriers to employment. It is good for people with disabilities who want the dignity, pride, friendships, independence and income that work provides. We are happy to answer any questions you have and to help in any way.

We have included a chart below which looks at the gap in workforce participation between those with and without disabilities nationally over time. As seen in the chart, as women and minorities have been able to make significant strides in joining the workforce, people with disabilities have not. We know that by maximizing the potential of North Carolina's WIOA plan, all of this can continue to change for the better for the people of North Carolina.

Chart 1 – The gap nationally in workforce participation rates between people with disabilities and their non-disabled peers.



Source for chart is the Disabilities Compendium.

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

Table 1 Ranking 50 States by Employment Rates and Employment Gap

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

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

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

Column 1 Ranking of States by Employment Rate of People with Disabilities			Column 2 Ranking of States by the Employment Gap between People with disabilities and people without disabilities				
#	State	% of PWDs Employed	#	State	% of PWDs Employed	% of People without Disabilities Employed	Employment Gap as a %
1	South Dakota	50.1	1	North Dakota	49.9	82.0	32.1
2	North Dakota	49.9	2	Nevada	40.9	74.3	33.4
3	Iowa	46.5	3	Utah	44.0	77.4	33.5
4	Nebraska	46.0	4	South Dakota	50.1	83.7	33.6
5	Wyoming	45.2	5	Hawaii	42.4	76.6	34.2
6	Minnesota	44.4	6	Alaska	40.8	76.0	35.3
7	Utah	44.0	7	Iowa	46.5	82.2	35.7
8	Hawaii	42.4	8	Wyoming	45.2	81.0	35.9
9	Colorado	41.6	9	Idaho	38.8	75.7	37.0
10	Nevada	40.9	10	Montana	44.4	82.9	38.5
11	Alaska	40.8	11	New Jersey	39.2	76.5	37.3
12	Montana	40.5	12	Texas	38.0	75.3	37.3
13	Connecticut	40.2	13	Colorado	41.6	79.1	37.4
14	New Hampshire	40.0	14	Connecticut	40.2	77.9	37.7

15	Kansas	39.8	15	Nebraska	46.0	83.9	37.9
16	Wisconsin	39.8	16	Washington	37.7	76.0	38.3
17	New Jersey	39.2	17	Minnesota	44.4	82.9	38.5
18	Maryland	39.1	18	Oregon	36.4	74.9	38.5
19	Idaho	38.8	19	California	33.3	72.2	38.9
20	Texas	38.0	20	Maryland	39.1	78.2	39.1
21	Washington	37.7	21	Oklahoma	36.4	75.6	39.2
22	Virginia	37.6	22	Arizona	32.8	72.5	39.7
23	Oklahoma	36.4	23	Kansas	39.8	79.7	39.9
24	Oregon	36.4	24	Illinois	35.7	75.7	40.0
25	Indiana	36.2	25	Virginia	37.6	77.6	40.0
26	Vermont	36.2	26	Louisiana	32.1	72.4	40.3
27	Illinois	35.7	27	New York	33.6	74.0	40.4
28	Delaware	35.6	28	Delaware	35.6	76.3	40.7
29	Massachusetts	35.5	29	Indiana	36.2	77.0	40.7
30	Ohio	34.6	30	New Mexico	30.4	71.2	40.8
31	Pennsylvania	34.5	31	New Hampshire	40.0	81.3	41.3
32	Rhode Island	33.9	32	Wisconsin	39.8	81.1	41.4
33	New York	33.6	33	Pennsylvania	34.5	76.5	42.0
34	California	33.3	34	Ohio	34.6	77.0	42.5
35	Arizona	32.8	35	North Carolina	31.3	74.3	43.0
36	Missouri	32.8	36	Mississippi	27.4	70.4	43.1
37	Maine	32.5	37	Florida	30.1	73.4	43.3
38	Louisiana	32.1	38	Georgia	29.6	73.1	43.5
39	North Carolina	31.3	39	Massachusetts	35.5	79.0	43.5
40	New Mexico	30.4	40	Rhode Island	33.9	77.7	43.8

41	Florida	30.1	41	Alabama	27.3	71.3	44.1
42	Tennessee	29.9	42	Vermont	36.2	80.4	44.2
43	Georgia	29.6	43	Missouri	32.8	77.2	44.4
44	Michigan	29.6	44	Tennessee	29.9	74.4	44.5
45	Arkansas	29.2	45	Arizona	32.8	72.5	39.7
46	South Carolina	29.0	46	West Virginia	25.6	70.5	44.9
47	Mississippi	27.4	47	Michigan	29.6	74.6	45.0
48	Kentucky	27.3	48	South Carolina	29.0	74.0	45.0
49	Alabama	27.2	49	Kentucky	27.3	74.4	47.1
50	West Virginia	25.6	50	Maine	32.5	79.9	47.4

Table 2

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

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

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

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

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

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

State	2012			2013			Change in Gap		Pop in 2013			Increase in Dis. Emp.	Increase in Non-PWD Emp.
	Dis.	No Dis.	Gap	Dis.	No Dis.	Gap	Pct. Points	Rank	Number	Rank	Size		
AK	39.0	76.3	37.3	47.8	75.2	27.4	-9.9	50	459,776	47	Working-age pop. under 1 million	8.8	-1.1
RI	28.7	77.0	48.3	34.3	76.3	42.0	-6.3	49	668,448	43	Working-age pop. under 1 million	5.6	-0.7
WY	43.9	78.5	34.6	50.7	79.4	28.7	-5.9	48	358,526	50	Working-age pop. under 1 million	6.8	0.9
NH	37.9	80.5	42.6	41.8	80.3	38.5	-4.1	47	842,880	40	Working-age pop. under 1 million	3.9	-0.2
MN	42.1	81.6	39.6	46.0	82.1	36.1	-3.5	46	3,357,171	21		3.9	0.5
NV	35.5	72.2	36.7	39.2	73.1	33.9	-2.8	45	1,719,885	34		3.7	0.9
WI	37.6	79.5	41.9	40.9	80.1	39.2	-2.7	44	3,544,103	20		3.3	0.6
SC	27.0	71.4	44.4	30.7	72.7	41.9	-2.5	42	2,893,842	24		3.7	1.3
NM	33.1	70.4	37.3	35.3	70.1	34.8	-2.5	42	1,243,353	36		2.2	-0.3
IL	33.4	74.6	41.2	36.1	75.0	38.9	-2.3	41	8,010,771	5	Working-age pop. over 5 million	2.7	0.4
IA	42.0	81.4	39.5	44.8	82.1	37.2	-2.3	40	1,868,852	30		2.8	0.7
UT	41.1	77.2	36.1	42.5	76.6	34.1	-2.0	39	1,701,705	35		1.4	-0.6
DE	34.6	75.1	40.6	36.4	75.1	38.7	-1.9	38	565,138	45	Working-age population under 1 million	1.8	0
CO	40.3	77.1	36.8	42.3	77.3	35.0	-1.8	36	3,304,940	22		2.0	0.2
HI	37.3	75.6	38.3	39.1	75.7	36.5	-1.8	36	822,542	42	Working-age population under 1 million	1.8	0.1
NE	43.5	82.2	38.7	45.5	82.6	37.1	-1.6	35	1,125,425	38		2.0	0.4
ND	51.6	83.3	31.7	52.8	83.1	30.2	-1.5	34	451,304	48	Working-age population	1.2	-0.2

											under 1 million		
KS	40.1	78.8	38.7	41.7	79.0	37.3	-1.4	33	1,730,369	33		1.6	0.2
MA	33.0	77.2	44.2	34.9	77.9	42.9	-1.3	31	4,272,843	14		1.9	0.7
OK	34.4	75.1	40.7	35.8	75.2	39.4	-1.3	31	2,295,734	28		1.4	0.1
TN	28.0	73.2	45.2	29.9	74.1	44.1	-1.1	30	3,983,560	16		1.9	0.9
NJ	35.0	74.5	39.5	36.6	75.1	38.5	-1.0	29	5,528,837	11	Working-age pop. over 5 million	1.6	0.6
TX	37.0	73.8	36.9	38.7	74.7	36.0	-0.9	28	#####	2	Working-age pop. over 5 million	1.7	0.9
FL	28.9	71.4	42.5	30.5	72.2	41.7	-0.8	27	#####	4	Working-age pop. over 5 million	1.6	0.8
NY	30.9	72.7	41.8	32.2	73.3	41.1	-0.7	26	#####	3	Working-age pop. over 5 million	1.3	0.6
AL	26.8	70.8	44.0	27.1	70.5	43.4	-0.6	25	2,945,466	23		0.3	-0.3
GA	30.3	70.8	40.5	31.5	71.5	40.0	-0.5	22	6,151,890	8	Working-age pop. over 5 million	1.2	0.7
CT	39.7	76.6	36.9	40.0	76.4	36.4	-0.5	22	2,235,695	29		0.3	-0.2
WV	24.3	70.1	45.8	25.3	70.6	45.3	-0.5	22	1,132,703	37		1.0	0.5
WA	35.7	74.3	38.7	36.4	74.7	38.3	-0.4	21	4,339,199	13		0.7	0.4
PA	33.0	75.1	42.1	33.9	75.6	41.7	-0.4	20	7,849,516	6	Working-age pop. over 5 million	0.9	0.5
MT	38.7	76.4	37.7	39.4	76.8	37.4	-0.3	19	616,125	44	Working-age pop. under 1 million	0.7	0.4
MI	27.9	71.7	43.8	29.9	73.4	43.5	-0.3	18	6,096,761	9	Working-age pop. over 5 million	2.0	1.7
MS	26.4	69.6	43.3	26.3	69.4	43.1	-0.2	17	1,790,746	31		-0.1	-0.2
CA	31.8	70.2	38.5	32.7	71.1	38.4	-0.1	15	#####	1	Working-age pop. over 5 million	0.9	0.9
VA	36.3	76.5	40.1	36.9	76.9	40.0	-0.1	15	5,112,923	12	Working-	0.6	0.4

											age pop. over 5 million		
KY	26.2	72.9	46.7	26.9	73.7	46.8	0.1	14	2,687,179	26		0.7	0.8
OH	32.8	75.1	42.2	33.5	75.9	42.4	0.2	13	7,072,114	7	Working-age pop. over 5 million	0.7	0.8
MO	32.2	76.2	44.0	33.0	77.1	44.2	0.2	12	3,666,019	19		0.8	0.9
MD	39.5	77.4	37.9	40.0	78.3	38.2	0.3	11	3,722,201	18		0.5	0.9
IN	33.5	75.5	41.9	33.8	76.0	42.3	0.4	10	4,008,950	15		0.3	0.5
VT	34.3	79.8	45.5	33.3	79.6	46.3	0.8	9	397,726	49	Working-age pop under 1 million	-1.0	-0.2
AZ	34.2	71.0	36.8	33.6	71.3	37.7	0.9	8	3,900,900	17		-0.6	0.3
OR	34.3	72.1	37.8	35.2	73.9	38.8	1.0	7	2,440,752	27		0.9	1.8
NC	30.2	72.2	42.0	30.3	73.5	43.2	1.2	6	6,000,202	10	Working-age pop. over 5 million	0.1	1.3
ID	38.6	74.8	36.2	36.7	75.2	38.5	2.3	5	946,943	39	Working-age pop. under 1 million	-1.9	0.4
ME	33.2	78.1	44.8	31.2	78.8	47.6	2.8	4	825,507	41	Working-age pop. under 1 million	-2.0	0.7
LA	34.4	72.6	38.2	31.3	72.4	41.1	2.9	3	2,825,101	25		-3.1	-0.2
AR	31.4	72.7	41.3	28.2	72.7	44.5	3.2	2	1,759,900	32		-3.2	0
SD	52.0	81.8	29.8	48.1	83.0	34.9	5.1	1	501,769	46	Working-age pop. under 1 million	-3.9	1.2

##