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Mar. 1, 2016

RespectAbility – Public Comments – Oklahoma Unified State Plan

Introduction:

RespectAbility is pleased to submit the following comments regarding the current draft of the State of Oklahoma'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 your state has made strides with the leadership of Governor Mary Fallin, Oklahoma can still do even better in terms of competitive, integrated employment for people with disabilities. **Only 36.4% of the 331,028 working age Oklahomans with disabilities are employed, other states have had success in employing upwards to 50% of persons with disabilities. Further, there are over 17,000 youth with disabilities between the ages of 16-20. Each year a quarter of them will age out of school into an uncertain future. As such, Oklahoma can look at innovative ways to close the 39.2 percentage point gap in the labor force participation rates (LFPR) between people with and without disabilities.**

WIOA offers Oklahoma the opportunity to invest strategically in the types of effective models and proven programs which will empower more Oklahomans with disabilities to pursue the American Dream. Oklahoma has much to learn from other states that have significantly improved employment outcomes. Other states have higher than 50% employment rates for their people with disabilities. [The Dakotas, Alaska, and Wyoming have achieved increased results by putting best practices into places.](#) The experience of these states shows ways that Oklahoma 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 Oklahoma.](#) 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 Oklahoma's workforce system and the need to better align programs.

1. Use the best data points, including the Labor Force Participation Rates of people with disabilities v. those without disabilities, as performance metrics:

As we expressed in our introduction, Oklahoma has the opportunity through WIOA to do better in terms of jobs for people with disabilities. [We know that your state has key leaders who understand the issues of expanding opportunities for people with disabilities and "getting Oklahomans back in the workforce"](#). However, we are concerned that a lack of good data in

the current draft of your State Plan means that your leaders will not know what steps need to be taken to overcome those barriers. What gets measured gets done – and you are not currently measuring important performance metrics nor does your include enough detail on disability.

Having reviewed the current draft of the Unified State Plan, we are deeply concerned about the lack of good data points regarding the size and composition of Oklahoma’s disability community. **In fact, the only explicit data point that we found in the State Plan regarding people with disabilities living in Oklahoma was buried on page 120 in the section on the Annual Estimates for VR.** We understand that this is a draft version of State Plan. However, this shortage of useful information is concerning in three ways.

First and foremost, this data is not structured in a way that that would be useful to the different elements of Oklahoma’s workforce system. Greater precision is needed for the workforce system to evolve to tap into the labor resource that the disability community represents. Second, including only the number of Oklahomans with disabilities does not reflect the complexities and realities facing your state’s citizens with barriers to employment. Third, we are concerned the current draft of your State Plan may not satisfy the specific requirements of the Workforce Analysis section of the Workforce Innovation and Opportunity Act. As such, we have several recommended revisions that could significantly strengthen the current draft of your Unified State Plan.

First, we recommend that additional data points be added that reflect the complexity and composition of Oklahoma’s disability community. We suggest this because of where Oklahoma stands in terms of employment rates for people with disabilities. Oklahoma currently ranks 23rd in the nation in terms of the employment rate for people with disabilities and it ranks 21st when you look at the gap in labor force participation rates between those with and without disabilities. This is above the national average certainly but proof that more needs to be done in order to empower people with disabilities to enter the workforce.

As such, we highly recommend that starting on page 6, the Workforce Analysis section of the current draft of the State Plan be revised to include several discreet data points on Oklahomans with disabilities. It is important to state the challenge clearly when there are over 300,000 working age Oklahomans with disabilities and only 36.4% of them are employed. As such, working age people between ages 21 and 64 needed to be listed as a separate data point. Further, the number of youth with disabilities in Oklahoma needs to be listed separately so that the workforce system has a clear view of the challenge moving forward. **There are over 17,000 young Oklahomans between the ages of 16 and 20. Ideally, one third of them will age out of the educational system and into the workforce. However, that will not happen if these young people are being excluded from the analysis of the state economy.**

Next, we recommend that your State Plan be revised to include the Labor Force Participation Rates for both people with and without disabilities in Oklahoma. Achieving success, especially through the implementation of WIOA, will very much depend on having access to the right data to drive the decision making process. **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 Oklahomans with disabilities. We are also including the LFPR example from Michigan's State Plan.

There is a 39.2 point gap in the Labor Force Participation Rates between people with and without disabilities in Oklahoma. 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.**

Additionally, while Oklahoma may only rank 23rd 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 39.9% of the 23,400 Oklahomans who are blind or have vision loss are employed while 51.5% of the 34,800 with hearing differences are also employed. Sadly, we also see that only 22.5% of Oklahomans 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 Oklahoma's workforce system expands successful school to work transition programs.** Fortunately, the State Plan does, briefly, discuss an effective model for expanding outcomes for this subpopulation. However, the challenge is not addressed with any near enough ambition to move the needle on employment outcomes. We have more to say on this point later in our public comments.

2. Busting stigmas, myths, and misconceptions must be a key part of Oklahoma's overall workforce strategy:

Low expectations and misconceptions are critical barriers to employment for people with disabilities. [A Princeton study shows that while people with disabilities are seen as warm, they are not seen as competent.](#) Similarly, [a study published by Cornell Hospitality Quarterly found that companies share a concern that people with disabilities cannot adequately do the work required of their employees.](#)

We know from her leadership on the NGA's *American Works Initiative* that Governor Fallin cares very deeply about workforce development. The thought and attention given to triangulating between employer needs, job preparations, and job seekers in the State Plan confirms as much. [We also know that key leaders in Oklahoma care about employment for people with disabilities because of thing like the 2015 Ability Job Fair.](#) However, such efforts will amount to very little if attitudinal barriers persist and misconceptions remain unresolved.

We therefore recommend that Oklahoma's Unified State Plan be amended to include a comprehensive proactive communications/public relations strategy for reducing such stigmas. Indeed, we know that other groups of Oklahomans 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.

[A more local example comes from Oklahoma's own Chesapeake Energy Corporation.](#)

This innovative energy company is participating in an innovative school to work transition program that brings multiple partners to support expanding employment opportunities. Such examples will be essential to the overall drive to overcome barriers to employment.

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 leaders need to know that people with disabilities can be the BEST people to get a job done.
- B. Human resources professionals and on-the-ground supervisors need to understand that hiring people with disabilities is generally easy and inexpensive, and that any costs incurred are more than offset from increased loyalty.** Hiring managers and supervisors are key implementers who can turn high minded policy and business goals into action at the ground level. However, studies show that many of them are afraid of what they don't know about people with disabilities. They are afraid of potential legal action, costs, or other failures. For them, they need supports that will empower to overcome their own fears and to excel at recruiting, hiring, supervising or working with teammates with disabilities. Oklahoma Department of Rehabilitation Services (ODRS) 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. Oklahoma's efforts need to be supported by a PR campaign that will inspire Oklahomans with disabilities to reach for the stars.** For example, Virgin Airways founder Sir [Richard Branson](#) and finance wizard [Charles Schwab](#) are dyslexic. Scientist Stephen Hawking and multi-billionaire businessman Sheldon Adelson, like Gov. Greg Abbott of Texas and President Franklin D. Roosevelt before them, are wheelchair/mobility device users. The CEO of Wynn Casinos,

Steve Wynn, is legally blind. Arthur Young, co-founder of the giant EY (formerly Ernst & Young) was deaf. Success sells success and that is something the workforce system should seriously utilize in an intentional manner moving forward.

We live in a world where perceptions are shaped at lightning speed by social media, entertainment and news. It can be hard to distinguish fact from fiction. Any campaign needs a multilayered approach in order to change the narrative around workers with disabilities so that they are seen for the abilities that they bring to the table. Social media certainly has a role to play in this effort. [Your state's Office of Disability Concerns already has a good online presence that could easily be expanded to tackle a campaign of this kind.](#)

In past years, the Governor's Office gave out "[Disability Employment Awards of Excellence.](#)" Such awards bring much needed media recognition and public visibility to key employer partners. We hope that this award series will continue in the years ahead.

As an example of the power and the value of making businesses care for hiring people with disabilities, we offer Oklahoma our insights gained from our #RespectTheAbility campaign. [#RespectTheAbility is a social media 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, which can be found on our website, offer insight in how to implement such a multilayered approach.

3. Ensure that Oklahoma's Sector Strategies identify Oklahomans with disabilities as an untapped labor resource:

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

In terms of the planning elements of Oklahoma's Unified State Plan, we would emphasize the critical importance of ensuring the people with disabilities are viewed as an untapped labor resource ready to be trained to meet Oklahoma's current and growing talent needs. For example, from page 6 we know that "Oklahoma has identified five ecosystems important to the economy to generate wealth, have employment growth potential, or where the state has a competitive advantage." These sectors are: "Aerospace", "Energy", "Agriculture", "Information", and "Transportation and Distribution." Further, in the coming years "the Health Care ecosystem" will also be critical to Oklahoma's economy.

However, the Unified State Plan does not discuss any methods or means whereby the workforce system can provide a pipeline of talent to meet this labor market need. As such, we would submit that Oklahoma look for ways to channel the talents and skills of people with disabilities into such sectors and to do so in a strategic, deliberate way. People with disabilities represent an untapped labor resource that can meet the diverse talent needs of Oklahoma's growing job sectors. The jobs gains in these sectors offer a great opportunity for focused sector strategies sustain and to achieve improved employment outcomes for people with disabilities in Oklahoma.

a. Healthcare, Hospitality, and the need to expand Project Search in Oklahoma:

The Unified State Plan makes it clear that Healthcare is a sector with rapidly increasing talent needs. As specifically stated on page 11 of the State Plan, “by 2020 total employment in the Health Care ecosystem will grow to 263,900 jobs in Oklahoma, an increase of 26,800 jobs for the state.”

People with disabilities can and should be part of the solution to this critical demand in the labor market. To quote [a 2014 report from the Office of Disability Employment Policy \(ODEP\)](#), “[people with disabilities] represent an untapped talent pool [and] offer significant value and insight” in the field of healthcare. It is important for healthcare institutions to reflect their customers, and people with disabilities interface more with the healthcare system. There are [numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living](#). **Employers working in health and elder care can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities.**

We recommend you look into implementing additional Project Search sites in Oklahoma. In reviewing the Unified State Plan, we were pleased to see that one of the Goals and Priorities discussed on page 122 is “Expansion of Project Search sites at Embassy Suites Hotel in Norman and Renaissance Hotel in Bricktown, Oklahoma City.” We commend this goal and look forward to seeing these sites succeed. However, this effort is the only reference made to this cost effective model in Oklahoma’s Unified State Plan. Despite resource constraints and bureaucratic complexities, there is a considerable need for even more Project Search sites in your state. Other states, through careful planning and strategic action, have rapidly expanded Project Search bringing together new employer partners to host worksites for ever more students with disabilities. We emphasize the value and utility of this model as a cost-effective means to meet Oklahoma’s growing labor market needs for health care workers.

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

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

b. High Turn Over Jobs and Distribution Jobs can also be sources of opportunity:

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.

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

c. Don't Neglect the Autism Advantage when thinking about STEM / Information Jobs in Oklahoma:

From page 9 of the State Plan, we know that "the Information and Financial Services ecosystem will increase to 111,200 jobs in Oklahoma, an increase of 2,350 jobs for the state." In thinking about how to prepare workers in such fields, it is still important look at the issue of preparing workers for careers in Science, Technology, Engineering and Mathematics (STEM). As has been documented in many cases, there can be an "Autism Advantage" in the STEM space. Indeed, some people on the Autism spectrum can have the very best skills in these types of high level, high demand careers. [Microsoft](#), [SAP](#), and [Specialisterne](#) have committed themselves to "[provide employment opportunities for people on the autism spectrum in roles such as software testers, programmers, system administrators, and data quality assurance specialists.](#)" [The Israeli Defense Forces recruits and trains their citizens on the Autism spectrum for work in their elite intelligence unit.](#)

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

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

[schools for STEM are located near IBM, a major STEM employer in their state](#). South Dakota should follow this model. Together, Oklahoma’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.

d. Don’t Forget Agriculture:

Lastly, we would also encourage Oklahoma to think about agriculture as another sector where people with disabilities can succeed. As agriculture is such a key industry, [there is an opportunity to replicate the success of TIAA-CREF’s Fruits of Employment project that provides internships and job training to workers with disabilities to prep them for careers in competitive agriculture](#).

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

The only reference to the employment opportunities and talent challenges created by the recently implemented Section 503 regulations found in the Unified State Plan are on page 98 in an oblique reference listed in the section on the Oklahoma ABLE Tech program.

We were surprised by the lack of any further discussion of Section 503, especially considering the project growth of the “Aerospace & Defense Ecosystem in Oklahoma. The current draft of the Unified State 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. Oklahoma should respond to these newly enacted regulations by adopting a strategy focused on competitive advantage, not just compliance. These regulations and requirements entail far more than just new rules for businesses to play by. Section 503 is an opportunity that could potentially have a broad impact on the employer engagement work of the entire workforce system. The companies who must comply with Section 503 have an opportunity to teach companies not impacted by the regulations how to effectively employ, engage, and retain workers or customers with disabilities. Specific companies that should be included in your outreach efforts include Patriot Team, Conoco Phillips, URS Corp, L-3 Communication Holdings INC., and CVR Energy INC. [More detailed information regarding federal contracts in Oklahoma can be found here](#).

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

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

Currently, Oklahoma does not have an affiliate chapter of the US Business Leadership Network (USBLN). This limits the flexibility and capability of Oklahoma to engage employers around hiring people with disabilities. As such, we highly recommend that the appropriate staff both in the workforce system and VR work with the employer partners to formalize their

intersections through the establishment of an affiliate chapter. Establishing a BLN Chapter in does would help to organize the “knowledge of community outreach, recruiting and interviewing, the accommodation process and barriers” needed to achieve improved outcomes. Currently, VR in Oklahoma has a network of businesses their work closely with in order to place VR clients into jobs. These business partners would certainly benefit from tapping into the national structure of the USBLN and their resources.

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

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

One of the often-neglected opportunities for people with disabilities is training opportunities offered by apprenticeship programs. We are pleased to see that Oklahoma will be addressing apprenticeship programs through efforts such as the goals “to align apprenticeship and internship opportunities as a way to create meaningful paid training experiences for job seekers and articulate paid training experiences with long term employment” discussed on page 131 and the inclusion of apprenticeships in the definition of “career pathway programs” on page 30, and the goal of using “Registered Apprenticeship certificates” to meet critical needs around “Improving Access to Postsecondary Credentials” on page 39. This is critical work and it is work that needs to be viewed through the lens of disability.

As Oklahoma looks to improve these programs, we highly recommend that the workforce system seriously look at ways to make apprenticeships accessible to people with disabilities. At the federal level, the Office of Disability Employment Policy has worked hard to generate resources which can open up these exciting programs to “youth and young adults with a full range of disabilities.” The regulations related to apprenticeship which have recently come out of the Department of Labor provide states the flexibility they need to refine and design training programs that maximally inclusive of people with diverse talents. [We encourage you to invest time and energy to understand the best practices contained in ODEP’s apprenticeship toolkit.](#) [Further, we would also highly recommend that VR staff connect and collaborate with the Federal officers responsible for apprenticeship programs.](#) Such innovative partnerships and improved accessibility are essential elements of realization the full promise of WIOA for people with disabilities.

Further, we would suggest that there is a critical opportunity to look at Section 503 and federal contractors as a partner in expanding apprenticeship programs. Funding to cover training costs could be a very attractive selling point for federal contractors looking to meet their 503 requirement. Further, we would also recommend looking at the intersection of apprenticeships and sector strategies. Not only can apprenticeships be set up in traditional fields such as construction, but they can also incredibly useful in health care and computer jobs. Look at the

successes achieved by Project SEARCH at a wide range of employers. As such, we recommend that the workforce system and the State Board investigate how to both open apprenticeship programs to people with disabilities and to create apprenticeship opportunities in new career fields as well.

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

There are many online and in person resources to help employers and people with disabilities come together to build success. However, all the stakeholders need to be educated to know that these resources exist, and that they are free and user-friendly. These resources must also all be accessible. **Oklahoma needs to make an effort to demonstrate to employers and prospective employees that these services exist. Doing so by coordinating it with the possible public relations campaign is one way to go about this. Also, Oklahoma should be careful not to waste money trying to re-invent the wheel in creating online resources as ASKJAN.org, [the US Department of Labor's Office of Disability Employment](http://theUSDepartmentofLabor.com) Policy, [our organization](http://ourorganization.org) and others also offer free toolkits, webinars and training opportunities. Another resource is Understood.org.** This is a comprehensive resource to help families and individuals with learning and attention issues build their educational and career plans. It will be helpful to collaborate with those groups however to ensure that the best tools are created to fit the training and information needs on these issues.

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

One significant reservation that we have regarding Oklahoma's Unified State Plan is the very limited attention given to the issue of transportation. It crops up as an issue in the section on migrant and seasonal farm workers (MSFWs) on page 72 and it is mentioned as a monitored outcome in the partnerships between "partnership alongside the Directors of the Oklahoma Family Network (OFN), National Alliance on Mental Illness (NAMI) Oklahoma" on page 110.

However, transportation is also a significant barrier to employment for many people with disabilities and other members of low-income communities. Many people with disabilities do not drive. Others cannot afford private transportation. It is vital to work with public transportation to ensure that there are bus routes to places where there are internships, apprenticeships and other work opportunities for people with disabilities.

People with disabilities need transportation solutions. Public transportation need not be the only solution. In places where it is not possible to coordinate a bus route, Oklahoma could look at partnering with Uber, Lyft, or other new transportation solutions. For people with disabilities who do drive, such companies as Uber and Lyft can also provide a way to enter into the workforce with flexible hours, so Oklahoma could also look at developing partnerships with these sorts of companies.

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 as well.

9. Strategic Engagement to Build a Mentor System for Customers of the Workforce System:

Government can't and shouldn't do everything. There is a massive role that can be played by volunteers who are willing to help people with barriers to work, including people

with disabilities, find and keep jobs. There is a critical, cooperative role for non-profits and faith-based organizations to play. Local workforce development areas, for example, could be encouraged to recruit volunteers from local faith communities or local non-profits. However, much more can and should be done to work with parents of teens and young adults with disabilities, and to create volunteer mentorships for people with disabilities who are looking for work or need supports to stay employed and/or grow their careers.

Faith-based organizations and many others can fill massive gaps. [There is a terrific booklet, Clearing Obstacles to Work, put out by the Philanthropy Roundtable that is rich with potential partners and proven programs.](#) This is a huge missed opportunity as you will see in the booklet we just mentioned above. It's all about teaching people to fish (helping them get and keep a job). It is also important to note in terms of the SNAP and TANF programs that too many faith-based programs focus on giving out food without giving out the volunteer support to help people sustain themselves through gainful employment. [In looking to rethinking policies around SNAP funding, we suggest looking at the innovative efforts of the Seattle Jobs Initiative \(SJI\) to realign that funding into more productive, employment outcomes.](#)

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

There are several points where the current draft of Oklahoma's Unified State Plan addresses the unique workforce challenges facing ex-offenders as they attempt to reenter society. We were encouraged to see the potential inclusion of Corrections education in the "Oklahoma Works System Review Team" on page 43, codified partnerships between Corrections and other programs on page 49, and the collaboration to provide VR services between "DSU partners with the Oklahoma Department of Corrections (ODOC)" on page 103. These are important efforts. **However, these efforts need to be viewed through the lens of disability.** The reason why is simple. [According to recently published data from the Bureau of Justice Statistics, "An estimated 32% of prisoners and 40% of jail inmates reported having at least one disability." This issue is a serious one and it needs to be addressed at the state level.](#)

Frequently people are involved in the criminal justice system because they have disability issues, including learning differences, ADHD, executive function, and mental health issues that went undiagnosed and/or unaddressed through childhood and into the school years. Given these statistics from the BJS, it is vital that your state identify how many of the individuals in the ex-offender pipeline have disabilities. Serving ex-offenders is a critical workforce development challenge and one that can only increase when disability is a factor and it is not addressed appropriately. The price paid for ignoring this issue are higher rates of recidivism and greater costs to society. Assessment tools are needed to identify disability issues as people enter the prison system. Doing so creates opportunities to address those issues productively. If people in the corrections system who will be released eventually are to be well served by Oklahoma's workforce system, then it is vital that disability issues be identified and addressed in a way that will help work successfully in the future.

Conclusion:

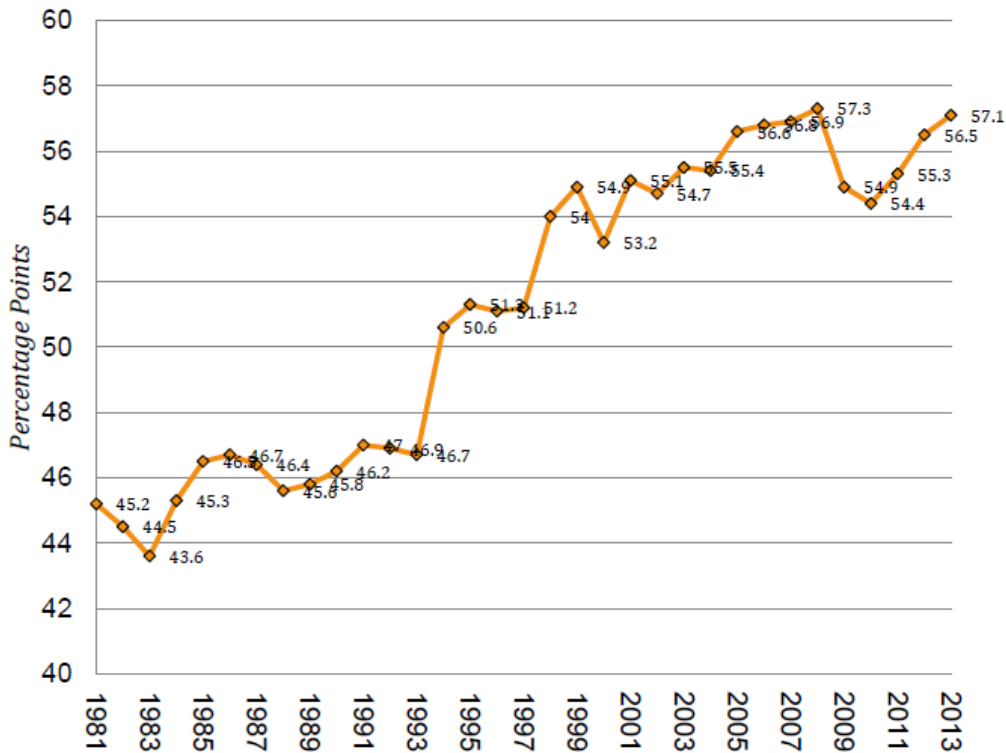
As we stated at the beginning of our Public Comments, while Oklahoma is above the national average, it still has the opportunity to do much better on and immediately benefit from jobs for people with disabilities. From the language of the Unified State Plan, there is a lot of innovative and dedicated work being done on workforce development in Oklahoma. Thanks to

WIOA, Oklahoma 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 Oklahoma state plan. However, there is some good as well. Our public comments are focus on several critical factors that can help Oklahoma 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 Oklahoma’s WIOA plan, all of this can continue to change for the better for the people of Oklahoma.

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 Oklahoma ranks nationally and to showcase several of the data points needed in Oklahoma’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	40.5	77.7	37.3
11	Alaska	40.8	11	New Jersey	39.2	76.5	37.3
12	Montana	40.5	12	Texas	38.0	75.3	37.3
13	Connecticut	40.2	13	Colorado	41.6	79.1	37.4
14	New Hampshire	40.0	14	Connecticut	40.2	77.9	37.7

15	Kansas	39.8	15	Nebraska	46.0	83.9	37.9
16	Wisconsin	39.8	16	Washington	37.7	76.0	38.3
17	New Jersey	39.2	17	Minnesota	44.4	82.9	38.5
18	Maryland	39.1	18	Oregon	36.4	74.9	38.5
19	Idaho	38.8	19	California	33.3	72.2	38.9
20	Texas	38.0	20	Maryland	39.1	78.2	39.1
21	Washington	37.7	21	Oklahoma	36.4	75.6	39.2
22	Virginia	37.6	22	Arizona	32.8	72.5	39.7
23	Oklahoma	36.4	23	Kansas	39.8	79.7	39.9
24	Oregon	36.4	24	Illinois	35.7	75.7	40.0
25	Indiana	36.2	25	Virginia	37.6	77.6	40.0
26	Vermont	36.2	26	Louisiana	32.1	72.4	40.3
27	Illinois	35.7	27	New York	33.6	74.0	40.4
28	Delaware	35.6	28	Delaware	35.6	76.3	40.7
29	Massachusetts	35.5	29	Indiana	36.2	77.0	40.7
30	Ohio	34.6	30	New Mexico	30.4	71.2	40.8
31	Pennsylvania	34.5	31	New Hampshire	40.0	81.3	41.3
32	Rhode Island	33.9	32	Wisconsin	39.8	81.1	41.4
33	New York	33.6	33	Pennsylvania	34.5	76.5	42.0
34	California	33.3	34	Ohio	34.6	77.0	42.5
35	Arizona	32.8	35	North Carolina	31.3	74.3	43.0
36	Missouri	32.8	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	Arkansas	29.2	73.8	44.6
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

											n 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

##