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RespectAbility – Public Comments – Rhode Island Combined State Plan

“People with disabilities are an important part of our community and deserve every opportunity to make it in Rhode Island... Still, we have not yet achieved full equality for people with disabilities.” - [Gov. Gina M. Raimondo, Statement on the 25th Anniversary of the ADA.](#)

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

Rhode Island can and must do more in order to expand competitive, integrated employment opportunities. Currently, your state ranks 32nd in the country in terms of your employment rate of people with disabilities. **Only 33.9 percent of Rhode Island’s 63,400 working age people with disabilities are employed. Further, as of 2013, there are 5,000 youth with disabilities between the ages of 16 and 20. Each year, one quarter of them will transition out of the school system and into an uncertain future.**

Thanks to WIOA, Rhode Island has the chance to expand job opportunities for people with disabilities. Your state has much to learn from other states that have worked hard to achieve improved employment outcomes. Other states, with small populations and limited resources, have achieved incredible outcomes and have close to a 50 percent employment rate for their citizens with disabilities. [States like South Dakota, North Dakota, and Iowa have achieved incredible results](#) thanks to dedicated leadership, key investments in best practices, and the expansion of employment opportunities for youth with disabilities.

To help states succeed in this [process we developed the Disability Employment First Planning Tool](#). 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 [Rhode Island](#).** That information is also attached to our comments.

Rhode Island’s WIOA plan is structured around three “guiding strategies” that include a “demand-driven sector-based strategy”, “a career pathway strategy”, and “an effective performance measurement strategy.” The lens of disability is needed in each of these strategies.

The spotlight is on Rhode Island and your state’s effort to expand employment opportunities for your citizens with disabilities. After all the settlement agreement in *U.S. v. Rhode Island* is “[the nation’s first statewide settlement agreement vindicating the civil rights of individuals with disabilities who are unnecessarily segregated in sheltered workshops and facility-based day programs](#).” With this agreement in place, Rhode Island needs to move forward with focused strategies to empower youth with disabilities to transition into the workforce and become a labor resource well trained to meet employer talent needs.

Our public comments on Rhode Island’s WIOA State Plan are structured around those points where greater clarity, precision, and data are needed to ensure that Rhode Islanders with disabilities will be better equipped to pursue the American Dream. From the need for the right performance metrics to employer engagement to investing in school to work transition programs for youth with disabilities, our comments are intended to help your state push hard to see improved integrated employment outcomes for your citizens with disabilities.

1. Rhode Island's State Plan is severely lacking in terms of good data on the composition of your state's disability community, the employment rates among Rhode Islanders with disabilities, and the gaps in Labor Force Participation Rates (LFPRs) between people with and without disabilities. Such data is needed to design good metrics:

As we expressed in our introduction, Rhode Island has the opportunity through WIOA to do better in terms of jobs for people with disabilities. Further, Rhode Island's Consent Decree, discussed on page 23 of the State Plan, means that there is a critical focus on what your state is doing to expanding competitive, integrated employment for your citizens with disabilities. Your efforts on this score are especially important your citizens with intellectual and developmental disabilities (IDD).

Having reviewed your State Plan, we are critically concerned about the lack of good data points on disability in the current draft of Rhode Island's State Plan. We fear that this means your state leaders do not know what steps need to be taken to support people as they overcome barriers to employment. **What gets measured gets done – and you are not measuring important performance metrics nor do you include enough detail on disability.**

Having reviewed the current draft of your State Plan, we are deeply concerned about the lack of good data points regarding the size and composition of Rhode Island's disability community. **In fact, there are only minimal data points in the State Plan regarding people with disabilities living in Rhode Island. One explicit data point was buried on page 102 in the section on "The relative distribution of eligible individuals who" have "the greatest social need (20 CFR 641.325(b).)"** Further, the 2017 ORS State Plan on page 39 reports "American Community Survey US Census Bureau 2009-2011 earnings estimate" and discusses the median income of "Rhode Islanders with a disability."

Given that this is a draft version of your State Plan, we implore you to update the draft to include several additional data points on disability and employment in Rhode Island before you submit it to the Department of Labor.

Figure 1.
Rhode Island Performance Metrics on Jobs for PWDs



Gov. Gina Raimondo (D)

- ❖ 77.7% of persons without disabilities aged 18 to 64 are employed.³
- ❖ 33.9% of PwDs aged 18 to 64 are employed.³
- ❖ Rhode Island ranks 32nd in the nation in terms of jobs for PWDs.
- ❖ **There remains a 43.8 point gap in the labor force participation rate (LFPR) between people with and without disabilities.**
- ❖ 145,887 people in RI have a disability.³
- ❖ 5,000 persons aged 16 to 20 have a disability.¹
- ❖ 63,400 persons aged 21 to 64 have a disability.¹
- ❖ The employment gap between People with and without disabilities increased by 1.8% between 2013 and 2014.³
- ❖ 42,703 PwDs receive SSDI.³
- ❖ In December 2014, RI's total expenditure on SSDI benefits was \$46,271,000.³
- ❖ Voc. Rehab. received 2,821 applicants in RI 2013.³
- ❖ Voc. Rehab. obtained 603 jobs for PwDs in RI in 2013.³

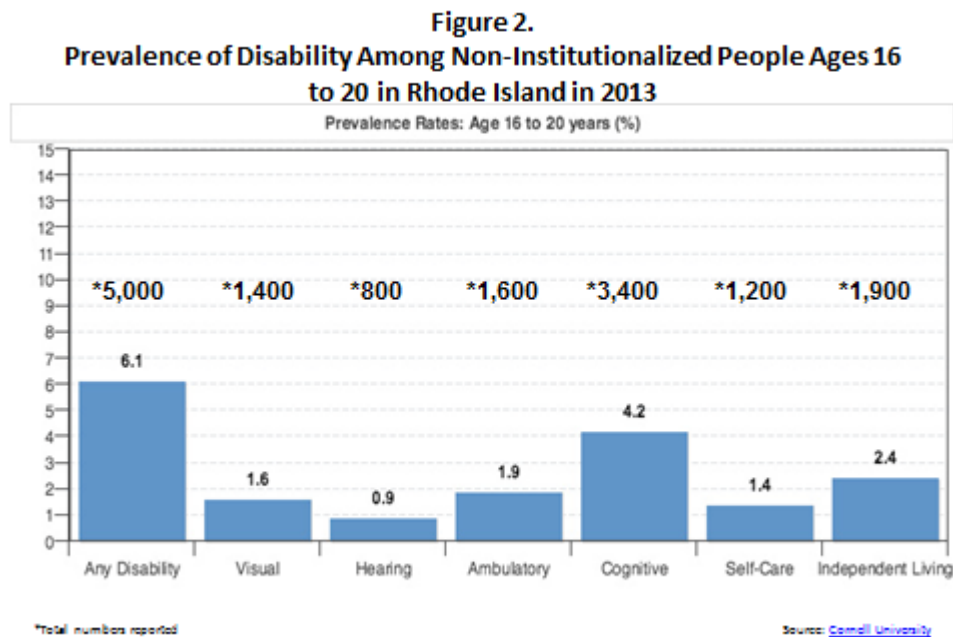
1. 2013 Disability Status Report: Rhode Island, disabilitystatistics.org
2. StateData: The National Report on Employment Services and Outcomes, 2014
3. [Annual Disability Statistics Compendium](http://annualdisabilitystatistics.compendium)

Greater precision is needed for the workforce system to evolve to tap into the labor resource that the disability community represents. Looking solely at median income and poverty rates among Rhode Islanders with disabilities does not reflect the complexities and realities facing your state's citizens with barriers to employment. Nor does it allow your state to focus on empowering youth. Lastly, we are concerned the current draft of your State Plan does not satisfy the specific requirements of Section 3 of WIOA which "must include an analysis of the current workforce, including individuals with barriers to employment."

Tracking unemployment information (which only reflects people actively looking for jobs) and job placements (which only monitors people who interface directly with the workforce system) is necessary, but not sufficient to drive true performance metrics that will create success. As such, we are concerned that there are no references whatsoever to the Labor Force Participation Rate (LFPR) in your State Plan. **This is a significant challenge because the LFPR is, from our perspective, the most important data point and performance metric for tracking employment outcomes is to track the gap in the Labor Force Participation Rate (LFPR) between people with and without disabilities.**

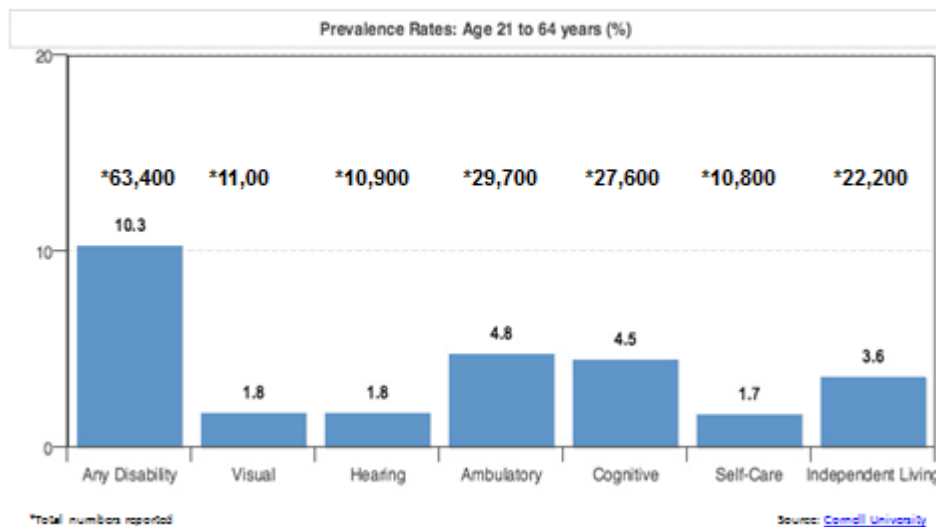
Good data is essential for any attempt to increase the number of people with disabilities who are succeeding in competitive, integrated employment. **As an example of the data that is needed, below are several charts which show the challenge in your state.**

- a. **Youth with disabilities who are aging in the workforce (ages 16-20).** If Rhode Island's workforce system is to seriously deliver on the promise to improve transitions to work for youth, it is critical to know how many youth with disabilities will be aging out of school.



- b. **Working age people with disabilities (ages 21-64).** According to the most recent available data from the Census Bureau, there are 63,400 working age Rhode Islanders with disabilities between the ages of 21 and 64. It is critical to distinguish between working age people and those we acquire disabilities due to the aging process. The chart below shows the diverse range of disabilities experienced in your state.

Figure 3.
Prevalence of Disability Among Non-Institutionalized People Ages 21 to 64 in Rhode Island in 2013



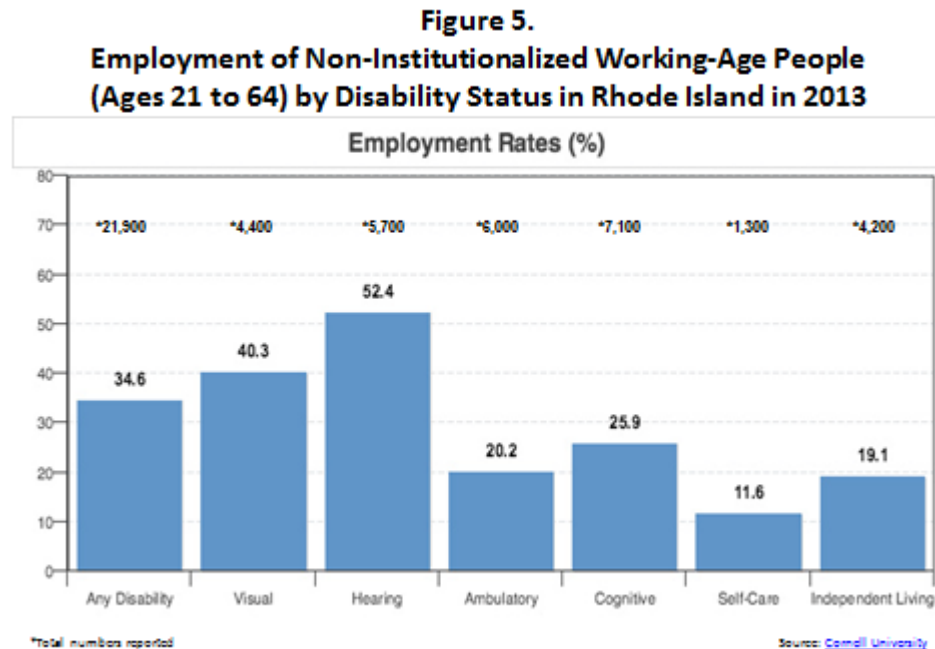
- c. **What types of disabilities do youth have who are transitioning into the workforce?**
This type of information is critical important because youth with vision, mobility and hearing disabilities need specific types of tools and training, but may otherwise be ready for high skill, high wage jobs. To support the success of youth with cognitive disabilities, it will be critical for Rhode Island to provide early work experiences, skill training, and job placements.

Figure 4.
RI Ages 6 to 21 Served Under IDEA

	2012	2013
All Disabilities	21,255	20,496
Specific Learning Disability	8,290	7,950
Speech or Language Impairment	2,966	2,796
Intellectual Disability	797	780
Emotional Disturbance	2,024	1,787
Multiple Disability	348	359
Hearing Impairment	140	128
Orthopedic Impairment	74	71
Other Health Impairment	3,458	3,375
Visual Impairment	57	56
Autism	1,911	1,998
Deaf Blindness	6	6
Traumatic Brain Injury	55	61
Developmental Delay	1,129	1,129

Source: [Annual Disability Statistics Compendium](#)

- d. **Labor Force Participation Rates broken down by disability type.** From the data, we often find that people who are blind or have vision loss are employed at higher rates than people with self-care or independent living disabilities. Similarly, we find that people with hearing differences are also employed at higher rates than are people with intellectual or developmental disabilities



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 Rhode Islanders with disabilities.** We are also including the LFPR example from Michigan’s Plan. 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.

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), State Plans 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.

We find the clearest statement of these opportunities on page 3 of the Combined State Plan in the Executive Summary. This section clearly states that “seven industry clusters were identified as the leading and potential leading economic drivers in the state.” The clusters are: “Biomedical Innovation”, “Information Technology/Software and cyber-physical systems/

Data Analytics”, “Defense Shipbuilding and maritime”, “Advanced business services”, “Design, food, and custom manufacturing”, “Transportation, distribution and logistics” and “Arts, education, hospitality, and tourism.” As Rhode Island’s workforce system looks for strategies to create a talent pipeline to meet these demands, we seriously encourage you to include people with disabilities in your thinking process. **People with disabilities represent an untapped labor resource that can meet the diverse talent needs of our nation’s growing job sectors. We feel that there are significant opportunities for Rhode Island to achieve improved employment outcomes among youth with disabilities through focused sector strategies.** The job gains in the sectors discussed above offer a great opportunity for focused sector strategies to achieve improved outcomes. We recommendations are listed below:

a. Transportation, Distribution, and Logistics offer significant opportunities for Rhode Islanders with disabilities:

As Rhode Island develops a sector strategy to train talent for the Transportation, Distribution, and Logistics sector, we seriously encourage you to learn from your neighbors and emulate what has worked in other states.

As stated on page 21 of the State Plan, “transportation, distribution and logistics” is one of the “two opportunity industry growth areas” and accounted for “21,322” jobs in 2013. It is a sector that has been making job gains even the nation economy struggled. As reported by the State Plan, this sector had “a 5.3% job gain from 2009-2013.”

Other states, through close collaboration with leading employers, have been able to develop outstanding training programs to prefer people with disabilities for careers in Transportation, Distribution, and Logistics. Many companies, including [UPS](#), [Wal-Mart](#), and [OfficeMax](#) have proven records of success.

Walgreens is the most visible example of a company whose distribution center infrastructure has directly benefited from the abilities that employees with disabilities possess. At the distribution centers in Windsor, Connecticut and Anderson, South Carolina, [Walgreens has definitively demonstrated that workers with disabilities are as productive, safer, and turn over less when compared to peers without disabilities](#). As a starting point, we would seriously encourage your workforce system staff to cross the border and see this center in action.

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 site them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future. **Another great example is Starbucks.** Their “[Inclusion Academy](#)” has rapidly grown from just a pilot program in Carson Valley, NJ to a complete program at their largest roasting plant.

Rhode Island, starting on page 8 of the 2017 ORS State Plan, has made a clear commitment to improving “Pre-Employment Transition Services (PETS) for In-School Youth.” Such pre-employment transition services have been critical to creating a talent pipeline well suited to meeting the talent needs of the companies mentioned above. We hope that your workforce system will reach out to the key logistics employers in Rhode Island and figure out how to get workers with disabilities trained for these types of jobs.

Launching this type of effort will take leadership and effort. Supporting such an endeavor would be a perfect opportunity for Rhode Island to look at the model offer by public/private partnerships focused on disability employment. These types of partnerships could focus on the “cluster” model, started by Poses Family Foundation that is having tremendous success in diverse states as Nevada, Georgia, and Ohio. [This model depends on “consortium of employers committed to implement or expand programs”, “a public/private partnership to coordinate services for job-seekers with disabilities, with a single point of contact for employers”, and “Connections among employers, public and private agencies, and schools to reach young adults with disabilities who are in transition from school to work.”](#)

b. 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.

These facts have significant implications for Rhode Island’s economy and the growth you are seeing in “arts, education, hospitality and tourism.” As reported on page 21 of the State Plan, the “arts, education, hospitality and tourism” sector generated “42,801 jobs in 2013.” In recent years, this sector has been growing steadily, “and “saw 5.2% in job gains.” Lastly, this sector has “a 38% higher industry concentration than the nation”, meaning that is an integral part of your state’s economy. Given the high turnover costs to employers and continuing growth, training youth with disabilities can be a critical way of meeting these employer talents need.

Accommodations and hospitality 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 hard work done by David Scott at the Embassy Suites in Omaha, Nebraska offers valuable lessons on how to prepare your citizens with disabilities for jobs in the hospitality industry.](#) State WIBs, 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.

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

One of the greatest areas for potential improving employment outcomes among Rhode Islanders rests with the most dynamic element of your state’s economy. As stated on page 20 of

the State Plan, “IT/software, cyber-physical systems and data analytics supported 12,538 jobs in 2013” and “the industry concentration was 18% higher than the nation.” While there was small decline in 2009-2013, this is a sector that will grow if the right policies are put into place. Further, advanced business services are also growing in importance. This sector added “34,780 jobs in advanced business services in 2013”, “has a 30% higher industry concentration than the nation”, and experienced a staggering “7.9% job growth from 2009-2013.”

Both of these areas fall under the rubric of Science, Tech, Engineering and Mathematics (STEM) and have incredible talent needs. These are career fields that should not be out of reach for people with disabilities. **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.**

Companies including [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 other states. 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.](#) This is model that Rhode Island should look into emulating. Together, state 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. Health Care & Social Assistance:

One way in which Rhode Island emulates the rest of the nation is in how much of the state workforce is employed in the healthcare sector. Consider the observation on page 24 that “the Healthcare industry which employs over 80,000 people in Rhode Island.” Further, those numbers will only grow in the immediate future. As reported in the “Rhode Island Industry Projections by Economic Sector-2012-2022” table on page 86 of the State Plan, “Health Care and Social Assistance” will grow by 17.2 percent in the next decade.

This rapidly emerging talent needs in health care represent both a challenge and an opportunity for the nation’s workforce system. It is challenge propelled by an aging population resulting in increasing demand for qualified workers ready to fill the talent needs of hospitals, assisted living centers, and nursing home. It is opportunity to channel the incredible talents of

people with disabilities into the workforce. This is a topic that needs to be examined closely and has implications for people with disabilities who want to work.

People with disabilities can and should be part of the solution to this demand in the labor market. A 2014 report from the [Office of Disability Employment Policy](#) (ODEP) captured this opportunity clearly, saying that “[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. 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.**

These examples all reflect how the Project SEARCH model is well suited to meeting the growing talent needs in health care across the many states. As such, we recommend that Project SEARCH be significantly expanded as it has been 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 are incredibly pleased to see that Project Search is part of the equation moving forward in Rhode Island. As reported on page 3 of the VR section of your State Plan, ORS is working hard “to create new pilot projects such as Project Search expansion and additional partnerships with businesses.” This is critical and we hope know that such training youth with disabilities for jobs in Health Care and Social Assistance will prepare them for a future of independence and opportunity. We see a commitment made on this point on page 16 where it states that “As a component of the PETS program, ORS, in collaboration with other partners, has instituted several Project Search programs within the health care industry sector.” This section of the State Plan clearly states that “The first Miriam Hospital Project Search - 2014, was so successful, that the program was replicated with Blue Cross in 2015, and is planning to further expand to an additional site in 2016.” This is an example of good work done well.

However, the extent of the talent need in this sector is such that rapid expansion of Project Search should be on your mind. We suggest that Rhode Island 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 taxpayers money while also strengthening the talent pool for employers.

e. Jobs with state government can also be sources of opportunity:

While the focus of our comments on the State Plans are around aligning the workforce system to create opportunities for people with disabilities in the private sector, public sector employment should not be neglected. Your state government's workforce will likely 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.](#)"

Connecticut should explore the feasibility of Affirmative Action hiring of people with disabilities for jobs in state government plus expanding state contracting obligations around Section 503 for Federal contractors. [Governor Inslee in Washington State](#), [Governor Dayton in Minnesota](#), and [Governor Snyder in Michigan](#) 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. People with disabilities can be a successful solution, especially in high turnover jobs. Lastly, as shown by Delaware and Montgomery County, having a fast track or selective placement hiring system for people with disabilities can create more jobs.

3. Busting Stigmas, Myths, and Misconceptions Should Be a Key Part of 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 recommend that Rhode Island's plan be amended to include a comprehensive, proactive communications/public relations strategy for reducing such stigmas. 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. The Governor's Commission on Disabilities [has already been doing this kind of work on a small scale](#). However, we feel that WIOA creates a significant opportunity to tackle this challenge. The Commission could take the lead on this type of communications effort and to coordinate between the different elements of your state's workforce system. In order to ensure that such efforts have the biggest possible impact, it needs to be supported by a serious, systematic and ongoing communications campaign that highlights the benefits of inclusive hiring.

It is important to understand that the barriers to gaining employment are not only physical. Attitudinal barriers can be just as detrimental as physical inaccessibility. Indeed, the stigmas, myths, misconceptions, and stereotypes that Rhode Islanders with disabilities face are serious barriers that your workforce system needs to address. We are pleased to see the close collaboration between ORS and the Rhode Island BLN discussed on pages 7 and 72 of the 2017 ORS State Plan. **These business relationships can be used in a PR campaign designed to combat the aforementioned stigmas, myths, and misconceptions that people with disabilities face.**

In terms of potential employer partners, we encourage your state plan to look at [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. People with disabilities can work successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and they can 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. **We are pleased to see your initiative to develop a presentation to highlight the benefits of employing people with disabilities, as described on page 164.** This is an excellent idea and should be included in your PR campaign.
- 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 players who can turn high minded policy and business goals into action at the ground level. However, studies show that many are uninformed about people with disabilities. They are afraid of potential legal action, costs, or other failures. They need supports that will empower them to overcome their own fears and to excel at recruiting, hiring, supervising, or working with teammates who have disabilities. 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, and should do so, given that they are one of the few states who have opted to go for a dual-customer approach at their program centers. 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 as well.
- C. People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectation must begin. Rhode Islanders needs a public relations campaign that will inspire Rhode Islanders with disabilities to set**

their hopes high, as low expectations and low self-esteem are a barrier to employment. For example, Virgin Airways founder Sir Richard Branson and finance wizard Charles Schwab are also 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 order to motivate and inspire in an intentional manner moving forward. We are pleased to see that Rhode Island understands this and has included it in their plan in its goal to increase collaboration with businesses. It will not be difficult to incorporate this into a communications strategy.

As an example of the power and value of making the business care for hiring people with disabilities, we offer Rhode Island the insights gained from our [#RespectTheAbility](#) campaign. The campaign focuses on how hiring people with disabilities can make organizations stronger and more successful. It highlights the benefits to employers that look beyond the disability and imagine the possibility when hiring talented employees with disabilities.

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

Another critical opportunity that needs to be discussed in Rhode Island's Combined State Plan is the issue of Section 503 of the Rehabilitation Act. Unfortunately, the current draft of your state plan lacks any references to the disability employment opportunities and talent challenges facing federal contractors. [Section 503 regulations have set new 7% utilization goal](#) set to recruit, hire, and retain qualified individuals with disabilities in all job categories.

Rhode Island should respond to these 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 Raytheon Company, Systems Engineering Associates Corporation, McLaughlin Research Corp, Adams and Associates INC., and BAE Systems PLC.** More detailed information regarding federal contracts in Rhode Island [can be found here](#).

5. Effective employer engagement will very much depend on getting the Rhode Island Business Leadership Network involved and active in the WIOA Process:

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.

As such, we are incredibly pleased to see [that the Rhode Island Business Leadership Network \(RIBLN\)](#) is twice referenced in the Combined State Plan. For example, page 7 of the 2017 ORS State Plan talks about “the Assistive Technology Access Partnership (ATAP)” and

specifically discuss how this partnership is carried out “in conjunction with the Business Leadership Network (BLN).” Further, on page 72, the ORS State Plan highlights how Rhode Island VR “has actively pursued enhancing the relationship with the business community through participation in the RI Business Leadership Network (RIBLN).” The results have been around “a myriad of educational workshops to employers” covering a range of disability employment topics.

In terms of enhancing this partnership and maximizing the opportunity to engage employers, we encourage ORS and RIBLN to actively engage with other affiliate chapters of the USBLN. In particular, we encourage you to look at the successes achieved in Wyoming, which used to possess several, active, engaged, and effective affiliate chapters. The Wyoming BLN, despite the challenges of a largely rural population and limited resources, has been achieving outstanding employment outcomes. Further, we hope that the RIBLN will expand their partnerships beyond ORS and begin to engage other elements of your state’s workforce system.

We would be happy to provide Rhode Island’s WIOA team with an introduction to Lynn Kirkbride the USBLN’s Director of Affiliate Relations. She is an incredible asset and has extensive experience around overcoming barriers to employment. Her email is lynn@usbln.org 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 the training opportunities offered by apprenticeship programs. While the current draft of Rhode Island’s Combined State Plan touches on the opportunities that apprenticeships offer, it does not do with an eye towards training people with disabilities, especially youth with disabilities. As with so many other sections of WIOA, the lens of disability needs to be added to Rhode Island’s efforts around apprenticeship. For example, on page 7, the State Plan talks about the development of a “registered apprenticeship program for Biomedical Equipment Technicians and Data Scientists.” A young person with a disability, if given the right training and preparation, could be a spectacular employee as a result of this program. The State Plan puts a great emphasis on “The Rhode Island 2015 career pathways statewide action plan” which aims to align education and training. Specifically, on page 73, the Plan states that this effort “offers scheduling and instructional methods to meet the needs of adult students.” Such flexibility includes “on the job training, apprenticeships...online instruction.” For example, are those online instruction materials fully accessible? Could a blind person, using screen reader software, learn though that platform? These are just examples of the overall need to ensure the programmatic accessibility of such training programs.

As your state looks to improve these programs, we highly recommend that Rhode Island’s workforce system fully utilize the wealth of resources that are available to make apprenticeships more 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 officer responsible for apprenticeship programs in your state or region](#). Such innovative partnerships and improved accessibility are essential elements of realizing 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 be 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. Overcome the gap between disability services and career services in Post-Secondary Education:

There is a fundamental disconnect in most post-secondary education programs between disability services and careers. This is not a new issue and it is one that other organizations have raised in the past. However, with the priorities put into place by the implementation of WIOA, there is a historic opportunity to bridge this gap and to improve career and technical education for young people with and without differences. As formulated by the National Organization on Disability, at most educational institutions, “the career services office, which assists students in preparing for” the workforce [“lack a strong—or any—connection to the office of disabled student services, which ensures proper accessibility and accommodations on campus for students with disabilities.”](#)

The result is a price we pay as a society is twofold. First, it costs employers who are unable to find qualified job candidates. Second, it costs students with disabilities who may be able to graduate with a degree thanks to accommodations but will go on to struggle to succeed in the working world. Nationally, there are 1.3 million young Americans ages 16-20 with disabilities. [They have high expectations to go into the workforce but currently only 53% of college graduates with disabilities are employed](#) as opposed to 84% of graduates with no disability. In total, only about 7% of people with disabilities will earn a college degree and less than half of the 2.3 million with a degree are employed.

[Due to the mandate created by Section 503 of the Rehabilitation Act, federal contractors now have a utilization goal to make sure that 7% of their employees across all job groups be qualified people with disabilities.](#) This regulation is actually a huge opportunity because companies are actively looking to hire recent graduates with disabilities. The first place for new recruits is college and campus recruiting. Your state has the chance to demonstrate to business that college students with disabilities are on campuses and that they should be actively targeting those with disabilities just as they do all other diversity recruiting on college campuses.

While the statistics cited above are national ones, they have bearing on the work that needs to be done through your community college system. Beyond just WIOA, community colleges are uniquely positioned to innovate in order to expand opportunity. Community colleges are very closely connected to the working world and the specific training requirements of employers.

8. 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. We know that broadband access is a huge issue in rural states. However, it's important to ensure that online resources enhance the effort of your workforce system.

Your state 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, your state 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 and](http://ourorganizationand) [others also offer free toolkits](http://othersalsoofferfree.com), [webinars and training opportunities](http://webinarsandtraining.com). 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.

9. Nothing About Us Without Us:

"Nothing About Us without Us" has long been a rallying cry for the one-in-five Americans who have a disability and it has implications for the workforce system. Section 107 of WIOA dictates the establishment, criteria, and membership for the Local Workforce Development Boards that are crucial implementers of each state's overall workforce strategy. **As such, we feel there is a critical need to ensure that people with disabilities are represented on such local boards and make their voices heard.** Section 107(b)(2)(A)(iii) of WIOA specifically states that "community-based organizations that have demonstrated experience and expertise in addressing the employment needs of individuals with barriers to employment" may be represented on the boards and this includes "organizations....that provide or support competitive integrated employment for individuals with disabilities."

As such, we were pleased to find on page 72 of the 2017 ORS State Plan that "ORS has representation on each of the two Rhode Island Workforce Investment Boards (WIBs), as well as the Governors' Workforce Board, the two Youth Councils of each WIB, as well as MOU's with each of these WIBs." Such representation is a critical sign that partnerships are being built.

As such, we feel that the next step would be for Rhode Island's workforce system to states look for ways to recruit local community organizations or self-advocates for inclusion on their local boards. Perhaps this could be a natural point of partnership for Independent Living Centers across the country that do crucial work supporting employment and independence for people with a wide range of disabilities.

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

One significant reservation that we have regarding many of the state plans that we have reviewed has been the limited attention given to the issue of transportation. This issue is critically important for both people with disabilities and other low-income communities. Many people with disabilities do not drive. Others cannot afford private transportation.

Transportation is not really addressed as a barrier to employment in the current draft of Rhode Island's Combined State Plan. Several sections of the Rhode Island Office of Rehabilitation Services (ORS)'s section of the State Plan touch on transportation. For example, on page 7 of the 2017 ORS State Plan, ORS talks about their "strong working relationship with

independent living centers” and how CILs provide “transportation training” among other “support services.” Later on, the ORS State Plan discusses the results of their “COMMUNITY COMPREHENSIVE NEEDS ASSESSMENT SURVEY.” Starting on page 35, the survey results capture many of the most critical issues impacting the disability community in Rhode Island and reflect many of the challenges that people face across the country. The “top four issues preventing individuals from maintaining employment” identified on page 36 include “personal home life barriers, social skills, availability of jobs **and availability/cost of transportation.**” This survey shows awareness on the part of ORS about what barriers are keeping people out of the workforce. However, the State Plan, as a whole, does not offer any specific strategies or potential solutions to the challenge of transportation. We encourage your state workforce system to work through these issues in a deliberative, collaborative fashion. Rhode Island’s relatively small geographic size is an asset in the case and public transportation needs to be interacting with your state’s workforce system.

While public transportation is a key part of the solution, it isn’t all that is needed. In places where it is not possible to coordinate a bus route, states 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.](#) Public sector employers and federal contractors who have Section 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.

11. Aging workers and those who acquire disabilities need to be specifically addressed:

We are pleased to see the attention given in Rhode Island’s WIOA State Plan around the needs of older workers. Starting on page 85, the State Plan goes into great detail about the Program Elements of the “Senior Community Service Employment Program (SCSEP).” This is important, especially given the aging of the Baby Boomer and their impact of the evolution of the nation’s workforce. However, we would encourage your state’s SCSEP program officers to look to the state of Iowa for ideas around innovative best practices to support older workers.

Attention should start BEFORE aging workers and those with recently acquired disabilities lose their job due to aging and/or a newly acquired disability. Many people who have been in the workforce for decades find that before full retirement age they cannot keep up with the physical demands of their jobs. It is vital to start working with them BEFORE they lose 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.

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

Government can’t and shouldn’t do everything. There is a massive role that can be played by volunteers who are willing to help people with barriers to work, including people with disabilities, find and keep jobs. There is a critical, cooperative role for non-profits and

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

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

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

There are several points where the current draft of Rhode Island's Combined State Plan addresses the unique workforce challenges facing ex-offenders as they attempt to reenter society. Starting on page 69, the section entitled "Corrections Education and other Education of Institutionalized Individuals" provides a good overview of your state's efforts on this score. Using funding "made available under Sec. 222(a)(1)", correction education efforts will be focused on "increasing the number of incarcerated adults completing a secondary school credential", "postsecondary education and training" and "entering/retaining employment." Page 70 of the State Plan details the educational efforts that will be made, including how "Participating offenders will be assessed through pre and post testing instruments and individualized education programs will be developed." This is critical work and we hope it will result in improved transitions back into society.

The lens of disability needs to be applied to the work your state is doing to meet the requirements under section 225 of WIOA. [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 states identify how many of the individuals in the corrections system and in the ex-offender pipeline have disabilities. There are two related challenges here. First, there is a need to identify potential disability issues among inmates during the intake process and ensure their needs can be met. Your State Plan says that "individualized education programs will be developed" for prisoners. Will there be screening or assessments to identify potential disabilities? Will these individual programs include learning accommodations or access to resources to facilitate learning? Ideally, this type of assessment could be done within the first thirty days of their sentence. Such identification could then feed into the work being done through educational programs in corrections. Second, are the issues related to preparing inmates for their release and reintegration into society? Whether it is mental health supports or learning accommodations helping ex-offenders to find employ when they are home is a critical workforce development challenge. It is a challenge that only grows more

Data Source-Chart 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: 2014 Disability Statistics Compendium

The Difference in the Employment Gap Between Disabled and Non Disabled Adults 2014

	State	Gap		State	Gap		State	Gap		State	Gap		State	Gap
50	Maine	47.4	39	Mass.	43.5	28	Delaware	40.7	17	Minnesota	38.5	6	Alaska	35.3
49	Kentucky	47.1	38	Georgia	43.5	27	New York	40.4	16	Washington	38.3	5	Hawaii	34.2
48	South Carolina	45	37	Florida	43.3	26	Louisiana	40.3	15	Nebraska	37.9	4	South Dakota	33.6
47	Michigan	45	36	Mississippi	43.1	25	Virginia	40	14	Connecticut	37.7	3	Utah	33.5
46	West Virginia	44.9	35	N. Carolina	43	24	Illinois	40	13	Colorado	37.4	2	Nevada	33.4
45	Arkansas	44.6	34	Ohio	42.5	23	Kansas	39.9	12	Texas	37.3	1	North Dakota	32.1
44	Tennessee	44.5	33	Pennsylvania	42	22	Arizona	39.7	11	New Jersey	37.3		Washington DC	45.2
43	Missouri	44.4	32	Wisconsin	41.4	21	Oklahoma	39.2	10	Montana	37.3			
42	Vermont	44.2	31	New Hampshire	41.3	20	Maryland	39.1	9	Idaho	37		Source: Annual Disability Statistics Compendium	
41	Alabama	44.1	30	New Mexico	40.8	19	California	38.9	8	Wyoming	35.9			
40	Rhode Island	43.8	29	Indiana	40.7	18	Oregon	38.5	7	Iowa	35.7		USA	40.3

Source: Annual
Disability Statistics
Compendium