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Mar. 18, 2016

## RespectAbility – Public Comments – South Carolina Unified State Plan

*“Our goal is to get as many people back to work, whether it’s veterans, whether it’s those with disabilities, whether it’s those with challenges, and we’re finding that businesses in South Carolina want to help.” – [Governor Nikki Haley, Interview, August 6, 2015.](#)*

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

**South Carolina can and must do more in order to expand competitive, integrated employment opportunities.** Currently, your state ranks 46<sup>th</sup> in the country in terms of your employment rate of people with disabilities. **Only 29 percent of South Carolina’s 352,200 working age people with disabilities are employed.** Further, as of 2013, there are 20,800 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, South Carolina has the chance to build on innovative work that is already being done around empowering more youth with disabilities to successfully transition from school to work.** Walgreens has garnered much media attention for their leadership around creating an inclusive workforce and capitalizing on the talents of employees with disabilities. Among their most successful efforts has been their Distribution Center in Anderson, South Carolina where [“42 percent of the Anderson Center's almost 275 employees have a disclosed disability of some sort including cognitive disabilities and autism.”](#) Likewise, at [the Spartanburg Regional Healthcare System](#), [youth with a variety of disabilities are being trained](#) for a variety of jobs in healthcare. These examples reflect the types of best practices that have helped other states have used to dramatically increase their employment rates for people with disabilities. [People with disabilities in the Dakotas, Iowa, and Wyoming are employed at a rate nearly twice that of South Carolina.](#) The experience of these states shows ways that South Carolina can dramatically improve their outcomes.

**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 [South Carolina](#).** That information is also attached to our comments

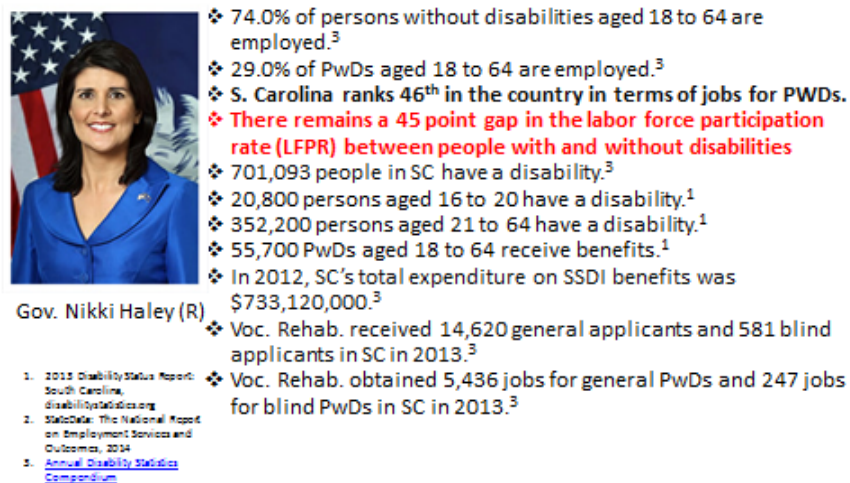
We know from [having spoken personally with your Governor](#) that there are state leaders in your state who are committed to empowering South Carolinians with disabilities to succeed. **Our public comments on South Carolina’s WIOA State Plan are structured around those points where greater clarity, precision, and data are needed to ensure that South Carolinians 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 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. Make sure that the best disability data points, especially the gap in Labor Force Participation Rates (LFPRs) between people with and without disabilities, are included in your Workforce Analysis:**

As we expressed in our introduction, South Carolina has the opportunity through WIOA to do better in terms of jobs for people with disabilities. We have reservations regarding the focus given to the unemployment rate when looking at South Carolinians with disabilities. For example, on page 19 in the “Individuals with Disabilities” subsection of the Workforce Analysis on page 19 of the Unified State Plan, the focus is on the unemployment rate of people with disabilities. Further, in the “Individuals with Disabilities” section of page 40, the focus is once again on the “10.3 percent unemployment rate for” youth with disabilities. **However, tracking unemployment information (which only reflects people actively looking for jobs) and job placements (which only monitors people who interface with the workforce system) is insufficient to drive performance metrics that will create success.**

**Having reviewed your State Plan, we are concerned about the lack of good data points on disability in the current draft of South Carolina’s Unified 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.**

**Figure 1.**  
**South Carolina Performance Metrics**

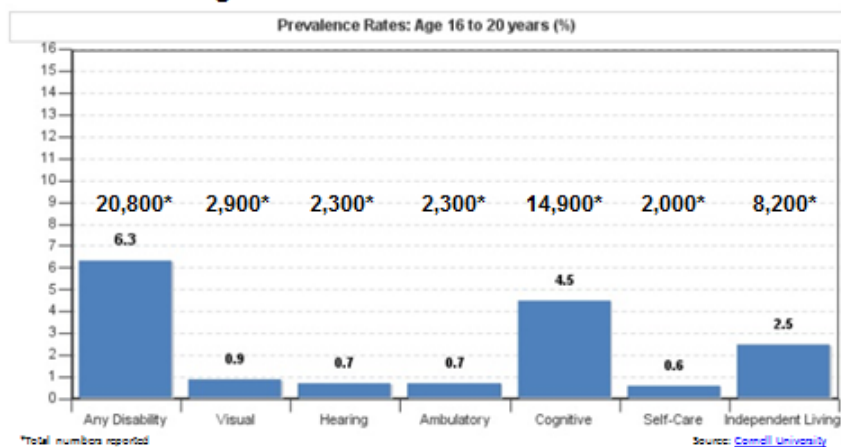


As we reported at the beginning of our public comments, only 29 percent working age with disabilities are employed in South Carolina compared to the 74 percent employment rate for those without disabilities. Critically, there is a 45 percentage point gap in the Labor Force Participation Rate between people with and without disabilities. We are concerned that there are no references to the Labor Force Participation Rate (LFPR) in your State Plan. **This is a serious problem because the LFPR is the most important data point and performance metric for tracking employment outcomes is to track the employment gap between people with and without disabilities.** We believe that with more focused work, South Carolina can move the needle in terms of empowering more people with disabilities to pursue the independence that jobs provide. 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.**

Below are the additional data points we would like to see integrated in your Plan:

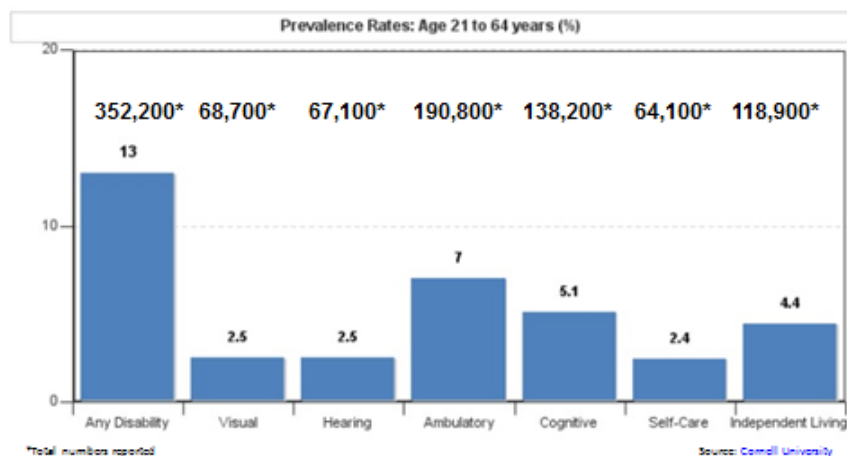
- a. **Youth with disabilities who are aging in the workforce (ages 16-20).** The biggest missed opportunity in terms of data is around youth with disabilities. WIOA puts a focus on the importance of better serving youth across the workforce system. If South Carolina's workforce system is to seriously 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.

**Figure 2.**  
**Prevalence of Disability Among Non-Institutionalized People**  
**Ages 16 to 20 in South Carolina in 2013**



- b. **Working age people with disabilities (ages 21-64).** According to the most recent available data from the Census Bureau, there are 352,000 working age with disabilities between the ages of 21 and 64 in South Carolina. It is critical to distinguish between working age people with disabilities and those we acquire disabilities due to the aging process. The chart below shows the range of disabilities experienced in your state.

**Figure 3.**  
**Prevalence of Disability Among Non-Institutionalized People**  
**Ages 21 to 64 in South Carolina in 2013**



**c. What types of disabilities do youth have who are transitioning into the workforce?**

From our review of your Unified State Plan, it is clear that South Carolina is working to improve collaboration “with the South Carolina Department of Education (SCDOE) to coordinate procedures and activities under the Individuals with Disabilities Education Act (IDEA)” as discussed on page 225. As such, we feel that it is important for the workforce system to have good information on the specific types of disability that are being experienced by students served under IDEA. 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 South Carolina to expand early work, skill training, and job placements.

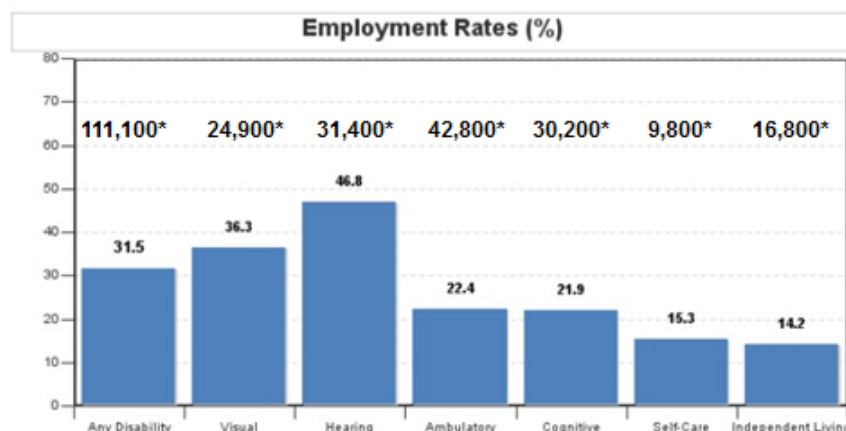
**Figure 4.**  
**SC Ages 6 to 21 Served Under IDEA**

	2012	2013
All Disabilities	88,904	89,202
Specific Learning Disability	41,491	41,100
Speech or Language Impairment	14,799	14,555
Intellectual Disability	7,192	6,847
Emotional Disturbance	2,946	2,754
Multiple Disability	830	954
Hearing Impairment	1,046	1,011
Orthopedic Impairment	571	532
Other Health Impairment	11,081	11,635
Visual Impairment	414	421
Autism	4,481	5,082
Deaf Blindness	5	8
Traumatic Brain Injury	188	179
Developmental Delay	3,860	4,124

Source: Annual Disability Statistics Report

- 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.

**Figure 5.**  
**Employment of Non-Institutionalized Working-Age People (Ages 21 to 64) by Disability Status in South Carolina in 2013**



\*Total numbers reported

Source: Cornell University

Additionally, while South Carolina may only rank 46th 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 36.3 percent of the 24,900 South Carolinians who are blind or have vision loss are employed while 46.8% of the 42,800 with hearing differences are also employed.** Given the flexibility and availability of assistive technology solutions, the employment rate for this subgroup should be much higher. Many people who are blind or deaf have incredible talent potential that can be unleashed by something as simple as a smartphone.

**Sadly, we also see that only 21.9% of South Carolinians with intellectual or developmental disabilities are employed.** For this demographic, workforce solutions may take more time and resources. **However, there will be a considerable return on investment if South Carolina's workforce system expands school to work transition programs.** The State Plan does, discuss an effective model for expanding outcomes for this subpopulation. However, the challenge is not addressed with anywhere near enough ambition to move the needle on employment outcomes. We have more to say on this point later in our public comments.

**This data will be essential as South Carolina's state leaders move forward with WIOA, because there are unique barriers to employment for peoples with disabilities.** We hope that this data will be used to develop and implement the performance metrics needed to guide resource investment and workforce programs.

## **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.

As reported on page 5, the sectors with the strongest "employment growth from 2009 to 2014" were: "Professional and Business Services; Trade, Transportation, and Utilities; and Leisure and Hospitality". Further, on page 6, your State Plan reports that "Retail Trade was the largest sector" of South Carolina's economy accounting for fully "15 percent of the employment." Retail Trade was quickly "followed by Manufacturing with 14 percent, and Accommodations and Food Services with 13 percent."

We see an interesting shift about to occur in South Carolina's economy as the Baby Boomer age. Specifically, as reported on page 10, "By 2022 the Health Care and Social Assistance industry will have the State's largest share of employment."

As such, in terms of the planning elements of South Carolina'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 your state's growing talent needs. People with disabilities represent an untapped labor resource that can meet many of the diverse talent needs of South Carolina's growing job sectors. With the right training and school to work transitions, people with disabilities can be outstanding employees for employers in the health care, retail, transportation, and business services sectors of South Carolina's economy. Our nation was founded on the principle that anyone who works hard should be able to get ahead in life. People with disabilities deserve to be able to work to achieve the American dream, just like anyone else. As such, South Carolina will see a significant return on investment by working hard to create career pathways for youth with disabilities to be trained for jobs in the sectors discussed above.



**a. Health and Elder Care:**

In Figure 7, “South Carolina Industry Employment Projections to 2022”, we see a clear statement of the significant opportunities and growing demand in the Health Care sector. In this sector, the State Plan projects a “Total 2012-2022 Employment Change” of over 59,000 jobs for a remarkable 26.15 percent growth rate. The rapid emerging talent needs in health care represent both a challenge and an opportunity for South Carolina’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.**

**South Carolinians with disabilities, especially youth, 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. 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 and dedication of employees with disabilities.**

On page 39, in the section on “Students with Disabilities”, we find a discussion of what work South Carolina has already done around adopting one of the most cost-effective models for empowering youth with disabilities to transition into the world of work. This section describes “SCVRD’s partnership with Spartanburg School District 6, the local Workforce Investment Board, and Spartanburg Regional Health System for the first Project SEARCH program in the state.” This innovative, business-led model features total workplace immersion, which facilitates a seamless combination of classroom instruction, career exploration, and worksite-based training for youth with intellectual and developmental disabilities. This section of the State Plan then goes on to report that a “second Project SEARCH site has been established in the Midlands, with Lexington-Richland School District 5 and Palmetto Health Parkridge.”

This is critically important work and we are glad to see your Unified State Plan discusses what Project Search can achieve. As such, we feel there is a significant opportunity for South Carolina to dramatically increase the number of Project Search sites in your state. As discussed above, the demand for health care and social assistance workers is rapidly growing in South Carolina. As such, we recommend that South Carolina invest in increasing the number of Project Search sites across your state. **We encourage South Carolina to follow the example of Wisconsin, Florida, and other states that are rapidly expanding Project Search.** Wisconsin for example started with three Project Search sites and is expanding to twenty seven sites in total.

Governor Scott Walker has become a champion of the Project Search model because it is so effective in producing outstanding employees and cost-effective to implement. Wisconsin is a living example of the return on investment that comes from empowering youth with disabilities through the transformative power of a job. As such, we seriously encourage state leaders in South Carolina to learn from the experiences of the dedicated state officials, VR counselors, workforce professionals, and special educators who have increased Wisconsin’s Project Search programs. 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 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. In the introduction to our public comments, we discussed the work in Walgreen's distribution centers to build a more inclusive workforce. Studies done of that effort definitely demonstrates the business imperative for hiring employees with disabilities. "A study of Walgreens distribution centers" [conducted in 2012 showed that](#) "workers with disabilities had a turnover rate 48% lower than that of the nondisabled population, with medical expenses 67% lower and time-off expenses 73% lower."

**In other states, the Project Search model has helped to train and prepare youth with disabilities, particularly those with intellectual and developmental differences, for successful careers in hospitality and food service.** This a good fit because these 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.

As reported on page 5 of your Unified State Plan, for the period between 2009 and 2014, "Leisure and Hospitality" added 20,000 jobs to the South Carolina economy. Further, this sector is well represented on your Business Advisory Council as discussed on page 237 of the State Plan. Given the talent needs of this sector, we highly recommend that your state look into ways of training more youth with disabilities for careers in this field. This is consonant with our recommendation to dramatically expand Project Search in South Carolina. In other states, [hotels and other hospitality employers have found Project SEARCH to be an amazing source of talent. The work done by Embassy Suites and David Scott in Omaha, Nebraska offers valuable lessons you can look to in order to improve employment outcomes for people with disabilities.](#)

Another outstanding example of how to do this 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.

While health care will quickly become South Carolina's largest job sector by the end of the decade, retail trade will remain a key driver of **South Carolina's economy. Retail is a sector with high turnover costs to employers and as such, people with disabilities can be a cost-effective labor solution.** We encourage your workforce system to recruit and partner with employers in the retail space where the higher retention rates of employees with disabilities can positively impact the company's bottom line. 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. Science, Tech, Engineering and Mathematics (STEM) and The Autism Advantage:**

Even though other sectors are driving the growth of South Carolina's economy, 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 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.](#) South Carolina should be looking at ways to follow this model. 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. State jobs and state contracting 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. We say even as recognize the statement on page 9 of your State Plan which expects that “Only State and Federal Government are projected to decline.” However, the workforce of government at both the State and Federal level will be impacted by the cresting wave of Baby Boomers retiring just as other sectors are being shaken. As such, people with disabilities should be part of the solution.

The importance of such hiring efforts was first discussed in Governor Markell’s *Better Bottom Line* Initiative. 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.](#)”

This is an issue that Governors both Republican and Democrat have taken action address. In many different states, Governors have worked hard to expand the recruitment and retention of people with disabilities for jobs in state government. [Governor Asa Hutchinson](#) has recently committed his state government to hiring more people with disabilities for jobs in state government. As he said in a Memorandum launching the effort: “a coordinated effort by the state is needed to reduce dependence on public benefits and to increase economic opportunities for Arkansans with disabilities.” “It is important,” he said, “that our state government set the example of this commitment.”

A further step that could be taken to expand such opportunities would be to look at state contracting as another potential avenue of opportunity. For example, we would encourage South



Carolina to learn from the experiences of Nevada and Massachusetts. [The Bay State recently launched an interesting Supplier Diversity Program \(SDP\)](#). This is a rare example where Massachusetts is actually leading the nation in terms of innovative efforts to expand opportunities for people with disabilities rather than simply relying on the perception of success. Likewise, in Nevada, “[the Preferred Purchase Program](#)” allows “agencies to bypass the competitive bid process and purchase goods and services from registered community training centers which employ people with disabilities.” Both efforts could be replicated in South Carolina. **We make this recommendation because the untapped potential of people with disabilities is such that a full-spectrum, all-of-the-above-and-more approach is needed.**

### **3. Busting Stigmas, Myths, and Misconceptions Should Be Part of South Carolina’s 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 your State 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. **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.**

As we stated in our introduction, we have spoken with Governor Haley and she has spoken very clearly about the talents that employees with disabilities possess. One of the most important and cost effective ways to communicate the business imperative for hiring diverse talent is to have state leader talk about this issue and conduct regular visits to model employers. Two great examples of how this work can be done come from leaders in Wisconsin and Michigan. [In Wisconsin, Governor Walker has actively championed the growth of Project Search and conducted regular site visits to model employers. In Michigan, Lieutenant Governor Caley and Justice Bernstein have lead what they call “Hidden Talent Tours” that showcase the benefits to the bottom line that come from hiring people with disabilities](#). Both of the example offer valuable insights in work that can be done in South Carolina. **This type of systematic and ongoing communications campaign must continue if you want to maximize your state’s success.** It is an effort that needs to be address through your Unified State plan.

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](#). However, it should be a component of South Carolina’s planning and implementation of a serious business-to-business PR effort. 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, Sprint Corporation, Starbucks, 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.
- 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. South Carolina needs a public relations campaign that will inspire Carolinians 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. Arthur Young, co-founder of the giant EY (formerly Ernst & Young) was deaf. These are the type of success stories that people with disabilities need and this is something the workforce system should seriously utilize.

As an example of the power and value of making the business care for hiring people with disabilities, we offer Wyoming 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. Addressing stigma in a sustained, strategic way needs to be part of South Carolina's larger effort to empower people to

overcome barriers to employment. You have the leaders who care and the employer who can tell their stories. We have high hopes that you can succeed in this effort.

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

Almost all of the state plans that we have reviewed have neglected to mention important rules surrounding the Rehabilitation Act of 1973. Most State Plans lack references to the employment opportunities and talent challenges created by the recently implemented Section 503 regulations regarding federal contractors and subcontractors. Your State Plan does talk about Section 503 and does so in an interesting way. Page 84 of your State Plan specifically talks about how South Carolina VR uses “Case Management System (CMS)... an internally developed set of programs that provide agency staff with real time access to client information to support integrated service delivery and data reporting.” Among the specific components of this system are a job matching function called “Universal Business System and Career Connect.” To quote the State Plan “these components assist employers receiving federal contracts to meet their hiring and reporting requirements under Section 503 of the Rehabilitation Act of 1973.” Such functions enhance the work of VR and help to foster close collaborations with business.

This is critically important work and we are very glad to see South Carolina addressing Section 503 with a specific approach aimed at fostering closer partnerships with business.

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 Savannah River Nuclear Solutions LLC, URS Corp, The Shaw Group INC, General Dynamics Corp, as well as Blue Cross and Blue Shield of South Carolina. More detailed information regarding federal contracts in [South Carolina can be found here](#).

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

The Common Assurances listed on page 112 of South Carolina’s State Plan will be critical factors in the overall implementation and ultimate success of WIOA. **As such, it is critical that each assurance is matched up with a strategy fitted to meeting and, if possible, exceeding the requirements of the law.**

For example, it is critical that the assurances listed on page 129 for Title 1-B Programs are matched up to specific strategies to achieve the “delivery of career and training services to individuals.” Further, the Wagner-Peyser Assurances on page 145 need careful implementation efforts as do the Adult Basic Education Assurances listed on page 156 and the VR assurances on pages 206 through 212.

As a good example of the level of detail needed here, consider WIOA Section 188. The anti-discriminatory rules originally outlined under WIA need to be updated to reflect the steps needed towards making universal access a reality. **For example, in seeking to meet Common Assurance #7 listed in the State Plan, we are directing states to consider the resources made available from the Office of Disability Employment Policy (ODEP).** [They have recently released a guide that digs deep into what universal accessibility will mean for the workforce system.](#) Further, Common Assurance #10 affirms each state plan’s commitment to meeting the

requirement that “one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990.”

**However, merely meeting legal requirements should not be the end of this process. Indeed, looking at physical and programmatic accessibility can be an opportunity to invest in a more proactive workforce system very actively committed to collaboration and partnerships.** If there is no plan that specifically identifies how the state is going to get to the commitment made in the assurance; the state is facing a serious problem.

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

Public policy is about the allocation of scarce resources to meet infinite needs. It is vital to invest resources on those points where they can have the greatest effect. **One challenge that we have seen in many states WIOA plan has been the prioritization of expensive bricks and mortar One-Stops as the primary access point for programs and services under WIOA.** Focusing exhaustively on One-Stop Centers, physical infrastructure, and co-locating services comes at the opportunity cost of losing the chance to improve supports and increase outcomes.

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

At the same time considerable thought needs to take place around the creation of a unified intake system for the workforce system and government benefits programs. Those shared databases must be fully accessible to people with disabilities who use screen readers or who need captions to understand videos that explain how to use the system. Thought also needs to go into privacy issues as private disability issues should not be shared where it is not needed and appropriate.

**7. 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 that South Carolina is looking to expand the vital opportunity that apprenticeship training can offer to young people with disabilities. For example, from 38, we are very excited to see the strategic investments being made by your State Board which “approved \$200,000 in funding for the development and implementation of apprenticeships for youth, individuals with disabilities, ex-offenders, and veterans.”** We are likewise pleased to hear that there are “Youth apprenticeship programs exist in 24 of South Carolina’s 46 counties.”

As your state makes these investments and improves these programs, we you’re your workforce system will make the most of available resources 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.](#) From our conversations with other states, we know that far too often, VR

staff are not connected and not collaborating [with the Federal program officers who support apprenticeship programs in their states](#). We hope this is not the case in South Carolina. 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 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.

## **8. Overcome the gap between disability 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.



## **9. 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](http://ASKJAN.org), [the US Department of Labor's Office of Disability Employment](http://theUSDepartmentofLabor.com) Policy, [our organization and others](http://ourorganizationandothers.org) also offer free toolkits, webinars and training opportunities. Another resource is [Understood.org](http://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.

## **10. 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 9 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."

Even a non-voting, ex-officio member of a WIB can bring critical perspectives that improve the WIB's efforts overall. As such, we recommend that 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.

## **11. 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 South Carolina's State Plan.** "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.

## **12. Aging workers and those who acquire disabilities must be specifically addressed:**

One surprising omission from South Carolina's WIOA State Plan are the needs of older workers. Other state plans that we have reviewed have given close attention to the challenges of support older workers through such efforts as the Senior Community Service Employment Program (SCSEP). We would encourage your state's team 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.

## **13. 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) 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.](#)

## **14. The disability issues of people involved in the corrections system must be addressed:**

**There are several points where the current draft of South Carolina's State Plan addresses the unique workforce challenges facing ex-offenders as they attempt to reenter society.** For example, on page 18, the State Plan reports that "South Carolina had an inmate population of 22,168 with 9,623 inmates being released in 2013." Further, from page 19, "In 2013, the S.C. Department of Juvenile Justice (DJJ) handled 16,754 cases" and had a "15 percent

recidivism rate among young offenders.” We are very glad to see that ex-offenders are among those who can now benefit from “funding for the development and implementation of apprenticeships” put into place by the SWDB mentioned on page 38. Lastly we are very pleased to see the close cooperation between corrections and VR discussed on page 44 of the State Plan. In the section on “Offenders”, the State Plan reports that “approximately 30 SCVRD counselors statewide provide vocational services on an as-needed basis for 23 SCDC facilities. SCVRD also works closely with the Department of Probation, Parole and Pardon.” 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. 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 complicated when a disability remain unaddressed. The price paid for ignoring these issue are higher rates of recidivism and greater costs to society. Addressing these issues at the beginning and at the end of the corrections process will have downstream effects and hopefully will enable states to address the intersectionality of these workforce, disability, and justice issues.

### **Conclusion:**

As we stated at the beginning of our public comments, South Carolina can and must do better in terms of jobs for people with disabilities. This is an issue that South Carolina has the opportunity to address because of WIOA and it must be addressed through your State Plan. Failing to properly train and prepare job seekers with disabilities costs your state’s economy incredible talent and shatters the aspirations of so many people with disabilities who want to pursue the American Dream, just like everyone else.

The bottom line is that expanding job opportunities for people with disabilities is a 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.





# RESPECTABILITY

## SC and Jobs for PwDs

Jennifer Laszlo Mizrahi, President

[www.RespectAbilityUSA.org](http://www.RespectAbilityUSA.org)



# South Carolina



Gov. Nikki Haley (R)

- ❖ 74.0% of persons without disabilities aged 18 to 64 are employed.<sup>3</sup>
- ❖ 29.0% of PwDs aged 18 to 64 are employed.<sup>3</sup>
- ❖ **S. Carolina ranks 46<sup>th</sup> in the country in terms of jobs for PwDs.**
- ❖ **There remains a 45 point gap in the labor force participation rate (LFPR) between people with and without disabilities**
- ❖ 701,093 people in SC have a disability.<sup>3</sup>
- ❖ 20,800 persons aged 16 to 20 have a disability.<sup>1</sup>
- ❖ 352,200 persons aged 21 to 64 have a disability.<sup>1</sup>
- ❖ 55,700 PwDs aged 18 to 64 receive benefits.<sup>1</sup>
- ❖ In 2012, SC's total expenditure on SSDI benefits was \$733,120,000.<sup>3</sup>
- ❖ Voc. Rehab. received 14,620 general applicants and 581 blind applicants in SC in 2013.<sup>3</sup>
- ❖ Voc. Rehab. obtained 5,436 jobs for general PwDs and 247 jobs for blind PwDs in SC in 2013.<sup>3</sup>

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

# South Carolina

		People with Disabilities (%)		People without Disabilities (%)	
		2013	2014	2013	2014
Poverty <sup>1</sup>	US	28.7	28.2	13.6	13.0
Ages 18 - 64	SC	29.1	30.0	15.7	15.0
Smoking <sup>1</sup>	US	25.4	24.5	16.2	15.3
Age 18 – over	SC	28.3	28.7	19.9	18.8
Obesity <sup>1</sup>	US	40.1	41.1	25.0	25.2
Ages 18 - over	SC	41.0	41.8	28.5	28.5
Employment <sup>1</sup>	US	33.9	34.4	74.2	75.4
Ages 18 – 64	SC	30.7	29.0	72.7	74.0

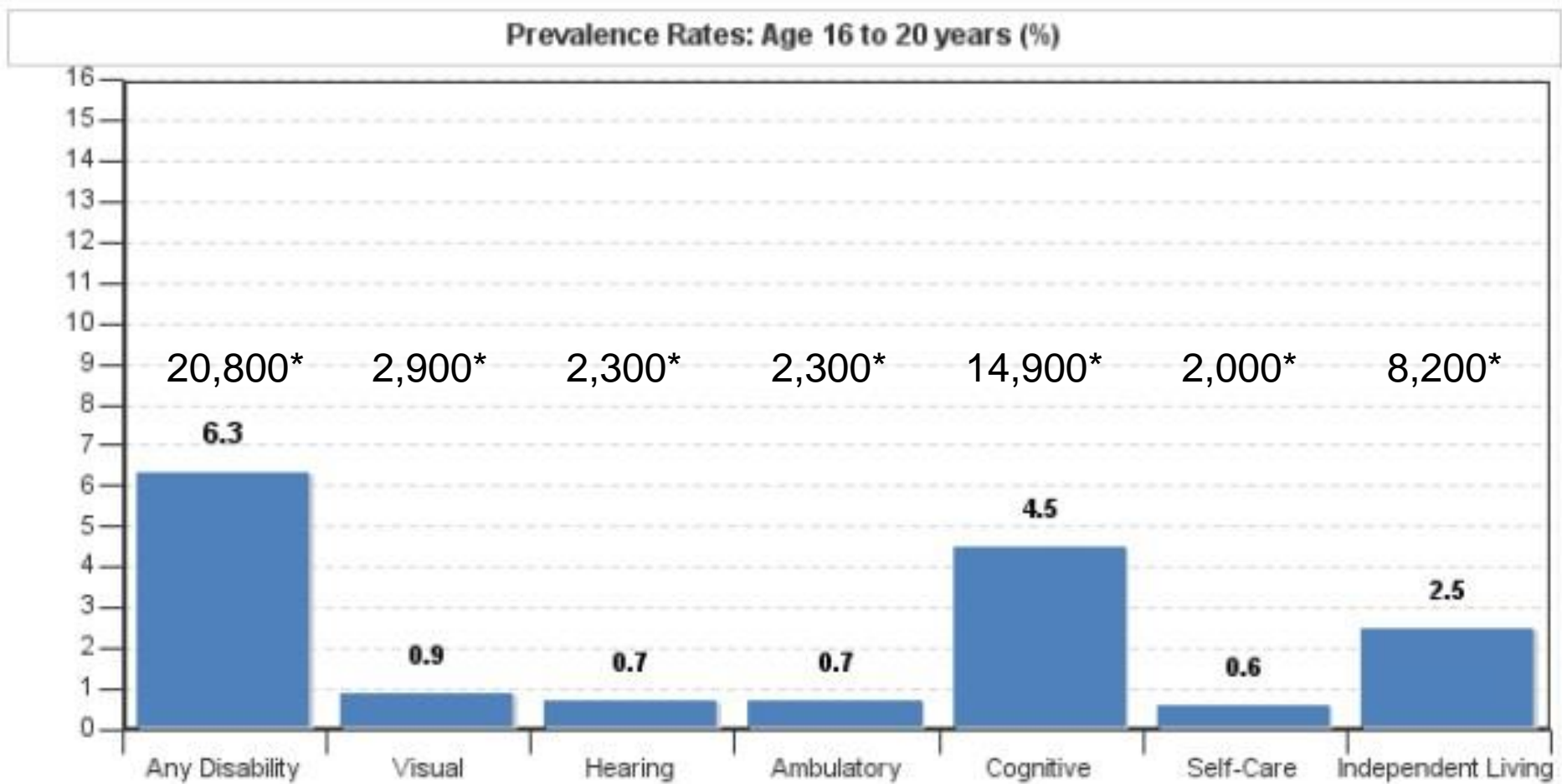
1. [Annual Disability Statistics Compendium.](#)

# SC Ages 6 to 21 Served Under IDEA

	2012	2013
<b>All Disabilities</b>	88,904	89,202
Specific Learning Disability	41,491	41,100
Speech or Language Impairment	14,799	14,555
Intellectual Disability	7,192	6,847
Emotional Disturbance	2,946	2,754
Multiple Disability	830	954
Hearing Impairment	1,046	1,011
Orthopedic Impairment	571	532
Other Health Impairment	11,081	11,635
Visual Impairment	414	421
Autism	4,481	5,082
Deaf Blindness	5	8
Traumatic Brain Injury	188	179
Developmental Delay	3,860	4,124

Source: [Annual Disability Statistics Compendium](#)

# Prevalence of Disability Among Non-Institutionalized People Ages 16 to 20 in South Carolina in 2013

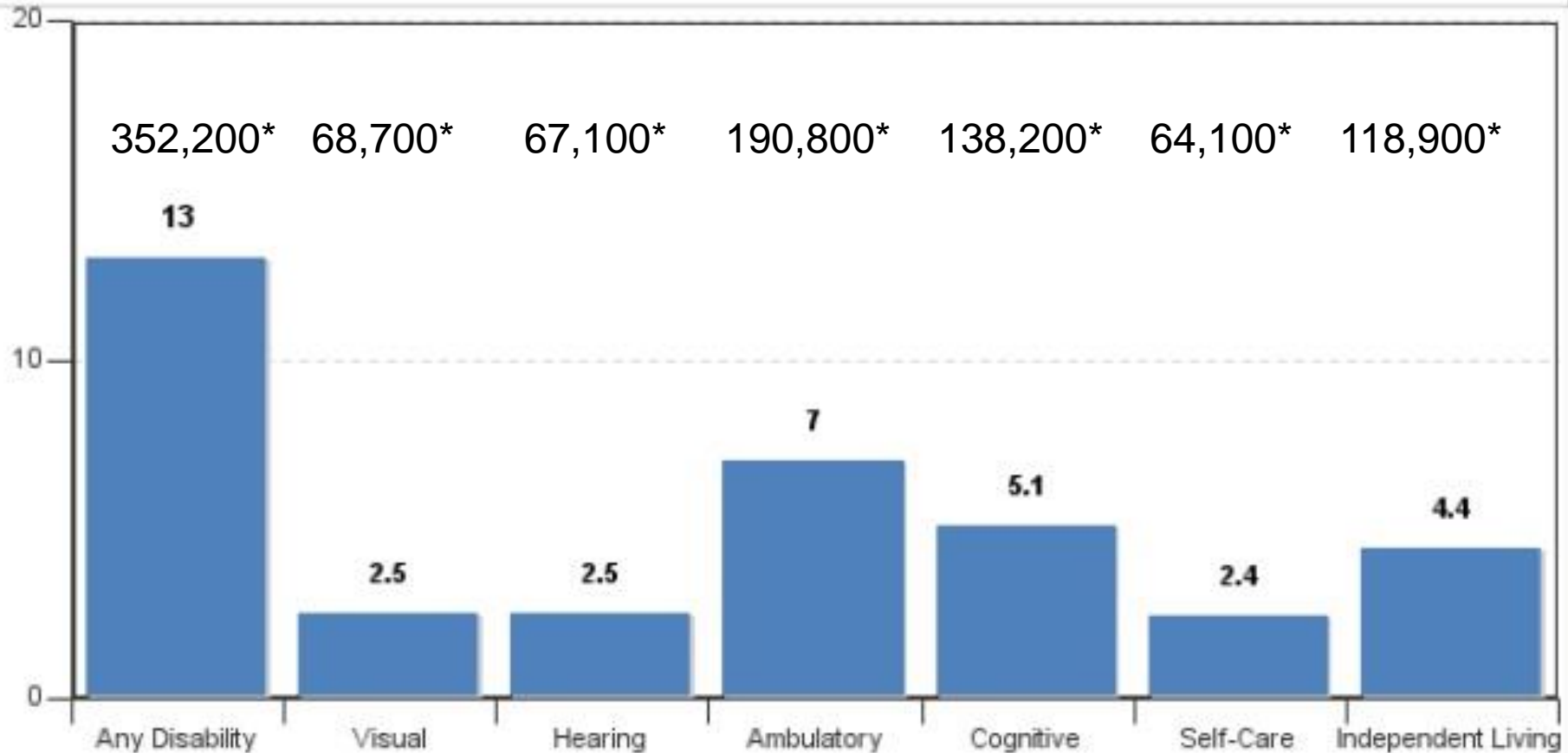


\*Total numbers reported

Source: [Cornell University](#)

# Prevalence of Disability Among Non-Institutionalized People Ages 21 to 64 in South Carolina in 2013

Prevalence Rates: Age 21 to 64 years (%)

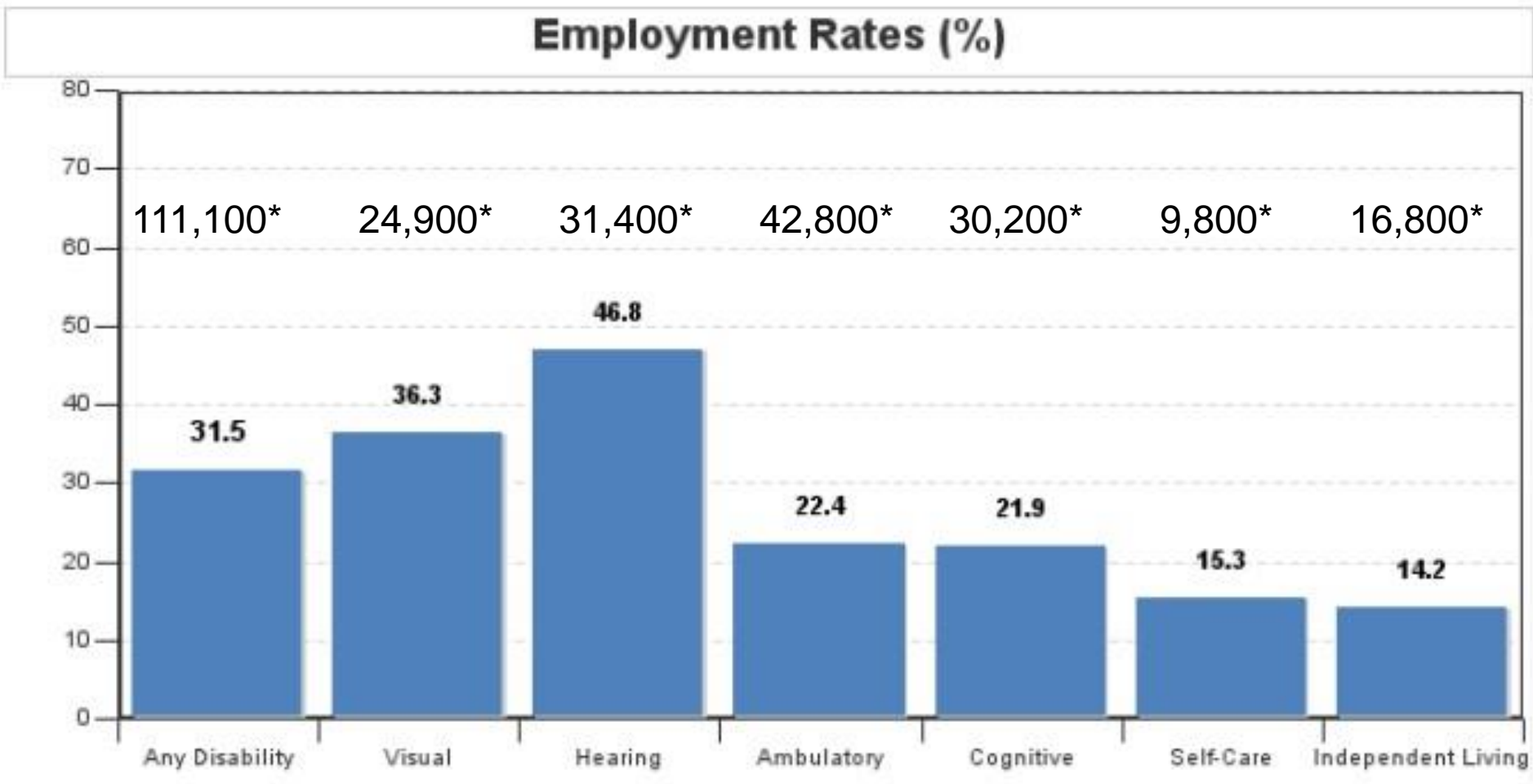


\*Total numbers reported

Source: [Cornell University](#)



# Employment of Non-Institutionalized Working-Age People (Ages 21 to 64) by Disability Status in South Carolina in 2013



\*Total numbers reported

Source: [Cornell University](#)

# South Carolina Project SEARCH Sites

- ❖ Palmetto Health Baptist Parkridge – Columbia
- ❖ Spartanburg Regional Healthcare System –  
Spartanburg

Project SEARCH: [www.projectsearch.us](http://www.projectsearch.us)

Contact Linda Emery at [linda.emery@cchmc.org](mailto:linda.emery@cchmc.org)

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

## ❖ Top contractors:

- Savannah River Nuclear Solutions LLC
- URS Corp
- The Shaw Group INC
- General Dynamics Corp
- Blue Cross and Blue Shield of South Carolina

- Complete list → [fed spending website](http://www.fedspending.org/fpds/fpds.php?reptype=p&detail=-1&fiscal_year=2011&sortby=f&database=fpds&dtype=T&stateCode=SC)

[http://www.fedspending.org/fpds/fpds.php?reptype=p&detail=-1&fiscal\\_year=2011&sortby=f&database=fpds&dtype=T&stateCode=SC](http://www.fedspending.org/fpds/fpds.php?reptype=p&detail=-1&fiscal_year=2011&sortby=f&database=fpds&dtype=T&stateCode=SC)

- Complete federal lists of 2006-2014 → [Federal Procurement Data System website](https://www.fpds.gov/fpdsng/cms/index.php/en/reports/62-top-100-contractors-report3.html)

<https://www.fpds.gov/fpdsng/cms/index.php/en/reports/62-top-100-contractors-report3.html>

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

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

# Jobs in South Carolina

## ❖ High Growth Industries in South Carolina:

- Maintenance, repair, and rebuilding of equipment, operation of government facilities, construction

<http://lmi.dew.sc.gov/lmi%20site/Documents/StateOfWorkforceReport.pdf>

## ❖ SC Integrated Workforce Plan 2012-2016

[http://dew.sc.gov/news/Integrated\\_Workforce\\_Plan.pdf](http://dew.sc.gov/news/Integrated_Workforce_Plan.pdf)

## ❖ SC Workforce Investment Board

[http://workforceinvestmentworks.com/workforce\\_board\\_info.asp?st=SC](http://workforceinvestmentworks.com/workforce_board_info.asp?st=SC)

# Resources

- ❖ StateData: The National Report on Employment Services and Outcomes, 2014 (data from 2013)
- ❖ 2013 Disability Status Report United States, Cornell University, 2013: [www.disabilitystatistics.org](http://www.disabilitystatistics.org)
- ❖ Fedspending: [www.fedspending.org](http://www.fedspending.org)
- ❖ Project SEARCH: [www.projectsearch.us](http://www.projectsearch.us)
- ❖ Job Accommodation Network: <https://askjan.org/>
- ❖ State Vocational Rehabilitation Agency:  
[http://wdcrobcolp01.ed.gov/Programs/EROD/org\\_list.cfm?category\\_cd=SVR](http://wdcrobcolp01.ed.gov/Programs/EROD/org_list.cfm?category_cd=SVR)
- ❖ RespectAbilityUSA: [www.respectabilityusa.org](http://www.respectabilityusa.org)



# Let Us Know If We Can Help!

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

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