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March 18, 2016

RespectAbility – Public Comments – Tennessee WIOA Combined State Plan

“WHEREAS, Tennesseans with and without disabilities live and work side by side in communities across Tennessee; and WHEREAS, every person, regardless of ability, has valuable strengths, infinite capacity to learn and the potential to make important contributions to their local communities.” -[Governor Bill Haslam, February 16, 2016](#)

RespectAbility is pleased to submit the following comments regarding the current draft of Tennessee'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.

Tennessee has the opportunity to work hard to improve outcomes in terms of competitive, integrated employment for people with disabilities. **Currently, your state ranks 42nd in the nation as measured by jobs for people with disabilities and only 29.9 percent of the approximately 563,863 working age Tennesseans with disabilities are employed.** Tennessee drops to 45th in the nation when you look at the 44.5 gap in the labor force participation rate between people with and without disabilities. **In total there are 537,500 working age people with disabilities in Tennessee. Added to that number are the 27,900 youth ages 16-20 with disabilities. Each year, one quarter of that number will age out of the school system into an uncertain future.**

However, thanks to WIOA, Tennessee has the chance to invest resources in **successful models and implement best practices to expand job opportunities for people with disabilities.** Your state has worked to learn from best practices around the country. Still, like others, it has much to learn from other states that have worked hard to achieve improved employment outcomes. Other states have close to 50% employment rates for their citizens with disabilities. [States like the Dakotas, Alaska, and Wyoming have achieved increase results by putting best practices into places.](#) We know that Tennessee is focused on improving results and can do the same. The experience of these states shows ways that Tennessee can dramatically improve their outcomes.

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

We are pleased to see that Tennessee takes employment for people with disabilities seriously, including them in almost every section of its Plan. Tennessee's emphasis on collaboration and cooperation among agencies, focus on relevant data, and desire to improve and self-evaluate. These are all encouraging signs. However, no plan is perfect and there are areas where the lens of disability issues is needed. **Our public comments on Tennessee's WIOA State Plan are structured around those points where greater clarity, precision, and data are needed to ensure that people with disabilities will be better equipped to pursue the American Dream.**

1. Make sure that the best data points, especially those around youth with disabilities as well as Labor Force Participation Rates (LFPRs) are in your Workforce Analysis.

From our review of the current draft of Tennessee's Combined State Plan we know that you have access to the right data to drive decision making. It is clear that your state is making good use the "Disability Program Navigator (DPN), and the Disability Employment Initiative (DEI)" grants. As reported on page 14 of the current draft of the Combined State Plan, this funding has been creating "to collaborative and sustained services".

Tennessee clearly has the essential building blocks needed to improve competitive, integrated employment outcomes for your citizens with disabilities. However, achieving such outcomes will very much require making sure that that right data drives both decision making and performance metrics in Tennessee. Tracking unemployment data (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.

We appreciate the depth of detail provided on pages 14 and 15 of your State Plan. These tables do much to describe the scope of the disability community in Tennessee. **This is good data but significant gaps remain in this data and it is not structure in a way useful to the workforce system.** Your State Plan lacks focused information on youth with disabilities, the diversity of disabilities in the community, and it lacks clarity in terms of Tennesseans with disabilities who are employed. Worst of all, your State Plan is short on references to the Labor Force Participation Rate (LFPR) for both people with and without disabilities. As such, we have recommendations to make in terms of further data points to include in your final draft.

Figure 1.

Tennessee Performance Metrics on jobs for PWDs



Gov. Bill Haslam (R)

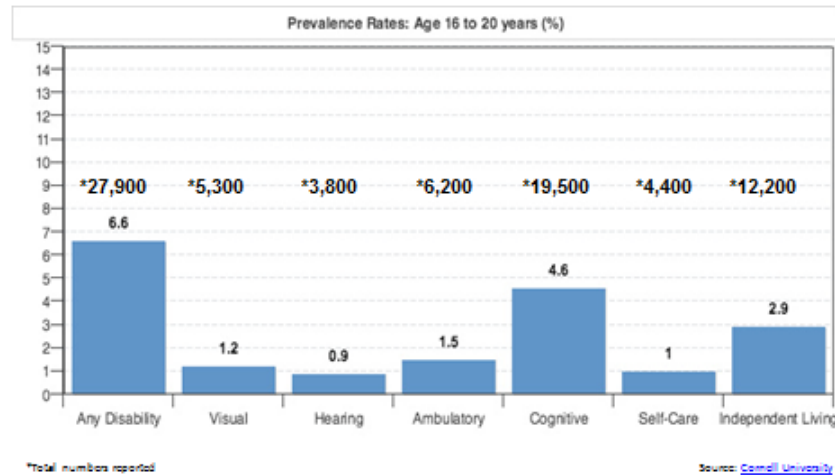
1. 2013 Disability Status Report: Tennessee, disabilitystatistics.org
2. StateData: The National Report on Employment Services and Outcomes, 2014
3. [Annual Disability Statistics Compendium](#)

- ❖ 74.4% of persons without disabilities aged 18 to 64 are employed.³
- ❖ 29.9% of PwDs aged 18 to 64 are employed.³
- ❖ 1,012,498 people in TN have a disability.³
- ❖ Tennessee ranks 42nd in the country in terms of jobs for PWDs.
- ❖ There is a 44.5 point gap in the labor force participation rate (LFPR) between people with and without disabilities
- ❖ 27,900 persons aged 16 to 20 have a disability.¹
- ❖ 537,500 persons aged 21 to 64 have a disability.¹
- ❖ The employment gap between People with and without disabilities increased by 0.4% between 2013 and 2014.³
- ❖ In 2014, 286,627 people received benefits.³
- ❖ In December 2014, TN's total expenditure on SSDI benefits was \$311,024,000.³
- ❖ Voc. Rehab. received 7,279 applicants in TN 2012.³
- ❖ Voc. Rehab. obtained 1,970 jobs for PwDs in TN in 2012.²

Your State Plan only references Labor Force Participation Rates (LFPR) on page 196 in connection with "the 55+ population." **This is a significant problem because the LFPR is 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 empowering more people with disabilities to succeed in competitive, integrated employment. **Below are the additional data points we would like to see integrated in the final draft of your State Plan:**

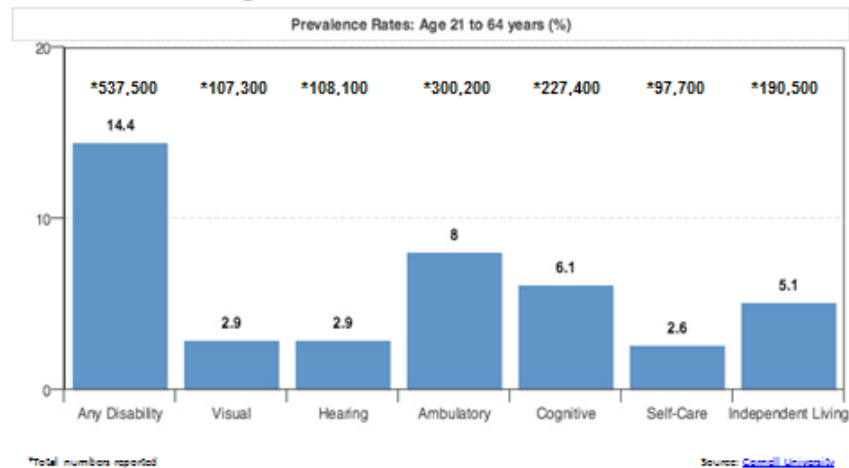
- a. **Youth with disabilities who are aging in the workforce (ages 16-20).** The biggest missed opportunity in terms of data is around youth with disabilities. WIOA puts a focus on the importance of better serving youth across the workforce system. If Tennessee's workforce system is to seriously deliver 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 Tennessee in 2013



- b. **Greater clarity around working age people with disabilities (ages 21-64).** The experience of disability is diverse and includes a wide range of differences both visible and invisible. As such, Tennessee's Combined State Plan needs to include clearer information regarding the types of disability that people are experiencing.

Figure 3.
Prevalence of Disability Among Non-Institutionalized People
Ages 21 to 64 in Tennessee 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 Tennessee to provide early work experiences and skill training.

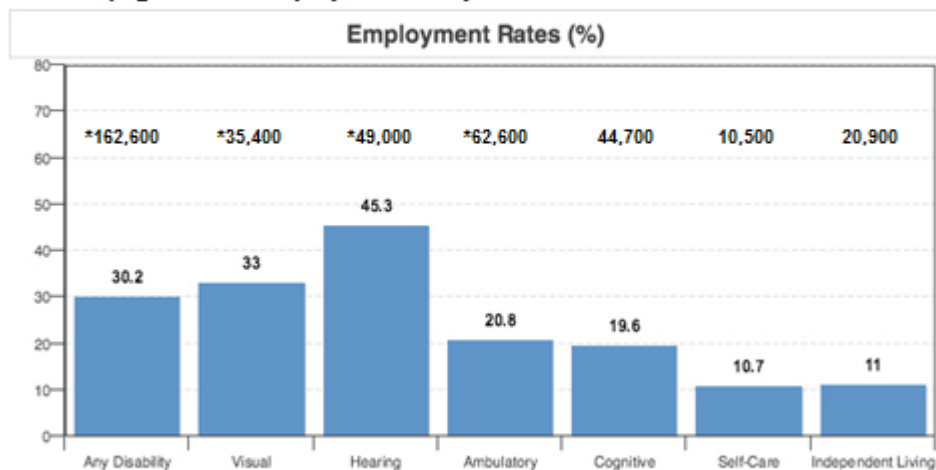
Figure 4.
Ages 6 to 21 IEPs by Category TN

	2012	2013
All Disabilities	114,340	117,804
Specific Learning Disability	47,038	48,781
Speech or Language Impairment	25,903	26,258
Intellectual Disability	7,421	7,401
Emotional Disturbance	3,295	3,264
Multiple Disability	2,033	2,040
Hearing Impairment	1,314	1,295
Orthopedic Impairment	654	608
Other Health Impairment	14,375	14,995
Visual Impairment	629	604
Autism	6,486	7,156
Deaf Blindness	8	7
Traumatic Brain Injury	310	315
Developmental Delay	4,874	5,080

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.

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



*Total numbers reported

Source: [Cornell University](#)

Tennessee's Plan shows an impressive commitment to using and sharing data to best achieve its goals. We commend your surveying and phone-banking to best evaluate your performance, as described beginning on page 156. We simply want to ensure that Tennessee is using the best, most representative data available in measuring its performance. We are very pleased to see Tennessee include "disability status of the workforce" in its Economic and Workforce Analysis section beginning on page 14. However, we recommend that the Labor Force Participation Rates, especially the gap between people with and without disabilities in the workforce, be included as a performance metric. It is far more representative of the barriers people with disabilities are facing and is the best performance metric for monitoring their employment. This gap should be included in your performance goals section in Appendix 1 beginning on page 190.

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 beginning on page 7 of the Combined State Plan in the section entitled: "Economic and Workforce Analysis." This section clearly states where talent needs have been growing in Tennessee's economy and where sectors have been losing ground. The "Nonfarm" industry sectors that have grown over the past decade include: "Educational and health services", "good producing", "professional and business services", "Leisure and hospitality", and jobs in state government. As Tennessee's workforce system looks for strategies to create a talent pipeline to meet these demands in both the agriculture and "nonfarm" industry sectors, 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.** The job gains in the sectors discussed above offer a great opportunity for focused sector strategies to achieve improved outcomes.

a. Health and Elder Care:

The rapid 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.

The State Plan projects continued growth in the field of "Health Care and Social Assistance." **People with disabilities can and should be part of the solution to this demand in the labor market.** To quote [a 2014 report from the Office of Disability Employment Policy \(ODEP\)](#), "[people with disabilities] not only represent an untapped talent pool, but also offer significant value and insight" in the field of healthcare. It is important for healthcare institutions to reflect their customers, and people with disabilities interface more with the healthcare system. There are [numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living.](#) **Employers working in health and elder**

care can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities.

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. We were very surprised at the absence of Project SEARCH in Tennessee's Plan, given that Tennessee is home to 8 Project SEARCH sites. As such, we recommend that Project SEARCH be specifically mentioned and utilized and expanded in Tennessee's WIOA Plan. 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. **Project SEARCH should be included in Tennessee's Pre-Employment Transition Services sections, especially on pages 126-128 in Tennessee's description of its Transition to Work program.** We suggest that you look to follow the example set by the state of Wisconsin where they started with three Project Search sites and are expanding to 27. The experiences of the dedicated state officials, VR counselors, workforce professionals, and special educators who have increased Wisconsin's Project Search programs offer profound insights in the steps necessary to make rapid expansion a reality. Thinking long-term, investments in Project Search and other such programs will save big money for taxpayers while also strengthening the talent pool for employers.

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

Exciting opportunities for improving employment outcomes for people with disabilities lay in the fields related to STEM jobs. **As 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.** This could be a very powerful resource for Tennessee. **As listed in the table on page 9, the "Professional, Scientific, and Technical Services" sector is expected to add 21,750 new jobs between 2014 and 2022.** STEM-related jobs are the future and can greatly strengthen Tennessee's economy.

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.](#) Other states 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. **When a student’s IEP and/or Individualized Plan for Employment (IPE) is being formulated, STEM-related jobs should be examined where appropriate.**

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

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

A great example of an employment sector where employees with disabilities can be tremendously successful is the hospitality industry. Accommodations and food service are extremely high turnover jobs and numerous studies show that people with disabilities can be outstanding in those fields and have significantly higher employer loyalty. Tennessee has projected the “Leisure and Hospitality” industry to add 17,690 jobs between 2014 and 2022.

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

Another sector with high turnover and big potential is retail trade. Many companies, including [UPS](#), [Wal-Mart](#), and [OfficeMax](#) have proven records of success. Given the prevalence of Fortune 500 companies headquartered in Tennessee, including Walmart, there are plenty of employment opportunities available for people with disabilities in retail. These companies can be outstanding partners for disability employment as these industries suffer from high turnover rates and people with disabilities are proven to have significantly higher retention rates. It is important to identify more specific opportunities with employers and to cite them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future.

d. Jobs with state government 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. In the year ahead, the workforce of many state governments is likely to be impacted by the cresting wave of Baby Boomers retiring just as other sectors are being shaken.

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

This is an issue that Governors, both Republican and Democrat, have taken action to address. In many different states, Governors have worked hard to expand the recruitment and retention of people with disabilities for jobs in state government. For example, [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." The untapped potential of people with disabilities is such that a full-spectrum, all-of-the-above-and-more approach is needed. While our priority is on seeing the talents of people with disabilities channeled into the private sector, employment opportunities in the public sectors shouldn't be over looked as part of the state's overall workforce strategy.

e. Agriculture:

For states like Tennessee where agriculture is a key industry, [there is an opportunity to replicate the success of TIAA-CREF's Fruits of Employment project that provides internships and job training to workers with disabilities to prep them for careers in competitive agriculture. Farmers in Georgia have already had success with a program designed to reduce barriers persons with disability face in agricultural fields and it can and should be incorporated into WIOA plans.](#)

People with disabilities should be included in your Agricultural Outreach Plan (AOP), as detailed on page 99. Given that agriculture accounts for 10.5% of Tennessee's economy, it is critical that people with disabilities be included in consideration for jobs in agriculture.

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 Tennessee's Combined 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.** Tennessee's Plan demonstrates a commitment to overcoming the barriers facing people with disabilities. However, 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 Tennesseans with disabilities face are serious barriers that your workforce system needs to address.

We are pleased to see that Tennessee takes the State Rehabilitation Council's recommendation, on page 120, to develop marketing strategies seriously. This marketing strategy should not be limited to increasing awareness of the litany of services provided by Vocational Rehabilitation. It should be amended to include a communications campaign that will break down the barriers people with disabilities face when seeking employment.

A systematic PR Campaign would help achieve both your Conservative Fiscal Leadership Goal (page 18) and your Education and Workforce Development Goal (page 17). This campaign will help to reduce the amount of money spent on benefits as people with disabilities gain employment and it will help create a more seamless transition path.

In terms of potential employer partners to help with this campaign, 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. Tennessee needs a public relations campaign that will inspire Tennesseans 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 Tennessee understands this and has included it in their plan in its goal to increase collaboration with businesses and to begin youth employment plans in middle school. It will not be difficult to incorporate this into a PR Campaign.

As an example of the power and value of making the business care for hiring people with disabilities, we offer Tennessee 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. Our profiles of diverse employers such as EY, AT&T, and Kwik Trip, which can be found on our website, offer insight on how to implement such a multilayered approach.

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

We are pleased to have found that Tennessee’s Combined State Plan directly addressed the challenges and opportunities created by the new regulation around Section 503 of the Rehabilitation Act. This is a unique business opportunity that demands a strategy focused on competitive advantage, not just compliance.

On page 141, we find a specific discussion of “the role of the state agency with 503 compliance” in the context of the evolving role of Vocational Rehabilitation under WIOA. This section directly states that “Tennessee VR BECs work with contacts established through the US

Department of Labor's Office of Federal Contract Compliance Programs as a resource to assist federal contractors in addressing the Final Rule of Section 503 of the Rehabilitation Act of 1973." This has been done by the BECs through a variety of meeting, trainings, and referrals to "job candidates available through Tennessee's VR services." Further, "BECs assist in recruiting efforts" directly connection businesses with qualified individuals with disabilities. We are also quite pleased to see "assistance with Section 503 compliance" listed on page 184 as an achievement reported by Tennessee VR in FFY2015.

This is outstanding and we hope that Tennessee will continue to leverage these partnerships into close cooperation with federal contractors doing business in Tennessee. 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 McKesson Corp, UT-Battelle LLC, The Babcock & Wilcox Company, FedEx Corp, and URS. More detailed information regarding federal contracts in [Tennessee 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 required of the entire workforce system and the program specific Assurances outlined in the State Plan are critical factors in the overall implementation and ultimate success of WIOA. As such, it is critical that each assurance is matched up with a strategy fitted to meeting and, if possible, exceeding the requirements of the law.

We are glad to see Tennessee acknowledge the importance of WIOA's Common Assurances. **Beginning on page 74, we would like to see more detail provided in terms of a focused strategy for implementing those common assurances.** This could mean providing focused strategies within this "Section V-Common Assurances" section, or, the Plan could include the individual common assurance in other places in the Plan where they might be better addressed an easier to organize.

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 meeting Common Assurance #7 listed in the State Plan on page 74, 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.

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

One challenge that we have seen in many states WIOA plan has been the prioritization of expensive brick 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.

On page 69 of Tennessee's Combined State Plan, we find the full summary of the Volunteer State's efforts to ensure the accessibility of the One-Stop Delivery System. We are glad to see such strong language around accessibility, however, we take a different view of how to move the workforce system forward.

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.](#)

With that said, there are other signs that Tennessee's workforce system is evolving in the right direction. Page 79 of the Plan discusses Mobile Units in the Rapid Response Services section. This is an excellent initiative and could easily be applied to helping people with disabilities gain successful employment. It would allow career coaches to work with people with disabilities without requiring the use of a physical one-stop center.

Tennessee has numerous other progressive initiatives, including the Pathways to Prosperity Network, the Business Services Unit, Workforce360°, and Jobs4TN, to name a few. Workforce One-Touch, as described on page 55, is an excellent initiative. But is it fully accessible for people with disabilities? Does it include specific disability issues? We want to capitalize on these excellent programs and ensure that these programs are inclusive of people with disabilities and are programmatically and technologically accessible.

Additionally, considerable thought needs to take place around the creation of a unified intake system for the workforce system and government benefits programs. Jobs4TN could be used for this. 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. Creating an affiliate chapter of the US Business Leadership Network, and/or working very closely with an existing chapter, is a great tool for effectively engaging employers and reaching the right business audience:

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

Because Tennessee does not have a state chapter of the US Business Leadership Network, we are recommending that you look at developing one. We are pleased that Tennessee has a Business Services Unit and that the Tennessee VR participates in the National Employment Team, as described on page 121. However, the lack of a US BLN chapter limits the flexibility and capability of states to engage employers around hiring people with disabilities. As such, we highly recommend that the appropriate staff both in the workforce system and VR work with the employer partners to formalize their intersections through the establishment of an affiliate chapter. Establishing a BLN Chapter would help to organize the "knowledge of community

outreach, recruiting and interviewing, the accommodation process and barriers” needed to achieve improved outcomes. **After contacting US BLN to create a state chapter, Tennessee’s chapter should be included on page 121 with the Business Services Unit.** Currently, VR agencies often have a network of businesses their work closely with in order to place VR clients into jobs. These business partners would certainly benefit from tapping into the national structure of the USBLN and their resources. **Additionally, a BLN chapter could coordinate with the Businesses Services Unit and Workforce360° in order to adhere to Governor Haslam’s Conservative Fiscal Leadership Goal.**

It is also imperative that after creating a chapter, it is included at the WIOA table. As such, we encourage Tennessee to look at the successes achieved in Wyoming, which possesses one of the most effective, engaged, and active affiliate chapters in the country. The Wyoming BLN, despite the challenges of a largely rural population and limited resources, has been achieving outstanding employment outcomes. We would be happy to provide Tennessee’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.

8. 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. We are pleased to see that Tennessee values apprenticeship programs, including them in its “State Strategy” section on page 21, as well as in its efforts to form and maintain partnerships with employers. This is critical work and it is work that needs to be viewed through the lens of disability.

As your state looks to improve apprenticeship programs such as Tennessee Promise, **we highly recommend that the workforce system seriously look at ways to make apprenticeships more accessible to people with disabilities.** For example, programs like Tennessee Promise and Tennessee Labor Education Alignment Program should be amended to specifically include and target 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 realization the full promise of WIOA for people with disabilities. **We would also like to see more active recruitment of people with disabilities. Your detailed, organized graphic on page 51 titled “Talent Recruitment Process” would be an excellent initiative if applied to jobseekers with disabilities. We would very much like to see Tennessee focus such activities around attracting young people with disabilities in these types of work-based learning programs.** Tennessee’s WIOA State Plan is committed to “more seamless path from high school, post-

secondary education or training to the workforce” and people with disabilities need to be part of that process. Doing so will require cooperation between education and workforce development.

Further, we would also 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.

9. 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.

Page 16, in the State Strategic Vision and Goals section, reads: “Education has a direct influence on jobs.” We agree. This is why career services in Post-Secondary Education must be aligned with disability services. The Tennessee Labor Education Alignment Program (LEAP) could be a great way to bridge this gap, if applied to people with disabilities.

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. The transition committee of the WIOA Roundtable that Tennessee formed would

be a great group to lead this initiative. Prof. Erik Carter at Vanderbilt is one of the most respected thinkers on disability issues and he should be consulted on your strategies.

10. Supporting Pre-Employment Transition Services through the Development of Public-Private Partnerships:

We are encouraging states to follow the example set by Florida and Wisconsin by working hard to expand the number of Project SEARCH sites. **Tennessee already has 8 Project SEARCH sites. As we mentioned before, they should be included in Tennessee's WIOA Plan, especially in the Career Pathways section beginning on page 23 and the Vocational Rehabilitation section detailing Transition services beginning on page 128.** However, this is not the only paradigm that you should follow.

Your school system, vocational rehabilitation, and local workforce boards can build creative, collaborative partnerships with companies that are leading in the disability space. **We are pleased to see that IEP meetings include information on Pre-Employment Transition Services, as explained on page 128.** We would like to see more of this.

Tennessee would benefit greatly by looking at other models of innovation that are showing great potential to fundamentally improve employment outcomes. To begin with, **we would highly recommend that Tennessee's workforce system examine how to support disability employment efforts through establishment of public/private partnerships in local communities.** Tennessee has already demonstrated a strong commitment to delegating duties to local and regional business teams. These local groups are vital in forming strong business partnerships.

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."](#)

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

We are encouraged that Tennessee appreciates the need for outreach and education about available services, as seen in its thorough self-evaluation through its extensive surveying as documented beginning on page 156 of the Plan. However, the Plan needs more.

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. For example, the Plan says on page 74 it will provide the public access to various Board meetings, including to people with disabilities. This could be a great resource to people with disabilities trying to gain employment and learn about the resources available to them, and they probably don't even know it exists. Also, Tennessee's previously mentioned surveying system could be used to personally spread information about free and accessible resources. After asking questions, the surveyor could give a quick list of

available resources. This would be an easy way to spread information in the disability community, while not spending any extra money doing so.

In addition, Tennessee should be careful not to waste money trying to re-invent the wheel in creating online resources because ASKJAN.org, [the US Department of Labor's Office of Disability Employment](http://theUSDepartmentofLabor.com), [our organization](#) and others also offer free toolkits, [webinars](#) and [training opportunities](#). It would be helpful to collaborate with these groups however to ensure that the best tools are created to fit the training and information needs on these issues. Since you already “receive technical assistance” from ODEP, and they have good resources available, **you could look into collaborating with them directly to disseminate the free resources they have available.**

12. 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.”

We are pleased by the Tennessee State Board’s diverse membership, as documented on page 58, but we recommend the inclusion of a disability community representative(s) on this board. We also think the inclusion of a disability community representative on the Pathways to Prosperity Network roster, as listed on page 23, would be incredibly impactful. We also recommend the inclusion of a self-advocate with lived experience on the Oversight Committee of the Tennessee Dept. of Labor and Workforce Development discussed on page 28.

Even a non-voting, advising member of a workforce/WIOA board can bring critical perspectives that improve the workforce’s efforts overall. As such, we feel that the next step would be for Tennessee’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.**

13. 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 enumerated among “the support factors involved in becoming self-sufficient” in the discussion of poverty on page 12 of the State Plan in the section about “Targeted Populations.” Further, page 200 discusses coordination by SCSEP specifically around “Coordinating with local service providers and community stakeholders...to develop solutions for local transportation services.” There are several other references to transportation on page

204 and 206. This is important work certainly, but they are only connected to services for aging Tennesseans and not connected to working age people with disabilities.

Transportation is a critical barrier to employment for many people with disabilities. As such, it is vital to work with public transportation to ensure that there are bus routes to places where there are internships, apprenticeships and work opportunities for people with disabilities.

People with disabilities need transportation solutions. Public transportation need not be the only solution. In places where it is not possible to coordinate a bus route, 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](#), so a state could also look at developing partnerships here.

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.

14. Aging workers and those who acquire disabilities must be specifically addressed:

We are pleased to see the attention given in Tennessee’s WIOA State Plan around the needs of older workers. Starting on page 195, the State Plan goes into great detail about the Program Elements of the “Senior Community Service Employment Program (SCSEP).” SCSEP is unique in being the “only federally-sponsored, job creation program targeted to low-income older Americans” and specifically “promotes the Governor’s initiative to engage and educate employers on the value of hiring older workers.” 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. This addition could be made in your Senior Community Service Employment section beginning on page 195. 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.

15. 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.](#)

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

Ex-offender who are returning and reintegrating back into society faced significant barrier to employments. Serving this population is a unique challenge facing the workforce system and, from our perspective, it is work that needs to be viewed through the lens of disability. **As such, we are pleased to see the Tennessee Department of Corrections included in Section C “Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System.” Page 125 specifically states the VR in Tennessee collaborations with Corrections to address the disability issues of “individuals released from state correctional facilities” as well as the “Tennessee Board of Probation and Parole.”** We commend Tennessee for addressing these challenges in your State Plan.

Many states omit disability issues when looking for ways 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. 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 remains 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 workforce, disability, and justice issues.

Conclusion:

The bottom line is that expanding job opportunities for people with disabilities is beneficial to all. 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 people 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. And it is good for taxpayers, because it reduces the amount of funding spent on SSDI and other disability programs in the long run.

In all of our work around WIOA, we have emphasized the fact that this new law represents the intersection of hope and history for people with disabilities. Tennessee's WIOA State Plan demonstrates some of the hard work, dedicated effort, and specific policies needed to realize those hopes. People with disabilities want to pursue the American Dream, just like everyone else. Making sure there are pathways for their talents to meet employer talent needs is a win-win-win for people with disabilities, taxpayers, and businesses alike. We are encouraged by what we have seen in Tennessee's Plan and are excited to see the final product.

We are happy to answer any questions you may have. Thank you for your time and consideration.

Below are two data tables that provide detailed information ranking the states in terms of employment rates for people with disabilities as well as the employment gap between people with and without disabilities. This has been added to show you where each state ranks nationally.

APPENDIX – Ranking 50 States by Employment Rates and Employment Gap

Data Source- Chart 1: Table 2.1: Employment—Civilians with Disabilities Ages 18 to 64 Years Living in the Community for the United States and States: 2014 from the Annual Disability Statistics Compendium

Disability Employment Rate by State, 2014														
	State	%		State	%		State	%		State	%		State	%
1	South Dakota	50.1	12	Montana	40.5	23	Oklahoma	36.4	34	California	33.3	45	Arkansas	29.2
2	North Dakota	49.9	13	Connecticut	40.2	24	Oregon	36.4	35	Arizona	32.8	46	South Carolina	29.0
3	Iowa	46.5	14	New Hampshire	40.0	25	Indiana	36.2	36	Missouri	32.8	47	Mississippi	27.4
4	Nebraska	46.0	15	Kansas	39.8	26	Vermont	36.2	37	Maine	32.5	48	Kentucky	27.3
5	Wyoming	45.2	16	Wisconsin	39.8	27	Illinois	35.7	38	Louisiana	32.1	49	Alabama	27.2
6	Minnesota	44.4	17	New Jersey	39.2	28	Delaware	35.6	39	North Carolina	31.3	50	West Virginia	25.6
7	Utah	44.0	18	Maryland	39.1	29	Massachusetts	35.5	40	New Mexico	30.4		Washington D.C.	30.3
8	Hawaii	42.4	19	Idaho	38.8	30	Ohio	34.6	41	Florida	30.1			
9	Colorado	41.6	20	Texas	38.0	31	Pennsylvania	34.5	42	Tennessee	29.9		Source: Annual Disability Statistics Compendium	
10	Nevada	40.9	21	Washington	37.7	32	Rhode Island	33.9	43	Georgia	29.6			
11	Alaska	40.8	22	Virginia	37.6	33	New York	33.6	44	Michigan	29.6		United States	34.4

Source: [Annual Disability Statistics Compendium](#)

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			
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](#)



RESPECTABILITY

TN and Jobs for PwDs

Jennifer Laszlo Mizrahi, President

www.RespectAbilityUSA.org

Tennessee



Gov. Bill Haslam (R)

- ❖ 74.4% of persons without disabilities aged 18 to 64 are employed.³
- ❖ 29.9% of PwDs aged 18 to 64 are employed.³
- ❖ 1,012,498 people in TN have a disability.³
- ❖ **Tennessee ranks 42nd in the country in terms of jobs for PWDs.**
- ❖ **There is a 44.5 point gap in the labor force participation rate (LFPR) between people with and without disabilities**
- ❖ 27,900 persons aged 16 to 20 have a disability.¹
- ❖ 537,500 persons aged 21 to 64 have a disability.¹
- ❖ The employment gap between People with and without disabilities increased by 0.4% between 2013 and 2014.³
- ❖ In 2014, 286,627 people received benefits.³
- ❖ In December 2014, TN's total expenditure on SSDI benefits was \$311,024,000.³
- ❖ Voc. Rehab. received 7,279 applicants in TN 2012.³
- ❖ Voc. Rehab. obtained 1,970 jobs for PwDs in TN in 2012.²

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

Tennessee

		People with Disabilities (%)		People without Disabilities (%)	
		2013 ¹	2014 ²	2013 ¹	2014 ²
Poverty	US	28.7	28.2	13.6	13.0
	TN	30.8	32.1	14.2	15.1
Smoking	US	25.4	24.5	16.2	15.3
	TN	35.5	34.7	20.1	20.1
Obesity	US	40.1	41.1	25.0	25.2
	TN	46.6	37.4	28.6	28.6
Employment	US	33.9	34.4	74.2	75.4
	TN	29.9	29.9	74.1	74.4

1. [Annual Disability Statistics Compendium, 2014](#)

2. [Annual Disability Statistics Compendium, 2015](#)

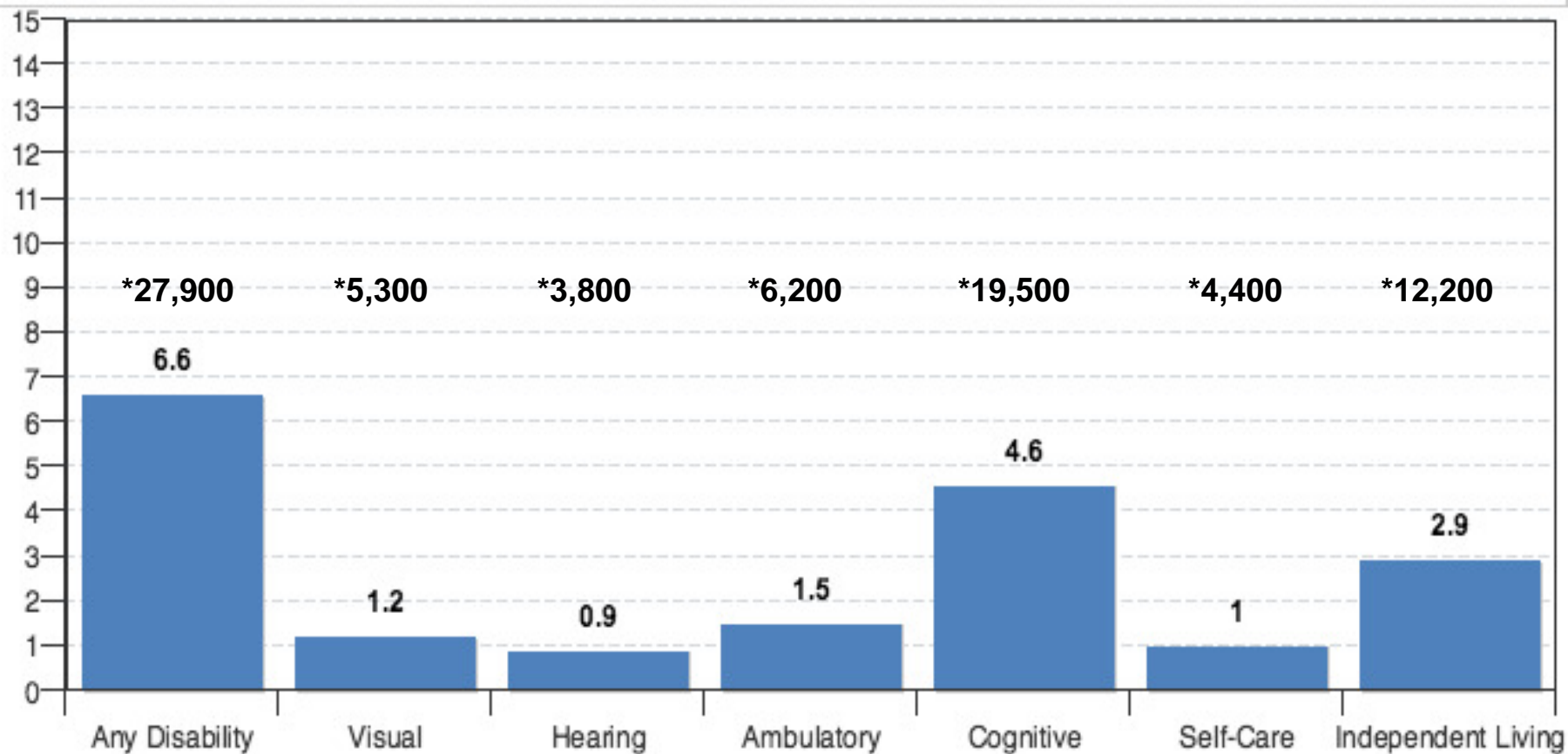
Ages 6 to 21 IEPs by Category TN

	2012	2013
All Disabilities	114,340	117,804
Specific Learning Disability	47,038	48,781
Speech or Language Impairment	25,903	26,258
Intellectual Disability	7,421	7,401
Emotional Disturbance	3,295	3,264
Multiple Disability	2,033	2,040
Hearing Impairment	1,314	1,295
Orthopedic Impairment	654	608
Other Health Impairment	14,375	14,995
Visual Impairment	629	604
Autism	6,486	7,156
Deaf Blindness	8	7
Traumatic Brain Injury	310	315
Developmental Delay	4,874	5,080

Source: [Annual Disability Statistics Compendium](#)

Prevalence of Disability Among Non-Institutionalized People Ages 16 to 20 in Tennessee in 2013

Prevalence Rates: Age 16 to 20 years (%)

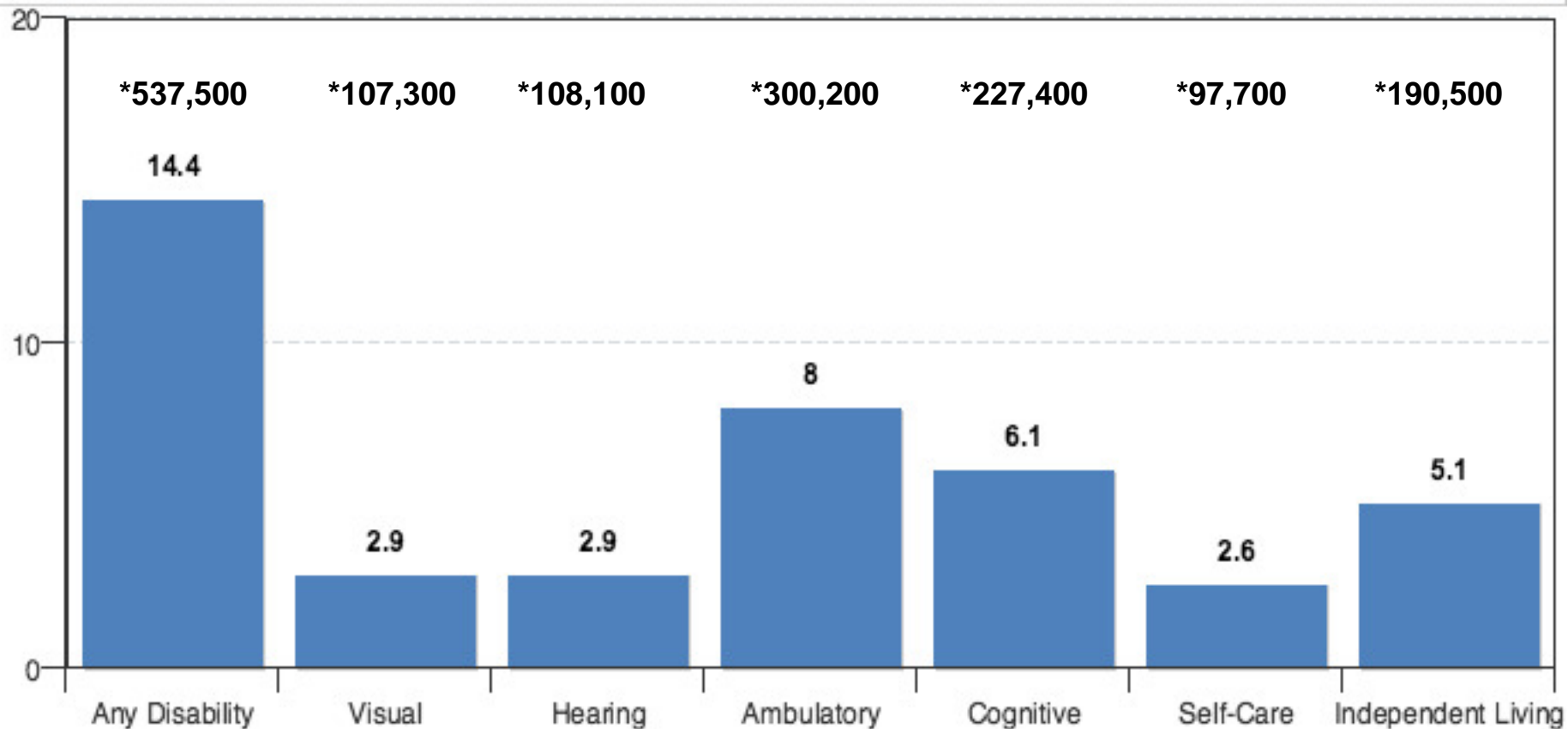


*Total numbers reported

Source: [Cornell University](#)

Prevalence of Disability Among Non-Institutionalized People Ages 21 to 64 in Tennessee in 2013

Prevalence Rates: Age 21 to 64 years (%)

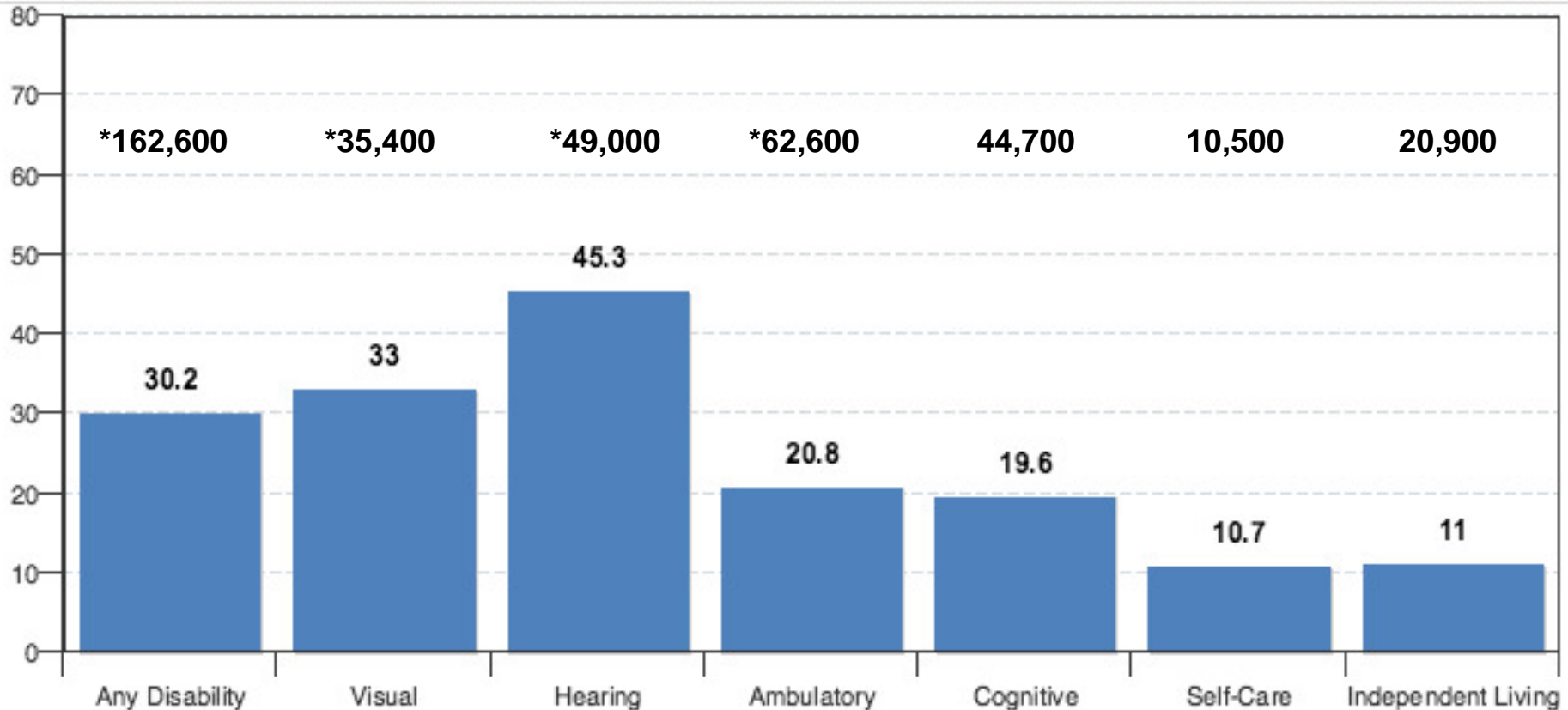


*Total numbers reported

Source: [Cornell University](#)

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

Employment Rates (%)



*Total numbers reported

Source: [Cornell University](#)

Project SEARCH: Program Description

- ❖ One school year or 9 months.
- ❖ 10 – 12 young adults with a variety of intellectual and developmental disabilities.
- ❖ Instructor and job coaches.
- ❖ Immersed in host business culture.
- ❖ Rotations through unpaid internships with continual feedback.
- ❖ Outcome of employment in the community.

Project SEARCH: HUGE \$ SAVER!

The Project SEARCH

Definition of a Successful Outcome:

- ❖ Competitive employment in an integrated setting.
- ❖ Year-round work.
- ❖ 16 hours per week or more.
- ❖ Minimum wage or higher.

- ❖ 273 programs in 44 states.
- ❖ 2500 young people per year.
- ❖ 60% healthcare, 40% broad mix of business types.
- ❖ 68% employment.
- ❖ 88% employee benefit eligible.
 - 35% take employee benefits, usually at 5 years.
 - Benefits alone save roughly 1 million dollars over a lifetime.
 - Family involvement curriculum to drive familial change in attitude.

TN Project SEARCH Sites

- ❖ East Tennessee Children's Hospital (Knoxville)
- ❖ Embassy Suites Downtown Nashville (Nashville)
- ❖ Embassy Suites, Murfreesboro, TN (Murfreesboro)
- ❖ Le Bonheur Children's Hospital (Memphis)
- ❖ Maryville College (Maryville)
- ❖ Montgomery County Government Offices (Clarksville)
- ❖ University of Tennessee Medical Center (Knoxville)
- ❖ West Tennessee Healthcare (Jackson)

Project SEARCH: www.projectsearch.us

- ❖ Contact Susie Rutkowski at susie.rutkowski@cchmc.org

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

❖ Top contractors:

- McKesson Corp
- UT-Battelle LLC
- The Babcock & Wilcox Company
- FedEx Corp
- URS

See the entire list on the [Fedspending website](#)¹

Complete federal lists of 2006-2013 → [Federal Procurement Data System website](#)²

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

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

Jobs in Tennessee

❖ Key emerging industries include Professional and Business Services, Education and Health Services, Construction, and Services Providing.

→SOURCE: Tennessee WIOA Combined State Plan, Section II-Page 8, “Industry Projections”

❖ Click for your [Workforce Development Board](#)

❖ Click for your [Regional Strategic Plan Executive Summary](#)

Resources

- ❖ Annual Disability Statistics Compendium, 2015:
http://www.disabilitycompendium.org/docs/default-source/2015-compendium/compendium_2015_final.pdf
- ❖ StateData: The National Report on Employment Services and Outcomes, 2014 (data from 2013):
<http://www.statedata.info/bbstates/Tennessee.pdf>
- ❖ 2013 Disability Status Report United States, Cornell University, 2013:
www.disabilitystatistics.org
- ❖ Fedspending: www.fedspending.org
- ❖ Project SEARCH: www.projectsearch.us
- ❖ Job Accommodation Network: <https://askjan.org/>
- ❖ State Vocational Rehabilitation Agency:
http://wdcrobcolp01.ed.gov/Programs/EROD/org_list.cfm?category_cd=SVR
- ❖ RespectAbilityUSA: www.respectabilityusa.org

Let Us Know If We Can Help!

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

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