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RespectAbility – Public Comments – Texas WIOA Combined State Plan

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

Because of WIOA, Texas has the opportunity to significantly improve employment outcomes for people with disabilities. **There are 1,553,500 people with disabilities between the ages of 21 to 64 in Texas and only 38% of them are employed.** Further, there remains a 38.5 percentage point gap in the Labor Force Participation Rate (LFPR) between people with and without disabilities in Texas. **There are 110,500 youth with disabilities in Texas and each year a quarter of them will age out of school and into an uncertain future.**

WIOA gives Texas 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 increased results by putting best practices into places.](#) We know that Texas is focused on improving results and can do the same. The experience of these states shows ways that Texas can improve 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 Texas.** That information is attached to our comments.

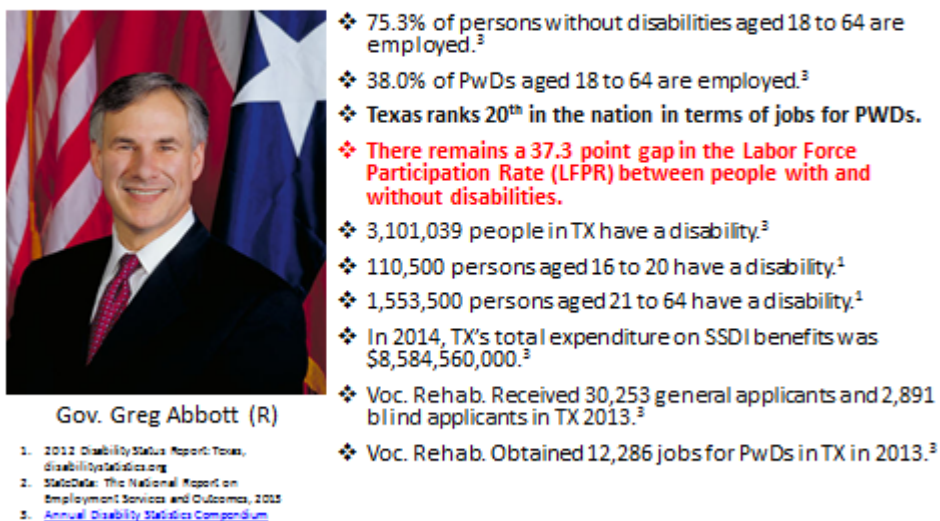
From our review, it is clear that your Combined State Plan is the product of hard work and extensive effort. For example the Economic and Workforce Analysis sections digs deep when it comes to looking at existing sectors of Texas' economy. The Plan also provides a clear view of where job growth is strongest in the years ahead. Likewise, much thought has been given to what needs to be done around physical accessibility. The State Plan even includes solid data on Texas' disability community and clear information on the Labor Force Participation Rates.

However, there are several gaps and missed opportunities as well. In particular, it does not seem that the disability lens has been applied to efforts related to things like apprenticeship programs or corrections education. Further, there is a missed opportunity in terms of expanding school to work transition programs for youth with disabilities. Focusing these efforts on employers in the growing sectors of health care, STEM, and high turnover fields could begin to create a pipeline of talent for employers and career pathways for youth with disabilities. **Our public comments on Texas 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) from your Workforce Analysis drive the design and implementation of strong performance metrics:

From our review of the current draft of Texas' Combined State Plan we know that you have access to the right data to drive decision making. Starting on line 20, page 14, in the Section on "Individuals with Disabilities" the State Plan directly frames the issue of disability in the larger context of economic development. As the Plan reports on line 21, "Approximately 12 percent of the Texas population is estimated to have some type of disability." This section then goes on to detail in lines 29 through 34, the critical work being done to migrate the "Vocational Rehabilitation (VR) program—currently housed at the Texas Department of Assistive and Rehabilitative Services (DARS)" over to "TWC on September 1, 2016." We know that this has complicated the WIOA implementation process in Texas. However, we feel that this transition will enable the Lone Star States to build new structures and new partnerships.

Figure 1.
Texas Performance Metrics on Jobs for PWDs



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

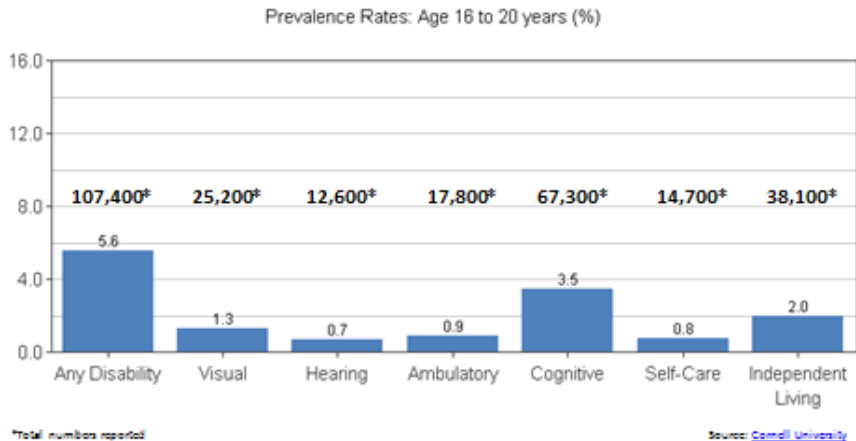
We appreciate the depth of detail provided on pages 27 and 28 of your State Plan. These tables do much to describe the scope of the disability community in Texas. **This is good data and it is structured in such a way as to be useful to your state's workforce system.** In particular, we want to congratulate you on the table which specifically details "Number of Texans, 18–64 years old in the labor force." Not only does this table look at the diversity of disabilities within the community, it also looks at more just the unemployment rates. Critically, this summary also includes specific data points on the Labor Force Participation Rate of people with disabilities.

As much as there is good information in this section of the Combined State Plan, several further refinements would enhance the clarity and impact of your draft WIOA Plan. **Specifically, we suggest a greater focus on the data points related to the specific challenges facing youth with disabilities. In particular, we hope that the final version of your Combined State Plan includes mention of the 38.5 point gap in employment between people with and without disabilities.**

We want to help your state move in the right direction when it comes to increasing employment rate for people with disabilities in Texas. Your workforce system is doing innovative work and it is critical that your efforts be optimized to fully tapping into the talents that people with disabilities, especially youth, have to offer. Good data is essential for any attempt to increase the number of people with disabilities who are succeeding in competitive, integrated employed. **As an example of the data that is needed, below are several charts which show the challenge in your state.**

- a. **Youth with disabilities who are aging in the workforce (ages 16-20).** 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 Texas' 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 Texas in 2013



- b. **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 Texas to provide early work experiences and skill training.

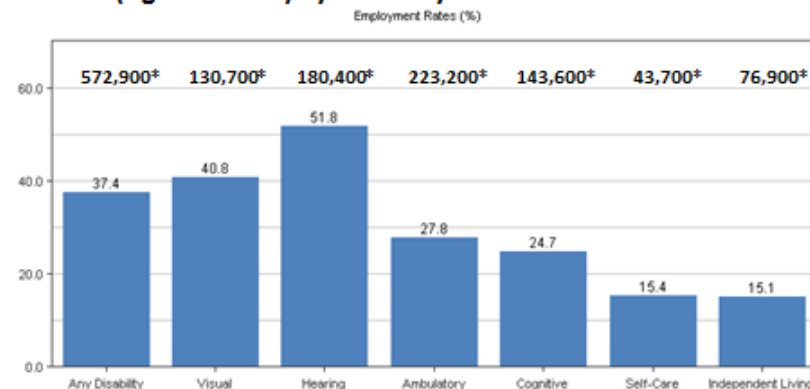
Figure 3.
Ages 6 to 21 IEPs by Category TX

| | 2012 | 2013 |
|-------------------------------|---------|---------|
| All Disabilities | 395,654 | 395,654 |
| Specific Learning Disability | 166,472 | 163,110 |
| Speech or Language Impairment | 61,025 | 62,448 |
| Intellectual Disability | 34,805 | 37,040 |
| Emotional Disturbance | 25,510 | 25,514 |
| Multiple Disability | 6,079 | 6,368 |
| Hearing Impairment | 6,079 | 6,014 |
| Orthopedic Impairment | 3,276 | 3,181 |
| Other Health Impairment | 52,105 | 52,934 |
| Visual Impairment | 3,032 | 3,044 |
| Autism | 36,021 | 39,826 |
| Deaf Blindness | 104 | 112 |
| Traumatic Brain Injury | 1,191 | 1,153 |
| Developmental Delay | 0 | 0 |

Source: [Annual Disability Statistics Compendium](#)

- c. **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 4.
Employment of Non-Institutionalized Working-Age People
(Ages 21 to 64) by Disability Status in Texas in 2012



*Total numbers reported

Source: [Cornell University](#)

Despite the fact “that the Texas economy continues to outpace the national economy” as mentioned on lines 3, page 28, it is clear that Texans with disabilities are struggling to overcome barriers and succeed in the workforce. Texas’ position as 20th in the nation in terms of employment rates for people with disabilities places it well above New York and California. However, people with disabilities in states such as the Dakotas, Wyoming, and Iowa, are employed at much higher rates than Texans with disabilities. As such, it is clear that Texas has a lot of work to do in order to fully tap into the underutilized labor resources that is the disability community.

Looking at the current employment rates for Texans with disabilities is highly illustrative when it comes to thinking through economic development strategies. There is a fundamental value in learning from the experiences of those with disabilities who are succeeding in the world of work. **From the data, we find that 40.8 percent of the approximately 130,000 Texans who are blind are employed while 51.8 percent of the 180,000 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 24.7 percent of Texans 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 Texas’ workforce system expands successful school to work transition programs.** In particular models [like Project Search](#), [Bridges from School to Work](#), as well as [the cluster model of Poses Family Foundation or Kessler Foundation](#) could be part of your state sector strategies to meet growing labor market needs. Likewise, there are several local programs in the greater Houston area that are doing remarkable work and very much worth your attention.

Indeed, the most effective way of continuing to improve outcomes in competitive, integrated employment is by focusing on sectors that are experiencing rapid growth. **In Texas, that means that youth with disabilities should be trained for jobs in Healthcare, STEM, and Hospitality.** Sadly, your Combined State Plan completely neglects to mention of the most cost-effective and employer driven models for improving outcomes for this subpopulation. 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 comments. We hope that this data will be used to 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.

It is clear that the Combined State Plan has taken the challenge of sector strategies very seriously. For example, the draft explicitly identifies the TWC’s commitment to “science, technology, engineering, and math (STEM) education and training” on line 26 of page 15. Further, the State Plan mentions how Texas is also making strides in “manufacturing, information technology, and health care, all of which require a highly skilled workforce” on lines 31 and 32. Starting on page 18 of the State Plan, we find a very detailed “Economic, Workforce,

and Workforce Development Activities Analysis” for the Lone Star State. In particular, we want to draw your attention to several industries which are driving economic growth in Texas. To quote lines 1 through 3 of page 21 of the State Plan, “Of these industries, the first four (Health Care and Social Assistance; Accommodation and Food Services; Educational Services, Public and Private; and Retail Trade) indicate projected employment levels of more than one million jobs by 2022, and growth at or near 200,000 jobs.”

As Texas’ workforce system looks for strategies to create a talent pipeline to meet these demands, we seriously encourage you to include people with disabilities in your thinking process. **People with disabilities represent an untapped labor resource that can meet the diverse talent needs of our nation’s growing job sectors.** 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:

Starting on page 21 in lines 8 through 14, the draft of the Combined State Plan clearly states that “The health care and social assistance industry has become the dominant industry of employment for Texas.” The numbers in these economic sectors alone are remarkable and speak to rapidly expanding talent needs for health care employers. From lines 9 and 10, “Demand for health care workers in Texas is only expected to increase” driven by a population with increasing numbers of both young and old people.

The rapid emerging talent needs in health care represent both a challenge and an opportunity for Texas’ workforce system and the nation as a whole. It is challenge propelled by an aging population resulting in increasing demand for qualified workers ready to fill the talent needs of hospitals, assisted living centers, and nursing home. It is opportunity to channel the incredible talents of people with disabilities into the workforce. This is a topic that needs to be examined closely and has implications for people with disabilities who want to work.

People with disabilities can and should be part of the solution to this demand in the labor market. A 2014 report from the [Office of Disability Employment Policy](#) (ODEP) captured this opportunity clearly, saying that “[people with disabilities] not only represent an untapped talent pool, but also offer significant value and insight” in the field of healthcare. It is important for healthcare institutions to reflect their customers, and people with disabilities interface more with the healthcare system. 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.**

Texas already has several outstanding Project Search worksites that are creating successful pathways for students with intellectual and development disabilities to successfully transition into the workforce. At [Atlas Copco Drilling Solutions](#), the [Medical Center of Lewisville](#), and [Seton Medical Center Williamson](#), Project Search interns are learning critical skills and gaining needed experience for them to ultimately become successful. **These worksites all showcase how the Project Search model is well suited to meeting Texas’ growing talent needs in health care.**

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.

Despite the accomplishments of this model, it is completely absent from the current draft of your Combined State Plan. Despite the startling numbers of jobs in the growing health care sector, your Plan neglects to include any references to one of the most cost-effective models for creating a career pathway for youth with disabilities. We feel there is a significant opportunity for Texas 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 Texas. As such, we recommend that Texas invest in increasing the number of Project Search sites across your state. **We encourage Texas 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 Texas 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. Science, Tech, Engineering and Mathematics (STEM) and The Autism Advantage:

In lines 28 and 29, the Combined State Plan reiterates that “TWC prioritizes programs that assist specific populations and initiatives.” Listed among those efforts are “veterans; youth; and science, technology, engineering, and math (STEM) programs.” That commitment is reflected in the wide variety of efforts being undertaken around STEM. Discussed in line 10 on page 106 is the “*Governor’s Summer Merit Program*” focused on scholarships for STEM. Beginning on line 44 of page 106, the State Plan discusses the work of the “*Texas Science Careers Consortium (Texas Science and Engineering Fair)*.” Shorter term initiatives also include the “*Governor’s Science and Technology Champions’ Academy*” discussed on page 107.

All of these efforts reflect the fact that STEM education is a clear priority in Texas’ WIOA plan. While it might not appear so on first glance, there is a significant opportunity in terms of youth with disabilities as it relates to jobs in STEM career fields. **As has been documented in many cases, there can be an “Autism Advantage” in the STEM space. Indeed, some people on the Autism spectrum can have the very best skills in science, math and engineering.** This could be a very powerful resource for Texas.

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.](#) Texas, which home to companies with big STEM needs such as AT&T, Dell, and L-3 Communications, should be looking at ways to follow this model.

Together, Texas’ 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) are being formulated, STEM-related jobs should be examined where appropriate.**

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

Starting on line 38, page 23, the Combined State Plan specifically outlines projections related to the economic growth of certain key occupational sectors between 2012 and 2022. The numbers are remarkable. The Table of Projections shows that for “Combined Food Preparation & Serving Workers” there will be a 32.4 percent growth with other 92,000 jobs added. Likewise, for environment services, retail, and food service, the projections indicate 23.9 percent, 16 percent, and 22.4 percent growth. In total this equals well over 100,000 new jobs in the Texas economy.

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

A great example of an employment sector where employees with disabilities can be tremendously successful is the hospitality industry. Accommodations and food service are extremely high turnover jobs and numerous studies show that people with disabilities can be outstanding in those fields and have significantly higher employer loyalty.

An outstanding example of the type of work needed is found in Missouri. As part of the Poses Family Foundation’s Workplace Initiative, a coalition of employment service providers has launched a successful training and placement program with the hospitality sector in St. Louis. This training runs for up to 12 weeks, and takes place on site at the hotel; all participants are paid by the hotel for the duration of training. Since the summer of 2015, two cohorts of trainees have completed training at the Hyatt Regency. Trainees have gone on to permanent employment at the Hyatt and other hotel partners in a range of departments—culinary; auditing; and customer service. This type of training and Poses’ Workplace Initiative could easily be part

of your overall Sector Strategies. 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](#). The TWIC, 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 size of the retail marketplace in Texas, there are plenty of employment opportunities available for people with disabilities to succeed. 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.

a. State jobs and supplier diversity 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 Texas's state governments is going to be impacted by the cresting wave of Baby Boomers retiring.

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."

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 Texas. **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 should not be neglected.**

d. Agriculture:

For states like Texas 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 in Appendix 4 of your State Plan.

3. Busting Stigmas, Myths, and Misconceptions Should Be a Key Part of your State'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 Texas' 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.** 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 impact Texas with disabilities are serious barriers that your workforce system needs to address.

A great example of what we have in mind comes from South Dakota, which currently has the highest employment rate for people with disabilities of any state in the nation. [Governor Dugaard recently launched](#) something called the "[Ability for Hire Campaign](#)" which aims for fight stigma by showcasing the incredible value that employees with disabilities bring to the work place. This is a model that Texas should seriously study and replicate. The natural starting place for any such effort could easily be the Texas Governor's Committee on People with Disabilities (GCPD). Their mission to work toward "a State where people with disabilities have the opportunity to enjoy full and equal access to lives of independence, productivity and self-determination" is in keeping with the larger policy goals of WIOA. They could really act as a convener for this type of effort and it might be possible for them to coordinate with the Greater Houston Business Leadership Network around business outreach. As we will reiterate multiple times in our comments, getting employers engaged and talking about how employees with disabilities benefit the bottom line of their companies is the necessary step for achieving improved outcomes.

Thanks to strong economic policies and a laser focus on promoting job growth, many large scale employers have operations in Texas. Many of these companies are already making efforts around inclusive hiring practices. 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. A component of this type of outreach is the importance of celebrating good work done well. A great example of what we have in mind is the [Lex Frieden Employment Awards](#). These annual awards bring much needed media recognition and public visibility to key employer partners. As WIOA builds stronger partnerships between employers and the workforce system, we hope to see many more nominees for these awards in the future.
- 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. Texas needs a public relations campaign that will inspire Texans 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.

As an example of the power and value of making the business care for hiring people with disabilities, we offer Texas 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 Texas 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 not discuss [the new 7% utilization goal set for companies](#) to recruit, hire, and retain qualified individuals with disabilities in all job categories.

Texas should respond to these newly enacted regulations by adopting a strategy focused on competitive advantage, not just compliance. These regulations and requirements entail far more than just new rules for businesses to play by. Section 503 is an opportunity that could potentially have a broad impact on the employer engagement work of the entire workforce system. The companies who must comply with Section 503 have an opportunity to teach companies not impacted by the regulations how to effectively employ, engage, and retain workers or customers with disabilities. Specific companies that should be included in your outreach efforts include Lockheed Martin Corp., Bell Boeing Joint Project Office, L-3 Communications Holdings INC., Royal Dutch Shell PLC, and Valero Energy Corp. More detailed information regarding federal contracts in [Texas can be found here](#).

5. 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. **Texas already has 8 Project SEARCH sites and many more are needed to continue building better futures for youth with disabilities in Texas.** However, this is not the only paradigm that you should follow. The school system, vocational rehabilitation, and local workforce boards can build creative, collaborative partnerships with companies that are leading in the disability space.

As such, we want to direct your attention to two local efforts and one national project, all of which offer considerable insight into best practices that will help to improve employment outcomes among Texans with disabilities, especially youth with disabilities. One of the critical

elements of empowering young people with disabilities to succeed in the workplace is ensuring they have a solid foundation of job skills. Easter Seal Greater Houston offers an interesting method of doing so through the “Electronic Recycling Training” section of [their Transition Services Program](#). Through [a close collaboration with a company called CompuCycle](#), ESGH is empowering youth with disabilities through a “curriculum focused on generalized jobs skills building and specific training for a range of jobs in an electronics recycling business.” This example is particularly interesting due to the close collaboration between a business and a non-profit aimed at creating job ready employees with disabilities.

The other local effort we would direct your attention to is are the summer internships offered “with the assistance of Jewish Family Service and the High School/High Tech Program of ESGH” This efforts is explicitly focused around “[working together to encourage students with disabilities to explore the fields of science, engineering and technology](#).” Given the clear priority on expanding STEM education in the Combined State Plan and our recommendation around having a sector strategy that includes young people with disabilities, this program is worth your close attention. At a minimum, we hope you will connect directly with JFS and ESGH staff and learn about from their experiences.

Having discussed two outstanding local partnerships are pre-employment and transition services, it is also valuable to look at a national example that is driving innovation. **We highly recommend that Texas examine how to support disability employment efforts through establishment of public/private partnerships in local communities.** 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.”](#)

6. Effective employer engagement depends on fully brining your state’s affiliate chapter of the US Business Leadership Network to the WIOA table:

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

As such we were deeply disappointed to see that no attention was given to one of the most important assets that Texas has in terms of making the business case for hiring people with disabilities. The [Greater Houston Business Leadership Network \(GHBLN\)](#) is an affiliate chapter of the national BLN, and we are disappointed to see that it is not yet at the WIOA table. To quote the affiliate chapter’s mission statement GHBLN works to “Cultivate and promote employers knowledge of the benefits of hiring qualified individuals with disabilities.” There specific goal is “dispel myths business people have about people with disabilities; encourage businesses to hire and retain employers with disabilities; and provide resources businesses need to do it.” The GHBLN should be a critical partner to the overall employer engagement efforts. They can persuasively make the business-to-business case for hiring employees with disabilities. As such, moving forward, we hope your workforce system will take fully advantage of this potential partnership.

In looking for ways for the workforce system to capitalize on the resources that an affiliate BLN chapter can provide, we suggest that Texas 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 Texas' 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.

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 the training opportunities offered by apprenticeship programs. **While the current draft of Texas' Combined State Plan touches on the opportunities that apprenticeships offer, it lacks the perspective of training people with disabilities, especially youth with disabilities.**

From reviewing your State Plan, it is clear that apprenticeship is a key element of your efforts around WIOA. For example, from lines 23 and 24, page 5 of the Plan states that "TWC also administers state-funded workforce development programs, including: Apprenticeship." More detail on those efforts is provided on page 13 in the section on "Workers" beginning on line 41. The greatest details on apprenticeship effort in Texas are found in the section from page 67 starting at line 8 specifically about "Alignment with Activities outside the Plan: Apprenticeship and Job Corps." Many, many changes to these programs are outlined in this section from ranging from TWC having "adopted new program rules" in 2014 to new "performance measures" to "help address demand for apprenticeship jobs across Texas." Later, on page 107 extending from line 30 to 38, the State Plan details registered apprenticeship opportunities explicitly for veterans. On the next page in lines 2 through 11, we see further details about ways Texas is looking to blending and braiding different funding streams to support apprenticeship. For example, "funding has been added to GR to supplement the program to include Workforce Investment Act, Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T), and Temporary Assistance for Needy Families (TANF) Noncustodial Parent (NCP) funds" **This is critical work, however, we are concerned that it lacks the disability lens.**

As your state looks to improve these programs, we highly recommend that the workforce system seriously look at ways to make apprenticeships accessible to people with disabilities. **At the federal level, the Office of Disability Employment Policy has worked hard to generate resources which can open up these exciting programs to "youth and young adults with a full range of disabilities."** The regulations related to apprenticeship which have recently come out of the Department of Labor provide states [the flexibility them need to refine and design training programs that maximally inclusive of people with diverse talents.](#)

Given the relocation of the Vocational Rehabilitation program to the organization structure of TWC, [we hope to see closer collaborations around getting VR clients connected to apprenticeship opportunities.](#) In too many other states, VR staff is unaware or disconnected from the program officers who provide critical support to apprenticeship programs. We hope Texas can be a model state by leading on these issues. Such innovative partnerships and improved accessibility are key elements of realizing the full promise of WIOA for people with disabilities.

Further, we would suggest that there is a critical opportunity to look at Section 503 and federal contractors as a partner in expanding apprenticeship programs. Funding to cover training costs could be a very attractive selling point for federal contractors looking to meet their 503 requirement. Further, we would also recommend looking at the intersection of apprenticeships and sector strategies. Not only can apprenticeships be set up in traditional fields such as construction, but they can also be incredibly useful in health care and computer jobs. Look at the successes achieved by Project SEARCH at a wide range of employers. As such, we recommend that the workforce system and the State Board investigate how to both open apprenticeship programs to people with disabilities and to create apprenticeship opportunities in new career fields as well.

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. 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 Appendix 9 of Texas’ Combined State Plan on 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.

For example, it is critical that the assurances 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 need careful implementation efforts as do the Adult Basic Education Assurances and the VR assurances.

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, 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. However, if there is no plan that specifically identifies how the state is going to get to the commitment made in the assurance, then Texas is facing a serious problem.

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

Starting on line 1, page 99, we find the full summary of the Texas’ Combined State Plans efforts to improve the accessibility of the One-Stop system. We are glad to see that there are core principles around which Texas’ efforts can be focused. “Ensuring that all customers can effectively use workforce products and services”, “creating a workspace accessible for individuals with disabilities” and “complying with all federal and state legal requirements” will help to improve the workforce system as a whole. We are glad to see the priority placed by TWIC, on “makingg its websites and other electronic and information resources (EIR) accessible and its content user-friendly for individuals with disabilities.” This is an essential step on the longer road towards programmatic accessibility. This entire section reflects the dedication and effort made to ensure the One-Stop system is preparing to fully meeting the workforce system needs of job seekers with disabilities. We are grateful for your word and we are glad for your strong language on this point. 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.](#)

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.

11. 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.

Texas 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. In addition, Texas 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](#), [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.**"

The diverse membership of the Texas Workforce Investment Council is fully on display starting with line 35 on page 52 and extending through to line 20 of page 53. While it appears to a solid mix of individuals, it is a group that is short on the perspectives offered by self-advocates with lived experience. As such, we seriously encourage the TWIC to look at appointing or on-boarding a self-advocate to join the Council.

Even a non-voting, advisor member can bring critical perspectives that improve the workforce's efforts overall. Likewise, we hope that Texas' workforce system look for further 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.

However, we are pleased to see several sections of Texas' Combined State Plan that address these issues. On line 7, Page 7 in the section detailing "Economic Development: Priority Goals", "addressing transportation needs" is part of the larger effort to improve the state economy. Further, on lines 29 and 30 of page 39 in the section on "Alignment of Workforce Programs", the State Plan lists "transportation" among "support services" that need to be provided through close coordination between "programs and agencies." Again on line 32 of page 64 in the section on "Youth Services", "assistance with transportation" is once again identified among "Supportive services." These are important acknowledgments of where work needs to be done. However, as written, the Combined State Plan does not develop full strategies of how to overcome this gap. 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 jobs 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:

From our perspective, another critical gap in the current draft of Texas' Combined State Plan is the lack of attention given to the unique needs of aging workers. This gap is especially troubling for those older workers who might age into disability and drop out of the workforce. In lines 26 and 27 on page 26 of the State Plan we do see an acknowledgment of the growing population of older workers in Texas' labor force. To quote the State Plan: "the labor force of 55 and older workers is projected to increase 38 percent." **As such, Texas needs to take a proactive approach to fully address the challenges of older workers and those who acquire disability BEFORE they lose their job due to aging or acquiring a functional impairment. 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.** We do see a few lines in your Combined State Plan that address the "Senior Community Service Employment Program" on page 67 on lines 1 through 6. Specifically, "Texas, the Office of the Governor has designated TWC as the state grantee for the Senior Community Service Employment Program (SCSEP) under Title V of the Older Americans Act of 1956." As TWIC moves forward with this grant, we seriously you to look to the state of Iowa for ideas around innovative work and emerging practices to support older workers.

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. An outstanding example of the role that local faith communities and local non-profits can play in this effort comes from [Jewish Family Service MainStreet Opportunities](#). In Houston, JFS runs a program rooted in evidence based best practices that provide “supportive and transitional employment program for adults with disabilities.” Likewise, [Easter Seals Greater Houston \(ESGH\)](#) manages a wide range of transition services and supports that play a critical role in empowering Texans with disabilities to overcome barriers. We seriously encourage the TWC to look closely at the work being done by these organizations.

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:

There are several points where the current draft of Texas’ Combined State Plan addresses the unique workforce challenges facing ex-offenders as they attempt to reenter society. For example, one of the priority MOU needs discussed by the Texas Workforce Commission on page 57, in lines 9, 10, & 18 is “Reintegration of offenders programs authorized under the Second Chance Act, 2007.” Further, there is an entire section specifically about the challenges facing ex-offenders starting on line 42 on page 71 of the State Plan. This section reports that “TWC is a member of the State Reentry Task Force, led by the Texas Department of Criminal Justice (TDCJ).” Among the activities carried out in this role, “TWC and TDCJ coordinate reporting data services between the criminal justice and workforce systems.” This is

a critical collaboration and we hope this close work creates pathways for returning citizens to be fully reintegrated into society. Ex-offenders who are returning and reintegrating back into society faced significant barrier to employments. Serving this population is a unique challenge facing the workforce system. **However, from our review of the current draft of Texas's State Plan, it appears that your state has neglected to add the lens of disability to the work being done to meet the requirements under section 225 of WIOA.** The need for this type of work is clear.

[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 these issues of workforce, disability, and justice.

Conclusion:

As we stated at the beginning of our Public Comments, Texas can and must do better in terms of jobs for people with disabilities. As one of the most populous states in our nation and with a state economy that outclasses many smaller nations, the rest of the country looks to the Lone Star State for leadership on the most important issues of our time. Despite abundant resources and vast population, Texas only ranks 20^h in the country in terms of your employment rate of people with disabilities. Failing to properly train and prepare job seekers with disabilities costs the Texas economy incredible talent and shatters the aspirations of so many Texans with disabilities who want to pursue the American Dream, just like everyone else.

However, thanks to WIOA, Texas has the chance to lead by example in terms of investing resources in successful models and implement best practices to expand job opportunities for people with disabilities. Making sure there are pathways for the talents of Texans with disabilities to meet employer talent needs is a win-win-win for people, taxpayers, and businesses alike. We remain concerned with some of what we have seen in Texas's plan. Our public comments discuss multiple ways that Texas can significantly improve outcomes and we hope see them implemented soon.

The bottom line is that expanding job opportunities for people with disabilities is win-win-win for employers, taxpayers and people with disabilities alike. It is good for employers because the loyalty, talent, and skills of workers with disabilities contribute to the employers' bottom line. It is good for the workforce system because improving services and supports for job seeker with disabilities will benefit others with different barriers to employment. It is good for

people with disabilities who want the dignity, pride, friendships, independence and income that work provides. We are happy to answer any questions you have and to help in any way.

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

| | 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 |

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

| | 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 | | | |
| 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 |



RESPECTABILITY

TX and Jobs for PwDs

Jennifer Laszlo Mizrahi, President

www.RespectAbilityUSA.org

Texas



Gov. Greg Abbott (R)

1. 2012 Disability Status Report: Texas, disabilitystatistics.org
2. StateData: The National Report on Employment Services and Outcomes, 2013
3. [Annual Disability Statistics Compendium](#)

- ❖ 75.3% of persons without disabilities aged 18 to 64 are employed.³
- ❖ 38.0% of PwDs aged 18 to 64 are employed.³
- ❖ Texas ranks 20th in the nation in terms of jobs for PWDs.
- ❖ **There remains a 37.3 point gap in the Labor Force Participation Rate (LFPR) between people with and without disabilities.**
- ❖ 3,101,039 people in TX have a disability.³
- ❖ 110,500 persons aged 16 to 20 have a disability.¹
- ❖ 1,553,500 persons aged 21 to 64 have a disability.¹
- ❖ In 2014, TX's total expenditure on SSDI benefits was \$8,584,560,000.³
- ❖ Voc. Rehab. Received 30,253 general applicants and 2,891 blind applicants in TX 2013.³
- ❖ Voc. Rehab. Obtained 12,286 jobs for PwDs in TX in 2013.³

Texas

| | | People with Disabilities (%) | | People without Disabilities (%) | |
|-------------------------|----|------------------------------|------|---------------------------------|------|
| | | 2013 | 2014 | 2013 | 2014 |
| Poverty ¹ | US | 28.7 | 28.2 | 13.6 | 13.0 |
| | TX | 26.9 | 25.6 | 14.2 | 14.0 |
| Smoking ¹ | US | 25.4 | 24.5 | 16.2 | 15.3 |
| | TX | 20.8 | 20.4 | 14.8 | 13.2 |
| Obesity ¹ | US | 40.1 | 41.1 | 25.0 | 25.2 |
| | TX | 43.6 | 44.7 | 28.1 | 28.8 |
| Employment ¹ | US | 33.9 | 34.4 | 74.2 | 75.4 |
| | TX | 38.7 | 38.0 | 74.7 | 77.0 |

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

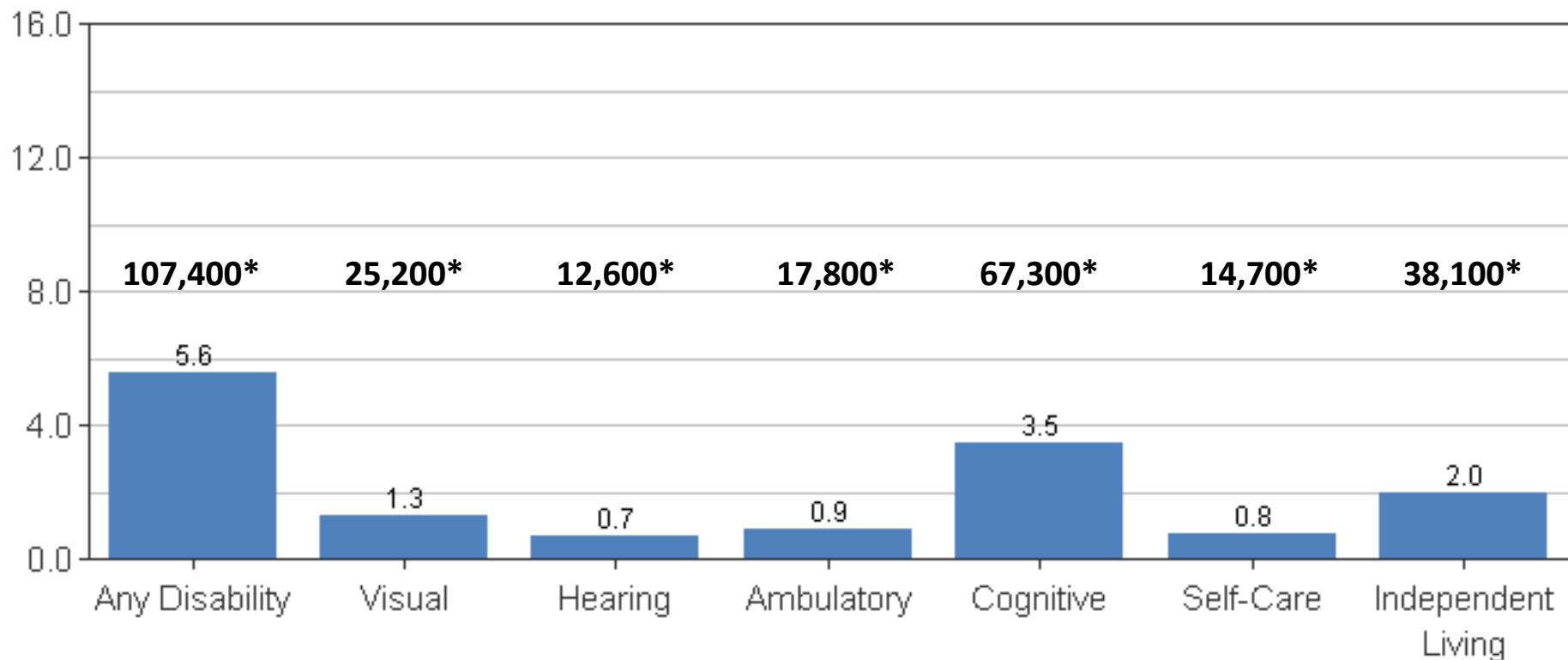
Ages 6 to 21 IEPs by Category TX

| | 2012 | 2013 |
|-------------------------------|---------|---------|
| All Disabilities | 395,654 | 395,654 |
| Specific Learning Disability | 166,472 | 163,110 |
| Speech or Language Impairment | 61,025 | 62,448 |
| Intellectual Disability | 34,805 | 37,040 |
| Emotional Disturbance | 25,510 | 25,514 |
| Multiple Disability | 6,079 | 6,368 |
| Hearing Impairment | 6,079 | 6,014 |
| Orthopedic Impairment | 3,276 | 3,181 |
| Other Health Impairment | 52,105 | 52,934 |
| Visual Impairment | 3,032 | 3,044 |
| Autism | 36,021 | 39,826 |
| Deaf Blindness | 104 | 112 |
| Traumatic Brain Injury | 1,191 | 1,153 |
| Developmental Delay | 0 | 0 |

Source: [Annual Disability Statistics Compendium](#)

Prevalence of Disability Among Non-Institutionalized People Ages 16 to 20 in Texas in 2012

Prevalence Rates: Age 16 to 20 years (%)

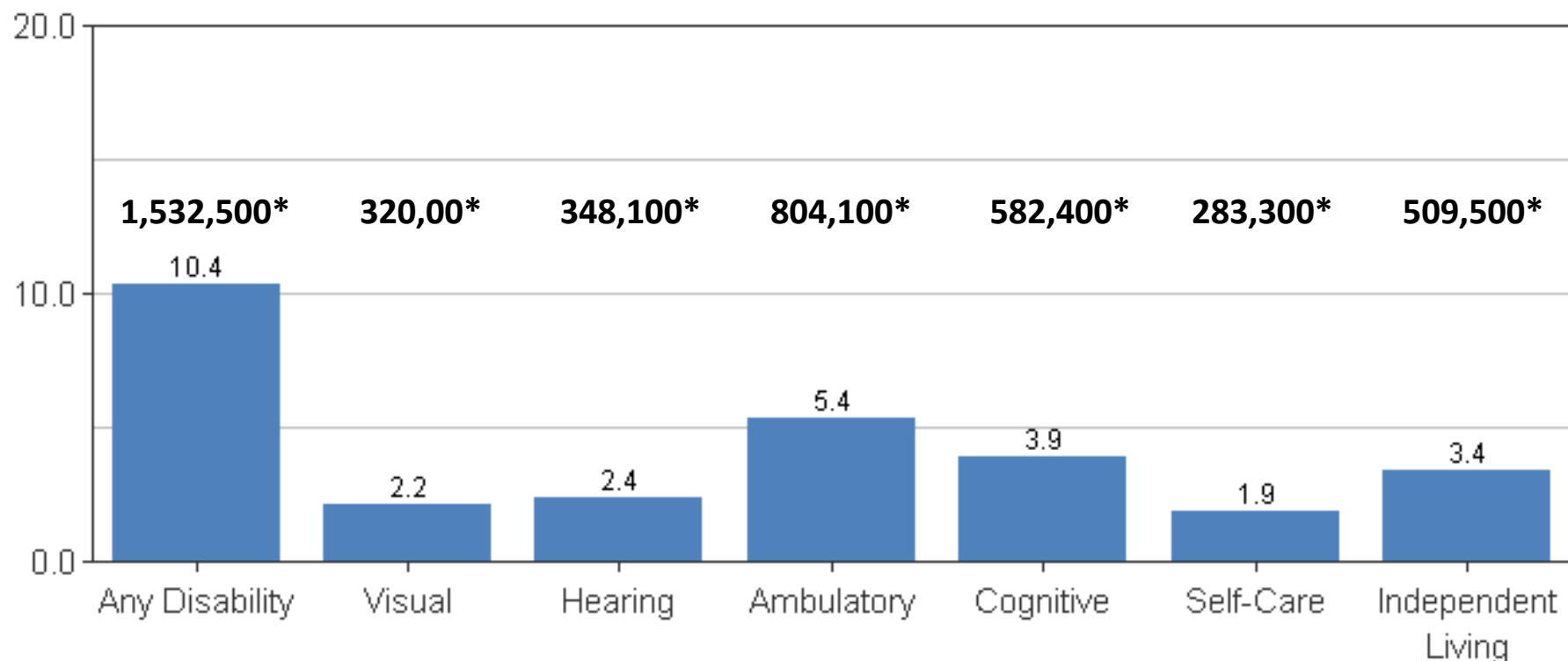


*Total numbers reported

Source: [Cornell University](#)

Prevalence of Disability Among Non-Institutionalized People Ages 21 to 64 in Texas in 2012

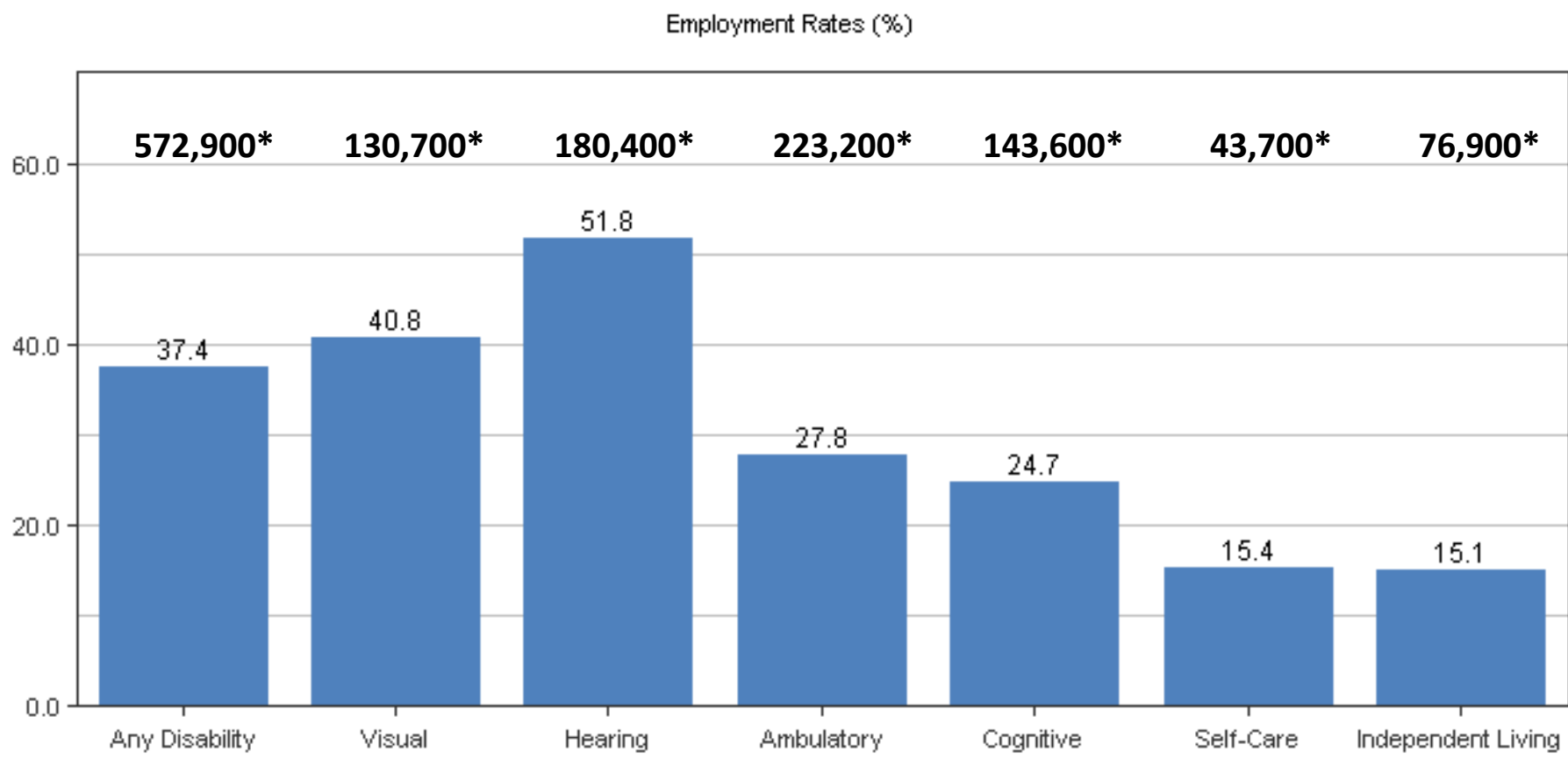
Prevalence Rates: Age 21 to 64 years (%)



*Total numbers reported

Source: [Cornell University](#)

Employment of Non-Institutionalized Working-Age People (Ages 21 to 64) by Disability Status in Texas in 2012



*Total numbers reported

Source: [Cornell University](#)

TX Project SEARCH Sites

- ❖ Atlas Copco Drilling Solutions LLC, Garland
- ❖ Medical Center of Lewisville, Lewisville
- ❖ Seton Healthcare Family/Dell Children's Medical Center of Central Texas, Austin
- ❖ Seton Medical Center Hayes, Kyle
- ❖ Seton Medical Center Williamson, Round Rock
- ❖ Texas Wesleyan University, Fort Worth
- ❖ United Healthcare, Sugar Land

Project SEARCH: www.projectsearch.us

Contact Erin Riehle at Erin.Riehle@cchmc.org

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

❖ Top contractors:

- Lockheed Martin Corp.
- Bell Boeing Joint Project Office
- L-3 Communications Holdings INC.
- Royal Dutch Shell PLC
- Valero Energy Corp.

- Complete list → [fed spending website](#)

http://www.fedspending.org/fpds/fpds.php?stateCode=TX&sortp=r&detail=-1&dtype=T&reptype=p&database=fpds&fiscal_year=2012&submit=GO

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

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 Texas

Texas continues to experience a fundamental shift in the industries driving its economy and its employment. Heavy manufacturing has been replaced by advanced technologies and related advanced manufacturing. Aerospace and defense industries continue to grow. The sectors of mining, manufacturing, real estate, and finance and insurance have all seen large proportional increases in relative contribution to Texas' GSP over the last decade. In terms of employment, growth has occurred across all sectors, with greater growth in health care, accommodation and food services, professional services, and mining.

Source: [Workforce Investment Works](http://workforceinvestmentworks.com/workforce_board_info.asp?st=TX)

http://workforceinvestmentworks.com/workforce_board_info.asp?st=TX

❖ [Click for Your Workforce Development Board](http://workforceinvestmentworks.com/workforce_board_info.asp?st=TX)

http://workforceinvestmentworks.com/workforce_board_info.asp?st=TX

❖ [Click for Texas Workforce Commission - 2015-2019 Strategic Plan](http://www.twc.state.tx.us/twcinfo/stratplan/twc15-19plan.pdf)

<http://www.twc.state.tx.us/twcinfo/stratplan/twc15-19plan.pdf>

Resources

- ❖ StateData: The National Report on Employment Services and Outcomes, 2013 (data from 2012)
- ❖ 2012 Disability Status Report United States, Cornell University, 2012: 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!

**RespectAbilityUSA
11333 Woodglen Drive, Suite 102
Rockville, MD 20852**

www.RespectAbilityUSA.org

Cell: (202) 365 – 0787

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