

Laurie Knowlton
Department of Workforce Services – WIOA
614 South Greeley Highway
Cheyenne, WY 82002

Dear Ms. Knowlton and WIOA Team:

The Governor's Employment First Task Force has carefully read and reviewed the Wyoming WIOA Unified State Plan. The task force is hereby submitting the following comments in relation to the Employment First Initiative HEA 0053 (2014), the task force's strategic plan, the State agencies partnered through the EFT, and on behalf of our strategic partners RespectABILITY USA.

RespectABILITY has been evaluating all of the state WIOA plans across the nation and has staff expertise devoted to this task. RespectABILITY has also helped us with our review.

Our understanding of the new emphasis in WIOA is working to provide service to persons with barriers to employment (including people with disabilities), increased collaboration between stakeholders to provide services and further employer engagement to help increase the employment rate for people with disabilities.

The task force was surprised to see little mention of the legislative mandate HEA 0053 in the WIOA State Plan other than in the section referencing the need to expand and increase employment services to youth on page 147: "Continuing to emphasize achievement of competitive integrated employment by individuals with disabilities through the Employment First Initiative."

It is the task force's belief that the goals of our strategic plan align well with mandates of WIOA and could strengthen the plan considerably. The following are the goals of the WY Employment First Initiative:

The five goals of the Wyoming Employment First Strategic Plan are to:

1. Make disability employment part of the state workforce strategy
2. Find and support businesses to employ people with disabilities
3. Ensure that State of Wyoming becomes a model employer of people with disabilities
4. Prepare youth with disabilities for careers that use their full potential and provide employers with skilled workers
5. Utilize existing limited resources to advance employment opportunities for people with disabilities

We believe that our recommendations will considerably strengthen the state plan and will promote greater disability inclusion in our workforce. We hope that you will consider incorporating the following recommendations of the task force and RespectABILITY into the final draft that will be submitted.

WIOA Unified State Plan Comments

Comments Provided by:
Joe Simpson, Administrator
Wyoming Department of Health, Behavioral Health Division
Developmental Disabilities Section

Page 156: The Division's partners should include the Wyoming Department of Health, Behavioral Health Division (including the Mental Health and Substance Abuse Services Section and the Developmental Disabilities Section) which includes the Medicaid Developmental Disabilities Waivers for children and adults.

Page 188: The Department of Workforce Services also coordinates with outside partners... should include the Wyoming Department of Health, Behavioral Health Division (including the Mental Health and Substance Abuse Services Section and the Developmental Disabilities Section) which includes the Medicaid Developmental Disabilities Waivers for children and adults. The Medicaid Waivers provide employment services for eligible youth and adults.

Page 256: the Interagency Cooperation - state Medicaid Plan – the Wyoming Department of Health, Behavioral Health Division provides an array of services for eligible youth and adults who receive services on the Supports, Comprehensive, and Adult Acquired Brain Injury Waivers. Services include an array of employment services for eligible citizens.

Page 271: Persons with severe and persistent mental illness (Goal 7) – The Mental Health and Substance Abuse Services Division is now the Behavioral Health Division and it has 2 sections: The Mental Health and Substance Abuse Services Section and the Developmental Disabilities Section.

Page 278: Supported employment services – 6th bullet, The Department of Health, should read Division of Behavioral Health instead of Developmental Disabilities,continues to be used for an array of employment services for developmentally disabled and those adults with an Acquired Brain Injury (ABI).

The Wyoming Employment First Initiative and Employment First Taskforce receive scant mention in the WIOA plan, particularly in terms of actionable strategies and outcomes. This task force was created by Governor Mead in accordance with Wyoming State Statute HEA 0053 passed in 2014, and requires the Employment First Task Force to develop a strategic plan to implement the Employment First policy within the state. The task force includes several state government partners.

Comments Provided by:
Linda Trujillo, Waiver Support Specialist
Wyoming Department of Health, Behavioral Health Division
Developmental Disabilities Section

1. I hope that we can work closely with the school district to obtain their data on transitions and youth with disabilities.

1c. It is interesting and important to know that specific disabilities require specific tools for training.

2. Letting employers see the facts from other employers who are benefiting from employing people with disabilities. We are already doing this in the Employment First Task Force regional summit meetings.

2b. I agree with the statement that employers are afraid of potential legal action, costs and other failures and they need supports to overcome their fears of hiring people with disabilities.

2c. I do not think a lot of people know that there are successful and famous people with disabilities. This might help dispel some of the stigmas and myths.

7. Apprenticeship programs are a great idea!!!

Comments Provided by:
Lynn Kirkbride, Director of Affiliate Relations
US Business Leadership Network
WY Employment First Taskforce member
Director of Affiliate Relations- USBLN
Founding Director of the WYBLN-1997

1) Governor's Employment First Initiative (HEA 0053 (2014) needs to be woven into the WY State WIOA plan.

- a) Don't be limited only to DVR to help to get more PWD (people with disabilities) employed. There still remains a 35.9 point gap in the labor force participation rate (LFPR) between people with disabilities compared to workers without disabilities. People with disabilities are a labor resource we can no longer ignore.

This plan puts all the responsibility for the employment of PWD on the WY on the Division of Vocational Rehabilitation. DVR placed 698 jobs in 2013 yet there are 38,300 people between 21-64 that are of working age with a disability. That means that there are a lot of people without service. There are 28 DVR counselors in the state of WY. They can only be stretched so far and need the assistance of all potential partners to address this employment challenge.

WIOA counts highly on collaboration and breaking down silos of service but disability employment isn't integrated throughout the plan as a targeted goal. Partners such as the school districts, DFS and the Department of Corrections should all be engaged. The EY First Initiative is poised to work collaboratively across all state agencies that serve PWD (people with disabilities). This exclusion is found in the following places:

P. 155 lists outside organizations that DWS is to coordinate with and Employment First and the Unita County Business Leadership Network are not included in this list

P. 155 Key Strategic Partnerships does not list either the EFI or the Unita County BLN

This is goal #1 of the EFI: Make disability employment part of the state workforce strategy

2) The WY WIOA Plan must include strong strategies for developing and engaging employers to hire PWD

- A) Take advantage of the 503 opportunity

There is no mention of the Section 503 of the Rehabilitation Act which passed in 2014 requires federal contractors with contracts of \$50,000 or more to hire 7% of their workforce, across all job utilization categories, from PWD (there are 1,700 federal contractors in the state of WY). This is an unprecedented federal requirement and an opportunity to place hundreds of people in good paying jobs in the state of WY but business needs to be cultivated and trained using B2B strategies. They need to know where to find these potential employees and how to support them on the job. This is best done through a business to business approach. There is a fear of

government agencies, especially in a state like WY, coming into business and telling them what to do. A B2B approach will go further in this development than old past methods have done. This plan fails to mention 503 even though this writer was at a public comment session in Casper in December and brought this to the attention of the writers.

- B. Utilize the existing expertise of the UCBLN and the USBLN in the state
The USBLN Affiliate network (<http://www.usbln.org/affiliates.html>) includes the Unita County BLN (<http://www.blnetworks.com>). There were 9 BLN's at one time in the state of WY up until 2012. This is a proven best practice for engaging business in a business-led business network which prepares them to recruit, hire, and support PWD in workplace. I believe the BLN's could be revived in WY through the EFI in the regional teams that are being developed.

This is EFI: Goal # 2 “Find and support businesses to employ people with disabilities” makes this a priority. EFI should be a part of the WIOA plan in Goal #2.

3) The WIOA plan needs to help to grow the talent of Youth with Disabilities through mentoring, internship and skill building programs.

This need to service “out of school youth” set forth by WIOA as a priority, makes little reference to **youth with disabilities**. I once sat on the WY State Transition Council (no longer in existence) where it was known that the drop rate for youth with disabilities was considerably higher than their non-disabled peers. It was also known that over 50% of the incarcerated youth had a disability. Why was this demographic not included in the many references to out of school youth? If real work is going to be done to increase the employment rate of youth, it must include those with disabilities.

- A) Utilize employment training programs as a strategy to put youth to work
Training programs like **Project Search**, WY's own **MentorABILITY** through the Unita County BLN (tried and true in existence in cooperation with local school districts since 2000) and the **BLN Employment Academy**- UCBLN (a program specifically targeted at out of school youth) should be brought to or replicated in the state. Youth with disabilities need to have skills to make them marketable, get them off the dole and bring their talents to work in WY. The state is focused on bringing young people back but these are young people that are currently captive here and want to work.

p. 132 Nothing about youth with disabilities here.

p. 138 Insert mentoring and training programs for youth with disabilities.

p. 203 Out of School Youth

This is EF Goal #4 Prepare youth with disabilities for careers that use their full potential and provide employers with skilled workers

4) WIOA Should include Funding for EF to help carry WIOA Goals forward regarding the employment of PWD

The goals of the Governor's EF strategic plan align completely with mandates of WIOA and could strengthen the plan considerably increasing the employment of PWD. This is where real collaboration could happen. Of course, the EF Initiative is currently an unfunded mandate so to get real traction there needs to be some financial buy-in. Some minimal funding could go a long way to accomplishing the goals of both plans (WIOA and EFI) Right now DVR is planning to hire an EF Coordinator but ramping up the regional teams will take someone to coordinate them in each area. I helped to run the BLN's for 15 years in Wyoming and know that it can be done with a small investment and will help to set all missions forward.

This is EYI Goal #5: Utilize existing limited resources to advance employment opportunities for people with disabilities

We have a golden opportunity to advance the inclusion of disability employment in the state of WY through a careful inclusion of the integration of Employment First Strategies in the new WIOA plan. It is my hope that these comments will be incorporated into WY's WIOA plan.

Comments Provided by:
Eric Jensen, Policy and Research Specialist
Wyoming Department of Health, Behavioral Health Division

It is very difficult to find the Wyoming WIOA state plan on line. The plan is not accessible on the WIOA webpage (<http://www.wyomingworkforce.org/workers/employment/wioa/>). The Wyoming WIOA Workforce Development Council webpage has not even been developed (the page has an ‘under construction’).

Goal 1, Page 142

“1.1: Engage the business community and align education and workforce training opportunities with the needs of Wyoming employers.”

The goal is unmeasurable. How does one measure whether “education and workforce training opportunities” are “aligned” with “the needs of Wyoming employers?” The corresponding strategy is just as vague: *“The Wyoming Workforce Development Council Executive Committee shall focus on the state’s most significant short- and long-term workforce development priorities that should inform the full Board’s priorities (1.1, 1.2, 1.3).”* All this sentence says is that the Wyoming Workforce Council will focus on maintaining the above stated goals. That is not a strategy. Additionally, *“Cultivate partnerships between sector strategies and apprenticeship programs (1.1)”* – how do you cultivate a strategy between two strategies. Additionally, an apprenticeship program is a sector strategy.

“1.2: Ensure training is predicated upon a labor market need by using employer feedback, labor market information, and sector strategy input.”

How is this goal going to be measured? Additionally, the goal does not make clear what training it is referring to. The goal should list where the training occurs, lay out a scale that measures how training is predicated upon the labor market, and defines success with the scale of measurement.

The corresponding strategy should simply be replaced with a more specific strategy. The strategy in the WIOA plan reads: *Create, foster, and expand sector strategies based upon input provided by employers and data provided by Wyoming Research and Planning (1.1, 1.2, 1.3).* Creating strategies is not a strategy. This language ought to be removed and replaced with concrete strategies, such as those offered in the Employment First Strategic Plan.

1.3, strategies: “Continue to strengthen the Wyoming Grown program with targeted marketing efforts to recruit Wyoming natives back to the state (1.3).”

What specific programs are we strengthening and how?

“2 Ensure all Wyoming people who want to work have access to an open, streamlined, and effective workforce development system.” And “2.1 Maximize core program coordination.”

In order to maximize something, it must first be measurable. How is this going to be measured? This goal is very broad and needs to be sharpened. Recommend taking language from the Wyoming Employment First Strategic Plan.

“To ensure accountability and transparency of funding, core programs shall provide a joint annual report to the Workforce Development Council which demonstrates administrative-to-program costs and program performance to help the Council identify opportunities for fund allocation (2.1).”

Revise language based on public comment regarding measurements in other areas.

“2.2 Utilize Career Pathways as an umbrella model in One-Stop centers.”

Too much jargon. This is a document for the general public. I would recommend either defining this language in the goal, or putting it in a way a member of the general public would understand.

“Develop a marketing plan to create awareness about services offered by One-Stop centers (2.1, 2.2, 2.3, 2.4).”

This is not a strategy. The plan should be stated, in summary, here in the State Plan.

“2.3 Evaluate efforts to ensure that training and education requirements match the state’s labor market needs”

Evaluations should occur before a strategy is developed and should be the driving force behind the specifics of the strategy. I would recommend changing this to “monitor efforts to ensure that...” by using previous market needs as a baseline.

“Labor market analysis and the needs communicated by employers should inform ongoing One-Stop system planning and development (2.2, 2.3).”

The WIOA plan already has labor market analysis. Is additional labor market analysis required?

“2.4 Work to reduce barriers to employment for underrepresented populations.”

Language is very broad. Goal should identify specific barriers and specific underrepresented populations, ie: stigmas are barriers for persons with disabilities. Additionally, goal needs a measurement and needs to define reduction along that measurement.

Comments Provided by:
Calob Taylor, Policy Analyst and Grants Coordinator
Wyoming Governor's Council on Developmental Disabilities

Pg. 100-101- The Mitchum study will have the ability to track former students and their progress. This will allow making goals and meeting them in the future. The information in the WIOA plan seemed to only touch the surface of what this report had to say. Incorporating more of this report throughout the entire plan would provide beneficial information to inform other sections of the plan.

Pg. 101- Disability table 1 is a very good visual comparison tool to identify working age Adults with disabilities.

There is no mention of current working trends for people with disabilities or the settings they work in. Are they working in an integrated setting or disability specific location? How many are in each of those locations? How many current FLSA Section 14c certifications are there in the state? How many people are paid at below minimum wage using FLSA Section 14c? Are there any state contracts in disability specific locations? Are people with disabilities paid below minimum wage using state dollars?

Pg. 249-256 References the "Governor's Planning Council on Developmental Disabilities" Which is now the "Governor's Council on Developmental Disabilities."

Pg. 266 Impact of employment on benefits was identified as a gap in knowledge for both providers and consumers. What is the plan to reduce this gap in knowledge?

Pg. 128, 134, 199, 203 all mention Financial Literacy but nothing mentioned how it would impact or be deployed to people with disabilities.

Pg. 147, 256, 268, 272 all speak to the work of the Employment First Task Force. Pg. 256 describes the board goal of the Employment First Task Force; however, more specifics could have been included such as the development of regions, regional employment summits, and regional teams.

None of the strategic vision and goals on pages 142-143 mentions disability specifically.

Pg. 267- Seem to share the previous goals and the accomplishments of the VR program and the State Rehab Council. There is a missed opportunity to include a collaborative effort with the Employment First Task Force and their strategic plan and progress.

Comments Provided By:
Philip Pauli, Policy and Practices Director
Best Practices on Employment
RespectAbility USA

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

Despite limited resources and small populations, Wyoming is far ahead of many states in terms of expanding competitive, integrated employment for people with disabilities. According to the most recent, publically available Census data, Wyoming ranks 5th in the nation as measured by the employment rate of people with disabilities. **Fully 45.2 percent of the 38,675 working age people with disabilities are employed in Wyoming. Because of your good work, the 8,200 youth with disabilities between the ages of 16 and 21 living in Wyoming have increasing chances to successfully transition into the world of work.**

We fully recognize that this draft State Plan has been written in the shadow cast by plummeting oil prices and an mining industry impacted by regulatory interference. Together, these have created significant challenges for Wyoming's economy. However, markets are defined by cyclical patterns and the partnerships that shape Wyoming's workforce system are equipped to overcome ongoing challenges. For example, the growing talent needs of employers in the healthcare and social care supports remain a factor in need of a strong sector strategy.

Upon reviewing the current draft of the state plan there remain a few areas where improvements can be made to achieve the best results possible. **Our public comments on Wyoming'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 disability data points, especially those around youth with disabilities as well as the gap in Labor Force Participation Rates (LFPRs) between people with and without disabilities, are included in your Workforce Analysis:

Tracking unemployment information (which only reflects people actively looking for jobs) and job placements (which only monitors people who interface directly with the workforce system) is necessary, but not sufficient to drive true performance metrics that will create success.

Wyoming's Unified State Plan directly addresses this challenge starting on page 100 in Section 2. Individual Populations, a. Disability. Herein, we find a clear statement of the challenges facing the state's disability community and Wyoming's workforce system. The Unified State Plan reports that "Wyoming has historically lacked the tools to track the labor force participation of people with disabilities." **This is a significant challenge because the LFPR is, from our perspective, the most important data point and performance metric for tracking employment outcomes is to track the gap in the Labor Force Participation Rate**

(LFPR) between people with and without disabilities. As the State Plan goes on to say that “through research made possible by the Workforce Data Quality Initiative (WDQI) grant, R&P has the ability to identify students with a disability” and help to identify their employment, earning, and “their participation in the labor market during and after their high school years by linking student data with administrative records.” This section of the State Plan goes on to discuss students with IEPs in great detail. We are pleased to report that your State Plan is the only one to directly included data on youth with IEPs and what types of difference they have. We are excited about the opportunities that this grant has created and hope that Wyoming will prioritize expending employment opportunities for youth with disabilities.

Figure 1.
Wyoming Performance Metrics on Jobs for PWDs



Gov. Matthew Mead
(R)

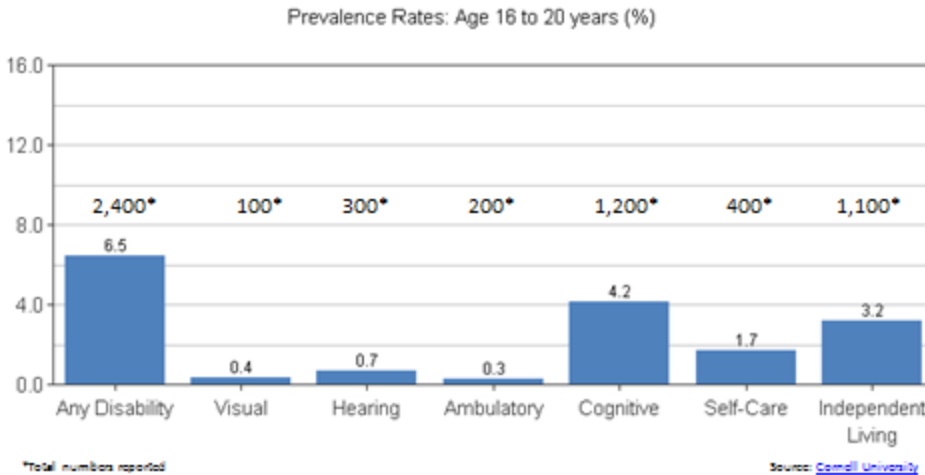
- ❖ 81% of persons without disabilities aged 18 to 64 are employed.³
- ❖ 45.2% of PwDs aged 18 to 64 are employed.³
- ❖ Wyoming ranks 5th in the nation in terms of jobs for PWDs.
- ❖ **There remains a 35.9 point gap in the labor force participation rate (LFPR) between people with and without disabilities.**
- ❖ 1,500 persons aged 16 to 20 have a disability.¹
- ❖ 38,300 persons aged 21 to 64 have a disability.¹
- ❖ 6,100 PwDs aged 18 to 64 receive benefits.¹
- ❖ In 2012, WY's total expenditure on SSDI benefits was \$184,836,000.³
- ❖ Voc. Rehab. received 2,161 general applicants in WY in 2012.²
- ❖ Voc. Rehab. obtained 678 jobs for PwDs in WY in 2012.²

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

As we reported at the beginning of our public comments, fully 45.2 percent working age with disabilities are employed in Wyoming compared to the 81 percent employment rate for those without disabilities. There remains however a 35.9 percentage point gap in the LFPR between people with and without disabilities. We believe that with more focused work, Wyoming can sustain the high ranking that it has achieved and can continue to succeed by empowering more people with disabilities to pursue the independence that jobs provide. Good data is essential for any attempt to increase the number of people with disabilities who are succeeding in competitive, integrated employment. **As an example of the data that is needed, below are several charts which show the challenge in your state.**

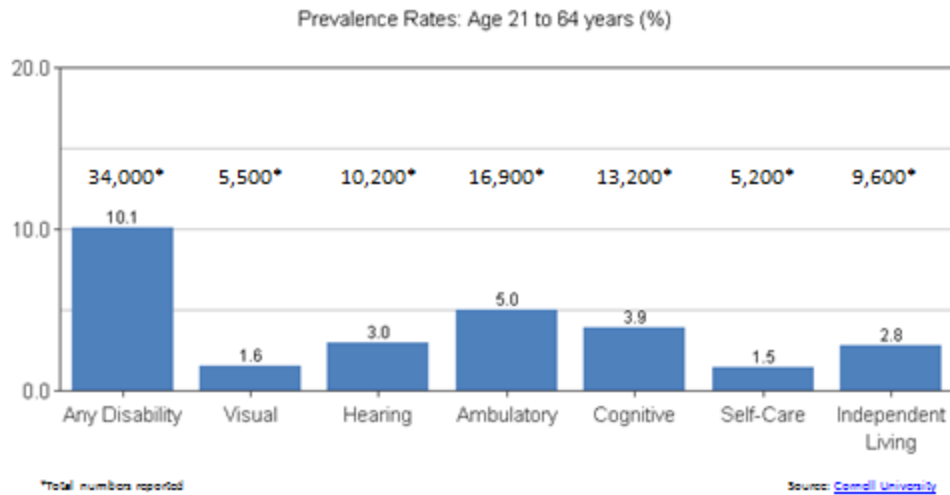
- a. **Youth with disabilities who are aging in the workforce (ages 16-20).** If Wyoming's workforce system is to seriously deliver on the promise to improve transitions to work for youth, it is critical to know how many youth with disabilities will be aging out of school.

Figure 2.
Prevalence of Disability Among Non-Institutionalized People
Ages 16 to 20 in Wyoming in 2012



- b. Working age people with disabilities (ages 21-64).** It is worth noting that Wyoming's Unified State Plan identified as an interesting dynamic at play within your disability community. Starting on page 101, the Plan states "As shown in Disability Table 1, estimates reveal that more than half (57.5 percent) of all individuals with at least one disability were age 55 and older." Further, "Wyoming's 55 and older population is not evenly distributed across the state" with most aging Wyomingites located in smaller counties. According to the most recent available data from the Census Bureau, there are 34,000 working age with disabilities between the ages of 21 and 64 in Wyoming. It is critical to distinguish between working age people with disabilities and those we acquire disabilities due to the aging process. The chart below shows the diverse range of disabilities experienced in your state.

Figure 3.
Prevalence of Disability Among Non-Institutionalized People Ages 21 to 64 in Wyoming in 2012



- c. **What types of disabilities do youth have who are transitioning into the workforce?**
 We deeply appreciate the inclusion of very detail data on people with disabilities broken down by age group in Disability Table 1 on page 101 and Disability Table 2 on page 103. However, we would add to this that it is critically important to look at the specific types of disability that are being experienced about students served under IDEA. This type of information is critical important because youth with vision, mobility and hearing disabilities need specific types of tools and training, but may otherwise be ready for high skill, high wage jobs. To support the success of youth with cognitive disabilities, it will be critical for Wyoming to expand early work, skill training, and job placements.

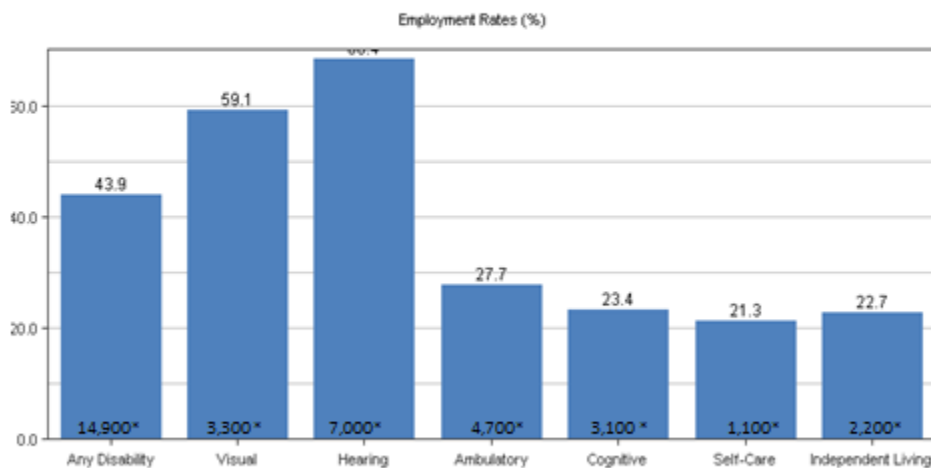
Figure 4.
Ages 6 to 21 IEPs by Category WY

	2011	2012
All Disabilities	11,990	11,883
Specific Learning Disability	4,382	4,250
Speech or Language Impairment	3,087	3,138
Intellectual Disability	526	491
Emotional Disturbance	717	641
Multiple Disability	194	217
Hearing Impairment	151	133
Orthopedic Impairment	70	72
Other Health Impairment	1,862	1,885
Visual Impairment	---	43
Autism	653	708
Deaf Blindness	---	0
Traumatic Brain Injury	67	71
Developmental Delay	229	234

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 Wyoming in 2012



*Total numbers reported

Source: [Cornell University](#)

From our review of the current draft of Wyoming's Unified State Plan, it is clear your workforce system understands the critical importance of tracking the Labor Force Participation Rate. Despite the barriers created by limited resources your state is endeavoring to compensate for those barriers and get the right data in hand. We add to your efforts our perspective that comparing the gap in the LFPR between people with and without disabilities helps guide the system to push for improved outcomes.

We are optimistic that Wyoming will sustain the employment it has already achieved and built towards continuing opportunities. After all, despite a drop in the employment rate between 2013 and 2014, people with disabilities in Wyoming are twice as likely to be working than people with disabilities in states like Maine, Kentucky, and West Virginia. Outside observers might discuss the case study of such states as being small states with tiny populations who got lucky with a booming energy sector with little relevance to disability policy. However, we would disagree that view. Wyoming, along with South Dakota and North Dakota are leading the nation both in terms of best practices and in terms of employment outcomes. As such, sustaining that position will very much depend on hard work and a focus on youth employment. There is a significant opportunity to rapidly expand school to work transition programs like Project Search. We are encouraged by the discussions occurring through VR among their transition consultants about the possibility of starting Project Search sites in Wyoming. This is a promisingly development and we hope that it will result in increasing opportunities for youth with disabilities to succeed. This opportunity needs to be met with ambition and expanded effort in order for Wyoming to continue moving the needle on employment outcomes. We have more to say on this point later in our public comments.

2. Busting Stigmas, Myths, and Misconceptions Should Be Part of Wyoming's Workforce Strategy:

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

As such, we recommend that your State Plan be amended to include a comprehensive, proactive communications/public relations strategy for reducing such stigmas. The best way to fight stigmas is to let employers see the facts from other employers who are already succeeding by hiring people with disabilities. **In order to ensure that such efforts have the biggest possible impact, it needs to be supported by a serious, systematic and ongoing communications campaign that highlights the benefits of inclusive hiring.**

Such a campaign would directly impact your state's efforts to move forward WIOA implementation and it would support the work of your Employment First Task Force. Looking at the barriers created by stigma, we would recommend that the Wyoming Governor's Council on Developmental Disabilities is a key partner for the workforce system to bring to the table and to push hard on improved outcomes. The Council is already framing a lot of their efforts, [particularly for March Disability Awareness Month](#), around fighting myths with truth. This effort

has critical implications for the workforce system and the need to fight stigma in a systematic way. Indeed, we know that other groups people with barriers to work also face stigmas, especially those leaving the corrections system.

We commend Governor Mead's effort to bring [media attention to the issue of disability employment](#), and [his clear words on the importance of Employment First efforts](#). Moving forward, we would highly encourage the Governor to follow the example set by governors in others states such as Jack Markell of Delaware, Jay Inslee of Washington, and Scott Walker of Wisconsin who have visited model employers in their home states and committed to showcasing the business case for hiring people with disabilities. **This type of systematic and ongoing communications campaign must continue if you want to maximize your state's success.** It is an effort that needs to be address through your Unified State plan.

In terms of potential employer partners, we encourage your state plan to look at [Disability Equality Index that assesses the inclusion and hiring efforts of major employers](#). It was put together by the United States Business Leadership Network (USBLN) which operates [a network of affiliates across the country that can be an incredible resource for your work](#). However, it should be a component of Wyoming's planning and implementation of a serious business-to-business PR effort. The companies which scored 100% in the USBLN index can be a great resource. These are Ameren Corporation, AT&T, Booz Allen Hamilton Inc., Capital One Financial Corporation, Comcast, NBC Universal, Ernst & Young LLP, Florida Blue, Freddie Mac, Highmark Health, JPMorgan Chase & Co., Lockheed Martin Corporation, Northrop Grumman Corporation, Pacific Gas and Electric Company, PricewaterhouseCoopers LLP (PwC), Procter & Gamble, Qualcomm, Sprint Corporation, Starbucks, and TD Bank N.A.

Polls and focus groups show that there are three types of messages and audiences that are needed to expand employment for people with disabilities. Serious communications campaigns are needed for all three:

- A. CEOs/business leaders need to understand the value proposition/business case for their specific company as to why they should focus on putting people with disabilities into their talent pipelines.** This is best done through business-to-business success stories. People with disabilities can work successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and they can be super talents in developing computer software and engineering solutions. CEOs and business leaders need to know that people with disabilities can be the BEST people to get a job done.
- B. Human resources professionals and on-the-ground supervisors need to understand that hiring people with disabilities is generally easy and inexpensive, and that any costs incurred are more than offset from increased loyalty.** Hiring managers and supervisors are key players who can turn high minded policy and business goals into action at the ground level. However, studies show that many are uninformed about people with disabilities. They are afraid of potential legal action, costs, or other failures. They need supports that will empower them to overcome their own fears and to excel at recruiting, hiring, supervising, or working with teammates who have disabilities. VR staff and community agencies can fully support human resources professionals and managers in dealing with their own specific fears and stigmas surrounding hiring people with

disabilities, and should do so, given that they are one of the few states who have opted to go for a dual-customer approach at their program centers. Moreover, online and in-person training is readily available to help from a variety of sources. RespectAbility has online webinars, as [does ASKJAN.org](#), USDOL and others. Partners like [the Poses Family Foundation Workplace Initiative](#) can provide training to the workforce staff and volunteers systems-wide as well as to community agencies in supporting companies through messaging efforts around related to fear and stigma. [The National Organization on Disability](#) and [the U.S. Business Leadership Network](#) offer strong resources as well.

- C. People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectation must begin. Wyoming needs a public relations campaign that will inspire Wyomingites with disabilities to set their hopes high, as low expectations and low self-esteem are a barrier to employment.** For example, Virgin Airways founder Sir Richard Branson and finance wizard Charles Schwab are also dyslexic. Scientist Stephen Hawking and multi-billionaire businessman Sheldon Adelson, like Gov. Greg Abbott of Texas and President Franklin D. Roosevelt before them, are wheelchair/mobility device users. Arthur Young, co-founder of the giant EY (formerly Ernst & Young) was deaf. These are the type of success stories that people with disabilities need and this is something the workforce system should seriously utilize.

As an example of the power and value of making the business case for hiring people with disabilities, we offer Wyoming the insights gained from our [#RespectTheAbility](#) campaign. The campaign focuses on how hiring people with disabilities can make organizations stronger and more successful. It highlights the benefits to employers that look beyond the disability and imagine the possibility when hiring talented employees with disabilities. Addressing stigma in a sustained, strategic way needs to be part of Wyoming's larger effort to empower people to overcome barriers to employment. You have the leaders who care and the employer who can tell their stories. We have high hopes that you can succeed in this effort.

3. 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.

However, we recognize that your state faces considerable challenges in the immediate future. To quote page 3 of your State Plan, "In the fall of 2015, Wyoming's economy was exposed to a substantial decline in the prices of oil, an extended period of low natural gas prices, and the erosion in the price of coal." These factors created significant challenges. However, we do feel there remain considerable opportunities to empower more people with disabilities to get jobs. After all, as stated on page 8, talent needs in "public administration, health care & social assistance, and educational services grew during the economic downturn of 2009Q1-2010Q1." In the next few sentences, the Plan goes on to observe that in these jobs sectors: "The demographic data for these sectors show that both industries have older workforces, indicating a potential need for new workers in the future." Healthcare in particular is one of "several emerging demand

industry sectors in Wyoming” analyzed in the State Plan. Likewise, “Public administration, tourism, and high technology” are also briefly discussed.

As such, in terms of the planning elements of Wyoming’s Unified State Plan, we would emphasize the critical importance of ensuring the people with disabilities are viewed as an untapped labor resource ready to be trained to meet your state’s growing talent needs. People with disabilities represent an untapped labor resource that can meet many of the diverse talent needs of Wyoming’s growing job sectors. The jobs gains in these sectors offer a great opportunity for focused sector strategies sustain and to achieve improved employment outcomes for people with disabilities in Wyoming.

a. 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.

In other states, the Project Search model has helped to train and prepare youth with disabilities, particularly those with intellectual and developmental differences, for successful careers in accommodations and food service. This a good fit because these are extremely high turnover jobs and numerous studies show that people with disabilities can be outstanding in those fields and have significantly higher employer loyalty. Further, as noted by Intro Figure 2 on page 12 of the State Plan, “30.8 percent of workers in leisure & hospitality are nonresidents.” **This lack of permanence drives employer labor costs and this is a place where efforts to train youth with disabilities could be prioritized.**

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 Wyoming can look to in order to improve employment outcomes for people with disabilities.](#) Your State Board, 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 of Wyoming’s economy, with high turnover and big potential, is retail trade. We encourage your workforce system to recruit and partner with employers in the retail space where the higher retention rates of employees with disabilities can positively impact

the company's bottom line. It is important to identify more specific opportunities with employers and to cite them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future.

b. Health and Elder Care:

Healthcare already represents a significant sector of Wyoming's state economy. As stated on page 22 of the State Plan, "In 2014, the health care and social assistance sector represented approximately 11.5 percent of total Wyoming employment." Healthcare, interestingly, was a sector that continue to grow even as Wyoming experienced a falling economy. Healthcare as a economic sector with significant talent needs will only grow in the years ahead. Indeed, on page 23, the State Plan reports that "According to R&P's long-term 2012-2022 industry projections, health care & social assistance is projected to grow by 16.5 percent, or approximately 1.7 percent per year." When you look more closely at these projections, you find that "employment in ambulatory health care services is projected to grow 27.1 percent", while "employment in hospitals is projected to grow 16.5 percent", and "employment in nursing and residential care facilities is projected to grow 12.1 percent."

The rapid emerging talent needs in health care represent both a challenge and an opportunity for Wyoming'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.

Wyomingites with disabilities, especially youth, can and should be part of the solution to this demand in the labor market. A 2014 report from the [Office of Disability Employment Policy](#) (ODEP) captured this opportunity clearly, saying that "[people with disabilities] not only represent an untapped talent pool, but also offer significant value and insight" in the field of healthcare.. It is important for healthcare institutions to reflect their customers, and people with disabilities interface more with the healthcare system. There are [numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living.](#) **Employers working in health and elder care can greatly benefit from the loyalty, 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 healthcare and social assistance in Wyoming. However, Wyoming currently has no Project Search site and the possibility of creating such sites is only listed as being a point of potential collaboration among the "transition consultants" discussed on page 256 of the State Plan. **We encourage Wyoming to follow the example of Wisconsin, Florida, and other states that are rapidly expanding Project Search.**

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 integrated employment. 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.

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

Even though other sectors are driving the growth of Wyoming’s economy, it is still important look at the issue of preparing workers for careers in Science, Technology, Engineering and Mathematics (STEM). **As has been documented in many cases, there can be an “Autism Advantage” in the STEM space. Indeed, some people on the Autism spectrum can have the very best skills in science, math and engineering.**

Companies including [Microsoft](#), [SAP](#), and [Specialisterne](#) have committed themselves to [“provide employment opportunities for people on the autism spectrum in roles such as software testers, programmers, system administrators, and data quality assurance specialists.”](#) [The Israeli Defense Forces recruits and trains their citizens on the Autism spectrum for work in their elite intelligence unit.](#)

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

Ensuring the Accessibility of Science, Technology, Engineering and Mathematics (STEM) Programs and Careers for People with Disabilities, especially Students with IEPs, is vital. As Carol Glazer of the National Organization on Disabilities wrote in *Huffington Post*, [“America is already lagging when it comes to STEM-skilled workers. The U.S. will have more than 1.2 million job openings in STEM fields by 2018.”](#) Governors in other states have looked at STEM needs and begun to develop solutions. For example, [in New York State Governor Cuomo has ensured that magnet schools for STEM are located near IBM, a major STEM employer in their state.](#) Wyoming should be looking at ways to follow this model. Together, state workforce system and educational system can look to supported-employment programs such as Project Search, Specialisterne, and [the Marriot Foundation's Bridges to Work Program](#) as models for developing a systematic approach to providing the supports necessary for our students on the autism spectrum to excel in STEM.

d. State jobs and state contracting can also be sources of opportunity:

While the focus of our comments on the State Plans are around aligning the workforce system to create opportunities for people with disabilities in the private sector, public sector employment should not be neglected. In the years ahead, the workforce of Wyoming’s state

government is likely to be impacted by the cresting wave of Baby Boomers retiring just as other sectors are being shaken.

The importance of such hiring efforts was first discussed in Governor Markell's *Better Bottom Line* Initiative. In Governor Markell's own words, "[One key action is to set a state goal for hiring people with disabilities through an executive order and hold agencies accountable for achieving that goal.](#)"

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 Wyoming 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 Virginia.

The untapped potential of people with disabilities is such that a full-spectrum, all-of-the-above-and-more approach is needed.

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

Wyoming's State Plan completely omits any mention of the important rules and opportunities created by Section 503 of the Rehabilitation Act of 1973. The plan lacks any references to the employment opportunities and talent challenges created by the recently implemented Section 503 regulations regarding federal contractors and subcontractors. [Wyoming's plan does not discuss at all the new 7% utilization goal set for companies to recruit, hire, and retain qualified individuals with disabilities in all job categories.](#)

Wyoming 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 CRH PLC, Hermes Consolidated Inc., Recco Inc., The Sinclair Companies, and M1 Support Services L.P.. [More detailed information regarding federal contracts in Wyoming can be found here.](#)

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

The Common Assurances listed on page 190 of Wyoming's Unified State Plan will be critical factors in the overall implementation and ultimate success of WIOA. **As such, it is**

critical that each assurance is matched up with a strategy fitted to meeting and, if possible, exceeding the requirements of the law.

For example, it is critical that the assurances listed on page 208 for Title 1-B Programs are matched up to specific strategies to achieve the “delivery of career and training services to individuals.” Further, the Wagner-Peyser Assurances on page 227 need careful implementation efforts as do the Adult Basic Education Assurances listed on page 244 and the VR assurances on pages 280 through 287.

As a good example of the level of detail needed here, consider WIOA Section 188. The anti-discriminatory rules originally outlined under WIA need to be updated to reflect the steps needed towards making universal access a reality. **For example, in seeking to meet Common Assurance #7 listed in the State Plan on page 191, we are directing states to consider the resources made available from the Office of Disability Employment Policy (ODEP). [They have recently released a guide that digs deep into what universal accessibility will mean for the workforce system.](#)** Further, Common Assurance #10 affirms each state plan’s commitment to meeting the requirement that “one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990.” **However, merely meeting legal requirements should not be the end of this process. Indeed, looking at physical and programmatic accessibility can be an opportunity to invest in a more proactive workforce system very actively committed to collaboration and partnerships.** If there is no plan that specifically identifies how the state is going to get to the commitment made in the assurance; the state is facing a serious problem.

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

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

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

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

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

One of the often-neglected opportunities for people with disabilities is training opportunities offered by apprenticeship programs. **We are pleased that Wyoming is looking to expand the vital opportunity that apprenticeship training can offer to young people with disabilities.** However, 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 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 Wyoming.](#) Such innovative partnerships and improved accessibility are essential elements of realization the full promise of WIOA for people with disabilities.

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

8. Overcome the gap between disability services and career services in Post-Secondary Education:

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

The result is a price we pay as a society is twofold. First, it costs employers who are unable to find qualified job candidates. Second, it costs students with disabilities who may be able to graduate with a degree thanks to accommodations but will go on to struggle to succeed in the working world. Nationally, there are 1.3 million young Americans ages 16-20 with

disabilities. [They have high expectations to go into the workforce but currently only 53% of college graduates with disabilities are employed](#) as opposed to 84% of graduates with no disability. In total, only about 7% of people with disabilities will earn a college degree and less than half of the 2.3 million with a degree are employed.

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

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

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

There are many online and in person resources to help employers and people with disabilities come together to build success. However, all the stakeholders need to be educated to know that these resources exist, and that they are free and user-friendly. These resources must also all be accessible. We know that broadband access is a huge issue in rural states. However, it's important to ensure that online resources enhance the effort of your workforce system.

Your state needs to make an effort to demonstrate to employers and prospective employees that these services exist. Doing so by coordinating it with the possible public relations campaign is one way to go about this. Also, your state should be careful not to waste money trying to re-invent the wheel in creating online resources as [ASKJAN.org](#), [the US Department of Labor's Office of Disability Employment](#) Policy, [our organization and others also offer free toolkits, webinars and training opportunities](#). [Another resource is Understood.org](#). This is a comprehensive resource to help families and individuals with learning and attention issues build their educational and career plans. It will be helpful to collaborate with those groups however to ensure that the best tools are created to fit the training and information needs on these issues.

10. Nothing About Us Without Us:

"Nothing About Us without Us" has long been a rallying cry for the one-in-five Americans who have a disability and it has implications for the workforce system. Section 107 of WIOA dictates the establishment, criteria, and membership for the Local Workforce Development Boards that are crucial implementers of each state's overall workforce strategy. **As such, we feel there is a critical need to ensure that people with disabilities are represented on such local boards and make their voices heard.** Section 107(b)(2)(A)(iii) of WIOA specifically states that "community-based organizations that have demonstrated experience and expertise in 9 addressing the employment needs of individuals with barriers to employment" may

be represented on the boards and this includes “organizations....that provide or support competitive integrated employment for individuals with disabilities.”

Even a non-voting, ex-officio member of a WIB can bring critical perspectives that improve the WIB’s efforts overall. As such, we recommend that states look for ways to recruit local community organizations or self-advocates for inclusion on their local boards. Perhaps this could be a natural point of partnership for Independent Living Centers across the country that do crucial work supporting employment and independence for people with a wide range of disabilities.

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

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

Transportation is not really addressed as a barrier to employment in the current draft of Wyoming’s Unified State Plan. “Transportation expenses” are referenced in the sections about “Services for individuals with disabilities” provided through “Division of Vocational Rehabilitation within the Department of Workforce Services” on page 159. Likewise, we also see transportation references among the “other supportive services” provided through a “State program for Temporary Assistance for Needy Families (TANF)” on page 211.

We recognize that transportation is a significant challenge in a largely state with limited resources such as Wyoming. However, we encourage your state workforce system to work through these issues in a deliberative, collaborative fashion.

Public transportation is only part of the 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. Public sector employers and federal contractors who have Section 503 obligations are key places for apprenticeships and internships and onboarding of talent. It is important for them to play a key role in planning for public transportation as well.

12. Aging workers and those with recently acquired disabilities must be specifically addressed:

Attention should start BEFORE aging workers and those with recently acquired disabilities lose their job due to aging and/or a newly acquired disability. Many people who have been in the workforce for decades find that before full retirement age they cannot keep up with the physical demands of their jobs. It is vital to start working with them BEFORE they lose their jobs. In Iowa, IVRS works with a major employer, Unity Point Hospital to “re-home” employees to other jobs within the same company when good workers can no longer do physical jobs and need a new assignment. They find that Emergency Room nurses, for example, come to a point where they can no longer keep up with the physical demands of that job. They have a department that works to “re-home” talented and valued employees who either age into a disability or acquire a disability through accident or illness. Empowering youth with disabilities to enter the workforce should be your highest priority, but keeping aging workers in the workforce until retirement age is also important. This will take a specific strategy and effort

so that you don't have massive numbers of people going onto disability rolls and out of the workplace prematurely.

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

Government can't and shouldn't do everything. There is a massive role that can be played by volunteers who are willing to help people with barriers to work, including people with disabilities, find and keep jobs. There is a critical, cooperative role for non-profits and faith-based organizations to play. Local workforce development areas, for example, could be encouraged to recruit volunteers from local faith communities or local non-profits. However, much more can and should be done to work with parents of teens and young adults with disabilities, and to create volunteer mentorships for people with disabilities who are looking for work or need supports to stay employed and/or grow their careers.

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

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

There are several points where the current draft of Wyoming's Unified State Plan addresses the unique workforce challenges facing ex-offenders as they attempt to reenter society. For example, as stated on 91, among the most important of WIOA's requirements is "an analysis of groups facing barriers to employment." Ex-offenders are a key group and face significant challenges in terms of workforce development. On page 106 we find the section specifically about "Ex-Offenders" and Corrections Table 1 on page 105 lists the Number and Percentage of Ex-Offenders by County of Conviction. Page 154 of the State Plan discusses how "Workforce Services coordinates with the Department of Corrections to provide re-entry workforce readiness, and education services for ex-offenders." Such educational activity occurs "both in prison within the pre-release category, as well as those already located within communities." One last example of the commitments made in Wyoming's WIOA Plan to serve this population starts on page 157 and discusses the "Dads Making a Difference" which is coordinated through an MOU between "Family Services and Workforce Services." **All of this is critical work and the lens of disability needs to be applied to what is being done.**

[According to recently published data from the Bureau of Justice Statistics, "An estimated 32% of prisoners and 40% of jail inmates reported having at least one disability."](#) This issue is a serious one and it needs to be addressed at the state level. Frequently people are involved in the criminal justice system because they have disability issues, including learning differences,

ADHD, executive function, and mental health issues that went undiagnosed and/or unaddressed through childhood and into the school years.

Given these statistics from the BJS, it is vital that states identify how many of the individuals in the corrections system and in the ex-offender pipeline have disabilities. There are two related challenges here. First, there is a need to identify potential disability issues among inmates during the intake process and ensure their needs can be met. Ideally, this type of assessment could be done within the first thirty days of their sentence. Such identification could then feed into the work being done through educational programs in corrections. Second, are the issues related to preparing inmates for their release and reintegration into society. Whether it is mental health supports or learning accommodations helping ex-offenders to find employ when they are home is a critical workforce development challenge. It is a challenge that only grows more complicated when a disability remain unaddressed. The price paid for ignoring these issue are higher rates of recidivism and greater costs to society. Addressing these issues at the beginning and at the end of the corrections process will have downstream effects and hopefully will enable states to address the intersectionality of these workforce, disability, and justice issues.

Conclusion:

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. Wyoming's Unified State Plan is a great example of that hard work, dedicated effort, and specific policies needed to realize those hopes. People with disabilities want to pursue the American Dream, just like everyone. Making sure there are pathways for their talents to meet employer talent needs is a win-win-win for people, taxpayers, and businesses alike. We are encouraged by what we have seen from Wyoming and we stand ready to assist in any way that we can.

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

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



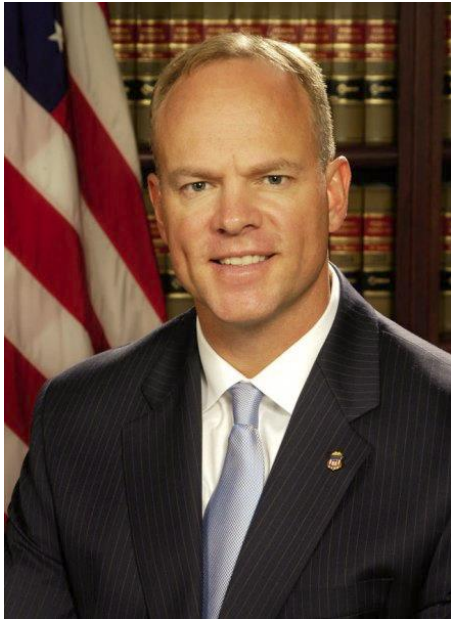
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Jennifer Laszlo Mizrahi, President

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Wyoming



Gov. Matthew Mead
(R)

- ❖ 81% of persons without disabilities aged 18 to 64 are employed.³
- ❖ 45.2% of PwDs aged 18 to 64 are employed.³
- ❖ **Wyoming ranks 5th in the nation in terms of jobs for PWDs.**
- ❖ **There remains a 35.9 point gap in the labor force participation rate (LFPR) between people with and without disabilities.**
- ❖ 1,500 persons aged 16 to 20 have a disability.¹
- ❖ 38,300 persons aged 21 to 64 have a disability.¹
- ❖ 6,100 PwDs aged 18 to 64 receive benefits.¹
- ❖ In 2012, WY's total expenditure on SSDI benefits was \$184,836,000.³
- ❖ Voc. Rehab. received 2,161 general applicants in WY in 2012.³
- ❖ Voc. Rehab. obtained 678 jobs for PwDs in WY in 2012.²

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

Wyoming Data

		People with Disabilities (%)		People without Disabilities (%)	
		2012	2013	2012	2013
Poverty ¹	US	29.2	28.7	13.6	13.6
	WY	22.8	16.7	11.6	10.1
Smoking ¹	US	26.0	25.4	16.9	16.2
	WY	23.9	28.4	21.4	18.3
Obesity ¹	US	39.1	40.1	24.5	25.0
	WY	35.3	39.1	22.0	24.6
Employment ¹	US	32.7	33.9	73.6	74.2
	WY	43.9	50.7	78.5	79.4

1. [Annual Disability Statistics Compendium](#). Pg 53, 54, 72, 73, 29

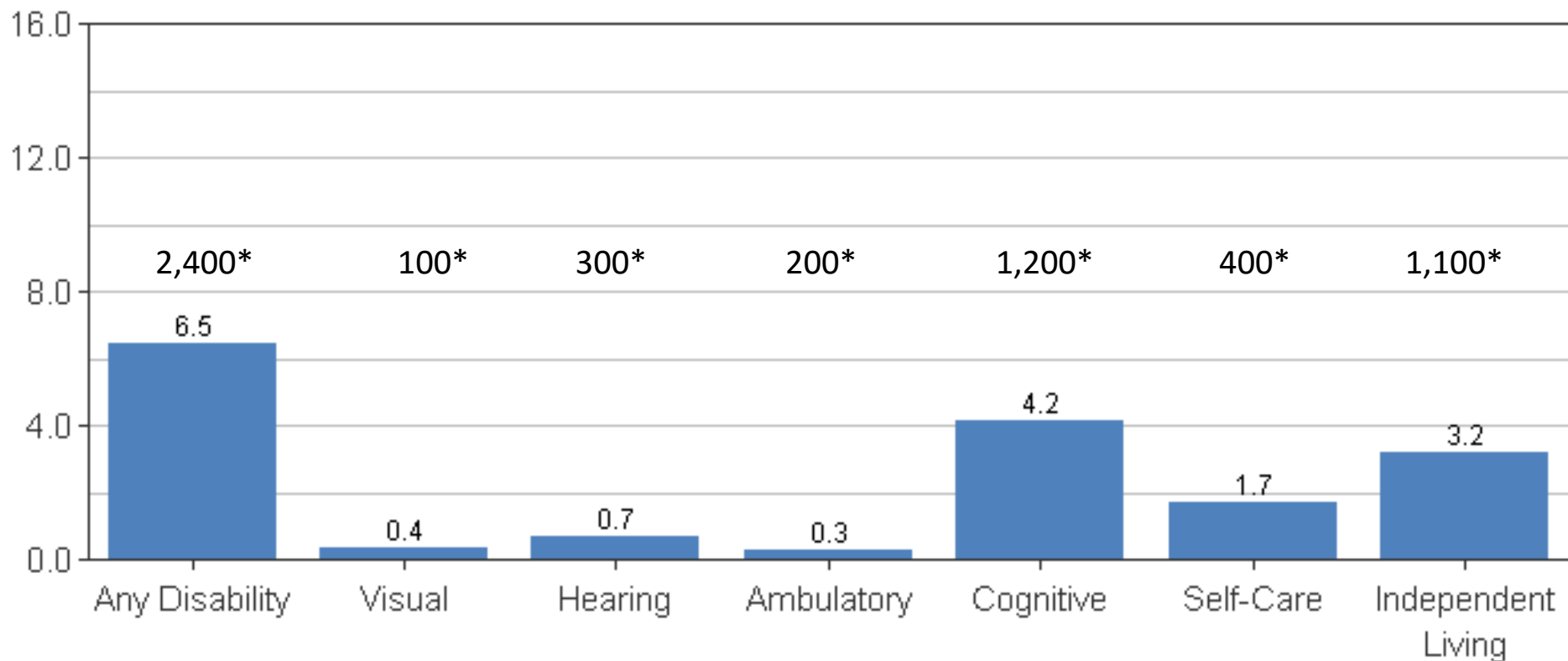
Ages 6 to 21 IEPs by Category WY

	2011	2012
All Disabilities	11,990	11,883
Specific Learning Disability	4,382	4,250
Speech or Language Impairment	3,087	3,138
Intellectual Disability	526	491
Emotional Disturbance	717	641
Multiple Disability	194	217
Hearing Impairment	151	133
Orthopedic Impairment	70	72
Other Health Impairment	1,862	1,885
Visual Impairment	----	43
Autism	653	708
Deaf Blindness	----	0
Traumatic Brain Injury	67	71
Developmental Delay	229	234

Source: [Annual Disability Statistics Compendium](#)

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

Prevalence Rates: Age 16 to 20 years (%)

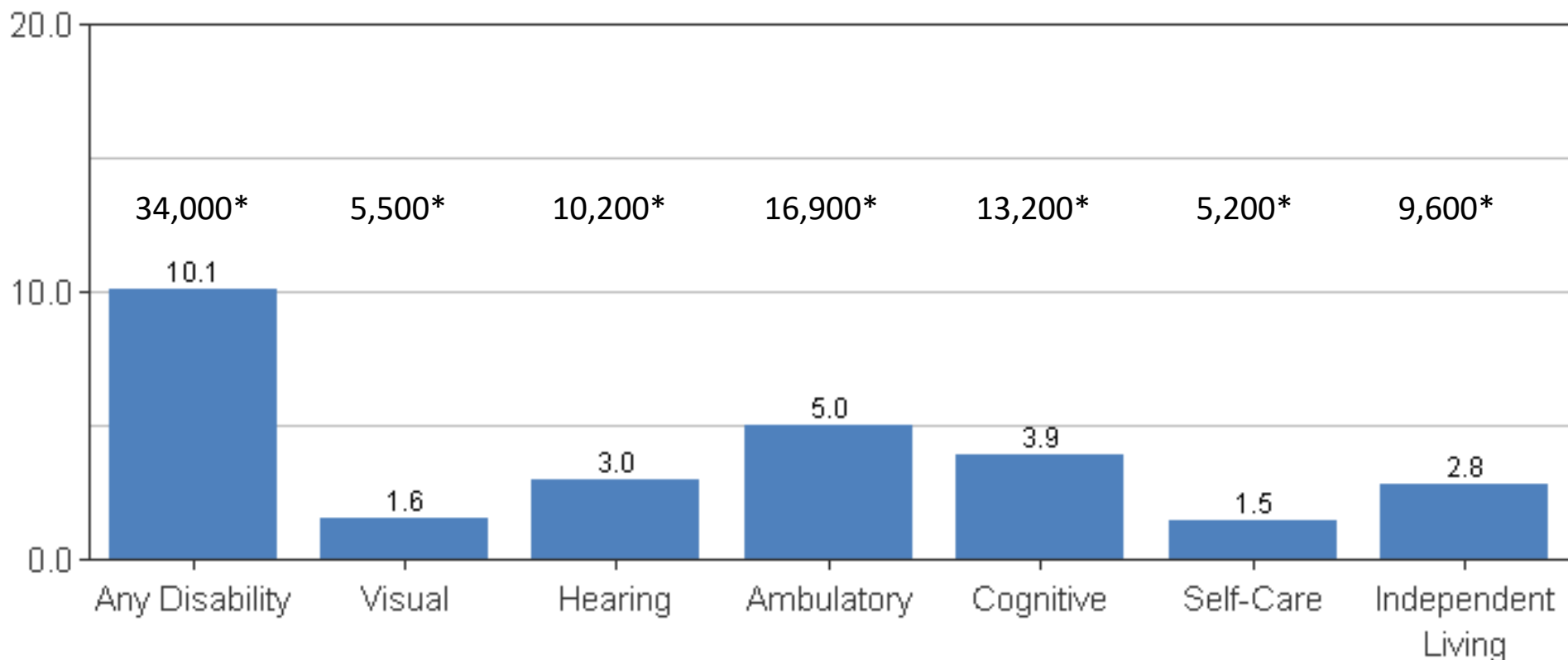


*Total numbers reported

Source: [Cornell University](#)

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

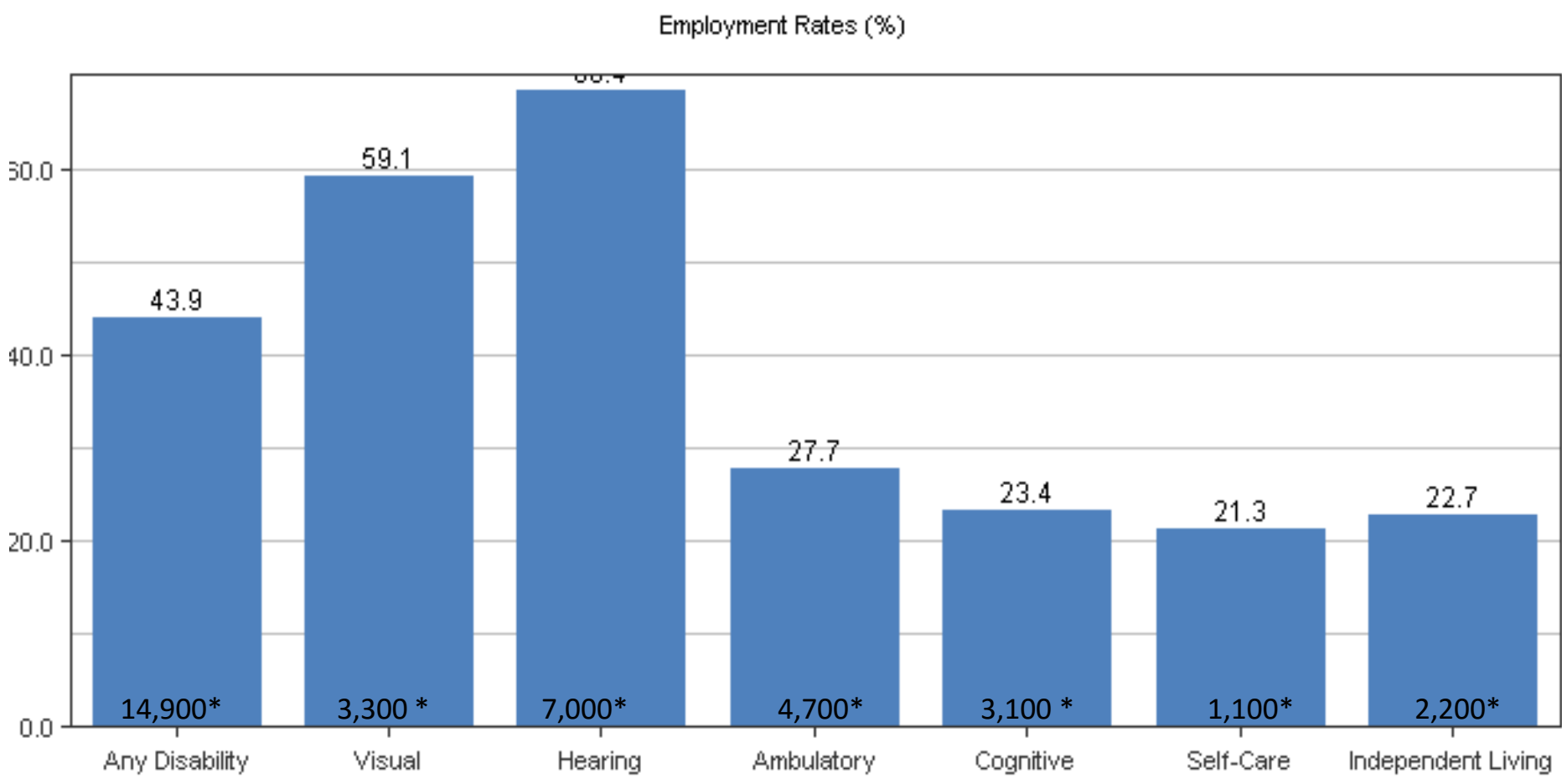
Prevalence Rates: Age 21 to 64 years (%)



*Total numbers reported

Source: [Cornell University](#)

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



*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.

Contact Project SEARCH

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:

- CRH PLC
- Hermes Consolidated Inc.
- Recco Inc.
- The Sinclair Companies
- M1 Support Services L.P.

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

http://www.fedspending.org/fpds/fpds.php?reptype=p&detail=-1&fiscal_year=2011&sortby=f&database=fpds&dtype=T&stateCode=WY

- 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)

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 Wyoming

❖ High Growth Industries:

- Healthcare
- Energy

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

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

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

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

❖ Click for your [Workforce Strategic Plan](http://wyomingworkforce.org/Documents/news/PY%202012%20Integrated%20Workforce%20Plan.pdf)

<http://wyomingworkforce.org/Documents/news/PY%202012%20Integrated%20Workforce%20Plan.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

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