



COMMONWEALTH OF VIRGINIA
Virginia Board for People with Disabilities

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TO: Sarah Dunnigan
Executive Director
Virginia Board of Workforce Development

FROM: Heidi L. Lawyer

RE: WIOA Combined State Plan Modifications

DATE: March 16, 2018

The Virginia Board for People with Disabilities (the Board) applauds the efforts of the Virginia Board of Workforce Development to develop a combined state plan that lays out the Commonwealth's vision for its workforce development system. The analysis of the current workforce, employment and unemployment data, and labor market trends is thorough and well supported, and the overall vision and goals of the plan are strong. The Board believes however that these elements of the plan can be improved with respect addressing the needs people with disabilities, and offers the following recommendations to that end.

Plan Section: Economic Workforce and Workforce Development Activities (Strategic)

Recommendation 1: Expand on the analysis of employment data related to people with disabilities by incorporating data from the Department of Behavioral Health and Developmental Services' semiannual employment reports.

States are required under WIOA to include in their Unified or Combined State Plan:

An analysis of the current workforce, employment and unemployment data, labor market trends, and the educational and skill levels of the workforce, including individuals with barriers to employment (including individuals with disabilities), in the State. WIOA §102(b)(1)(B).

The analysis in the Commonwealth's modified state plan is thorough and well supported by data. It provides an important backdrop for the goals and strategies contained in the combined state plan. There is however limited data contained in the analysis related specifically to employment barriers unique to individuals with disabilities. Additional data on employment outcomes for individuals who have developmental disabilities and who are recipients of state funded employment services is available and would provide helpful information for the analysis.

The Department of Behavioral Health and Developmental Services (DBHDS) initiated an employment data collection effort as part of its work to comply with the Commonwealth's settlement agreement with the Department of Justice. This data is published in a semiannual report, and it provides significant insights into employment outcomes for people with developmental disabilities who are recipients of employment support services in Virginia, including data on the number of individuals with developmental disabilities who receive employment supports and services from either the Department for Aging and Rehabilitative Services (DARS) or DBHDS, the wages that these individuals receive, and the settings in which they work. The most recently published report, for instance, indicates that the lowest wage paid to an individual in a sheltered workshop setting was \$0.04 per hour. Data from this report sheds significant light on the employment landscape for individuals with developmental disabilities and should be included in an analysis of current employment data pertaining to individuals with disabilities in the Commonwealth.

Plan Section: State Strategic Vision and Goals

Recommendation 2: Use the data from DBHDS's semiannual employment reports to inform planned goals, strategies, and performance measures as they relate to people with disabilities.

States are required under WIOA to include in their Unified or Combined State Plan:

A description of the State's strategic vision and goals for preparing an educated and skilled workforce (including preparing youth and individuals with barriers to employment) ... WIOA §102(b)(1)(D).

The Board supports the Goals contained in Virginia's Combined State Plan, including goals to:

- Emphasize career pathways towards "middle skills jobs;"
- Identify avenues for family-sustaining wages for Virginia's workers; and
- Accelerate business engagement in the workforce.

Each of these goals is especially pertinent to people with disabilities. As DBHDS's semiannual employment reports demonstrate, many individuals with disabilities who are served by Virginia's workforce system, or who would benefit from being served by Virginia's workforce system, are employed in positions that pay subminimum wages and offer little or no opportunities for advancement. Experience has shown that many of these individuals, if provided the appropriate supports and training, are capable of engaging in competitive integrated employment that is compensated at minimum wage or above.

Specifically, the Board recommends adopting a goal to reduce the employment gap between people with and people without disabilities. This could be accomplished by ensuring that existing and newly developed apprentice programs are structured in a way that is programmatically accessible to people with disabilities; focusing a portion of the Commonwealth's planned business engagement activities on promoting the inclusion of people with disabilities in existing workplace diversity activities; and including a specific focus on increasing competitive integrated employment opportunities for people with disabilities as a subset of the overall "wages" goal contained in the plan.

Thank you again for the opportunity to comment. Feel free to contact me at Heidi.Lawyer@vbpd.virginia.gov should you have any questions or need additional information.