




## RESPECTABILITY

*RespectAbility.org*

 *Respect\_Ability*

### BOARD OF DIRECTORS AND ADVISORS

Ollie Cantos, Chair  
Linda L. Burger, Treasurer  
Randall Duchesneau, Secretary  
Vivian Bass, Vice Chair  
Janet LaBreck, Vice Chair  
Khadija Bari  
Hon. Steve Bartlett, Chair Emeritus  
Christine Cadena  
Shelley Cohen  
Steven Chbosky  
Eleanor Clift  
Judith Creed  
Sneha Dave  
Ila Eckhoff  
Andrew Egan  
Gabrielle Einstein-Sim  
Calvin Harris, Chair Emeritus  
Janie Jeffers  
Evelyn Kelley  
Paul Martin  
Donna Meltzer  
Jonathan Murray  
Jaime H. Pacheco-Orozco  
Richard G. Phillips, Jr.  
Victor Pineda  
Vincenzo Piscopo  
Gerard Robinson  
Jim Sinocchi  
Delbert Whetter

To: Members and Staff, Montana - State Workforce Innovation Board

From: RespectAbility

Re: Public Comments for April 26<sup>th</sup>, 2022

Dear Gov. Gianforte, Chair Hopfauf, and Vice Chair Bentley

Thank you very much for the opportunity to offer our comments for the Montana - State Workforce Innovation Board April 26<sup>th</sup>, 2022, meeting. RespectAbility is a nonpartisan, nonprofit disability inclusion organization dedicated to fighting stigmas and advancing opportunities for millions of Americans with disabilities.

One-in-five Americans have a disability according to the U.S. Census Bureau. People with disabilities are America's largest minority group and the only one that, due to accident, aging, or illness, anyone can join at any time. Indeed, in Montana itself, [there are 158,000](#) residents living with some form of disability and they make up fully 14.9 percent of the state's population.

These facts have wide-ranging implications for the state's overall workforce development planning, and the unique challenges facing Montanans with disabilities need to be recognized across the entire scope of your board's work.

In these comments, RespectAbility's team of subject matter experts and advocates with disabilities have collected our critical ideas, policy proposals, and key data to inform your board's decision-making process. While we are a national organization, we are eager to collaborate with you and your team.

Our ideas and recommendations are as follows:

- ***Focus on Closing the Gap in Labor Force Participation Rates between Montanans with and without disabilities:*** As Montana and the nation grapples with strategies to get people back to work and to fill in labor shortages, it is worth recognizing the good and bad news facing workers with disabilities. Nationwide, as a direct result of the Pandemic, more than 1 million workers with disabilities have lost their jobs nationwide. Back in 2020, Montana's employment rate for all working-age people with disabilities in America was 41.6 percent, compared to 77.9 percent of people without disabilities.

*People with disabilities are engaging with the labor force in higher numbers than before the pandemic.* According to the Bureau of Labor Statistics, people with disabilities now have a 37.8 percent labor force participation rate, compared to 77.2 percent of those without disabilities. Decision making entities like your workforce board need to adopt a focused strategy for getting more people with disabilities into the workforce and the right metrics to hold themselves accountable for that success.

- ***Look at Strategies to Close the Gap in High School Graduation Rates:*** The link between educational attainment and ultimate employment success is clear. As such, gaps in educational attainment, especially around high school completion rates, have serious long-term impacts on the labor force, the talent pipeline, and the economic wellbeing of Montanans.

In Montana's K-12 public schools, there are over 18,000 students with disabilities. The changing demographics of the nation are reflected in the student population, with fully 26.5 percent of them being Black, Indigenous, or People of Color (BIPOC) individuals with disabilities. 11.4 percent of students with disabilities nationwide, or almost 720,000 students, identify as English-language learners. The gap in graduation rates between students with and without disabilities continues to undermine their futures. This means that thousands of students with disabilities are leaving Montanans school system with uncertain prospects for finding a place in the workforce.

- ***Expand on the Use of Online, Cohort-Based Apprenticeships for Workers in the Knowledge Economy and the Nonprofit Sector:*** The pandemic has made remote work an accepted reality for thousands of workers, normalizing a common reasonable accommodation request long championed by workers with disabilities. Microsoft has dramatically expanded their accessibility features, including built-in speech to text technology which makes it possible for people with even the most limited mobility to use computers. This has opened an unprecedented window for people with disabilities to contribute to the success of nonprofits, communities and beyond. Remote work also has great promise at expanding apprenticeship programs into more diverse sectors of the Montana state economy, especially the knowledge economy. RespectAbility has retooled our own National Leadership Program from being a cohort-based internship program located in Washington D.C., into an all-virtual, work-from-anywhere skills-based training program.

Further, cohort-based models offer a cost-effective method for delivering workforce services, especially for transition aged youth with disabilities. As such, we recommend that professionals involved with the provisions of Pre-Employment Transition Services (Pre-ETS) examine proven models of cohort-based services and look to build on models such as:

- ***Project SEARCH and the Caring Economy:*** Project SEARCH is a school-to-work transition program for adults with intellectual and developmental disabilities that prepares them for good paying careers in hospitals, elder-care, and the caring economy. By placing students with disabilities into three internships at a job site over the course of an academic year, student learn skills, build their confidence, and gain competitive work experience. There are already SEARCH sites in several hotels and hospitals around the greater St. Paul metropolitan area. Critically, we also believe that there is serious professional development

value in taking workforce professionals from other programs to a SEARCH site and facilitating the chance to more about the SEARCH model. To learn more, please visit <https://www.projectsearch.us/learn-about-our-book/>

- ***Look at Expanding Access to Entrepreneurship as a Workforce Solution:*** In the pre-pandemic era, job seekers with disabilities were already turning to self-employment in far higher numbers than their non-disabled peers. As of the 2019 American Community Survey, approximately 700,000 workers with disabilities were self-employed, enjoying the flexibility and opportunities that entrepreneurship provides. In looking at the issue of self-employment and promoting entrepreneurship among people with disabilities, special attention should be directed to the equity issues of access to capital and systemic racism. Several disability organizations have been advocating for the inclusion of people with disabilities as a specific category under the rules of the Community Reinvestment Act (CRA) and to advance racial diversity in the entrepreneurship space.
- ***Improving Pre-ETS and continuing to offer virtual services:*** Despite the eagerness of so many to jump directly to the post-COVID world and a return to normal, providers working with youth with and without disabilities need to be prepared to continue to provide virtual services now and in the future. Last year, the Tennessee Department of Human Services published a comprehensive guide about virtual pre-ETS and best practices proven during the worst months of the pandemic. Youth with disabilities, especially those between the ages of 14 to 21, need to be prepared for the digital workforce and virtual training is a necessary first step. Continuing to provide virtual services presents a direct opportunity to tackle the digital divide by directly providing access to technology and assistive technology for youth with disabilities from marginalized communities.

Pre-Employment Transition Services (Pre-ETS) are one of the most important elements of the Workforce Innovation and Opportunity Act (WIOA) of 2014. Part of that innovative approach is the inclusion of and collaboration with local educational agencies to order to be connect students with disabilities to skill development programs and other training needs.

It is important to adapt pre-ETS to meet the needs of students that are virtually learning. This is done by creating clear guidelines for presenting pre-ETS in a virtual environment and planning to continue to do so in the near future. This includes scheduling time for virtual instruction, making sure that content adheres to the 5 components of pre-ETS, keeping up lines of communication and adapting documents to virtually monitor student progress, while allowing progress information to be shared among IEP teams on the educational side.

- ***Leveraging Federal Contractors and Section 503 to Drive Employment Opportunities for Workers with Disabilities:*** In looking at new strategies, alternative pathways, and economic sectors to support the aspirations of jobseekers with disabilities, it is worth recognizing the unique place occupied by companies doing business with the federal government. Section 503 of the Rehabilitation Act of 1973, as amended specifically contains legislative language about affirmative action, non-discrimination against individuals with disabilities, and subsequent regulations have been used to encourage contractors to hire individuals with disabilities through affirmative action. Beginning in 2016, the Office of Federal Contracting Compliance Program (OFCCP) set a new utilization goal for contractors to have up to 7 percent of their workforce, in all job categories, be individuals with disabilities. The 7 percent goal was very much intended as a gauging goal and a tool to encourage great diversity efforts. There is comprehensive information available to support contractors through great national organizations like the National Organization on Disability (NOD) and Disability: IN.

There are major, multi-billion-dollar contractors doing business with the federal government across Montana. Examples of major federal contractors include:

1. Ames Construction, Inc. \$34.49 million (0.4% of total contracts)
2. Neptune Aviation Services, Inc. \$26.7 million (0.3% of total contracts)
3. Torrent Technologies Inc \$26.23 million (0.3% of total contracts)
4. Swank Enterprises \$17.33 million (0.2% of total contracts)
5. TNL Sales LLC \$13.32 million (0.2% of total contracts)

For more detailed information, please visit our website here:

<https://www.respectability.org/lajobs/federal-contractors/>

- ***Ensuring Family Engagement is an Element of Workforce Development Planning to Support Transition-Aged Youth with Disabilities:*** A critical, if often neglected, element of transition planning and workforce development is the importance of family engagement. Families are crucial stakeholders and valuable partners in the effort to get more youth with disabilities into the workforce. The National Technical Assistance Center on Transition (NTACT) has been tracking key innovations and best practices around family engagement and transition services even before the pandemic got started. More details are available online here: <https://transitionta.org/topics/family-engagement/>.

Likewise, given the rich cultural, linguistic, and ethnic diversity of STATE communities, resources in languages other than English are absolutely essential. More work needs to be done in this space, but as a starting point, we are delighted to several Spanish language documents developed by RespectAbility and our partner organizations: <https://worldenabled.org/our-projects/respect-ability-spanish-disability-guide-for-parents/>

- ***Work with Subject Matter Experts and Learn from Past Implementation of Best Practices:*** One of the fundamental ideas of WIOA was to improve workforce services through new partnerships and collaborations to tear down siloes separating programs. There are numerous national, state and local organizations with deep knowledge about improving services to jobseekers with and without disabilities. RespectAbility is such organization, but there are many others who are eager to help improve outcomes. On that front, the work of the National Governors Association (NGA) *Better Bottom Line* initiative and the Council of Montana Governments (CSG): *Work Matters A Framework for States on Workforce Development for People with Disabilities* come to mind. Likewise, the 2018 Accenture study and the 2020 report from Mercer and Global Disability Inclusion on employees with disabilities have critical lessons to teach private sector employers seeking to onboard talented workers with disabilities.

As an organization that advocates on behalf of job seekers with disabilities and their families, we believe that collecting the best ideas, emerging practices and innovative policies is critical to ensuring that Americans with and without disabilities have equal access to good jobs. Without such ideas, communities and policymakers cannot direct appropriate resources to the places that need them most, particularly in the wake of the COVID-19 pandemic. If you have any questions or would like to discuss these matters further, our team stands ready to help, however we can. Thank you.

*These comments were prepared thanks to the hard work and close attention of RespectAbility's Apprentices, Staff, and Board Members. Special credit is due to current Apprentices Alex Hilke, Elizabeth Pezone, Shereen Ali, and Roy Payan who have been active contributors to our organization's work on policy, advocacy, civic engagement and advancing disability inclusion. They represent future leaders who will have a substantial impact on the opportunities and aspirations of millions of Americans with disabilities.*