



LEAD CENTER

Reviewing Your State's WIOA Unified or Combined State Plan from a Disability Perspective

(WIOA Title I – Workforce
Development Activities)

The National Center on Leadership for the Employment and Economic Advancement of People with Disabilities (LEAD) is a collaborative of disability, workforce and economic empowerment organizations led by **National Disability Institute** with funding from the **U.S. Department of Labor's Office of Disability Employment Policy**, Grant No. #OD-23863-12-75-4-11.

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BACKGROUND

- ▶ Under the Workforce Innovation and Opportunity Act (WIOA), every Governor must submit a Unified or Combined State Plan to the U. S. Secretary of Labor that outlines a four-year workforce development strategy for the State's workforce development system by April 1, 2016, including the State plan for Vocational Rehabilitation (VR).



PLEASE NOTE

- ▶ Areas in the slides that are noted and *italicized* represent examples of how certain requirements could be met, but are not explicit requirements stated in the law or in the rules and regulations.
- ▶ For a summary of Title I with specific citations for each of the items on the following slide deck, please click [here](#)
- ▶ Additional resources:
 - ▶ For more information about Title IV of WIOA, please see [Reviewing Your State's WIOA Unified or Combined State Plan from a Disability Perspective \(Title IV-Vocational Rehabilitation Requirements\)](#)
 - ▶ For specific citations for each of the items on the slide deck on Title IV, click [here](#).
 - ▶ Full [WIOA Bill](#) Text
 - ▶ [TEGL 14-15](#) -- Workforce Innovation and Opportunity Act (WIOA) Requirements for Unified and Combined State Plans



STRATEGIC ELEMENTS

- I. Workforce Analysis
- II. State Strategic Vision and Goals
- III. State Performance Goals
- IV. State Strategy



I. WORKFORCE ANALYSIS

The State Plan must include:

- ▶ an analysis of the current workforce, including individuals with disabilities and other individuals with barriers to employment.
- ▶ employment and unemployment statistics, labor market trends, education and skill levels of the workforce, and skill gaps.



IN REVIEWING THE WORKFORCE ANALYSIS SECTION OF THE PLAN: ASK #1:

1. Does the State Plan's workforce analysis of the current workforce include an analysis of information about individuals with disabilities, including youth with disabilities, and other individuals with barriers to employment that includes:
 - ▶ *The number of individuals working in non-integrated settings and those being compensated through a 14c certificate.*
 - ▶ *The number of individuals involved in other post-secondary education and job training programs (e.g., community rehabilitation programs) that may serve individuals who often do not attend four-year colleges, community colleges, and/or trade schools.*

(examples convey how certain requirements could be met, but are not explicit requirements stated in the law or in the rules and regulations)



IN REVIEWING THE WORKFORCE ANALYSIS SECTION OF THE PLAN: ASK #2:

2. Does the State Plan's workforce analysis of the current labor market trends include identifying skill gaps by individuals with barriers to employment including individuals with disabilities?



IN REVIEWING THE WORKFORCE ANALYSIS SECTION OF THE PLAN: ASK #3-4

3. *Does the State Plan's workforce analysis of the current labor market identify state and local businesses that fall under the obligation of section 503 and are they meeting their obligation?*
4. *Does the State have an Employment First policy? Does this policy include goals for the employment of individuals with disabilities? Are these goals being integrated into the goals for labor market participation for individuals with disabilities?*

(these questions are examples of how certain requirements could be met, but are not explicit requirements stated in the law or in the rules and regulations)



II. STATE STRATEGIC VISION & GOALS

The State Plan must include the State's strategic vision and goals for:

- ▶ developing its workforce and
- ▶ meeting employer needs in order to support economic growth and economic self-sufficiency.

The plan must include goals for preparing an educated and skilled workforce for all individuals, including youth and adults with disabilities and individuals with other barriers to employment.



IN REVIEWING THE STATE STRATEGIC VISION & GOALS, ASK #5:

5. Does the State Plan's statement of goals for preparing an educated and skilled workforce include goals for preparing youth and adults with disabilities?



III. STATE PERFORMANCE GOALS

The State Plan must include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance specified in the statute.



IN REVIEWING STATE PERFORMANCE GOALS, ASK #6-7:

6. Does the State Plan describe how it will:

- ▶ establish performance goals,
- ▶ ensure that those goals are met for each subpopulation including those with disabilities, and
- ▶ disaggregate performance data to measure outcomes for individuals with disabilities and other individuals with barriers to employment?

7. Does the State Plan address the needs of individuals with disabilities with respect to:

- ▶ attaining employment, and
- ▶ Focusing on employment that offers opportunities for career advancement that can legitimately result in economic self-sufficiency?



IV. STATE STRATEGY

The State Plan must:

- ▶ include the State's strategies to achieve its strategic vision and goals, including a discussion of specific strategies to address the needs of individuals with disabilities and other individuals with barriers to employment, and
- ▶ describe strategies the State will use to align the core programs, including the State's vocational rehabilitation (VR) program and other disability-related optional one-stop partner programs, to achieve fully integrated customer services consistent with the strategic vision and goals.



IN REVIEWING STATE STRATEGY, ASK #8-10:

8. Do the State Plan's strategies to achieve the strategic vision and goals include a discussion of specific strategies to address the needs of individuals with disabilities (including youth with disabilities) and other individuals with barriers to employment?
9. Does the State Plan describe how it will streamline service delivery across multiple programs to make the system understandable and accessible for individuals with disabilities and other individuals with barriers to employment?
10. Does the State Plan describe strategies the State will use to align the State's vocational rehabilitation program and other disability-related optional one-stop partner programs to achieve fully integrated customer services consistent with the strategic vision and goals?



IN REVIEWING STATE STRATEGY, ASK #11-12:

11. Does the State Plan identify how mandated and optional one-stop partner program activities and resources will be coordinated to provide high quality customer-centered services including supportive services to job seekers with disabilities?

12. Does the State Plan identify:
 - ▶ optional disability-related programs (e.g., State agencies for mental health and intellectual and developmental disabilities),
 - ▶ activities carried out by Statewide Independent Living Councils and Centers for Independent Living,
 - ▶ Ticket to Work and Self-Sufficiency Program, Client Assistance Program, and
 - ▶ programs administered by disability service providers?



OPERATIONAL PLANNING ELEMENTS

- A. State Board Functions
- B. Coordination, Alignment, and Provision of Services to Individuals
- C. Membership of State Board
- D. Addressing the Accessibility of the One-Stop Delivery System
- E. Use of Governor's Set-Aside Funding



A. STATE BOARD FUNCTIONS

State Board functions focus on developing and continually improving the workforce development system by:

- ▶ Identifying and disseminating best practices for service delivery, including strategies for serving individuals with disabilities and other individuals with barriers to employment.
- ▶ Developing strategies to implement technological improvements that facilitate access to services and activities, including improvements to ensure technology is accessible to individuals with disabilities.



IN REVIEWING STATE STRATEGY, ASK #13:

13. Does the State Plan's description of State Board functions include the development of strategies to support career pathways for the purpose of providing jobseekers, including individuals with disabilities, with workforce development services, education, and supportive services to enter or retain employment?



IN REVIEWING STATE STRATEGY, ASK #14-15:

14. Does the State Plan's description of State Board functions include identification and dissemination of best practices for serving individuals with disabilities and other individuals with barriers to employment? Does the State Plan include a reference to and incorporation of Training and Employment Notice No. 01-15 "Promising Practices in Achieving Universal Access and Equal Opportunity: A Section 188 Disability Reference Guide?"
16. Does the State Plan's description of State Board functions include descriptions of improvements to ensure technology is accessible to individuals with disabilities?



B. COORDINATION, ALIGNMENT, AND PROVISION OF SERVICES TO INDIVIDUALS

The State Plan must describe how the entities carrying out core programs (e.g., the State VR program) and optional programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services to jobseekers, including individuals with disabilities and other individuals with barriers to employment.



IN REVIEWING STATE STRATEGY, ASK #16-17:

16. Does the State Plan describe how the State VR agency and entities providing optional disability-related programs will coordinate activities and resources for individuals with disabilities and other individuals with barriers to employment?
17. Do the program coordination standards include operational standards for leveraging resources and capacity, including resources and capacity for individuals with disabilities?



IN REVIEWING STATE STRATEGY, ASK #18-19:

18. Do the program coordination standards include operational standards (e.g., Integrated Resource Teams (IRTs) like those utilized in the Disability Employment Initiative (DEI) program or other methods used to jointly fund/offer services) to meet the specific needs of all individuals, including individuals with disabilities and others with barriers to employment?

19. Does the State Plan identify optional disability-related programs, such as programs carried out by State agencies for people with mental health disabilities and/or intellectual and developmental disabilities, activities carried out by Statewide Independent Living Councils and Centers for Independent Living, Ticket to Work and Self-Sufficiency Programs, Client Assistance Programs, Medicaid programs, and programs administered by disability service providers?



C. MEMBERSHIP OF STATE BOARD

The State Board **must** include representatives of the Government, including the lead State officials with primary responsibility for each of the core programs (e.g., the State VR program). In addition, the State Board **may** include one or more representatives of community-based organizations that provide or support competitive, integrated employment for individuals with disabilities.



IN REVIEWING STATE STRATEGY, ASK #20:

20. Does the State Plan provide a membership roster for the State Board that includes:

- ▶ The State VR director?
- ▶ Community-based organizations that provide or support competitive, integrated employment for individuals with disabilities?
- ▶ Others that may be distinctly qualified to offer insight to the needs of individuals with disabilities (self-advocates)?



D. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM

The State Plan must describe:

- ▶ how the one-stop delivery system (including one-stop operators and the one-stop delivery system partners) will comply with Section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act with regard to physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities.
- ▶ compliance with accessibility requirements, including staff training and support for addressing the needs of individuals with disabilities.
- ▶ the State's one-stop certification policy, particularly the accessibility criteria.



IN REVIEWING STATE STRATEGY, ASK #21:

21. Does the State Plan describe how the one-stop delivery system (including one-stop operators and the one-stop delivery system partners) will comply with Section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act with regard to physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities? Do such actions include:
- ▶ Providing reasonable accommodations for individuals with disabilities?
 - ▶ Making reasonable modifications to policies, practices, and procedures where necessary to avoid discrimination against individuals with disabilities?
 - ▶ Administering programs in the most integrated setting appropriate?
 - ▶ Communicating with individuals with disabilities as effectively as with others?
 - ▶ Providing appropriate auxiliary aids and services, including assistive technology devices and services, where necessary, to afford individual with disabilities an equal opportunity to participate in and enjoy the benefits of the program or activity?



IN REVIEWING STATE STRATEGY, ASK #22-23:

22. Does the State Plan describe how the State Board engages early with relevant Equal Opportunity Officers in establishing the criteria for determining compliance with physical and programmatic accessibility requirements and other requirements related to providing equal opportunity, including equal opportunity for individuals with disabilities?

23. Does the State Plan include a description of compliance through providing staff training and support for addressing the needs of individuals with disabilities?



IN REVIEWING STATE STRATEGY, ASK #24-25:

24. Does the State Plan describe the State's one-stop certification policy, including the criteria regarding effectiveness related to physical and programmatic accessibility?
 - ▶ Does the State Plan certification policy include criteria specific to physical and programmatic accessibility for all comprehensive one-stop centers?
 - ▶ Does the State Plan certification policy include criteria specifying that all affiliated sites must be physically and programmatically accessible to individuals with disabilities?
25. Does the State Plan include a reference to and incorporation of Training and Employment Notice No. 01-15 "Promising Practices in Achieving Universal Access and Equal Opportunity: A Section 188 Disability Reference Guide?"



E. USE OF GOVERNOR'S SET-ASIDE FUNDING

The State Plan must describe how the state will use Governor's set-aside funding, which can be targeted to youth and/or adults activities.



IN REVIEWING STATE STRATEGY, ASK #26-28:

26. *Does the State Plan propose the use of set-aside funds for financial literacy activities for youth and/or adults including individuals with disabilities?*
27. *Does the State Plan propose using set-aside funds for connecting education and training strategies, supporting work-based learning, and/or improving job and career results for job seekers with disabilities?*
28. *Does the State Plan propose using set-aside funding to further advance Employment First strategies for youth and adults with disabilities?*

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LINKS TO CITATIONS AND ADDITIONAL RESOURCES

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