# Review of 2021-2024 WOIA Local Plans

## Overview

Historically, Workforce Innovation and Opportunity Act (WIOA) local plans concentrated on vocational rehabilitation (VR) efforts and not all disability systems. WIOA does not mandate all systems serving people with disabilities to be a part of statewide planning. However, guidance for 2021-2024 WIOA local plans required local boards to provide more details on how they address the needs of people with disabilities, especially regarding competitive integrated employment (CIE) efforts.

In 2018, the California Committee on Employment of People with Disabilities (CCEPD) focused primarily on the evaluation of the 2017-2020 WIOA regional plans, which provide overviews of workforce programs and strategies at a larger regional level. This time, for more detail, the CCEPD’s Employment and Training Subcommittee expressed interest in staff concentrating on the evaluation of the local plans, which provide more detailed information on local level workforce programs and strategies than the regional plans. As a result, this evaluation could not provide a direct comparison analysis between 2017-2020 and 2021-2024 local plans because the goals of the plans are different. Regional plans focus on workforce analysis and local plans focus on service delivery and partnerships.

Staff evaluated 2021-2024 local plans for trends, best practices, and possible partnership opportunities. The 2021-2024 WIOA local plans showed extensive partnerships across multiple disability systems and inclusion of strategies for people with disabilities. The strategies for people with disabilities in the new local plans will undoubtedly improve the upward mobility of many more people with disabilities throughout the state.

## Background

The CCEPD worked with the California Workforce Development Board (CWDB) in plan evaluations during the last modification process for 2017-2020 plans and recognized more specific goals and specific information should be included for people with disabilities. This was especially the case with CIE local partnership agreements (LPAs), focused on addressing the needs of people with intellectual and developmental disabilities (ID/DD).

When the regional and local plan guidance was developed for 2021-2024 plans, the CCEPD provided comments supporting the inclusion and description of how local boards would work with the Department of Rehabilitation (DOR) and the LPA partners in alignment with the [CIE Blueprint](https://cdn-west-prod-chhs-01.dsh.ca.gov/chhs/uploads/2017/06/CIE/California-Competitive-Integrated-Employment-Blueprint.docx), and encouraged no wrong door policies. This was encouraged to improve and create systemic approaches between the programs and systems to better coordinate services and case management for people with ID/DD. It should be noted that the Blueprint’s language does not require participation from local workforce boards or America’s Job Centers of California (AJCCs) as official partners.

CEEPD comments also included the need for staff training and capacity building that includes assistive technologies, disability as part of cultural competency, and benefits planning. Additionally, recommendations included that [WIOA Section 188](https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/statutes/section-188-workforce-innovation-opportunity-act) compliance efforts must ensure virtual service delivery includes accessibility features. WIOA Section 188 requires nondiscrimination and equal opportunity for numerous populations, including people with disabilities. This includes physical and programmatic access. Access to technology, including affordable and consistent internet, and assistive equipment were encouraged for inclusion among any broader technology strategies.

The [final guidance](https://edd.ca.gov/Jobs_and_Training/pubs/wsd20-05.pdf) for 2021-2024 plans developed by the CWDB included many of the CCEPD’s recommendations. That said, some CCEPD recommendations were generalized within the context of multiple populations and not worded directly for people with disabilities. For example, the guidance included language very similar to our recommendation on CIE Blueprint coordination. The guidance also included brief reference to technology for WIOA Section 188 compliance. Staff training and professional development needs were generally focused on trauma, which impacts numerous populations, and did not include separate references to people with disabilities specifically. However, many local plans touched on these topics within the context of CIE, as referenced later in this document.

## 2021-2024 Local Plan Trends

The CCEPD was encouraged by the additional inclusion of people with disabilities, beyond what was included in the 2017-2020 WIOA local plans. The increased number of strategies will lead to the upward mobility of people with disabilities throughout the state. Review of the [39 approved 2021-2024 WIOA local plans](https://cwdb.ca.gov/2021-regional-and-local-plans-cwdb-officially-approved/) made available by the CWDB (of 45 local plan areas) found many reoccurring themes. However, within those themes, there were many inconsistencies on the level of details provided. These inconsistencies should be addressed through the recommendations presented later in this document to fully understand the strategies used for people with disabilities.

It should be noted that most strategies for people with disabilities were included within the section on CIE Blueprint partner coordination. While the Blueprint puts a concentration on individuals with intellectual and developmental disabilities (ID/DD), the WIOA definition of CIE does not. As a result, many CIE sections included cross-disability strategies.

The most reoccurring theme, with references in every local plan, were the importance of partnerships for those working on CIE strategies, including DOR. Many referenced partnerships with regional centers and local education agencies (LEAs), the primary partners in LPAs. However, there were inconsistences and a lack of clarity on the specific involvement with the LPAs themselves. While many referred to being official plan partners (19), others only made mention of participating in LPA meetings (10). Many had no clear indication of the level of LPA participation (6). Additionally, 4 plans made no reference to an LPA at all. It should also be noted some local boards included reference to multiple LPAs.

Another reoccurring theme was the co-location of services, which helps to improve job seeker outcomes, efficiencies between systems, and often co-enrolment in programs. Co-location of services in the local plans had varying levels. While a few local plans indicated physical co-location of DOR at an AJCC, others indicated the availability of DOR staff eight hours a month, or simply co-location with no specific times referenced. Some referenced co-location has been limited due to the COVID-19 pandemic.

The importance of staff training around disability services was another reoccurring theme for most local plans. Many referenced DOR led trainings, such as Windmills and disability etiquette. Others referenced trainings targeted towards specific disability needs, such as hearing, mental health, and assistive technologies. Some mentioned their AJCCs have staff members specifically trained to address the needs of people with disabilities and serve as disability resource coordinators or disability service navigators.

Specific programs and initiatives varied greatly within strategies. However, the most reoccurring initiatives for people with disabilities were Disability Employment Accelerator (DEA) grants, followed by the Summer Training and Employment Program for Students (STEPS) program. These programs were used to help address the needs of people with disabilities through soft skills training, vocational preparation and social adjustment training, work experience, and permanent placement into CIE.

## Best Practices

As previously referenced, many strategies for people with disabilities were included within the section on CIE Blueprint partner coordination. However, those strategies often expanded beyond ID/DD, into cross-disability strategies. While [all local plans](https://cwdb.ca.gov/2021-regional-and-local-plans-cwdb-officially-approved/) included strategies for people with disabilities, there are undoubtedly some that rose above others as best practices. The below local plans included comprehensive strategies with the most details and were most worthy of highlighting as best practices. While often CIE related, these best practices also included the most overarching strategies for inclusion of cross-disability.

The [Orange, Santa Ana, and Anaheim workforce development boards](https://www.anaheim.net/DocumentCenter/View/37111/Unified-Local-Plan-21-24-2) are combined into a single local plan for Orange County. Board staff participate in the Orange County LPA meetings that include the education providers, Regional Center of Orange County, DOR regions, and other community-based organizations. The latest employment and training programs include Addressing Barriers to Employment (ABE) for adults and the STEPS program for youth. The Orange board and Goodwill Industries of Orange County are lead program partners. The program gives Orange County region students and adults facing challenges more opportunities to achieve their greatest levels of personal and economic independence. Program participants are provided opportunities to participate in soft skills training, vocational preparation and social adjustment training, work experience, and permanent placement into CIE. DOR collaboration includes student services to the AJCCs for eligible youth program participants and cross-training and professional development to ensure local board front-line staff understands DOR’s vast offerings.

The [Sacramento Employment and Training Agency (SETA)](https://www.seta.net/app/uploads/2012/07/Complete-Draft-Sacramento-Workforce-Development-Plan-PY-2021-24-final-3-26-21-..._.pdf) Disability Employment Initiative (DEI) and Disability Employment Accelerator (DEA)

grant initiatives have allowed SETA to build the capacity of AJCC staff to serve individuals with disabilities through specialized training opportunities for staff and reviews of physical and programmatic access. The program and system staff formed a Disability Services Workgroup, whose participants are known as disability services navigators, and is led by a disability resource coordinator. SETA works with the Alta Regional Center on regional center eligibility and enrollment, and disability etiquette. SETA and DOR staff have collaborated for cross-training in eligibility, enrollment, and service delivery. SETA and DOR collaboration has included employer outreach and engagement. SETA participates on the Northern California Business Advisory Council, which was developed in 2015 to promote partnership between local employers and employment/trainingprograms to promote employment of people with disabilities. At the release of the new local plan, SETA had not yet utilized the LPA template developed by DOR, DDS and the California Department of Education (CDE). However, SETA included extensive information on WIOA Section 188 and ADA compliance, including disability etiquette and reasonable accommodation trainings for staff. They also take a no wrong door approach for all service locations, with memorandums of understanding (MOUs) in place for many service partners.

[San Bernardino](https://wp.sbcounty.gov/workforce/wp-content/uploads/sites/5/2021/08/SB-Local-Plan-FINAL.pdf) engages with local partners to promote CIE by assigning staff to attend LPA meetings, cross training, and identifying resources and partners for business engagement for a paid work experience program. Staff of the San Bernardino DOR office are co-located at the three AJCCs to help better serve the disability community by linking to available resources. They have developed paid work experiences and internships through DOR, such as WIOA out-of-school youth programs. DOR and the Inland Regional Center support the job coaching function as part of this collaboration to serve job seekers. They are part of the DOR CIE Business Services team which is responsible for recruiting, referral, and employment engagement strategies to serve the ID/DD population. Additionally, AJCC staff members are trained to meet the needs of people with disabilities, including on the use of assistive technologies, and virtual services through their Virtual OneStop (VOS) system. They have recently upgraded their assistive technology equipment.

The [Solano local board](https://www.solanoemployment.org/sites/default/files/Solano%20Local%20Workforce%20Plan%20PY2021-2024%20DRAFT.pdf), through increased coordination with the North Bay Regional Center DOR, has built partnerships with contractors that serve individuals with disabilities to improve access and utilization of the AJCC system and WIOA services. Through this work, they are a community partner with the Solano LPA. Partners have come together as part of a DEA grant for customized work and learn strategies for individuals with disabilities. The board’s work has increased on-the-job training reimbursements to employers for hiring individuals with disabilities from 50% to 75%. This has allowed businesses to take on the additional training needed to bring an individual with a disability up to speed on the job. The board also added transitional jobs as a work and learn service offering. Solano and its disability partners continue to develop strategies around employer engagement, earn and learn strategies, educational transition services, disability benefits counseling, and improved service coordination. Solano plans to develop strategies in partnership with the Napa-Solano Building Trades Council to improve access to apprenticeship programs for individuals with disabilities as part of its DEA grant. They are currently piloting common case management approaches as part of the AB1111 grant with a local community-based organization’s employment services for individuals with mental health conditions. Partners leverage and collaborate on services such as disability advocacy, benefits counseling, job coaching, transportation assistance, and other supportive services provided by DOR and community-based organizations in the area.

The [Verdugo local plan](http://verdugoworkforce.com/wp-content/uploads/2021/03/Verdugo-Local-Plan-Draft_Comp.pdf) (link not currently working) has noticeably more references to disabilities than any other local plan. While Verdugo has served people with disabilities for many years, the strategic focus on ID/DD began six years ago with the examination of the demographic data, the increasing rates of autism spectrum disorder, and their partners’ commitment to develop career pathways for this underserved population. Through the Verdugo Computer Numerical Control Machinist Academy for students with intellectual disabilities, founded in Glendale in 2015, Verdugo has a proven co-enrollment strategy. This model was shared with the other six local boards and used as the foundation for developing a strategic co-enrollment process for the region. Another innovative program they utilize is their work experience (WEX) program through STEPS. The STEPS project provides job preparation training, including job exploration, workplace readiness skills training, and work-based learning experiences through summer work experience, to students with disabilities.

## Recommendations for Next Steps

The increased strategies for people with disabilities in the recent local plans will undoubtedly improve the upward mobility of many more people with disabilities throughout the state. However, based on CCEPD staff review of local plans, we make the following recommendations to further improve outcomes.

First, through the CCEPD’s Employment and Training Subcommittee, members should hold a discussion on the local plans and brainstorm ideas for improving partnerships with workforce systems and other non-DOR systems. This discussion could include a panel presentation with local plan partners identified among best practices. While the initial review discussion on local plans will be done in the CCEPD’s Employment and Training Subcommittee, it would likely be beneficial to extend conversations into the CCEPD’s State Coordination Subcommittee or Full Committee, as issues overlap purviews. A joint meeting between the Employment and Training and State Coordination Subcommittees might be an appropriate step.

Second, to clarify and address inconsistencies with the level of details provided for CIE and other strategies for people with disabilities, a survey of local plan partners could be developed to adequately take inventory of services and to request information on continued barriers to establishing partnerships for people with disabilities.

Third, statewide webinars and/or trainings, with the coordination of local entities sharing best practices on can be provided to increase the replication of those best practices and make them systemic. These should focus on challenges most common when addressing the needs of people with disabilities, such as soft skills training, vocational preparation and social adjustment training, work experience, and permanent placement into CIE. Trainings should include the importance of co-location and no wrong door policies.

Finally, although the CIE Blueprint is currently in its fifth and final year, there have been discussions of an extension. Additionally, new LPAs are still being developed. If the CIE Blueprint is extended, its continuation could include an amendment to include local workforce development boards and/or AJCCs among primary LPA partners for any new LPAs or existing LPAs that are modified. More discussion will be needed on how SB 639 intersects with the CIE Blueprint.