



February 14, 2024

Ms. Ashley Anglesey
Branch Manager – Legislation, State Plan, and Policy
California Workforce Development Board
Attn: State Plan Comments
800 Capitol Mall, Suite 1022
Sacramento, CA 95814

Dear Ms. Anglesey:

The California Committee on Employment of People with Disabilities (CCEPD) appreciates the continued partnership and collaboration with the California Workforce Development Board (CWDB) on behalf of people with disabilities. The CCEPD is encouraged by the inclusion of people with disabilities throughout the California Unified Strategic Workforce Development Plan Program Years 2024-2027 (State Plan) and inclusion of Title IV programming throughout the State Plan. However, the CCEPD recommends additional language to improve employment opportunities for people with disabilities.

According to the data presented in the State Plan, the unemployment rate and labor force participation rate for this segment of the California labor force were 10.4% and 21.6%, respectively. These rates are alarming compared to the rates of workers without disabilities – 4.7% and 62.3%, respectively because they have remained relatively flat. Only one of every five Californians with disabilities are employed in California. High unemployment rates and continued low labor force participation continues for people with disabilities in their prime working age, leading to inequities for their entire life. These unemployment rates are a primary reason why people with disabilities in California are nearly twice as likely to live in poverty than those without disabilities – 22.5% compared to 11.8%. It should also be noted that according to the U.S. Census Bureau, full-time, year-round U.S. workers with disabilities earned 87 cents for every dollar earned by those without disabilities. The gap widened even further when

including all workers, regardless of work schedule or occupation, to 66 cents for every dollar. This needs to be a call to action for specific and targeted approaches to serve people with disabilities and weaved into equity initiatives.

The CCEPD was encouraged to see a list of disability-related trainings delivered by Department of Rehabilitation (DOR) among the operating planning elements and information on potential best practices in service delivery. Adequate staff training should also include components of cross-training across programs and services. There should be more emphasis on cross-training throughout all State Plan sections. Cross-training is especially important as California continues to encourage planning across multiple partner programs to ensure alignment in service delivery and leveraging of resources for maximum benefit to WIOA participants. The CCEPD would welcome an opportunity to partner with CWDB to highlight and expand best practices for service delivery for people with disabilities.

Programmatic accessibility remains a concern for CCEPD because there are continued low numbers of participants who identify with a disability being served by local areas. More evaluation is needed to understand the participants with disabilities who are receiving services from those titles. We would welcome those conversations with CWDB and other workforce partners.

The State Plan acknowledges some statewide efforts for strategic co-enrollment were stalled during the COVID-19 pandemic and efforts are currently in the processes of being re-engaged. Co-enrollment strategies, a robust referral system, and improved alignment of resources and services across the comprehensive education, workforce development, and human service system, should be a goal of all service providers and greatly improve outcomes for job seekers, including those with disabilities and other underserved groups. The CCEPD would like to see common intake, a robust referral system, and alignment of resources become a priority for system partners. The alignment of resources should also include disability-related organizations providing employment and support services.

Supportive services should include benefits planning strategies for people with disabilities. Navigating benefits and employment can result in barriers for people with disabilities entering or reentering the workforce. People with disabilities may lose supportive services, such as long-term services and

supports or health insurance. Existing local workforce areas, such as SETA and Madera, have incorporated benefits planning strategies into their service delivery when serving people with disabilities. These local areas have either weaved the use of the webtool, Disability Benefits (DB) 101, and benefits planning information as the individual is seeking career information and services and developed partnerships with local DOR office or WIPA to provide benefits planning. However, additional encouragement of benefits planning should be incorporated in the State Plan for more workforce areas to follow suit.

The CCEPD is pleased that the DOR is building sector strategies into the career development goals of the consumers and increasing work-based learning opportunities for consumers.

We continue to support DOR's strategies to serve people with disabilities through an intersectional lens and to participate in state workgroups serving a particular population. The CCEPD recommends that DOR develop strategies to serve English Language Learners with other workforce partners and consider partnering with community-based organizations serving various racial and ethnic communities throughout California. It will strengthen approaches to serving underserved ethnic communities, such as Latinx and Asian and Pacific Islanders.

While many of the strategies in the State Plan may help lead to competitive integrated employment (CIE) for job seekers with disabilities, it is important (CIE) strategies are also identified separately. This is especially important to reference in the State Plan, as SB 639 makes it illegal to pay an employee with disabilities less than the legal minimum wage by January 1, 2025. It should also be noted that CIE strategies should be applied for all job seekers with disabilities, not only those with intellectual and developmental disabilities.

While most of the State Plan understandably centers around gaining employment, more strategies for retaining employment would be beneficial. Many of the previously referenced recommendations will assist in an overall job retention strategy. However, a concentrated focus is necessary for people with disabilities. Job seekers with disabilities face many obstacles (accessibility, transportation, benefits planning, etc.) most other job seekers do not, even just to access initial employment. Those obstacles are often compounded once employment is gained. More comprehensive

job retention strategies will benefit all workers, especially those with disabilities.

The CCEPD values our ongoing collaboration with the CWDB regarding improving employment outcomes for people with disabilities. As a partner, we are here to assist in developing goals and strategies to improve the employment rate for people with disabilities.

If you have questions, or would like to discuss the CCEPD's comments, please contact Maria Aliferis-Gjerde, the Executive Officer of the CCEPD, at (916) 558-5698.

Sincerely,

A handwritten signature in black ink, appearing to read "Taylor Winchell". The signature is fluid and cursive, with a large loop at the end.

(Taylor Winchell
Chair, CCEPD

cc: Nancy Farias
Director
Employment Development Department

Joe Xavier
Director
Department of Rehabilitation

Department Designees to CCEPD