



October 9, 2024

Kaina Pereira
Executive Director
California Workforce Development Board
Attn: Draft Directive Comments
800 Capitol Mall, Suite 1022
Sacramento, CA 95814

Dear Mr. Pereira:

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. We were pleased that the Regional and Local Planning Guidance PY 25-28 Draft Directive incorporated strategies to include people with disabilities throughout planning processes.

The letter makes comments on the draft directive which the CCEPD believes will additionally improve workforce opportunities for job seekers with disabilities throughout the state.

Workforce and Economic Analysis (Page Four)

Decreasing unemployment rates for Californians requires an understanding of different populations, especially those who are historically unserved or underserved. The CCEPD believes data on historically unserved and underserved populations should be included in regional planning unit (RPU) development, including not just people with disabilities, but specific disability types. This is important for RPUs to adequately realize and address their workforce needs.

Aligning, Coordinating, and Integrating Programs and Services (Page Nine)

The CCEPD commends the CWDB for including system alignment in the draft directive. However, we believe additional emphasis should be made for system alignment of the various entities serving people

with disabilities. Job seekers with disabilities are often served by numerous systems for workforce and support needs. This can get confusing for not just the job seekers, but also the service providers. We have two populations, people with developmental or intellectual disabilities and people with mental health or behavioral health disabilities who are served by separate systems and programs, and those need to be aligned when working with an individual seeking employment. We recommend that service providers from those systems are included as part of the partnerships for RPUs and local workforce development boards (LWDBs). Those separate programs should be included in the planning process and strategies for those two populations.

Additionally, we believe it is essential RPUs and LWDBs have alignment with the current development of the Master Plan for Career Education, Master Plan for Developmental Services, as well as the current development of the Employment Development Department and Department of Rehabilitation Collaboration Pilot, which will enhance collaboration between WIOA Title I and IV programs. As strategies are developed through those initiatives, we recommend that they be included in future plan updates. Lastly, the Collaboration Pilot may lead to additional strategies for plans to incorporate for people with disabilities for future plans.

WIOA Section 188 and Americans with Disabilities Act (Page 10)

The CCEPD was pleased to see more of an emphasis on programmatic access beyond the historical physical accessibility local plans have focused on. However, we believe additional reference regarding the training of staff on disability etiquette and culture would be beneficial. Additionally, the inclusion of details on how information and referrals are done between partners serving people with disabilities would be an improvement. By evaluating previous plans, LWDBs place all their information on people with disabilities in this section. We recommend separating the physical accessibility from programmatic access and provide concrete questions for local workforce areas. For instance, in this section workforce areas should describe their service delivery methods (i.e use of navigators, Employment Network and benefits planners, information and referrals or co-enrollment strategies) to assist people with disabilities. In some cases, we see reference to partnership with the Department of Rehabilitation with no clear strategies to understand the nature of partnership between the LWDB and DOR. For accessibility access,

LWDBs have a checklist to meet and can provide information on that checklist or how they meet accessibility requirements.

Coordination with Local Partnership Agreement Partners for Competitive Integrated Employment (Page 11)

While the CCEPD is pleased this requirement is included in the draft directive, we believe additional information and context should be provided. Many areas do not have local partnership agreements (LPAs) in place, therefore similar strategies to the LPAs should be replicated within those areas. We recommend keeping the LPA language but expanding it to provide information on the partnerships (i.e. service providers that serve people with intellectual or developmental disabilities, DOR, and Regional Centers) specifically serving this population. Lastly, in future years, the CWDB should explore partnership agreements with the Department of Developmental Services. The CCEPD recommends clearer language that explicitly relates to serving this population based on recent state developments, including the elimination of sub-minimum wage. Additionally, the state is developing a Master Plan on Developmental Services, which should be incorporated into LWDB services. Competitive integrated employment (CIE) goes beyond those with intellectual and developmental disabilities and includes all disability types.

Accessibility and Inclusivity (Page 13)

The CCEPD commends the CWDB for including information about the need for reasonable accommodations and accessible documents in the draft directive. However, ensuring true accessibility requires staff to be aware of disability etiquette and have cultural competency in serving people with disabilities, including language on how staff are trained and prepared to adequately serve people with disabilities.

In addition to the above recommendations to improve the draft directive, the CCEPD believes that language should be added in serving people with mental and behavioral health disabilities. This population, like other people with disabilities, has barriers to employment. However, as the COVID pandemic shed light on the mental and behavioral health of Americans, we need to develop and recognize best practices in employing people with mental health and behavioral health disabilities.

We look forward to ongoing collaborative efforts with the CWDB regarding job seekers with disabilities. If you have questions, or would like to discuss

the CCEPD's comments, please call Maria Aliferis-Gjerde, the Executive Officer of the CCEPD, at (916) 558-5698.

Sincerely,

Taylor Winchell
Chair, CCEPD

cc: Nancy Farias
Director, Employment Development Department

Joe Xavier
Director, Department of Rehabilitation

Department Designees to CCEPD