

California Committee on the Employment of People with Disabilities

February 3, 2020

Tim Rainey
Executive Director
California Workforce Development Board
Attn: State Plan Comments
800 Capitol Mall, Suite 1022
Sacramento, CA 95814

Dear Mr. Rainey:

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 2020-2023 (State Plan) and inclusion of Title IV throughout the State Plan. The CCEPD also recommends additional language to improve employment opportunities for people with disabilities.

The CCEPD commends the emphasis of equity in the principles of high road workforce development agenda. Institutional bases of inequality remain for people with disabilities. Although people with disabilities have gained many rights, discrimination and bias still exist for people with disabilities and many live a life of poverty and lack opportunities. As the Governor stated in his budget press conference, students with disabilities continue to have achievement gaps. According to the data presented in the State Plan, people with disabilities, as whole, have high unemployment rates and low labor participation rates. Because of this, we feel very strongly that disability should be incorporated into equity discussions. Lastly, the CCEPD supports that continued and new partnership agreements and new or ongoing workforce initiatives should develop and incorporate strategies for people with disabilities.

The CCEPD continues to support efforts of upward mobility for all Californians. The CCEPD believes that additional emphasis should also be included for people with disabilities. As noted above, people with disabilities have an educational achievement gap, high unemployment rates and low labor participation rates. Therefore, the State of California should consider people with disabilities as a priority due to existing data. Additionally, strategies for serving individuals with disabilities should be incorporated along with the three populations listed in the plan: immigrants, justice-involved and homeless or housing insecure.

The current objective of enabling upward mobility for all Californians lacks a specific policy strategy to ensure that proactive inclusion is ensured for underserved populations. Universal access alone does not ensure inclusion. Instead, the CCEPD recommends strategies within the State Plan to allow for Regional Planning Units and Local Workforce Development Plans to demonstrate ongoing proactive approaches such as inclusive eligibility and suitability standards, enabling long term engagement in case management, enrollment targets based on local and regional data, or staff development and cross training for staff and partners in assisting underserved populations, including people with disabilities.

The CCEPD commends the efforts of the CWDB to incorporate career technical education (CTE) programs as part of the State Plan. In reviewing the State Plan for CTE, the CCEPD believes that more program alignment is needed with programs serving people with disabilities and CTE programs. The CCEPD encourages workforce support for a proposal to create parity for people with disabilities participating in CTE programs to reflect the local percentages of people with disabilities in their local areas. This would serve as a goal to increasing the number of students with disabilities participating in CTE programs. Lastly, cultural competency curriculum for CTE professional development and other workforce professionals should include content on disabilities, implicit bias and trauma-informed practices.

The CWDB should include benefits planning and work incentives planning discussions for supportive services. People with disabilities need benefits planning and work incentive planning to manage their cash benefits (including SSI and SSDI) and healthcare benefits (such as Medi-Cal, Medicare, and In-Home Supportive Services) to determine how work may impact their earnings from employment. Inclusion of benefits and work

incentives planning should be considered a supportive service for people with disabilities. The CCEPD has proposed an integrated benefits approach to include a web-based tool, such as DB 101, and cross-system training on benefits and work incentives planning for practitioners serving people with disabilities.

The CCEPD is encouraged by the inclusion of assistive technology as a support service. The CCEPD supports more collaborative efforts for the America's Job Centers of California to understand the use of assistive technology for people with disabilities.

The CCEPD commends inclusion of more operational goals and incorporation of the Competitive Integrated Employment Local Partnership Agreements (LPA) throughout the State Plan. As partners, the CCEPD participated in the evaluation of Local Workforce Development Plans during the modification process, there was a recognition that more specific goals should be developed to increase knowledge with the Competitive Integrated Employment LPAs. The CCEPD supports additional collaboration with the Department of Developmental Services and Regional Centers regarding LPAs and other support services.

The CCEPD strongly supports common intake forms for the Workforce Innovation and Opportunity Act programs and other programs with partnership agreements. Common intake would help people with disabilities and all Californians navigate systems for needed services. We offer our expertise in this endeavor and strongly support efforts of strategic co-enrollment among various programs and "no wrong door" approaches to programs and services.

The CCEPD commends the Department of Rehabilitation for including the Youth Leadership Forum (YLF) as a strategy in its portion of the State Plan to meet the overall goal of promoting career pathways. The CCEPD oversees the planning of the annual cross-disability YLF program with community and state partners. We invite our state partners to support our efforts in creating a YLF 2.0 model where more regional events are created in addition to the statewide event for youth with disabilities.

The CCEPD values our ongoing collaboration with the CWDB regarding improving employment outcomes for people 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,

Damien Ladd
Chair, CCEPD

cc: Sharon Hilliard
Acting Director
Employment Development Department

Joe Xavier
Director
Department of Rehabilitation

Department Designees to CCEPD