

# California Committee on the Employment of People with Disabilities

February 3, 2022

Tim Rainey  
Executive Director  
California Workforce Development Board  
Attn: CWDB Policy Unit  
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. We were pleased that California's 2020-2023 Unified Strategic Workforce Development Plan includes numerous strategies for people with disabilities.

The letter makes comments to California's 2020-2023 Unified Strategic Workforce Development Plan Modifications recently released. While we commend the CWDB for including people with disabilities within numerous strategies, we believe there can be improvements to the following State Plan components.

## **Economic and Workforce Analysis**

Based on the analysis, the CCEPD recommends that the CWDB make people with disabilities a priority population to target strategies and efforts. The unemployment and labor participation rates for people with disabilities remain flat, and therefore, new approaches need to be developed. Additionally, the CCEPD recommends reference to people with disabilities being substantial percentages of other target populations, especially justice involved individuals and individuals experiencing homelessness.

## **Strategic Planning Elements**

The CCEPD appreciates numerous references to people with disabilities throughout the strategic planning elements. However, more detailed strategies would be beneficial, especially within supportive services and integrated service delivery.

- The CCEPD recommends formal agreements with the state's Assistive Technology program and local workforce development programs. This will help with the efficient use of assistive technology and ongoing training of frontline staff. The CCEPD also recommends that local plans outline efforts to access the internet to address the digital divide for working age individuals with disabilities.
- The CCEPD believes any integrated service delivery model should include strategic co-enrollment for people with disabilities. This will improve and create systemic approaches between the programs and systems to better coordinate services and case management for people with disabilities.
- The CCEPD recommends that Department of Rehabilitation (DOR) and local workforce development areas have agreements on benefits planning to offer technical assistance and ongoing training to frontline staff among all WIOA partners.
- The CCEPD was surprised to see no references to virtual services among strategies. While they might be an option with many service providers, they were not specifically identified. Inclusion of virtual services is essential for most job seekers since the COVID pandemic began, especially among job seekers who have disabilities. Understanding how service providers are using virtual services and identifying innovative approaches will be essential post-pandemic.
- The CCEPD urges the inclusion of disability-related strategies for wraparound services for immigrants, youth and homeless or housing insecure individuals. The CCEPD is also pleased the DOR is developing a formal agreement for justice-involved individuals and supports targeted approaches.

## **Operational Planning Elements**

The CCEPD was pleased by the additional references to people with disabilities beyond the original plan. Collaboration with the DOR for many elements, both among Title IV and other strategies, was encouraging to see. References to co-enrollment and common intake are also to be

commended. The CCEPD believes the below comments would improve the operational planning elements.

- While the CCEPD was encouraged by the reference to youth with disabilities in earn and learn and career pathway strategies, more development and formal agreements are needed to ensure youth are adequately transitioning to lives of independence.
- CCEPD is encouraged that DOR seeks to develop strategic co-enrollment efforts for its independent living programs and vocational rehabilitation program. As mentioned in the section above, the CCEPD recommends formal agreements on assistive technology and benefits planning, which are part of the independent living programs. As well, independent living and employment programs should have shared assessments to identify person-centered needs regardless of which system the individual accesses and coordination of referrals and services across systems.
- CCEPD is encouraged that DOR seeks to include local workforce areas in the Local Partnership Agreements for people with intellectual disabilities/developmental disabilities. The CCEPD recommends continued strategies for people with intellectual disabilities/developmental disabilities, especially with the implementation of Senate Bill (SB) 639, with the local workforce development areas.
- As referenced previously for the strategic planning elements, the CCEPD also recommends more details on virtual and online services within the operating planning elements.
- The CCEPD recommends that training made available to the field by the State, like that offered through the EDD Capacity Building Unit, provide training that focuses on disability services perhaps done in coordination with EDD's Disability Employment Accelerator team. Further, the CCEPD is happy to see disability-related staff training included among other commonly used statewide training resources such as CWA's California Training Initiative (CTI). However, training needs to focus on the intersectionality of disability with other target populations and training must be ongoing for all frontline staff. Developing or leveraging existing training for intersectionality and disability will further promote programmatic accessibility for people with disabilities.
- While a high-level overview paragraph for accessibility of the one-stop delivery system for individuals with disabilities is included and a

link is provided to the related workforce services directive, the CWDB should provide additional details to continue emphasizing the importance of WIOA Section 188 for both physical and programmatic accessibility.

#### **Title IV Requirements**

The continued focus on competitive integrated employment (CIE) is critical to the upward mobility of people with intellectual and developmental disabilities throughout the state. The CCEPD recommends that CIE Blueprint strategies are continued and enhanced as implementation of SB 639 occurs throughout the State and with local workforce development areas.

The CCEPD supports that vocational rehabilitation program will collaborate with independent living services and develop more integrated services.

#### **Appendix 1: Performance Goals for the Core Programs**

For Title IV, while percentage increases are included for measurable skill gains in expected and negotiated levels, there are no numeric values for employment, median earnings, or credential attainment. Each measure is only reflected with the word “baseline” and no numeric value.

- The CCEPD recommends including numeric values for expected and negotiated levels for employment, median earnings, or credential attainment so there is clarity for readers on what “baseline” means in each section.

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,

April Dawson  
Chair, CCEPD

cc: Nancy Farias  
Director

Employment Development Department

Joe Xavier

Director

Department of Rehabilitation

Department Designees to CCEPD