**California Committee on the Employment of People with Disabilities**

October 12, 2020

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 Draft Directive incorporated guidance to include people with disabilities throughout planning processes.

The letter makes comments to the Regional and Local Planning Guidance PY 21-24 Draft Directive on the following topics: Workforce and Economic Analysis, Outcomes Measure A and B, Equity and Economic Justice, Local Plan Partner Coordination, Technology Coordination, WIOA Section 188, Staff Training and Capacity Building, and Attachment Three.

**Workforce and Economic Analysis**

As a part of decreasing the unemployment rate for people with disabilities, data on people with disabilities should be included in the Regional Planning Unit (RPU) development. The Draft Directive is unclear whether the RPUs include all populations or only those chosen based on priorities of the regional partners. In the last round of RPU development, there was a lack of consistent data on people with disabilities.

* The CCEPD recommends that data on people with disabilities and other populations should be included in the RPUs.

**Outcome Measure A**

The outcome measure, measure A, is overly broad and may not have the intended consequence of measuring success for particular populations with barriers.

* The CCEPD recommends that the more appropriate measure should be focused on the targeted population(s) in the RPU, including people with disabilities. Otherwise, the measure will not assist in long-term analysis of success of workforce participants and making the workforce system(s) more equitable.

**Outcome Measure B**

The outcome measure, measure B, describes equal access to and successful completion of regional career pathways for historically underserved populations.

* The CCEPD recommends that plans also describe regional strategies for equitable service delivery, ensuring that services available to people with disabilities are not limited by which regional partner’s local area they reside in. Otherwise, the measure will not ensure that individuals with disabilities throughout each region have equal opportunity to become competitive in regional industry sectors.

**Equity and Economic Justice**

We thank the California State Workforce Development Board (CWDB) for including people with disabilities in the discussion of equity and economic justice. Although people with disabilities have gained many rights, discrimination, stigma and low expectations still exist for people with disabilities. Due to institutional barriers and stigma, many people with disabilities can live a life of poverty. Including disability as part of the equity discussion is a good beginning for developing strategies to decrease unemployment rates for people with disabilities.

* We recommend the CWDB, RPUs and Local Workforce Development Boards (Local Boards) to champion people with disabilities as a talented pipeline, part of California’s diverse society and found in all segments of society and every community.

The CCEPD supports the statement that RPUs and Local Boards are encouraged to invest in longer term approaches when serving individuals who experience barriers to employment. Depending on a person’s situation, people with disabilities may need supportive services, assistive technology or additional time to accomplish employment goals. The CCEPD supports reframing how the system(s) should serve all Californians, including people with disabilities. The CCEPD welcomes any opportunities to work with CWDB to develop longer term strategies focusing on people with disabilities.

**Local Plan Partner Coordination**

We support the inclusion and description of how Local Boards will work with the Department of Rehabilitation and the Local Partnership Agreement partners in alignment with the Competitive Integrated Blueprint. 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 more no-wrong door approaches for people with disabilities. The CCEPD continues to recommend increasing partnership agreements with non-Workforce Innovation and Opportunity Act (WIOA) partners serving people with disabilities.

**Training and Capacity Building**

The CCEPD is pleased that Local Boards must describe training and professional efforts for frontline staff.

* The CCEPD recommends that training should include knowledge of assistive technology, disability as a part of cultural competency, and benefits planning for people with disabilities. The CCEPD also recommends cross-training on case management and programmatic service delivery for partners serving people with disabilities.

**WIOA Section 188**

Due to COVID-19, the CCEPD recommends the CWDB to review the WIOA Section 188 compliance efforts to ensure virtual service delivery includes accessibility features for technology and inclusive practices are used for people with disabilities with methods of service delivery.

**Technology**

The CCEPD also supports that Local Boards should incorporate strategies for access to technology in the plans. With the pandemic, access to affordable and consistent internet and electronic equipment is crucial to employment, education and training, and access to health care.

* Local Board plans should also encompass assistive technology when developing strategies to access technology. Leaving assistive technology out of the broader technology strategy will create barriers for people with disabilities.

**Attachment Three**

In reference to attachment three, the CCEPD is pleased more entities representing people with disabilities were included as partners.

* However, the CCEPD recommends Regional Centers and Local Partnership Agreement partners serving people with intellectual or developmental disabilities and Disabled Student Services Programs should be listed as outreach partners.

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,

Original Signed

Damien Ladd

Chair, CCEPD

cc: Sharon Hilliard

Director

Employment Development Department

Joe Xavier

Director

Department of Rehabilitation

Department Designees to CCEPD