

# Workforce Best Practices Policy Recommendations

## Introduction

The California Committee on Employment of People with Disabilities (CCEPD) is a statewide advisory body that seeks to increase the employment rate of people with disabilities and better coordinate programs and services for people with disabilities. The mission of the CCEPD is to evaluate, develop, promote, and influence policies, systems, and implementation efforts to increase employment and training of people with disabilities. This includes making policy recommendations to the Secretary of the Labor and Workforce Development Agency and the Secretary of the California Health and Human Services Agency.

In late 2021, the CCEPD reviewed all 2021-24 Workforce Innovation Opportunity Act (WIOA) Regional Strategic Plans and Local Plans and identified best practices for serving people with disabilities. Throughout 2022 and 2023, the CCEPD collaborated with numerous workforce areas they identified as best practices. The CCEPD's goal was to develop a best practices toolkit to help replicate service delivery practices that typically yield the best results, and to develop policy recommendations that would enhance those efforts. Three surveys were conducted to identify additional service highlights and challenges for workforce areas, with dozens of areas participating in each. Additionally, the CCEPD held numerous meetings and received input from its member organizations and eight workforce areas statewide through focused presentations and panel discussions.

The CCEPD understands each workforce area is different in their needs and capabilities and all programs and services serve people with disabilities. Many workforce areas, regardless of how established or thorough they were with services, experienced similar challenges with long-term capacity building in serving people with disabilities. The outlined policy recommendations, many relating to capacity building, will improve workforce services for people with disabilities. CCEPD's aspirations for California's workforce system and programs is for all its programs to have the capacity to serve people with disabilities for pathways leading to careers and jobs that can sustain a life of economic independence. To achieve this vision, our central building blocks for workforce programs need to incorporate disability knowledge at every step, leading to co-enrollment

and integrated resource teams, to help people with disabilities have careers.

These recommendations are not limited to WIOA Title I partners. They apply to other WIOA title partners, including DOR, and other organizations providing workforce services as well.

Recommendations are listed below:

- 1. Improve training infrastructure for disability inclusion to ensure workforce staff are adequately prepared to serve people with disabilities. This includes both disability access/accommodations/etiquette training and cross-training amongst workforce partners and disability related programs and systems.**
- 2. Policies to incentivize integrated resource teams and service delivery between partners to better serve people with disabilities and create more robust services.**
- 3. Development and implementation of policies that encourage comprehensive job retention and secondary job placement services for both new workers and incumbent workers to ensure attainment of high quality competitive integrated employment (CIE).**

### **Policy Recommendations**

The CCEPD's analysis of current best practices has culminated in policy recommendations that will build more capacity within local workforce areas to develop and strengthen robust workforce programs to better serve people with disabilities. These policy recommendations support stronger co-enrollment efforts for people with disabilities and better partnerships between workforce partners and disability-related programs.

The "best practice" workforce areas went beyond just providing physical and programmatic access. They incorporated strategies for people with disabilities in their service delivery models and culture. These local workforce areas all had elements of the proposed policy recommendations in their practices.

- 1. Improve training infrastructure for disability inclusion to ensure workforce staff are adequately prepared to serve people with disabilities. This includes both disability**

**access/accommodations/etiquette training and cross-training amongst workforce partners and disability related programs and systems.**

Training for workforce staff on serving people with disabilities must cover more than the basic requirements of the [Americans with Disabilities Act \(ADA\)](#) and [Section 188 of WIOA](#). Additionally, staff should receive disability access/accommodations/etiquette training, as well as cross-training across disability programs and systems. While the initial point of contact is especially important, all levels of staff should be culturally competent regarding disability needs.

Considerable improvements are needed to ensure training is adequate and consistent statewide. Procuring adequate training has been a challenge for many workforce partners due to limited availability of training resources and procurement requirements. Under WIOA, workforce service providers and vendors must follow federal procurement requirements. However, many local areas add even stricter requirements. When possible, procurement requirements need to be reassessed to reduce the substantial burdens on both workforce partners and training vendors. Some primary concerns raised include long bidding processes that require receiving multiple quotes, and risk management/insurance requirements that medium and small training vendors are unable to meet. As a result, much training is currently developed and conducted at local and regional levels. This has led to varying and inconsistent localized efforts, often with local workforce partners developing training themselves.

A vetted list of available workforce trainings should be formally procured and exist as a resource for local areas to find trainers across various topics in one place. It could serve as a referral resource for those seeking bids on services, or if formally procured, local areas with less stringent procurement policies could piggyback on an existing procurement if structured appropriately. (Piggybacking is a contract term used when an agency uses an existing procurement process / contract from another agency as the justification and documentation to form their own contract directly with the vendor to purchase the same or similar items or services.)

Recognizing WIOA will require areas to follow local procurement

policies which are often even more stringent than those at the federal and state levels, a repository for referral to various trainers to secure bids on services from one vetted source is a value-added service.

The vetted list should incorporate overviews of training curriculum for local workforce partners to match training needs. These overviews should also include expectations for both the training vendors and staff to be trained.

A vetted training list made available for workforce providers to access for capacity building, technical assistance, and topical trainings, would have a positive streamlining effect on procurement in time spent and administrative costs.

Policies that include preference for trainers with shared experiences as people with disabilities should be encouraged.

There also needs to be more continuity of trainings, so they occur frequently and proactively, not just as the result of a new funding stream or in reaction to a challenge. Maintaining an adequate training infrastructure after funding streams end is essential. Cross system collaborative training should be encouraged when possible.

### **Disability Access/Accommodations/Etiquette Training**

As previously referenced, much training is currently developed and conducted at local and regional levels, which leads to a varied cultural competency among workforce partner staff regarding disability. At the statewide level, the [Disability Access Services program within the Department of Rehabilitation \(DOR\)](#) offers numerous training courses to assist addressing the needs of people with disabilities, including disability culture. Workforce partners can send staff to these trainings. However, the current fee-for-service structure does not optimize opportunities for many workforce areas. In addition to sending staff to these statewide virtual trainings, tailored in-person trainings towards local workforce needs would also improve customer experience for people with disabilities. Many workforce areas expressed the need for improved disability-related trainings as a high concern. Enhancing statewide training strategies will increase

knowledge of disability culture and will improve workforce outcomes for people with disabilities.

## **Cross-Training Across Workforce Partners, Programs, And Systems**

Cross-training is the practice of training employees across multiple roles and programs on the dual customer approach (addressing the needs of both job seekers and businesses) to enhance the service experience for people with disabilities and all customers. Cross-training creates value between organizations and helps staff understand how each program can offer an individual the support needed from the beginning of first contact through employment. It also creates an understanding of the different requirements for each program and helps streamline interactions between programs. Cross-training across [required WIOA partners](#) helps service providers and job seekers alike. In addition to partners required through WIOA, [California's Unified Strategic Workforce Development Plan \(see page seven\)](#) encourages additional regional partnerships.

Most cross-training is left to service providers themselves. Because this cross-training is often the result of specific short-term initiatives and funding streams received at the regional level, there are large inconsistencies regarding the depth and/or length of cross-training programs in workforce areas throughout the state. More consistent investments and strategies at a statewide level can ensure all regions address cross-training adequately for people with disabilities.

Investing in constant and consistent cross-training across programs will also strengthen collaboration and partnerships between workforce service providers, human services, and disability-related organizations. Concerns have been expressed that cross-training is currently minimal and often only done when meeting the requirements on short-term grants and initiatives. Following the expiration of grants and initiatives, cross-training often either doesn't occur or only occurs minimally, and partners return to focusing on their own programs and systems. Ongoing cross-training helps to minimize these siloes and grow partnerships. People with disabilities are better served if consistent and ongoing cross-training occurs.

It should be noted cross-training should also occur internally by organizations; siloes often exist within organizations, especially in larger organizations that offer multiple programs and services.

## **2. Policies to incentivize integrated resource teams and service delivery between partners to better serve people with disabilities and create more robust services.**

Integrated resource teams were a best practice of all the workforce areas we collaborated with. The integrated resource team approach involves diversified service systems coordinating services and leveraging funding to meet the needs of job seekers, while simultaneously ensuring there is not a duplication of services. This strategy should include WIOA title partners, including DOR, human services programs, education partners, and other disability-related organizations.

In conversations with workforce areas, many raised challenges with developing long-term partnerships and adequately integrating service delivery between partners. They expressed the need for breaking down siloes between partners and working more collaboratively as opposed to competitively. Workforce areas also highlighted how people with disabilities have better outcomes when the systems and programs can come together and work through the service needs of that individual rather than placing the responsibility on the individual to seek services from each entity.

The most successful co-enrollment strategies include a common intake and referral process across programs and systems. To implement such strategies, formal data sharing agreements and memorandums of understanding are often necessary and should be encouraged to encourage integrated resource teams.

The Employment Development Department (EDD) and California Workforce Development Board (CWDB) issued [Directive WSD19-09](#) in 2020, which provides guidance and established procedures regarding California's strategic co-enrollment efforts under WIOA. The directive provided guidance on the roles and responsibilities of workforce partners, and was developed in coordination with numerous state departments, including DOR. However, it is a general

guidance for all populations. As stated in the directive, integrated service delivery should target populations with complex service needs.

Additional statewide guidance on co-enrollment for people with disabilities from DOR, in collaboration with EDD and CDWB, would benefit local workforce partners and community partners greatly. Guidance specifically centered on people with disabilities will create the framework and structure to support coordination among the titled partners of WIOA and additional support needs through other disability-related entities. Such guidance can provide better understanding of partner roles, mandates, resources available for support and services, success indicators, and how data can and cannot be used. CCEPD supports efforts to incentivize integrated service delivery from the workforce partners because it can lead to streamlining client co-enrollment intake processes and blending or braiding of resources for job seekers with disabilities.

Blended and braided funding both involve combining two or more sources of funding to support a program or activity. Blended funding combines multiple funding streams for one purpose without continuing to differentiate or track individual sources. Braided funding pools multiple funding streams toward one purpose while separately tracking and reporting on each source of funding. The blending and braiding of resources should be encouraged whenever addressing the needs of people with disabilities through integrated resource teams. This strategy can improve employment outcomes by closely connecting access to needed workforce supports.

While there are constant funding streams to support workforce services, additional workforce funding often comes from competitive grants and is only provided short-term. Existing funding can support many workforce services. However, additional specialized funding is often needed to provide more robust services and fill any gaps. As a result, a strong commitment to partnerships often includes partners blending and braiding resources to help the employment journey of a person with disabilities. More guidance can assist the blending and braiding of resources of both titled partners and non-titled partners of WIOA. For instance, guidance on benefits planning can lead to more

referrals to disability-related organizations that offer those types of services.

**3. Development and implementation of policies that encourage comprehensive job retention and secondary job placement services for both new workers and incumbent workers to ensure attainment of high quality competitive integrated employment (CIE).**

Many workforce services focus on the job seeker's skills preparation through attaining initial employment. Workforce areas have shared that challenges often arise for new employees a few months after employment. While workforce areas [report employment data](#) for the second and fourth quarters after a participant's exit, comprehensive services are rare or minimal during this time. More focus is needed on comprehensive job retention strategies and providing continuity of services for both new workers and [incumbent workers](#).

While WIOA does not fund unlimited follow-up services, funds can follow workers for up to one year. Utilization of supportive services to provide more robust retention support would net positive outcomes across performance measures and maintain client engagement through the 12-month follow-up period. Additional non-WIOA funds may be needed to enhance services or extend them beyond 12 months.

Supported services for incumbent workers may include providing access to transportation, technologies, benefits planning, or other essential needs to assist with job retention.

The need for benefits planning was the most referenced challenge for workforce areas we collaborated with. Benefits planning helps individuals determine how their cash benefits (including SSI and SSDI) and healthcare benefits (such as Medi-Cal, Medicare, and In-Home Supportive Services) or housing benefits may be impacted by earnings from employment. Clear, timely, and accurate benefits planning encourages people with disabilities to choose employment over benefits, and plan for their future. Benefits planning greatly improves long-term employment outcomes and job retention. If people with disabilities do not manage their benefits, they risk losing



access to health care or long-term services and support. They are also at risk of overpayments of benefits that must be refunded to the Social Security Administration (SSA).

More strategies are also necessary to address upward mobility and moving across employers for promotions or other job opportunities. The continuity of services should be available to ensure the attainment of quality jobs that pay an equitable living wage, not just the maintenance of staying at low paying, entry level positions.

Addressing these gaps is important, especially with efforts to increase and improve CIE statewide. [CIE](#) refers to a workplace where a person with a disability earns at least minimum wage, works with people without disabilities, and has the same pay, benefits, and opportunities for promotion as workers without disabilities. While most of California's CIE efforts have focused on intellectual and developmental disabilities, all disabilities are included within CIE. With the elimination of subminimum wage, more continuity of workforce services will be needed to support CIE efforts.

Providing more consistency and continuity of services focused on job retention statewide will dramatically improve long-term employment outcomes. Additionally, while some workforce areas have staff focused on servicing targeted populations (such as people with disabilities) performing these duties, these positions are often limited to the timeframes of grants and initiatives, or the role is only a small portion of a staff member's other work duties. When staff, preferably those with shared experiences of a person with a disability, are in place to address the workforce needs of people with disabilities, the disability culture is considerably improved. Staff in these roles can ensure services are fully accessible, and work as a liaison across disability related programs and services.

Providing a more robust continuity of services statewide following job placement will improve California's efforts to increase CIE for people with disabilities.

The CCEPD is hopeful the new Employment First Office (to be established July 1, 2024) will incorporate the recommendation and assist to leverage policies and develop guidance for workforce

service providers. While focused on providing services to the intellectual and developmental disabilities community, and not all with disabilities, the Employment First Office will be a permanent state office under the California Health and Human Services Agency charged with facilitating the consistent and complete interpretation and implementation of the Employment First Policy across the many state agencies and departments.

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