

**From:** Greenlee, Ann M - VETS [REDACTED]  
**Sent:** Friday, March 18, 2016 4:30 PM  
**To:** HI-WIOAPlanComment  
**Subject:** Plan Comment

**Strategic Vision Between Economic and Workforce Development – Comprehensive Economic Development Strategies (CEDS)**

Hawaii is developing an innovative public workforce

P 72

**GOALS OF THE WORKFORCE DEVELOPMENT SYSTEM IN HAWAII**

- 1 To provide coordinated, aligned services.
- 2 To prioritize services to vulnerable populations, specifically homeless individuals and Native Hawaiians.
- 3 To develop sector strategies and a career pathways system that will integrate education and training, and move skilled jobseekers into growth industries.
- 4 To augment a high employment rate.
- 5 To fully engage employers in the workforce development system to address the talent shortage.

All US Dept of Labor funded programs require priority of service to veterans and eligible spouses. The plan documents this in other areas. Goal #2 seems to conflict with the legal requirement.

Ann M. Greenlee  
State Director, Hawaii & Guam  
Veterans' Employment & Training Service  
U.S. Department of Labor | [www.dol.gov/vets](http://www.dol.gov/vets)

[REDACTED]  
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**From:** Winona Whitman [REDACTED]  
**Sent:** Sunday, March 20, 2016 7:40 PM  
**To:** [REDACTED]  
**Subject:** WDC WIOA Unified State Plan July 1, 2016 through June 30, 2020, Indian & Native American Programs

Aloha Allicyn,

The following are comments to add on Page 60 of the subject Plan:

**Comprehensive Services Program (CSP) For Adults, WIOA, Title I, Subtitle D, Sec. 166**

**Activities** – Training, career, and follow-up services for adults who need to enter, re-enter, retain, or upgrade their unsubsidized employment leading to self-sufficiency.

**Strengths** – Experience in operating statewide employment and training programs for Native Hawaiians, American Indians, and Alaska Natives since 1978 under CETA (Comprehensive Employment and Training Act); JTPA (Job Training Partnership Act); WIA (Workforce Investment Act); and presently under WIOA.

**Capacity To Provide Services** - Statewide program with offices and staff on the islands of Hawaii, Kauai (also serving Niihau), Maui, Molokai (also serving Lanai), and Oahu.

**Supplemental Youth Services Program (SYSP), WIOA, Title I, Subtitle D, Sec. 166**

**Activities** – Supplemental youth services for ages 14-24 throughout the school year, during summer vacation, and/or during breaks during the school year; menu of services includes occupational skills training which must include priority consideration for training programs that lead to recognized post-secondary credentials that are aligned with in-demand industry sectors of occupations or occupations in the local area; work experiences that have academic and occupational educational component; etc.

**Strengths** – Same as CSP above.

**Capacity To Provide Services** – Same as CSP above.

Please let me know if there are any questions. Thank you.  
Winona

**M. Winona Whitman**  
Statewide Department Director, Employment & Training

**ALU LIKE, Inc.**

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**From:** Katherine Keir [REDACTED]  
**Sent:** Monday, March 21, 2016 11:04 AM  
**To:** HI-WIOAPlanComment  
**Cc:** Katherine Keir  
**Subject:** WIOA Plan- Comments

Aloha,

In reviewing the draft WIOA Unified State Plan, I noticed a lack of mention of the various community-based organizations that are currently providing employment / workforce development services.

The CBOs should be integrated as key partners in the Plan's implementation, including:

- Data sharing (ensuring CBOs are included in data sharing and analysis activities)
- Coordination, alignment and service provision (to both Individuals and Employers)
- Partnerships with educational institutions (CBOs are already partnering with community colleges and vocational training providers)
- Leveraging of resources (some CBO programs are funded with non-government dollars and thus represent another resource)

Thank you,

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**Katherine Keir, MPH**  
*Vice-President, Mission Advancement*  
Goodwill Hawaii

[REDACTED] | [REDACTED]

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**From:** Matsunaga, Marilyn A. [REDACTED]  
**Sent:** Monday, March 21, 2016 4:45 PM  
**To:** HI-WIOAPlanComment  
**Subject:** Comments -- DRAFT WIOA Unified Plan

**Very Strongly** request that amendments be made to the plan **before** it is reviewed by the WDC at their meeting this month:

1. Economic analysis – this section needs a lot of help as the information contained in the draft is quite thin and/or out-of-touch with current economics and actual business trends.
2. Please add in the economic analysis and jobs projections data from the Hawaii Innovation Assets Report. Here is a link: [https://www.hawaii.edu/innovation/wp-content/uploads/2015/06/HIAR\\_r11\\_lores.pdf](https://www.hawaii.edu/innovation/wp-content/uploads/2015/06/HIAR_r11_lores.pdf)
  - a. This data is what Oahu's Local Board will be emphasizing.
  - b. This report's data and projections are business driven with support from the Hawaii Business Roundtable, the Chamber of Commerce of Hawaii as well as the University of Hawaii, the counties' governments, etc. As such, it is in full step with the spirit of WIOA.
3. Delete all references to a specific for-profit company in all sections regarding "HireNet Hawaii." It is not wise to endorse a specific company for a service that must go out to bid in order to select vendors now and into the future.
4. Governors – whoever wrote the draft is referencing several different Governors all as if they are all the same person. Please correct.
5. Delete all examples that were WIA driven. WIOA has different priorities and this is an excellent opportunity for Hawaii to be more progressive.
6. There needs to be a lot more business emphasis. The Draft plan is more like an in-house government document for integrating public social services rather than a business-driven systems plan that serves business and job seekers.

There are a substantial number of other items that need to be corrected in the Draft Plan. These are just a sample of the more important ones.

*With best regards,*  
*Marilyn A. Matsunaga, M.B.A.*  
*Executive Director*  
*Oahu Workforce Investment Board*  
[REDACTED]  
[www.owib.org](http://www.owib.org)

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**From:** Philip Pauli [REDACTED]  
**Sent:** Monday, March 21, 2016 4:46 PM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** For Your Review - Hawaii WIOA State Plan Comments  
**Attachments:** RespectAbility Hawaii WIOA State Plan Comments 03-21-16 FINAL.pdf

Good afternoon Hawaii WIOA team,

RespectAbility is pleased and honored to have the opportunity to offer the attached public comments on Hawaii's Unified State Plan. As you all know, WIOA is a huge paradigm shift that will expand opportunities for people with disabilities if the states adopt best practices and invest in successful models.

We already sent in the attached document through the form at <http://labor.hawaii.gov/wdc/wioa-plan-draft-public-comment/>. However, we also wanted to share our thoughts directly with you.

As ever, our biggest question for you is...how can we be helpful? How can our organization provide you with the resources or information you need to empower more people with disabilities to pursue the American dream? Whatever you need, we stand ready to help.

Regards,

Jennifer Mizrahi & Philip Pauli

Our comments address the following sections of your Unified State Plan:

- Page 14 (i) Existing Demand Industry Sectors and Occupations
- Page 17 (ii) Emerging Demand Industry Sectors and Occupations
- Page 18 Table 7. Projected Average Annual Job Growth by Industry for Short- and Long-term
- Page 21 Table 12. Ten Hawaii occupations projected to have the most annual job openings
- Page 45 Individuals with Disabilities
- Page 45 Table 42 Employment Status by Disability Status, State and County, 2014
- Page 164, section j, bullet 4
- Page 75 HAWAII STRATEGIC PARTNERS
- Page 83 (B) Alignment of Activities Outside the Plan
- Page 108 City and County of Honolulu, Hawaii County, Maui County, Kauai County
- Page 117-Addressing the Accessibility of the One-Stop Delivery System for Individuals with Disabilities
- Page 157 (g) Coordination with Employers. (1) VR services; and

Page 158 (2) transition services, including pre-employment transition services, for students and youth with disabilities

Page 174 Priority I: To provide Pre-Employment Transition Services (PETS)

Page 175- State's Strategies, Priority 3

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Philip Pauli

Policy and Practices Director

RespectAbility



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March 21, 2016

## RespectAbility – Public Comments – Hawaii Unified State Plan

*“WHEREAS, Disability Employment Awareness Month supports the “Workforce Innovation and Opportunity Act” in increasing opportunities for individuals with disabilities in Hawai‘i to engage in competitive integrated employment, for those facing barriers to employment, and invests in the important connection between education and career preparation; and WHEREAS, Disability Employment Awareness Month encourages employers from the public and private sector to see the whole person, promoting and supporting employment opportunities for individuals with disabilities, because at work, it is what people can do that matters;”- Gov. David Ige, [Disability Employment Awareness Month Proclamation](#), Sep. 25, 2015.*

RespectAbility is pleased to submit the following comments regarding the current draft of Hawaii’s Unified State Plan as required under Section 102 of the Workforce Innovation and Opportunity Act (WIOA). We are pleased to have this opportunity to offer our comments, raise our questions, and provide our suggestions about the content of the state plan.

**Today Hawaii has the opportunity to work hard to improve outcomes in terms of competitive, integrated employment for people with disabilities.** Currently, your state ranks 8<sup>th</sup> in the country in terms of their employment rate of people with disabilities. **42.4% of the approximate 69,846 working age Hawaiians with disabilities are employed. Further, there are over 8,879 youth ages 16-20 with disabilities, and each year a quarter of them will age out of school into an uncertain future.**

**Thanks to WIOA, Hawaii, has the chance to invest resources in successful models and implement best practices to expand job opportunities for people with disabilities.** While Hawaii ranks among the best states in terms of employment rate for people with disabilities, there still exists a large gap between that rate and the employment rate for those without disabilities. Your state can additionally learn from other states that have worked hard to achieve improved employment outcomes. Other states have higher than 50% employment rates for their citizens with disabilities. [States like the Dakotas, Alaska, and Wyoming have achieved significant results by putting best practices into place.](#) The experience of these states shows ways that Hawaii can dramatically improve their outcomes. **Likewise, we are also seeing pockets of excellence around innovative youth programs designed to address disability employment in Georgia, Nevada, and Kentucky.**

**To help the states succeed in this process we developed a resource called the Disability Employment First Planning Tool.** This document details best practices and effective models. This toolkit contains models that are proven to work, be cost effective to implement, and be successful. [We have developed an extensive collection of data on disability and employment in Hawaii.](#) That information is attached to our comments.

**Our public comments on Hawaii WIOA State Plan are structured around those points where greater clarity, precision, and data are needed to ensure that people with disabilities will be better equipped to pursue the American Dream.** From the accessibility of the workforce system to employer engagement to investing in transition programs for youth with disabilities, our comments are intended to help your state push hard to see improved integrated employment outcomes for Hawaiians with disabilities.

**1. Make sure that the best disability data points, especially those around youth with disabilities as well as the gap in Labor Force Participation Rates (LFPRs) between people with and without disabilities, are included in your Workforce Analysis:**

From our review of the current draft of Hawaii’s Unified State Plan we know that you have access to the right data to drive decision making. Tracking unemployment information (which only reflects people actively looking for jobs) and job placements (which only monitors people who interface directly with the workforce system) is necessary, but not sufficient to drive true performance metrics that will create success. We are very glad to see the level of regional, labor force, and employment data included in Table 42 Employment Status by Disability Status, State and County, 2014 on page 45 of your Unified State Plan. The inclusion of County specific information will be very useful to the regionally diverse elements of your state’s workforce system as well as your local workforce partners. In particular, we deeply appreciate the inclusion of youth with disabilities as a discreet data point. To quote page 45, “Statewide, youth (between 18-34 years of age) with disabilities numbered 10,033 in 2008 according to the census data.” Given the priority of time, money, and energy focused on youth throughout WIOA, it is critical to focus in on expanding opportunities for young people with disabilities. Likewise, we are very glad to see that Table 42 includes both labor force participation among Hawaiians with disabilities as well as the employment rates. **This is a critical distinction and from our perspective the labor force participation rate is the most important data point. As such, we hope that tracking the gap in the Labor Force Participation Rate (LFPR) between people with and without disabilities will drive the design of your state’s performance metrics.**

As much as there is good information in this section of the Unified State Plan, several additional data points are needed. More detailed information regarding the specific kinds of disability that are common in the community are important as are more data points related to the specific challenges facing youth with disabilities. In particular, we hope that the final version of your Unified State Plan includes mention of the 34.2 point gap in employment between people with and without disabilities. We suggest these revisions in order to enhance the clarity and impact of your otherwise excellent draft WIOA Plan.

**Figure 1.  
Hawaii Performance Metrics on jobs for PWDs**



Gov. David Ige (D)

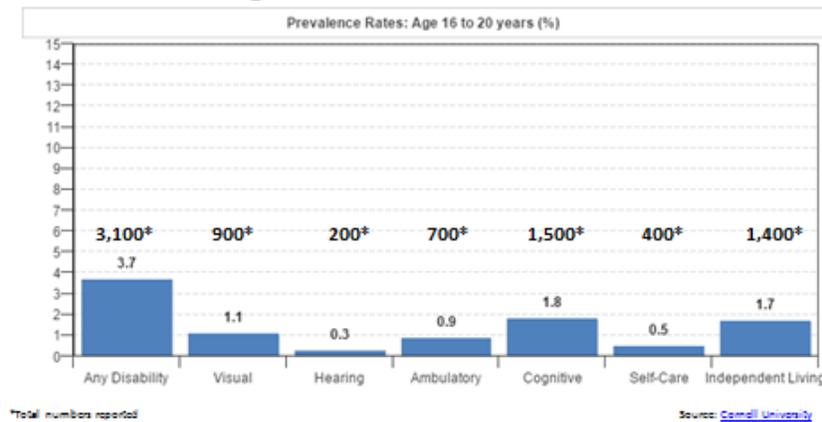
1. 2012 Disability Status Report: Hawaii, [disabilitystatistics.org](http://disabilitystatistics.org)
2. StateData: The National Report on Employment Services and Outcomes, 2013
3. [Annual Disability Statistics Compendium](#)

- ❖ 76.6% of persons without disabilities aged 18 to 64 are employed.<sup>3</sup>
- ❖ 42.4% of PwDs aged 18 to 64 are employed.<sup>3</sup>
- ❖ Hawaii currently ranks 8<sup>th</sup> in the nation in terms of jobs for PWDs.
- ❖ **There remains a 34.2 percentage point gap in the Labor Force Participation Rate (LFPR) between people with and without disabilities.**
- ❖ 3,100 persons aged 16 to 20 have a disability.<sup>1</sup>
- ❖ 63,500 persons aged 21 to 64 have a disability.<sup>1</sup>
- ❖ 151,009 civilians with disabilities live in HI.<sup>3</sup>
- ❖ The employment gap between PwDs and people without disabilities decreased 1.8% from 2010 to 2011.<sup>3</sup>
- ❖ 26,846 PwDs aged 18 to 64 received SSDI and SSI benefits in 2012.<sup>3</sup>
- ❖ In 2012, the total expenditure on SSDI benefits in HI was \$356,208,000.<sup>3</sup>
- ❖ Voc. Rehab. obtained 235 jobs for PwDs in HI in 2012.<sup>2</sup>
- ❖ Voc. Rehab. received 1,107 general applicants in HI 2012.<sup>3</sup>

We want to help your state sustain the positive improvements it has made in recent years around the increasing employment rate for people with disabilities in Hawaii. Your workforce system is doing innovative work and it is critical that your efforts be optimized to fully tapping into the talents that people with disabilities, especially youth, have to offer. Good data is essential for any attempt to increase the number of people with disabilities who are succeeding in competitive, integrated employment. **As an example of the data that is needed, below are several charts which show the challenge in your state.**

**A. Youth with disabilities who are aging in the workforce (ages 16-20).** If Hawaii’s workforce system is to seriously deliver on the promise of improving school to work transitions for youth, it is critical to know how many youth with disabilities will be aging out of school.

**Figure 2.**  
**Prevalence of Disability Among Non-Institutionalized People**  
**Ages 16 to 20 in Hawaii in 2013**



**B. What types of disabilities do transitioning youth have?** This information is critically important because youth with vision, mobility and hearing disabilities need specific types of tools and training, but may otherwise be ready for jobs. To support youth with cognitive disabilities, it will be critical to provide early work experiences.

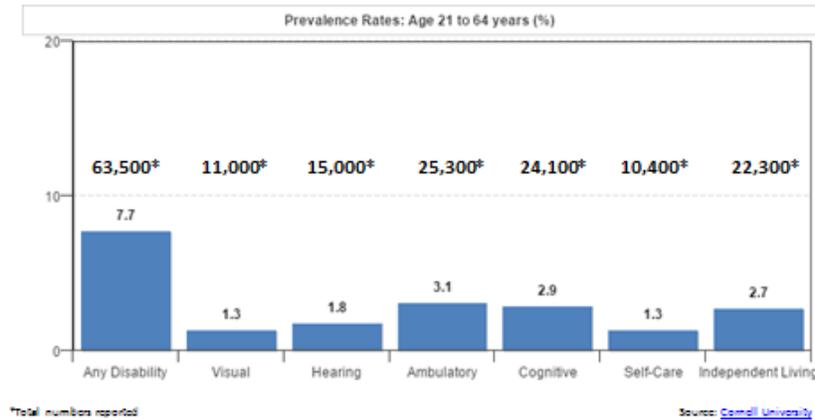
**Figure 3.**  
**Ages 6 to 21 Served by IDEA in HI**

	2011	2012
All Disabilities	17,156	17,142
Specific Learning Disability	8,509	8,510
Speech or Language Impairment	541	553
Intellectual Disability	1,156	1,116
Emotional Disturbance	1,100	1,063
Multiple Disability	497	508
Hearing Impairment	308	289
Orthopedic Impairment	79	82
Other Health Impairment	2,636	2,636
Visual Impairment	58	57
Autism	1,133	1,199
Deaf-Blindness	10	9
Traumatic Brain Injury	61	54
Developmental Delay	1,068	1,066

Source: [Annual Disability Statistics Compendium](#)

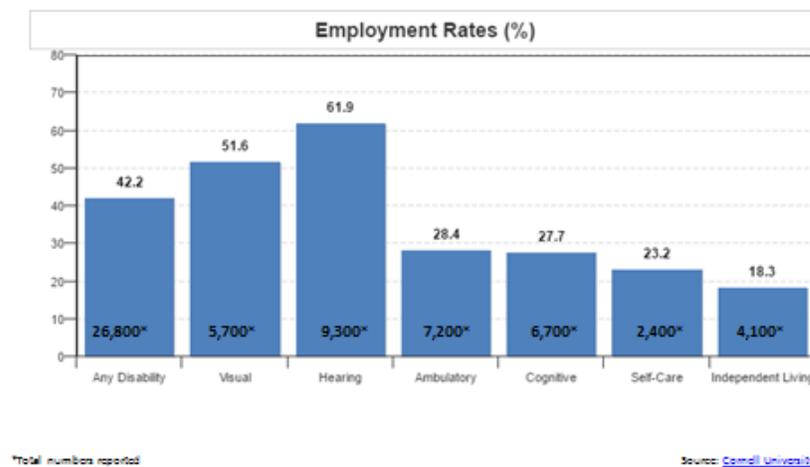
**C. Greater clarity around working age people with disabilities (ages 21-64).** The experience of disability is diverse and includes a wide range of differences both visible and invisible. As such, Hawaii’s Unified State Plan needs to include clearer information regarding the types of disability that people are experiencing.

**Figure 4.**  
**Prevalence of Disability Among Non-Institutionalized People**  
**Ages 21 to 64 in Hawaii in 2013**



**D. Labor Force Participation Rates broken down by disability type.** From the data, we often find that people who are blind or have vision loss are employed at higher rates than people with self-care or independent living disabilities. Similarly, we find that people with hearing differences are also employed at higher rates than are people with intellectual or developmental disabilities

**Figure 5.**  
**Employment of Non-Institutionalized Working-Age People (Ages 21**  
**to 64) by Disability Status in Hawaii in 2013**



Additionally, because Hawaii has climbed the ranks to 8<sup>th</sup> in the nation in terms of the employment rate for people with disabilities, it is illustrative to look at the experience of those with disabilities who are succeeding in the world of work. **From the data, we find that 51.6**

**percent of the 5,700 Hawaii residents who are blind or have vision loss are employed while 61.9 percent of the 9,300 with hearing differences are also employed.** Given the flexibility and availability of assistive technology solutions, the employment rate for this subgroup should be much higher. Many people who are blind or deaf have incredible talent potential that can be unleashed by something as simple as a smartphone.

**Sadly, we also see that only 27.7 percent of Hawaii residents with intellectual or developmental disabilities are employed.** For this demographic, workforce solutions may take more time and resources. **However, there will be a considerable return on investment if Hawaii’s workforce system expands successful school to work transition programs.** In particular models [like Project Search](#), [Bridges from School to Work](#), as well as [the cluster model of Poses Family Foundation or Kessler Foundation](#) could be part of your state sector strategies to meet growing labor market needs. Indeed, the most effective way of continuing to improve outcomes in competitive, integrated employment is by focusing on sectors that are experiencing rapid growth. **In Hawaii, that means that youth with disabilities should be trained for jobs in Healthcare, STEM, and Hospitality.** The State Plan does, discuss an effective model for expanding outcomes for this subpopulation. However, the challenge is not addressed with anywhere near enough ambition to move the needle on employment outcomes. We have more to say on this point later in our comments. We hope that this data will be used to implement the performance metrics needed to guide resource investment and workforce programs.

## **2. Strong Sector Strategies- The need for strategic alignment of workforce development and economic development to expand employment for people with disabilities:**

As required by WIOA Sec. 102(b)(1)(A), State Plans must include a detailed analysis of the economic sectors of the state economy that are growing and are forecasted to grow in the future. The success of WIOA depends on being an employer driven paradigm shift. Expanding opportunities for people with barriers to employment such as disability requires strong partnerships with employers in those sectors which are rapidly expanding.

Pages 14 and 17 do much to describe both the “Existing Demand Industry Sectors and Occupations” of Hawaii’s economy as well as the “Emerging Demand Industry Sectors and Occupations.” Specifically on page 18, the Unified State Plan reports identified the five industries that are growing across all counties of the state of Hawaii. Those industries are: “services; trade, transportation, and utilities; leisure and hospitality; and construction reflect the strength of healthcare, tourism, and construction to the economy.” Further, as noted on page 20, “Many of the job openings for the short- and long-term will occur in entry level, transitional jobs.” Lastly as noted on page 21, “Among the occupations with the most projected openings, six occupations were common to all four counties.” Those six occupations were: “retail salespersons; food preparation and serving workers; waiters and waitresses; cashiers; maids and housekeeping cleaners; and landscaping and groundskeeping workers.”

Meeting these talent needs will require the focus of Hawaii’s workforce system. In looking to meet the employer talent needs in many of these sectors, we seriously encourage your workforce system to view people with disabilities as an untapped labor resource that can succeed in many of these job sectors with the right combination of supports and training. Indeed, in fields like health care, hospitality, retail, and food preparation, employees with disabilities can be the most successful employees. The job gains in these sectors offer a great opportunity for focused sector strategies to sustain and build on employment outcomes being achieved among people with disabilities. **Below are our thoughts on how to do that:**

**a. Health and Elder Care:**

Page 17 of the current draft of Hawaii’s Unified State Plan specifically describes the rapidly growing demand and labor market share of the health care sector. In fact, to quote the section about Emerging Demand Industry Sectors and Occupations, healthcare is one of “three growing sectors that will account for more than 57 percent of the short-term job gain.”

The rapid emerging talent needs in health care represent both a challenge and an opportunity for the nation’s workforce system. It is a challenge propelled by an aging population resulting in increasing demand for qualified workers ready to fill the talent needs of hospitals, assisted living centers, and nursing home. It is opportunity to channel the incredible talents of people with disabilities into the workforce. This is a topic that needs to be examined closely and has implications for people with disabilities who want to work.

Further, health care is also one of three sectors that “will account for almost two-thirds of the increase in the long-term forecasts.” A 2014 report from the [Office of Disability Employment Policy](#) (ODEP) captured this opportunity clearly, saying that “[people with disabilities] not only represent an untapped talent pool, but also offer significant value and insight” in the field of healthcare. It is important for healthcare institutions to reflect their customers, and people with disabilities interface more with the healthcare system. There are [numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living](#). **Employers working in health and elder care can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities.**

**These examples all reflect how the Project Search model is well suited to meeting the growing talent needs in health care across the many states. As such, we recommend that Project Search be significantly expanded as they have done in Wisconsin, Florida and other states.** Nationally, each year approximately 2,700 such young people, spread out in 45 states, do a nine month, school-to-work program that takes place entirely at the workplace. This innovative, business-led model features total workplace immersion, which facilitates a seamless combination of classroom instruction, career exploration, and worksite-based training and support. Nationally, Project Search sites overall have been achieving outstanding results for people with disabilities, employers, and taxpayers alike. For example, [the first longitudinal study of the program found “a 68% success rate in transitioning students from high school into competitive employment” and “Project SEARCH sites in Upstate New York that have an impressive 83% success rate overall.”](#) The goal for each participant is competitive employment.

Given these facts, we were quite surprised to see the limited focused on Project Search in the current draft of your Unified State Plan. Project Search as a model is enumerated among several different strategies outlined on page 174 regarding strategies for expanding “Pre-Employment Transition Services (PETS)” as required by WIOA. Further, there are some signs of sector focused strategies in the VR section of the Unified State Plan. Specifically on page 158 in the Section about “transition services”, the Plan mentions that a “pilot program is underway which provides students with disabilities work experience in various areas of the hospitality industry, a significant employer in Hawaii.” This is important and we would like to see much more of this type of focused effort in the immediate future.

We suggest that you look to follow the example set by the state of Wisconsin where they started with three Project Search sites and are expanding to 27. The experiences of the dedicated state officials, VR counselors, workforce professionals, and special educators who have increased Wisconsin’s Project Search programs offer profound insights in the steps necessary to make rapid expansion a reality. Thinking long-term, investments in Project Search and other

such programs will save big money for taxpayers while also strengthening the talent pool for employers.

**b. High Turnover Jobs: Hospitality/Accommodations, Food Service, Retail Trade:**

Millions of dollars are lost each year due to employee turnover. [For all jobs earning less than \\$50,000 per year, the average cost of replacing one employee is between \\$6,000 and \\$20,000.](#) Research shows that employees with disabilities, when their interests and abilities are aligned with the needs of employers, are more productive and loyal than their non-disabled peers. Company records show that even when the relatively more expensive accommodations were factored in, the overall costs of disability accommodations were far outweighed by the low turnover rates and better tenures of the employees with disabilities.

**A great example of an employment sector where employees with disabilities can be tremendously successful is the hospitality industry.** Accommodations and food service are extremely high turnover jobs and numerous studies show that people with disabilities can be outstanding in those fields and have significantly higher employer loyalty. **With Hawaii's tremendous hospitality sector, initiatives highlighting their profitability working in the industry should be a slam-dunk for employers.** Specifically, as stated on page 23, “Gains within the visitor industry will positively impact retail trade, air and sightseeing transportation, and of course accommodations and food services.” As such, expanding training for youth with disabilities to go into the hospitality career field could easily be a win-win-win for the taxpayers, businesses, and citizens of Hawaii.

One way of doing this might be to prioritize the growing sectors of Hawaii’s economy in terms of the “Summer Youth Employment Program” discussed on page 174 of the State Plan. This section specifically states that “the State Workforce Development Division” is partnering directly with “Honolulu, Maui, Kauai and Hawaii Counties” around “paid work-based learning experiences, internships, and employment.” Focusing these efforts on employers in growing could begin to create a pipeline of talent for employers and career pathways for youth with disabilities.

An outstanding example of the type of work needed is found in Missouri. As part of the Poses Family Foundation’s Workplace Initiative, a coalition of employment service providers has launched a successful training and placement program with the hospitality sector in St. Louis. This training runs for up to 12 weeks, and takes place on site at the hotel; all participants are paid by the hotel for the duration of training. Since the summer of 2015, two cohorts of trainees have completed training at the Hyatt Regency. Trainees have gone on to permanent employment at the Hyatt and other hotel partners in a range of departments—culinary; auditing; and customer service. This type of training and Poses’ Workplace Initiative could easily be part of your overall Sector Strategies. Likewise, in other states, [hotels and other hospitality employers have found Project SEARCH to be an amazing source of talent.](#) [The work done by David Scott at the Embassy Suites in Omaha, Nebraska](#) is a clear example of [how to develop training opportunities and improve employment outcomes](#) for people with disabilities in a specific sector like hospitality. Your State Board, along with other components of the workforce system, should connect with employers to begin figuring out how to benefit from these models.

**Another sector with high turnover and big potential is retail trade.** Many companies, including [UPS](#), [Wal-Mart](#), and [OfficeMax](#) have proven records of success. [Walgreens has demonstrated that workers with disabilities in their distribution centers are as productive, safer, and turn over less when compared to peers without disabilities.](#) These efforts have taken the logistics sector by storm with [Lowe's](#), [OfficeMax](#), [Pepsi](#), as well as [P&G](#) are all launching their

own successful disability hiring initiatives. For example, [as reported by the National Organization on Disability, “Lowe’s hired more than 150 new workers with disabilities in the first year, and an additional 250 workers in the following 18-month period.”](#) They can be outstanding partners for disability employment as these industries suffer from high turnover rates and people with disabilities are proven to have significantly higher retention rates. It is important to identify more specific opportunities with employers and to cite them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future.

**c. Science, Tech, Engineering and Mathematics (STEM) and The Autism Advantage:**

Exciting opportunities for improving employment outcomes for people with disabilities lay in the fields related to STEM jobs. **As has been documented in many cases, there can be an “Autism Advantage” in the STEM space. Indeed, some people on the Autism spectrum can have the very best skills in science, math and engineering.** [Microsoft, SAP, and Specialisterne](#) have committed themselves to [“provide employment opportunities for people on the autism spectrum in roles such as software testers, programmers, system administrators, and data quality assurance specialists.”](#) [The Israeli Defense Forces recruits and trains their citizens on the Autism spectrum for work in their elite intelligence unit.](#)

Delaware’s Governor Jack Markell is partnering with companies to employ more people on the Autism spectrum in STEM jobs. Such examples need to be implemented by other states. This issue of STEM and access for student with disabilities is a natural point of partnership between the workforce system and the educational system. That work needs to start young, be matched with high expectations for success, and designed to ensure people with disabilities have the chance to become future scientists, engineers, doctors and mathematicians.

**Ensuring the Accessibility of Science, Technology, Engineering and Mathematics (STEM) Programs and Careers for People with Disabilities, especially Students with IEPs, is vital.** As Carol Glazer of the National Organization on Disabilities wrote in *Huffington Post*, [“America is already lagging when it comes to STEM-skilled workers. The U.S. will have more than 1.2 million job openings in STEM fields by 2018.”](#) Governors in other states have looked at STEM needs and begun to develop solutions. For example, [in New York State Governor Cuomo has ensured that magnet schools for STEM are located near IBM, a major STEM employer in their state.](#) Other states should be looking at ways to follow this model. Together, state workforce system and educational system can look to supported-employment programs such as Project Search, Specialisterne, and [the Marriot Foundation’s Bridges to Work Program](#) as models for developing a systematic approach to providing the supports necessary for our students on the autism spectrum to excel in STEM.

**d. State jobs and supplier diversity can also be sources of opportunity:**

While the focus of our comments on the State Plans are around aligning the workforce system to create opportunities for people with disabilities in the private sector, public sector employment should not be neglected. In the year ahead, the workforce of many state governments is likely to be impacted by the cresting wave of Baby Boomers retiring just as other sectors are being shaken.

As such, adopting affirmative actions to hire people with disabilities could be a solution to this coming challenge. Other states have adopted such steps as an opportunity measure in their state hiring policies. This was first discussed in Governor Markell’s *Better Bottom Line* Initiative and later in RespectAbility’s *Disability Employment First Planning* Toolkit. In Governor

Markell's own words, "[One key action is to set a state goal for hiring people with disabilities through an executive order and hold agencies accountable for achieving that goal.](#)"

More state governments should explore the feasibility of Affirmative Action hiring of people with disabilities for jobs in state government plus expanding state contracting obligations similar to the model we see in Section 503 for Federal contractors. [Governor Inslee in Washington State](#) and [Governor Dayton in Minnesota](#) have been working to implement such measures for people with disabilities through executive orders. [Likewise, we are also seeing great success with governmental hiring of people with disabilities at the local level in Montgomery County Maryland.](#) The untapped potential of people with disabilities is such that a full-spectrum, all-of-the-above-and-more approach is needed. While our priority is on seeing the talents of people with disabilities channeled into the private sector, employment opportunities in the public sectors shouldn't be over looked as part of the state's overall workforce strategy.

e. **Agriculture:**

Page 92 of Hawaii's Unified State Plan specifically talks about the state goal of achieving agricultural self-sustainability. At the same time, achieving this goal faces the significant obstacle as "60% of farmers will be retiring within the next 10 years, and the younger generation is not interested in continuing their family farms." Hawaii appears to be heading into an agricultural worker shortage. While the state is currently taking measures to combat this, we would like to suggest that [there is an opportunity to replicate the success of TIAA-CREF's Fruits of Employment project that provides internships and job training to workers with disabilities to prep them for careers in competitive agriculture. Farmers in Georgia have already had success with a program designed to reduce barriers persons with disability face in agricultural fields and it can and should be incorporated into WIOA plans.](#)

**3. Busting Stigmas and Misconceptions Should Be a Part of Your Workforce Strategy:**

Low expectations and misconceptions are critical barriers to employment for people with disabilities. [A Princeton study shows that while people with disabilities are seen as warm, they are not seen as competent.](#) Similarly, [a study published by Cornell Hospitality Quarterly found that companies share a concern that people with disabilities cannot adequately do the work required of their employees.](#)

**As such, we recommend that Hawaii's Plan be amended to include a comprehensive, proactive communications/public relations strategy for reducing such stigmas.** The best way to fight stigmas is to let employers see the facts from other employers who are already succeeding by hiring people with disabilities. **In order to ensure that such efforts have the biggest possible impact, it needs to be supported by a serious, systematic and ongoing communications campaign that highlights the benefits of inclusive hiring.**

Looking at Hawaii's WIOA plan, we believe there is an opportunity to implement such a strategy under State's Strategies, Priority 3 on page 175. This Priority is focused around increasing employer engagement and directly involves collaboration with Hawaii's affiliate chapters of the US Business Leadership Network. We are incredibly pleased to see this focus, this energy, and this effort. It is truly one of the most outstanding elements we have seen of any WIOA state plan and we do not say this lightly. This strategy focuses on employers and features a forum highlighting the benefits of disability hiring. However, this needs to be an ongoing campaign, rather than an event here or there. We recommend Hawaii incorporate elements [from South Dakota's Ability for Hire campaign](#), which has a recurring public relations element.

In terms of potential employer partners, we encourage your state plan to look at [Disability Equality Index that assesses the inclusion and hiring efforts of major employers](#). Hawaii has several active affiliate chapters of the USBLN and they should leverage that connection to push forward on a serious business-to-business PR effort. The companies which scored 100 points in the USBLN index can be a great resource. These are Ameren Corporation, AT&T, Booz Allen Hamilton Inc., Capital One Financial Corporation, Comcast, NBC Universal, Ernst & Young LLP, Florida Blue, Freddie Mac, Highmark Health, JPMorgan Chase & Co., Lockheed Martin Corporation, Northrop Grumman Corporation, Pacific Gas and Electric Company, PricewaterhouseCoopers LLP (PwC), Procter & Gamble, Qualcomm Incorporated, Sprint Corporation, Starbucks Coffee Company, and TD Bank N.A.

Polls and focus groups show that there are three types of messages and audiences that are needed to expand employment for people with disabilities. Serious communications campaigns are needed for all three:

- A. CEOs/business leaders need to understand the value proposition/business case for their specific company as to why they should focus on putting people with disabilities into their talent pipelines.** This is best done through business-to-business success stories. People with disabilities can work successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and they can be super talents in developing computer software and engineering solutions. CEOs and business leaders need to know that people with disabilities can be the BEST people to get a job done. A component of this type of outreach is the importance of celebrating good work done well. On page 157, the State Plan discusses how, on Hawaii island, the local affiliate chapter “sponsors Hoomohala Recognition Awards to highlight the special efforts of specific employers who have hired individuals with disabilities.” .” Such awards bring much needed media recognition and public visibility to key employer partners. We hope that this award series will continue in the years ahead.
  
- A. Human resources professionals and on-the-ground supervisors need to understand that hiring people with disabilities is generally easy and inexpensive, and that any costs incurred are more than offset from increased loyalty.** Hiring managers and supervisors are key players who can turn high minded policy and business goals into action at the ground level. However, studies show that many are uninformed about people with disabilities. They are afraid of potential legal action, costs, or other failures. They need supports that will empower them to overcome their own fears and to excel at recruiting, hiring, supervising, or working with teammates who have disabilities. VR staff and community agencies can fully support human resources professionals and managers in dealing with their own specific fears and stigmas surrounding hiring people with disabilities, and should do so, given that they are one of the few states who have opted to go for a dual-customer approach at their program centers. Moreover, online and in-person training is readily available to help from a variety of sources. RespectAbility has online webinars, as [does ASKJAN.org](#), USDOL and others. Partners like [the Poses Family Foundation Workplace Initiative](#) can provide training to the workforce staff and volunteers systems-wide as well as to community agencies in supporting companies through messaging efforts around related to fear and stigma. [The National Organization on Disability](#) and [the U.S. Business Leadership Network](#) offer strong resources as well.

**B. People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectation must begin. Hawaii needs a public relations campaign that will inspire Hawaiians with disabilities to set their hopes high, as low expectations and low self-esteem are a barrier to employment.** For example, Virgin Airways Founder Sir Richard Branson and finance wizard Charles Schwab are also dyslexic. Scientist Stephen Hawking and multi-billionaire businessman Sheldon Adelson, like Gov. Greg Abbott of Texas and President Franklin D. Roosevelt before them, are wheelchair/mobility device users. The CEO of Wynn Casinos, Steve Wynn, is legally blind. Arthur Young, co-founder of the giant EY (formerly Ernst & Young) was deaf. Success sells success and that is something the workforce system should seriously utilize in order to motivate and inspire in an intentional manner moving forward. Page 164, section j, bullet 4 – Need identified for high expectations. We like that Hawaii is looking at this but would like it to be quantified. It should also tie in with PR campaign on successful employment of PwDs and profitability.

As an example of the power and value of making the business care for hiring people with disabilities, we offer Hawaii the insights gained from our [#RespectTheAbility](#) campaign. The campaign focuses on how hiring people with disabilities can make organizations stronger and more successful. It highlights the benefits to employers that look beyond the disability and imagine the possibility when hiring talented employees with disabilities.

**4. Section 503 of the Rehabilitation Act and Federal Contractors offer states the chance to innovate, collaborate, and expand opportunity:**

Almost all of the state plans that we have reviewed have neglected to mention important rules surrounding the Rehabilitation Act of 1973. Most State Plans lack references to the employment opportunities and talent challenges created by the recently implemented Section 503 regulations regarding federal contractors and subcontractors. Your State Plan does not discuss [the new 7% utilization goal set for companies](#) to recruit, hire, and retain qualified individuals with disabilities in all job categories.

Hawaii should respond to these newly enacted regulations by adopting a strategy focused on competitive advantage, not just compliance. These regulations and requirements entail far more than just new rules for businesses to play by. Section 503 is an opportunity that could potentially have a broad impact on the employer engagement work of the entire workforce system. The companies who must comply with Section 503 have an opportunity to teach companies not impacted by the regulations how to effectively employ, engage, and retain workers or customers with disabilities. Specific companies that should be included in your outreach efforts include BAE Systems PLC, Nikei Corp, Manu Kai LLC, BCP Construction of Hawaii INC, Pelatron INC. More detailed information regarding federal contracts in [Hawaii can be found here.](#)

**5. Ensure that the Assurances in Your WIOA Checklist are matched up to a strategy to fully implement them and be successful:**

The Common Assurances required of the entire workforce system and the program specific Assurances outlined in the Hawaii Unified State Plan on page 120 are critical factors in the overall implementation and ultimate success of WIOA. **As such, it is critical that each assurance is matched up with a strategy fitted to meeting and, if possible, exceeding the requirements of the law.**

For example, it is critical that the assurances listed on page 132 for Title 1-B Programs are matched up to specific strategies to achieve the “delivery of career and training services to individuals.” Further, the Wagner-Peyser Assurances on page 149 need careful implementation efforts as do the Adult Basic Education Assurances listed on page 145 and the VR assurances on pages 183 through 186.

As a good example of the level of detail needed here, consider WIOA Section 188. The anti-discriminatory rules originally outlined under WIA need to be updated to reflect the steps needed towards making universal access a reality. For example, in seeking to meeting Common Assurance #7 listed in the State Plan, we are directing states to consider the resources made available from the Office of Disability Employment Policy (ODEP.) [They have recently released a guide that digs deep into what universal accessibility will mean for the workforce system.](#) Further, Common Assurance #10 affirms each state plan’s commitment to meeting the requirement that “one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990.” However, merely meeting legal requirements should not be the end of this process. Indeed, looking at physical and programmatic accessibility can be an opportunity to invest in a more proactive workforce system very actively committed to collaboration and partnerships. However, if there is no plan that specifically identifies how the state is going to get to the commitment made in the assurance, then Hawaii is facing a serious problem.

**6. Avoid the Opportunity Costs of Focusing Too Much on One-Stop Centers. Programmatic and Database Accessibility and Privacy is Critically Important:**

Public policy is about the allocation of scarce resources to meet infinite needs. It is vital to invest resources on those points where they can have the greatest effect. **One challenge that we have seen in many states WIOA plan has been the prioritization of expensive bricks and mortar One-Stops as the primary access point for programs and services under WIOA.** Focusing exhaustively on One-Stop Centers, physical infrastructure, and co-locating services comes at the opportunity cost of losing the chance to improve supports and increase outcomes.

As such, we closely reviewed the section on page 117 which details “Addressing the Accessibility of the One-Stop Delivery System for Individuals with Disabilities.” **We were most interested in the work being done through “HireNet Hawaii.” Described on page 119 as “the State’s internet based, self-service and staff service data base for core programs” HireNet is in essence a virtual one-stop that provides connections across core WIOA Partners. We have two points to make regarding this work.**

**First, the workforce needs of state economies are evolving rapidly thanks to technology and globalization.** Investing excessive resources on physical locations at the expense of improving online delivery of workforce services and supports is an example of looking backwards, not forwards. Moreover, [the District of Columbia and others have successfully moved much of their one-stop services to trained staff with laptops that go to schools, hospitals, and community organizations where they are better able to serve the public.](#) As such, we are incredibly excited about HireNet Hawaii.

Second, we trust that your state workforce system has made every effort to ensure that this resource fully accessible to people with disabilities who use screen readers or who need captions to understand videos that explain how to use the system. We reiterate the importance of accessibility testing because even now the workforce systems in other states do not fully grasp the value of programmatic accessibility.

Third and perhaps most important of all, as stated on page 113, “HireNet Hawaii will serve as a common and accessible intake process to help streamline and integrate service delivery among core partners.” We are glad to see that Hawaii has been placing considerable thought into the creation of a unified intake system. With that said, it is critically important that thought is given to privacy issues as private disability issues should not be shared where it is not needed and appropriate. On page 116, the current draft of the Plan says that the Workforce Development Council will develop “(D) Privacy Safeguards”. We look forward to seeing what safeguards are developed and how they address disability issues in full detail in final draft of your Unified State Plan

**7. Continue capitalizing on your collaborations with the affiliate chapters of the US Business Leadership Network (BLN) in order to effectively engage employers and reach the right audience about the advantages of hiring employees with disabilities:**

Some of the most promising work included in the current draft of Hawaii’s Unified State Plan is on page 157 in the section about “(g) Coordination with Employers.” This section specifically details the collaborative work being done between “the Workforce Development Division (WDD), the Developmental Disabilities Division (DDD), Developmental Disabilities Council (DDC), Department of Education (DOE), Adult Mental Health Division (AMHD) and the University of Hawaii’s Center for Disability Studies.”

This work has been advancing the efforts and mission of Hawaii’s affiliate chapters of the US Business Leadership Network (USBLN). There are significant opportunities to expand these chapters and to increase their effectiveness. As discussed on page 81, “the DEI (Round VI) program recently awarded to DLIR includes as a goal increasing the number of Business Leadership Networks.” We look forward to seeing how VR in Hawaii will carry this work forward and to recruit more employers to the network. Affiliate chapters offer you flexibility and capability to engage employers around hiring people with disabilities. They have a knowledge of community outreach, recruiting and interviewing, the accommodation process and barriers needed to achieve improved outcomes.

Your State Plan has clearly brought USBLN to the WIOA Table and in a substantive, strategic way. As we stated previously about communicating the business case for hiring people with disabilities, effective employer engagement is a necessary component of achieving improved employment outcomes. One of the most effective means of carrying that message forward is to have a network of engaged businesses whose bottom line has benefitted from the talents of employees with disabilities. Business to business communication can help tear down the misconceptions and stigmas which are barriers to employment. It will help if the governor and other leaders also engage with the BLNs.

**8. Ensure that Apprenticeship Programs are Fully Accessible and Actively Recruiting Young People with Disabilities, Especially with Government Contractors:**

One of the often-neglected opportunities for people with disabilities is the training opportunities offered by apprenticeship programs. While the current draft of Hawaii’s Unified State Plan touches on the opportunities that apprenticeships offer, it lacks the perspective of training people with disabilities, especially youth with disabilities. Page 68 of the State Plan reports there are “32 apprenticeship programs available that represent a wide variety of occupations.” Further, it is clear from the “HAWAII STRATEGIC PARTNERS” section on page 76 that apprenticeship is a key priority and that a critical element of the Career Pathway System will be “employer-led committees based on the economic sectors identified by the state.” This close

cooperation with employer will be critical to having employer needs drive the evolution of the workforce system. Specific responsibility for Apprenticeship programs fall under the aegis of “the State Apprenticeship Agency “through which “WDD (WDD) Administration serves on behalf of the DLIR” as discussed on page 83. The State Plan, on page 108 in the section on the “City and County of Honolulu, Hawaii County, Maui County, Kauai County”, specifically directs state funds to support apprenticeship. This is critical work, however, we are concerned that it lacks the disability lens.

As your state looks to improve these programs, we highly recommend that the workforce system seriously look at ways to make apprenticeships accessible to people with disabilities. At the federal level, the Office of Disability Employment Policy has worked hard to generate resources which can open up these exciting programs to “youth and young adults with a full range of disabilities.” The regulations related to apprenticeship which have recently come out of the Department of Labor provide states the flexibility them need to refine and design training programs that maximally inclusive of people with diverse talents. toolkit. Further, [we would also highly recommend that VR staff connect and collaborate with the Federal officer responsible for apprenticeship programs in Hawaii](#). Such innovative partnerships and improved accessibility are essential elements of realization the full promise of WIOA for people with disabilities.

Further, we would suggest that there is a critical opportunity to look at Section 503 and federal contractors as a partner in expanding apprenticeship programs. Funding to cover training costs could be a very attractive selling point for federal contractors looking to meet their 503 requirement. Further, we would also recommend looking at the intersection of apprenticeships and sector strategies. Not only can apprenticeships be set up in traditional fields such as construction, but they can also incredibly useful in health care and computer jobs. Look at the successes achieved by Project SEARCH at a wide range of employers. As such, we recommend that the workforce system and the State Board investigate how to both open apprenticeship programs to people with disabilities and to create apprenticeship opportunities in new career fields as well.

## **9. Overcome the gap between disability services and career services in Post-Secondary Education:**

**There is a fundamental disconnect in most post-secondary education programs between disability services and careers.** This is not a new issue and it is one that other organizations have raised in the past. However, with the priorities put into place by the implementation of WIOA, there is a historic opportunity to bridge this gap and to improve career and technical education for young people with and without differences. As formulated by the National Organization on Disability, at most educational institutions, “the career services office, which assists students in preparing for” the workforce [“lack a strong—or any—connection to the office of disabled student services, which ensures proper accessibility and accommodations on campus for students with disabilities.”](#)

The result is a price we pay as a society is twofold. First, it costs employers who are unable to find qualified job candidates. Second, it costs students with disabilities who may be able to graduate with a degree thanks to accommodations but will go on to struggle to succeed in the working world. Nationally, there are 1.3 million young Americans ages 16-20 with disabilities. [They have high expectations to go into the workforce but currently only 53% of college graduates with disabilities are employed](#) as opposed to 84% of graduates with no disability. In total, only about 7% of people with disabilities will earn a college degree and less than half of the 2.3 million with a degree are employed.

[Due to the mandate created by Section 503 of the Rehabilitation Act, federal contractors now have a utilization goal to make sure that 7% of their employees across all job groups be qualified people with disabilities.](#) This regulation is actually a huge opportunity because companies are actively looking to hire recent graduates with disabilities. The first place for new recruits is college and campus recruiting. Your state has the chance to demonstrate to business that college students with disabilities are on campuses and that they should be actively targeting those with disabilities just as they do all other diversity recruiting on college campuses.

While the statistics cited above are national ones, they have bearing on the work that needs to be done through your community college system. Beyond just WIOA, community colleges are uniquely positioned to innovate in order to expand opportunity. Community colleges are very closely connected to the working world and the specific training requirements of employers.

### **10. Supporting Pre-Employment Transition Services through the Development of Public-Private Partnerships:**

We are encouraging states to follow the example set by Florida and Wisconsin by working hard to expand the number of Project SEARCH sites as they are so efficient and effective. However, this is not the only paradigm that you should follow. The school system, vocational rehabilitation, and local workforce boards can build creative, collaborative partnerships with companies that are leading in the disability space.

States would benefit greatly by looking at other models of innovation that are showing great potential to fundamentally improve employment outcomes. To begin with, we would highly recommend that state workforce systems examine how to support disability employment efforts through establishment of public/private partnerships in local communities. These types of partnerships could focus on the “cluster” model, started by Poses Family Foundation that is having tremendous success in diverse states as Nevada, Georgia, and Ohio. [This model depends on “consortium of employers committed to implement or expand programs”, “a public/private partnership to coordinate services for job-seekers with disabilities, with a single point of contact for employers”, and “Connections among employers, public and private agencies, and schools to reach young adults with disabilities who are in transition from school to work.”](#) (PETS Strategies – p174, p175/6 Employer Engagement Strategies including partnerships with Chamber of Commerce, USBLN, Disability Employment Initiative, ODEP EFSLMP...they appear to be covered..I believe they even have project search and SEVR (I don't know what this means we should do)

### **11. Getting Out the Word on Free and Accessible Services and Resources:**

**There are many online and in person resources to help employers and people with disabilities come together to build success.** However, all the stakeholders need to be educated to know that these resources exist, and that they are free and user-friendly. These resources must also all be accessible. We know that broadband access is a huge issue in rural states. However, it's important to ensure that online resources enhance the effort of your workforce system.

**Your state needs to make an effort to demonstrate to employers and prospective employees that these services exist. Doing so by coordinating it with the possible public relations campaign is one way to go about this. Your state like others should be careful not to waste money trying to re-invent the wheel in creating online resources as [ASKJAN.org](#), [the US Department of Labor's Office of Disability Employment](#) Policy, [our organization and others also offer free toolkits](#), [webinars and training opportunities](#). [Another resource is](#)**

[Understood.org](#). This is a comprehensive resource to help families and individuals with learning and attention issues build their educational and career plans. It will be helpful to collaborate with those groups however to ensure that the best tools are created to fit the training and information needs on these issues.

We are very pleased to Hawaii's close coordination with the subject matter experts (SMEs) from the Office of Disability Employment Policy. Your state's involvement with "Round VI" of the Disability Employment Initiative (DEI), detailed on page 118, provides you access to the expertise needed to drive hard for improved employment outcomes in Hawaii. Further, we are very pleased to see key leaders in your state are working with ODEP SMEs "the areas of: (1) capacity building for a more coordinated interagency approach toward employing individuals with disabilities and (2) development of a Cooperative Agreement between the EFSLMP partners for a cross-system policy, process and procedure." This is critical work and we are glad to see it integrated into your Unified State Plan. We would reiterate that the disparate elements of Hawaii's workforce system would benefit from sharing the wealth of resources generated by ODEP. As your state moves forward on disability employment projects, we also encourage you to look at resources such as [the Designing Statewide Career Development Strategies & Programs](#) guide to focus your effort around youth with disabilities.

## **12. Nothing About Us Without Us:**

**"Nothing About Us without Us" has long been a rallying cry for the one-in-five Americans who have a disability and it has implications for the workforce system.** Section 107 of WIOA dictates the establishment, criteria, and membership for the Local Workforce Development Boards that are crucial implementers of each state's overall workforce strategy. **As such, we feel there is a critical need to ensure that people with disabilities are represented on such local boards and make their voices heard.** Section 107(b)(2)(A)(iii) of WIOA specifically states that "community-based organizations that have demonstrated experience and expertise in 9 addressing the employment needs of individuals with barriers to employment" may be represented on the boards and this includes "organizations....that provide or support competitive integrated employment for individuals with disabilities."

Even a non-voting, ex-officio member of a WIB can bring critical perspectives that improve the WIB's efforts overall. We are pleased to see that the Vocational Rehabilitation system is very well represented both in the Career Pathways system discussed on page 72 as well as on the Workforce Development Council as discussed on page 100.

As such, we recommend that states look for ways to recruit local community organizations or self-advocates for inclusion on their local boards. Perhaps this could be a natural point of partnership for Independent Living Centers across the country that do crucial work supporting employment and independence for people with a wide range of disabilities.

## **13. Transportation is a vital component and it must be addressed directly:**

One significant reservation that we have regarding many of the state plans that we have reviewed has been the limited attention given to the issue of transportation. This is of critical importance not only for people with disabilities but also other members of low-income communities. Many people with disabilities do not drive. Others cannot afford private transportation.

One of the many things required of the Vocational Rehabilitation system through the paradigm shift of WIOA is "an assessment of the rehabilitation needs of individuals with disabilities residing within the State." This information is provided on page 163 of Hawaii's

Unified State Plan. **Specifically, this section identifies “Lack of transportation (especially in the neighbor islands)” as first of several critical needs among people with disabilities in Hawaii. However, the State Plan, as a whole, does not offer any specific strategies or potential solutions to the challenge of transportation.** We encourage your state workforce system to work through these issues in a deliberative, collaborative fashion. It is vital to work with public transportation to ensure that there are bus routes to places where there are internships, apprenticeships and other work opportunities for people with disabilities.

People with disabilities need transportation solutions. Public transportation need not be the only solution. In places where it is not possible to coordinate a bus route, states could look at partnering with Uber, Lyft, or other new transportation solutions. For people with disabilities who do drive, such companies as Uber and Lyft can also provide a way to enter into the workforce with flexible hours, so a state could also look at developing partnerships with these sorts of companies. WIOA is an opportunity to think big in terms of potential solutions. In Alaska, they are looking at flying VR counselors to provide services to eligible clients in remote parts of the state. While this is not necessarily a solution that Hawaii can copy, it does suggest that thinking big is a key part of approaching WIOA.

Public sector employers and federal contractors who have Section 503 obligations are key places for apprenticeships and internships and onboarding of talent. It is important for them to play a key role in planning for public transportation as well.

#### **14. Aging workers and those who acquire disabilities must be specifically addressed:**

We are pleased to see the attention given in Hawaii’s WIOA State Plan around the needs of older workers. Starting on page 85, the State Plan goes into detail about the “Senior Community Service Employment Program (SCSEP).” This is important, especially given the aging of the Baby Boomer and their impact on the evolution of the nation’s workforce. SCSEP is very much a reactive solution to the challenges that older workers face. In through the program design of such efforts, we encourage your state leaders to look to the state of Iowa for ideas around innovative best practices to support older workers.

**Attention should start BEFORE aging workers and those with recently acquired disabilities lose their job due to aging and/or a newly acquired disability. Many people who have been in the workforce for decades find that before full retirement age they cannot keep up with the physical demands of their jobs. It is vital to start working with them BEFORE they lose their jobs.** In Iowa, IVRS works with a major employer, Unity Point Hospital to “re-home” employees to other jobs within the same company when good workers can no longer do physical jobs and need a new assignment. They find that Emergency Room nurses, for example, come to a point where they can no longer keep up with the physical demands of that job. They have a department that works to “re-home” talented and valued employees who either age into a disability or acquire a disability through accident or illness. Empowering youth with disabilities to enter the workforce should be your highest priority, but keeping aging workers in the workforce until retirement age is also important. This will take a specific strategy and effort so that you don’t have massive numbers of people going onto disability rolls and out of the workplace prematurely.

#### **15. Strategic Engagement to Build a Mentor System for Customers of the Workforce System:**

**Government can’t and shouldn’t do everything. There is a massive role that can be played by volunteers who are willing to help people with barriers to work, including people**

**with disabilities, find and keep jobs. There is a critical, cooperative role for non-profits and faith-based organizations to play.** Local workforce development areas, for example, could be encouraged to recruit volunteers from local faith communities or local non-profits. However, much more can and should be done to work with parents of teens and young adults with disabilities, and to create volunteer mentorships for people with disabilities who are looking for work or need supports to stay employed and/or grow their careers.

Faith-based organizations and many others can fill massive gaps. [There is a terrific booklet, Clearing Obstacles to Work, put out by the Philanthropy Roundtable that is rich with potential partners and proven programs.](#) This is a huge missed opportunity as you will see in the booklet we just mentioned above. It's all about teaching people to fish (helping them get and keep a job) rather than just giving them fish. It is also important to note in terms of the SNAP and TANF programs that too many faith-based programs focus on giving out food without giving out the volunteer support to help people sustain themselves through gainful employment. [In looking to rethinking policies around SNAP funding, we suggest looking at the innovative efforts of the Seattle Jobs Initiative \(SJI\) to realign that funding into more productive, employment outcomes.](#)

#### **16. The disability issues of people involved in the corrections system must be addressed:**

**There are several points where the current draft of Hawaii's Unified State Plan addresses the unique workforce challenges facing ex-offenders as they attempt to reenter society.** Page 141 of the State Plan directly addresses Corrections Education effort in Hawaii. These efforts are coordinated through the "Department of Education and the Department of Public Safety" who collaborate in order "to provide jointly-funded basic skills education programs and services to Hawaii's eligible incarcerated population." Internal to this effort, are "Special education programs" focused on meeting the "meet unique needs of the institution's eligible population." We are glad to hear about this effort. **Far too often, states neglect to add lens of disability to the work being done to meet the requirements under section 225 of WIOA.** The need for this type of work is clear.

[According to recently published data from the Bureau of Justice Statistics, "An estimated 32% of prisoners and 40% of jail inmates reported having at least one disability."](#) This issue is a serious one and it needs to be addressed at the state level. Frequently people are involved in the criminal justice system because they have disability issues, including learning differences, ADHD, executive function, and mental health issues that went undiagnosed and/or unaddressed through childhood and into the school years.

**Given these statistics from the BJS, it is vital that states identify how many of the individuals in the corrections system and in the ex-offender pipeline have disabilities.** There are two related challenges here. First, there is a need to identify potential disability issues among inmates during the intake process and ensure their needs can be met. Ideally, this type of assessment could be done within the first thirty days of their sentence. Second, are the issues related to preparing inmates for their release and reintegration into society? Whether it is mental health supports or learning accommodations helping ex-offenders to find employ when they are home is a critical workforce development challenge. It is a challenge that only grows more complicated when a disability remains unaddressed. The price paid for ignoring these issue are higher rates of recidivism and greater costs to society. Addressing these issues at the beginning and at the end of the corrections process will have downstream effects and hopefully will enable states to address the intersectionality of workforce, disability, and justice issues.

**Conclusion:**

Hawaii has been rapidly increasing employment outcomes among people with disabilities. From the language of the Unified State Plan, there is a lot of innovative and dedicated work being done on workforce development in Hawaii. Thanks to WIOA, Hawaii has an opportunity to invest resources in successful models and implement best practices to expand job opportunities for people with disabilities. Still, we remain concerned with the lack of detail and coordination we have found in certain sections of the State Plan. However, there is some good as well, especially with the use of Business Leadership Networks and youth employment. Our public comments are focus on several critical factors that can help Hawaii to continue improving outcomes and we hope see them implemented soon.

The bottom line is that expanding job opportunities for people with disabilities is win-win-win for employers, taxpayers and people with disabilities alike. It is good for employers because the loyalty, talent, and skills of workers with disabilities contribute to the employers' bottom line. It is good for the workforce system because improving services and supports for job seeker with disabilities will benefit others with different barriers to employment. It is good for people with disabilities who want the dignity, pride, friendships, independence and income that work provides. We are happy to answer any questions you have and to help in any way.

Below are two data tables that provide detailed information ranking the states in terms of employment rates for people with disabilities as well as the employment gap between people with and without disabilities. This has been added to show you where each state ranks nationally.

**APPENDIX – Ranking 50 States by Employment Rates and Employment Gap**

Data Source- Chart 1: Table 2.1: Employment—Civilians with Disabilities Ages 18 to 64 Years Living in the Community for the United States and States: 2014 from the Annual Disability Statistics Compendium

**Disability Employment Rate by State, 2014**

	State	%		State	%		State	%		State	%			
1	South Dakota	50.1	12	Montana	40.5	23	Oklahoma	36.4	34	California	33.3	45	Arkansas	29.2
2	North Dakota	49.9	13	Connecticut	40.2	24	Oregon	36.4	35	Arizona	32.8	46	South Carolina	29.0
3	Iowa	46.5	14	New Hampshire	40.0	25	Indiana	36.2	36	Missouri	32.8	47	Mississippi	27.4
4	Nebraska	46.0	15	Kansas	39.8	26	Vermont	36.2	37	Maine	32.5	48	Kentucky	27.3
5	Wyoming	45.2	16	Wisconsin	39.8	27	Illinois	35.7	38	Louisiana	32.1	49	Alabama	27.2
6	Minnesota	44.4	17	New Jersey	39.2	28	Delaware	35.6	39	North Carolina	31.3	50	West Virginia	25.6
7	Utah	44.0	18	Maryland	39.1	29	Massachusetts	35.5	40	New Mexico	30.4		Washington D.C.	30.3
8	Hawaii	42.4	19	Idaho	38.8	30	Ohio	34.6	41	Florida	30.1			
9	Colorado	41.6	20	Texas	38.0	31	Pennsylvania	34.5	42	Tennessee	29.9			
10	Nevada	40.9	21	Washington	37.7	32	Rhode Island	33.9	43	Georgia	29.6			
11	Alaska	40.8	22	Virginia	37.6	33	New York	33.6	44	Michigan	29.6		United States	34.4

Source: Annual Disability Statistics Compendium

Data Source-Chart 2: Table 2.9: Employment Gap—Civilians Ages 18 to 64 Years Living in the Community for the United States and States, by Disability Status: 2014 Disability Statistics Compendium

**The Difference in the Employment Gap Between Disabled and Non Disabled Adults 2014**

	State	Gap		State	Gap		State	Gap		State	Gap			
50	Maine	47.4	39	Mass.	43.5	28	Delaware	40.7	17	Minnesota	38.5	6	Alaska	35.3
49	Kentucky	47.1	38	Georgia	43.5	27	New York	40.4	16	Washington	38.3	5	Hawaii	34.2
48	South Carolina	45	37	Florida	43.3	26	Louisiana	40.3	15	Nebraska	37.9	4	South Dakota	33.6
47	Michigan	45	36	Mississippi	43.1	25	Virginia	40	14	Connecticut	37.7	3	Utah	33.5
46	West Virginia	44.9	35	N. Carolina	43	24	Illinois	40	13	Colorado	37.4	2	Nevada	33.4
45	Arkansas	44.6	34	Ohio	42.5	23	Kansas	39.9	12	Texas	37.3	1	North Dakota	32.1
44	Tennessee	44.5	33	Pennsylvania	42	22	Arizona	39.7	11	New Jersey	37.3		Washington DC	45.2
43	Missouri	44.4	32	Wisconsin	41.4	21	Oklahoma	39.2	10	Montana	37.3			
42	Vermont	44.2	31	New Hampshire	41.3	20	Maryland	39.1	9	Idaho	37			
41	Alabama	44.1	30	New Mexico	40.8	19	California	38.9	8	Wyoming	35.9			
40	Rhode Island	43.8	29	Indiana	40.7	18	Oregon	38.5	7	Iowa	35.7		USA	40.3

Source: Annual Disability Statistics Compendium



# RESPECTABILITY

## Hawaii and Jobs for PWDs

Jennifer Laszlo Mizrahi, President

[www.RespectAbilityUSA.org](http://www.RespectAbilityUSA.org)

# Hawaii



Gov. David Ige (D)

1. 2012 Disability Status Report: Hawaii, [disabiliystatistics.org](http://disabiliystatistics.org)
2. StateData: The National Report on Employment Services and Outcomes, 2013
3. [Annual Disability Statistics Compendium](#)

- ❖ 76.6% of persons without disabilities aged 18 to 64 are employed.<sup>3</sup>
- ❖ 42.4% of PwDs aged 18 to 64 are employed.<sup>3</sup>
- ❖ **Hawaii currently ranks 8<sup>th</sup> in the nation in terms of jobs for PwDs.**
- ❖ **There remains a 34.2 percentage point gap in the Labor Force Participation Rate (LFPR) between people with and without disabilities.**
- ❖ 3,100 persons aged 16 to 20 have a disability.<sup>1</sup>
- ❖ 63,500 persons aged 21 to 64 have a disability.<sup>1</sup>
- ❖ 151,009 civilians with disabilities live in HI.<sup>3</sup>
- ❖ The employment gap between PwDs and people without disabilities decreased 1.8% from 2010 to 2011.<sup>3</sup>
- ❖ 26,846 PwDs aged 18 to 64 received SSDI and SSI benefits in 2012.<sup>3</sup>
- ❖ In 2012, the total expenditure on SSDI benefits in HI was \$356,208,000.<sup>3</sup>
- ❖ Voc. Rehab. obtained 235 jobs for PwDs in HI in 2012.<sup>2</sup>
- ❖ Voc. Rehab. received 1,107 general applicants in HI 2012.<sup>3</sup>

# Hawaii

		People with Disabilities (%)		People without Disabilities (%)	
		<b>2012</b>	<b>2013</b>	<b>2012</b>	<b>2013</b>
Poverty <sup>1</sup>	US	29.2	28.7	13.6	13.6
	HI	22.5	24.1	10.0	10.2
Smoking <sup>1</sup>	US	26.0	25.4	16.9	16.2
	HI	18.9	16.0	13.7	12.8
Obesity <sup>1</sup>	US	39.1	40.1	24.5	25.0
	HI	33.2	30.3	21.4	20.3
Employment <sup>1</sup>	US	32.7	33.9	73.6	74.2
	HI	37.3	39.1	75.6	75.7

1. [Annual Disability Statistics Compendium](#). Pg 53, 54, 72, 73, 29

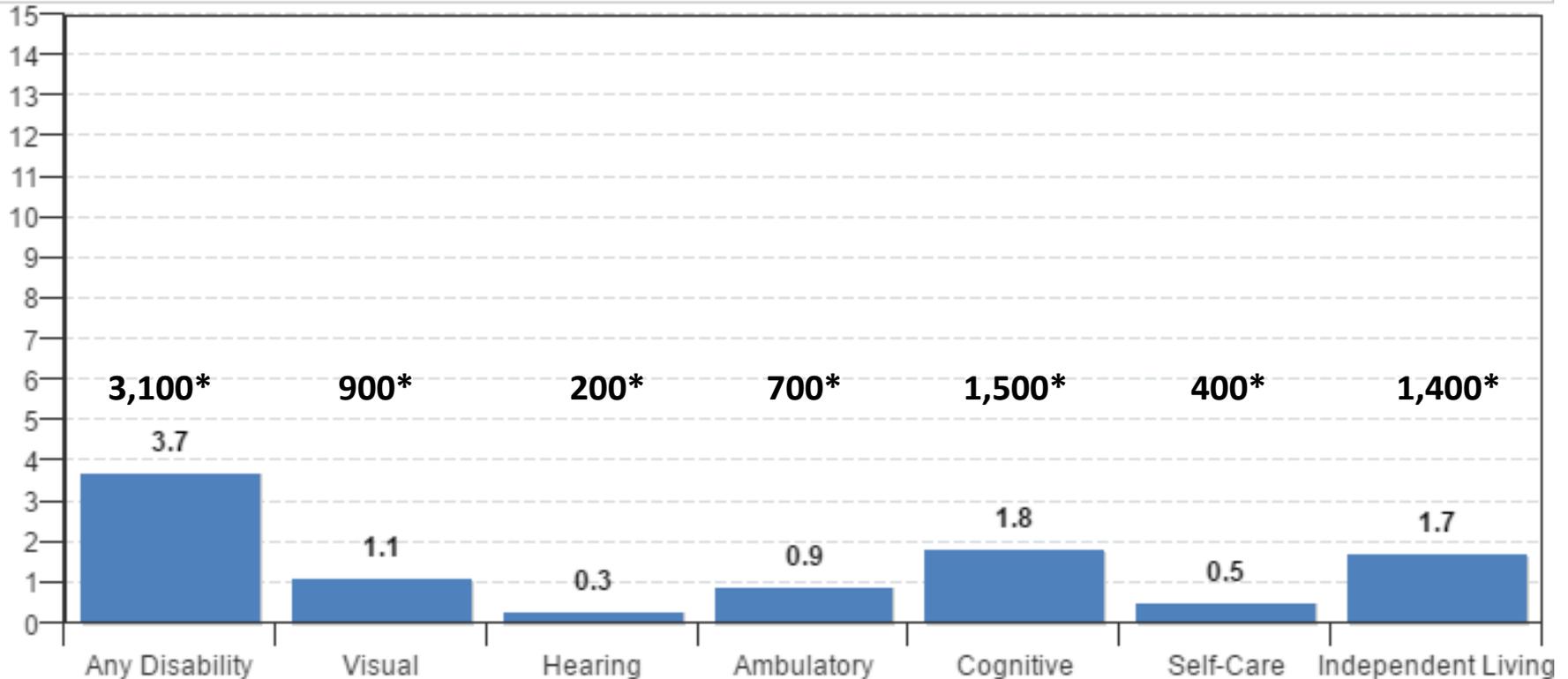
# Ages 6 to 21 Served by IDEA in HI

	2011	2012
All Disabilities	17,156	17,142
Specific Learning Disability	8,509	8,510
Speech or Language Impairment	541	553
Intellectual Disability	1,156	1,116
Emotional Disturbance	1,100	1,063
Multiple Disability	497	508
Hearing Impairment	308	289
Orthopedic Impairment	79	82
Other Health Impairment	2,636	2,636
Visual Impairment	58	57
Autism	1,133	1,199
Deaf-Blindness	10	9
Traumatic Brain Injury	61	54
Developmental Delay	1,068	1,066

Source: [Annual Disability Statistics Compendium](#)

# Prevalence of Disability Among Non-Institutionalized People Ages 16 to 20 in Hawaii in 2012

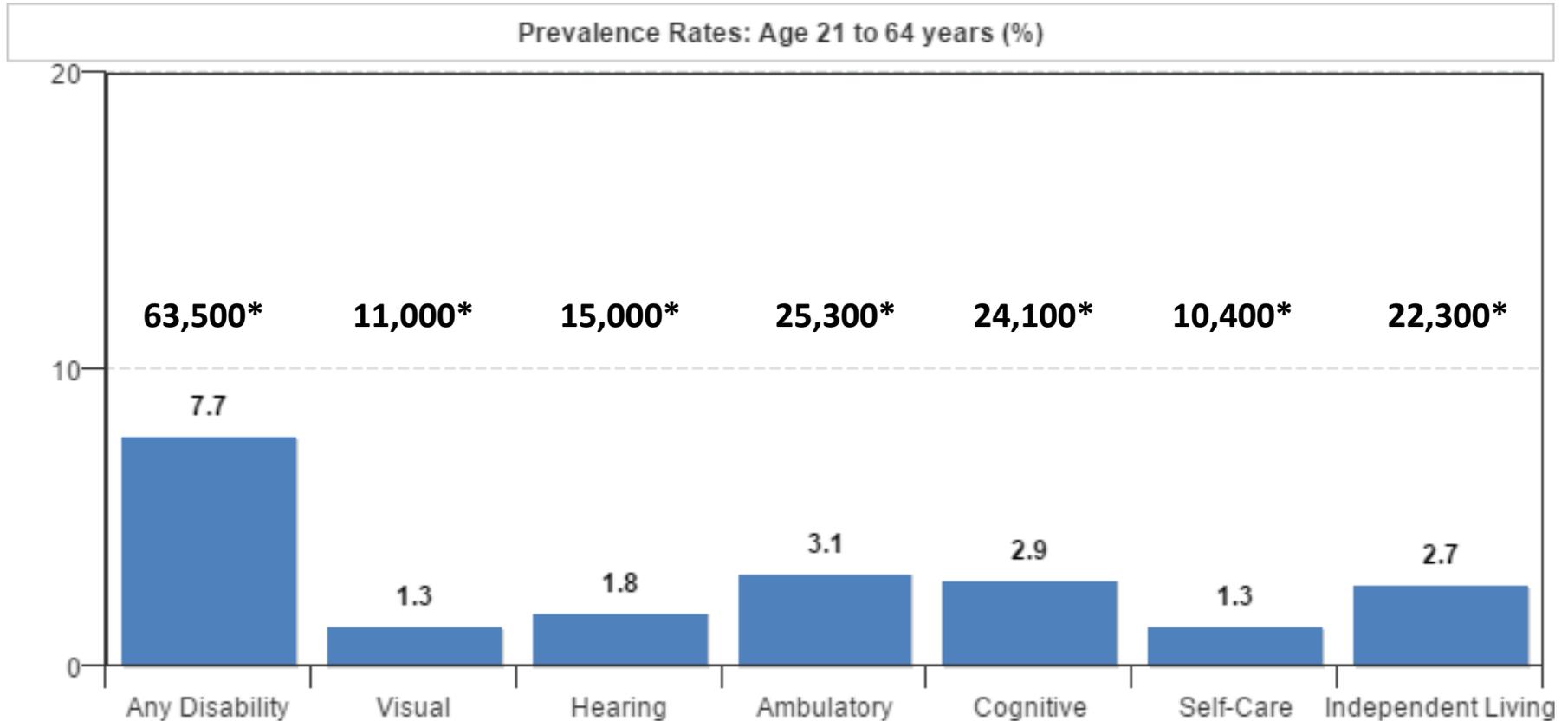
Prevalence Rates: Age 16 to 20 years (%)



\*Total numbers reported

Source: [Cornell University](#)

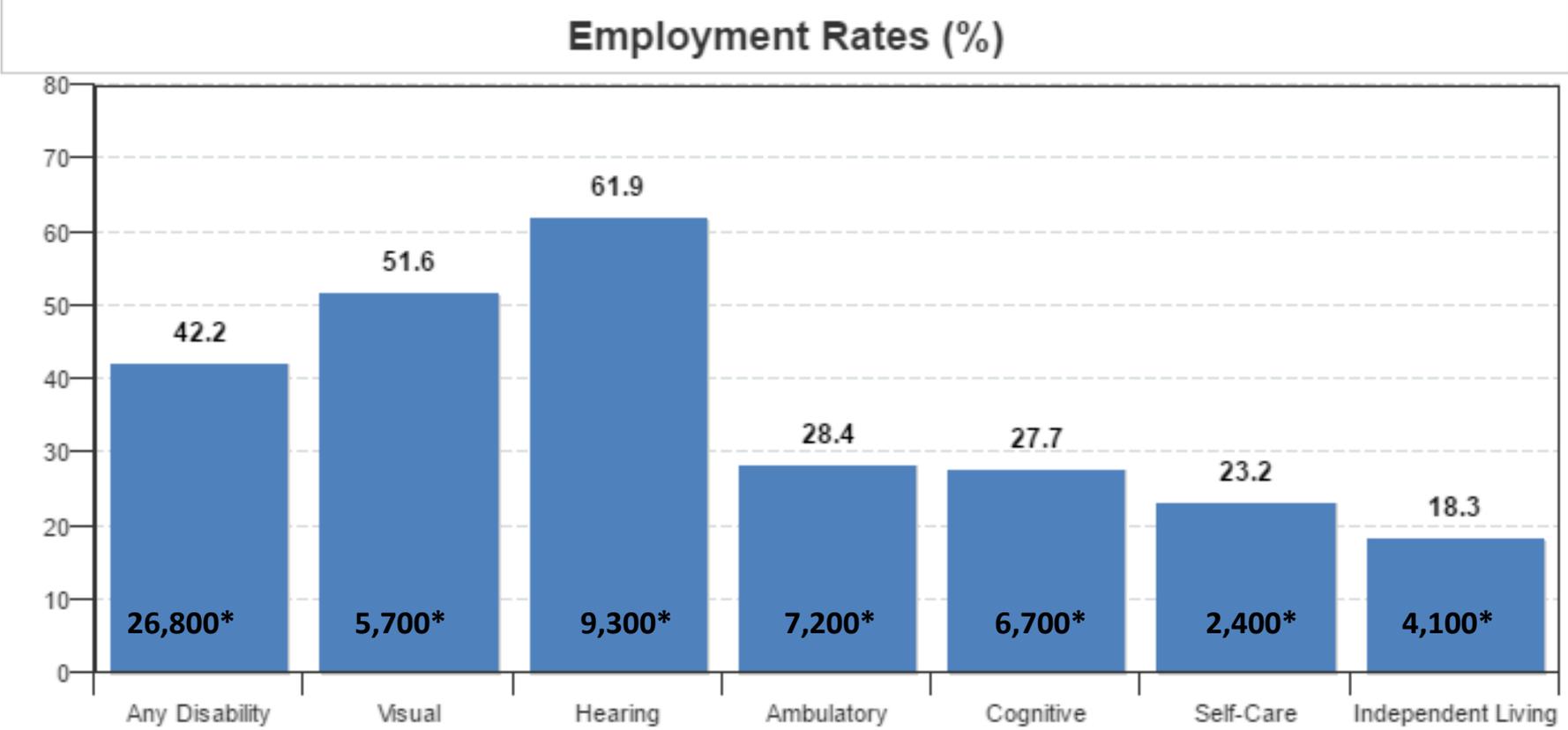
# Prevalence of Disability Among Non-Institutionalized People Ages 21 to 64 in Hawaii in 2012



\*Total numbers reported

Source: [Cornell University](#)

# Employment of Non-Institutionalized Working-Age People (Ages 21 to 64) by Disability Status in Hawaii in 2012



\*Total numbers reported

Source: [Cornell University](http://Cornell University)

# Project SEARCH: Program Description

- ❖ One school year or 9 months.
- ❖ 10 – 12 young adults with a variety of intellectual and developmental disabilities.
- ❖ Instructor and job coaches.
- ❖ Immersed in host business culture.
- ❖ Rotations through unpaid internships with continual feedback.
- ❖ Outcome of employment in the community.

# Project SEARCH: HUGE \$ SAVER!

The Project SEARCH  
Definition of a Successful  
Outcome:

- ❖ Competitive employment in an integrated setting.
- ❖ Year-round work.
- ❖ 16 hours per week or more.
- ❖ Minimum wage or higher.

- ❖ 273 programs in 44 states.
- ❖ 2500 young people per year.
- ❖ 60% healthcare, 40% broad mix of business types.
- ❖ 68% employment.
- ❖ 88% employee benefit eligible.
  - 35% take employee benefits, usually at 5 years.
  - Benefits alone save roughly 1 million dollars over a lifetime.
  - Family involvement curriculum to drive familial change in attitude.

# Contact Project SEARCH

Project SEARCH: [www.projectsearch.us](http://www.projectsearch.us)

# Which Employers in Your State Must Meet 503 Rules (Hire PwDs)?

## ❖ Top contractors:

- BAE Systems PLC
- Niking Corp
- Manu Kai LLC
- BCP Construction of Hawaii INC
- Pelatron INC

For the complete list go to the [Fedspending website](#):

[http://www.fedspending.org/fpds/fpds.php?reptype=p&detail=-1&fiscal\\_year=2011&sortby=f&database=fpds&datatype=T&stateCode=HI](http://www.fedspending.org/fpds/fpds.php?reptype=p&detail=-1&fiscal_year=2011&sortby=f&database=fpds&datatype=T&stateCode=HI)

Resources for federal contractors include:

[Job Accommodation Network](#)

<https://askjan.org/>

[US Business Leadership Network](#)

[www.usbln.org](http://www.usbln.org)

# Jobs in Hawaii

❖ Hawaii has one of the fastest growing populations of people over 65. This leads to numerous shortages in long term care occupations in facilities. Due to an increase in home-based care these facilities are now receiving patients who are much sicker and require higher levels of care.

❖ [Click for your Workforce Development board](http://workforceinvestmentworks.com/workforce_board_info.asp?st=HI)

[http://workforceinvestmentworks.com/workforce\\_board\\_info.asp?st=HI](http://workforceinvestmentworks.com/workforce_board_info.asp?st=HI)

❖ [Click for your Workforce Development Plan](http://labor.hawaii.gov/wdc/reports/)

<http://labor.hawaii.gov/wdc/reports/>

# Resources

- ❖ StateData: The National Report on Employment Services and Outcomes, 2013 (data from 2012)
- ❖ 2012 Disability Status Report United States, Cornell University, 2012: [www.disabilitystatistics.org](http://www.disabilitystatistics.org)
- ❖ Fedspending: [www.fedspending.org](http://www.fedspending.org)
- ❖ Project SEARCH: [www.projectsearch.us](http://www.projectsearch.us)
- ❖ Job Accommodation Network: <https://askjan.org/>
- ❖ State Vocational Rehabilitation Agency: [http://wdcrobcolp01.ed.gov/Programs/EROD/org\\_list.cfm?category\\_cd=SVR](http://wdcrobcolp01.ed.gov/Programs/EROD/org_list.cfm?category_cd=SVR)
- ❖ RespectAbilityUSA: [www.respectabilityusa.org](http://www.respectabilityusa.org)

# Let Us Know If We Can Help!

**We have many resources for policy makers and employers on our website and are ready to help!**

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**From:** Arima, Michelle L. [REDACTED]  
**Sent:** Monday, March 21, 2016 5:39 PM  
**To:** HI-WIOAPlanComment  
**Subject:** Draft 2 of Unified State Plan Comments  
**Attachments:** Unified State Plan Comments draft 2.docx; ATT00001.htm; Comments Unified Plan in a chart format.docx; ATT00002.htm

Aloha,

Please see the attached comments on the Unified State Plan submitted by Oahu and Hawaii Island counties.

Thank you for this opportunity.  
Michelle Arima

## State Unified Plan Comments

- Page 5 – NOTE (bottom of page) – The original draft of the Unified State Plan was collaboratively developed and thoroughly vetted with a wide range of stakeholders. Beginning in October 2014, workforce system stakeholders met periodically to develop a vision, shared goals and a service delivery strategy for the Unified State Plan. The stakeholder group was comprised of representatives from the core partner agencies, state and **local workforce boards**, the American Job Centers... **Involved only since December 4, 2015**
- Page 7 – Traded Cluster Chart – **Will discuss and review w/Oahu...doesn't benefit our image**
- Page 8 – Hawai'i Island Economic Outlook – “The outlook for 2016 of Hawai'i Island continues to be good due to continuing strength in the **tourism market** and residential construction. What is promising for the Big Island, is a diversification in the destinations from which visitor are arriving. Hawai'i Island has always had more Japanese visitors than other outer island, but a weak yen and still no direct airlift **reduced** their count by **14%** in 2015. Helping to offset this was a nearly 10% increase in Canadian visitors.” **How is this good?**
- Page 13 – Profile of the State of Hawai'i Economy – Second paragraph – “The State of Hawai'i...” **Exact same paragraph as page 7**
- Page 28 – First paragraph, last sentence – “...In May 2015, the Research and Statistics Office conducted a soft skills survey of businesses that will aid in the development of training videos.” **When will videos be distributed?**
- Page 57 –
- Page 64 – American Job Centers – Hawai'i's four American Job Centers... **Only 4?**
- Page 71 – Strategic Vision Between Economic & Workforce Development – Comprehensive Economic Development Strategy (CEDS) – last sentence - ...”This includes incumbent workers, traditional pipeline students, adult learners, workers with disabilities and all classifications of dislocated worker. **Veterans, Ex-Offenders?**
- Page 72 – Goals of the Workforce Development system in Hawai'i – 2 – “To prioritize services to vulnerable populations, specifically homeless individuals and Native Hawaiians.” **Veterans and spouses, Ex-Offenders, Persons with disabilities?**
- Page 72 – (4) Assessment – “describe how the state will assess the overall effectiveness of the workforce development system in the state in relation to the strategic vision and goals stated above, and how it will use the assessment results to make continuous or quality improvements.” **Response – WDC to complete**
- Page 73/74 – last sentence – “This system will address the US Dept of Labor's six key elements of Career Pathways to ensure that those essential components are included:...” **Only 5 listed**
- Page 82/83 – 1<sup>st</sup> Paragraph, 2<sup>nd</sup> Sentence – “...DLIR had been using and will continue to use HireNet Hawai'i... **Counties looking into other programs, HireNet is not working**
- Page 83 C) Coordination, Alignment, and Provision of Services to Individuals... **What about the other vulnerable populations?**

- Page 86 D) Coordination, Alignment, and Provision of Services to Employers... **Tracking does not answer providing high quality services**
- Page 87 – 1<sup>st</sup> Paragraph – “Services to employers provided by core partners will be tracked in HireNet Hawai‘i so that core partner staff can better coordinate services and avoid or reduce duplication.” **Employers do not use HireNet**
- Page 89 – (F) Partner engagement with other education and training providers (table) **What about the other ETPs?**
- Page 89 – Two paragraphs under the Other Education and Training Partners Chart, starting with “On October 1, 2012...” **Expired?**
- Page 90 – First 6 paragraphs – **is this going to be a strategy?**
- Page 90 – last paragraph – “Following the end of the meeting on March 31, the software industry in Hawai‘i has been active in putting into action the proposals made at the Skills Panel meeting...” **What year?**
- Page 91 – Paragraph 5 – **How much funding is available today?**
- Page 95 – Last paragraph – “The WDC has and will continue to take a proactive role...” - **Local areas are waiting for guidance.**
- Page 99 – Flow chart – **Does not match what was provided by WDC**
- Page 101 – **David Deluz, Jr. is Chair (currently listed as Vice-President)**
- Page 119 – Section IV: Coordination with Combined State Plan Programs – **Not answered. Also, why is New Day Plan being referenced in the 4<sup>th</sup> paragraph? In the 5<sup>th</sup> paragraph “State Workforce Investment Board” should be changed to Workforce Development Board”**
- Page 120 – Section 4 in the 3<sup>rd</sup> point – **define who the “lead State agencies” are.** In the 4<sup>th</sup> point a and b – **what is the assurance?**
- Page 121 – **Alphabetize counties or sort by population**, point 7 – “appropriate action” – **what are they?** Point 11 – **what is DVOP?** Last paragraph – **change “investment” to “development”**
- Page 122 – Point 1. “The smallest are for federal Labor Market Information (“LMI”) data is the county level. State LMI data is collected for the islands and the counties, but is not available for sub-areas.” – **Not a coherent statement.** Point 2. – “subject areas” – **which ones?**
- Page 123 – First bullet “Services are delivered “seamlessly” so that participants are unaware that the services provided at the One-Stop are being delivered by multiple agencies and through multiple funding streams. **Not accurate – participants are aware that multiple agencies participate in the One-Stop**
- Page 124 – First Paragraph – **“At this time** Hawai‘i’s One-Stop Job Centers and Youth Programs use HireNet Hawai‘i for common intake...” **Insert “At this time” to begin the sentence.**
- Page 124 – (B) “Describe how the State intends to use Governor’s set aside funding. Describe how the State will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to

address at risk companies and workers.” **Maui Sugar Cane fields – Money from Federal Government. Response does not answer the question.**

- Page 126 – (b) Adult and Dislocated Worker Program Requirements (1) Work-Based Training Models – If the State is utilizing work-based training models (e.g. on-the-job training, incumbent worker training, transitional jobs, and customized training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State’s strategies for how these models ensure high quality training for both the participant and the employer. **Response does not answer the question**
- Page 127-128 – (4) “Describe how the State will implement and monitor the priority for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134©(3)(E), which applies to individualized career services and training services funded by the Adult Formula program.”

Response - “The State has determined that unless the funds allocated to a local area for WIOA Adult employment and training activities are sufficient to provide adequate services to atleast 25% of that area’s adult poverty population, the funds will be considered limited. Currently, the funds are considered limited in all the local areas, therefore, priority of service will be given to recipients of public assistance and those meeting the definition of low-income.” **Basic skills deficient, priority of services be factored in at all times rather than when funds are limited.**

- Page 128 – (5) “Describe the State’s criteria regarding local area transfer of funds between the adult and dislocated worker programs.” **Response – “WDC will update its WIA requirements”**
- Page 128 – (c) “Youth Program Requirements. With respect to youth workforce investment activities authorized in section 129 of WIOA – (1) Identify the State developed criteria to be used by local boards in awarding grants for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as describe in section 116(b)(2)(A)(ii) of WIOA in awarding such grants.” **Response – “WDC will issue criteria for grant awards.”**
- Page 129 – (3) “Describe how the state will ensure that all 14 program elements described in WIOA section 129(c)(2) are made available and effectively implemented.” **Response – WDC will issue programmatic requirements.**

PAGE #	PASSAGE/QUOTE:	COMMENTS & CORRECTIONS:
Throughout Draft	The draft confuses Governors – it references past and current Governors all as if they are the current Ige Administration. For example, it talks about the “New Day,” and it talks about various skills panels from years past.	<p>The draft needs to accurately identify which Governor it is talking about.</p> <p>Please edit out old projects long ago completed and expired under the old law.</p> <p>Many sections of the draft Unified Plan appear to be copied from the old plan that was administered under the old law. These sections should be deleted.</p>
Throughout draft	The draft state Unified Plan does not provide a clear overview of how it interrelates with the Local Boards’ plans.	Recommend adding a section or appendix that provides the reader with an overview of the state plan and the local plans – how they are similar and how they are different.
5	NOTE (bottom of page) – The original draft of the Unified State Plan was collaboratively developed and thoroughly vetted with a wide range of stakeholders. , workforce system stakeholders met periodically to develop a vision, shared goals and a service delivery strategy for the Unified State Plan. The stakeholder group was comprised of representatives from the core partner agencies, state and local workforce boards, the American Job Centers...	<p>CORRECTION: <u>Beginning in December 4, 2015</u></p> <p>Note: The first time Local Boards were invited to participate in Unified State Plan meetings was December 4, 2015</p>
7 & throughout draft	<p><b>Traded Cluster</b> – identifies Hawaii’s major industries clusters as:</p> <ul style="list-style-type: none"> <li>• Hospitality and tourism</li> <li>• Electric power generation and transmission</li> </ul>	<ul style="list-style-type: none"> <li>• The Local Boards will be using other, more current sources of data for the economic analysis sections of the Local Plans and requests that a</li> </ul>

	<ul style="list-style-type: none"> <li>• Water transportation</li> <li>• Environmental Service</li> <li>• Fishing and fishing products</li> <li>• Music and sound recording</li> <li>• Jewelry and precious metals</li> </ul> <p>(Source: Hawaii Comprehensive Economic Development Strategies [CEDs] process )</p>	<p>more representative economic analysis also be included in the State’s Unified Plan.</p> <ul style="list-style-type: none"> <li>• Why is the Hawaii Comprehensive Economic Development Strategies process used as the basis for the “economic analysis” when there are also an array of other more frequently referenced economic and business-focused reports available.</li> <li>• This data is outdated</li> <li>• This data does not accurately reflect modern day innovations and strategies for growing Hawaii’s economy</li> <li>• There are very well-respected organizations such as the Hawaii Business Roundtable, UHERO, the University of Hawaii, etc. that have more current and accurate data regarding Hawaii’s largest industries, emerging industries and industries with future economic impact (jobs impact).</li> </ul> <p>STRONGLY RECOMMEND: The plan be amended before passage to delete outdated data and insert current data such as the facts and statistics included in the “<b>Hawaii Innovation Assets Report</b>” commissioned by the Hawaii Business Roundtable and support by the Chamber of Commerce of Hawaii, the University of Hawaii, all the county governments in Hawaii and the Pacific Resource Partnership.</p>
8	<p>Hawai`i Island Economic Outlook – “The outlook for 2016 of Hawai`i Island continues to be good due to continuing strength in the <b>tourism market</b> and</p>	<p>Why is this source’s opinion quoted and not others that address more than just tourism?</p> <p>This concern holds true for all counties.</p>

	<p>residential construction. What is promising for the Big Island, is a diversification in the destinations from which visitor are arriving. Hawai'i Island has always had more Japanese visitors than other outer island, but a weak yen and still no direct airlift <b>reduced</b> their count by <b>14%</b> in 2015. Helping to offset this was a nearly 10% increase in Canadian visitors.”</p>	<p>The lack of economic analysis makes it difficult to perceive this draft plan as being business led.</p>
28	<p>First paragraph, last sentence – “...In May 2015, the Research and Statistics Office conducted a soft skills survey of businesses that will aid in the development of training videos.”</p>	<p>When will these videos be developed and who will fund their development?</p>
64	<p>The draft says there are four American Job Centers in Hawaii...</p>	<p>The Local Boards oversee more than 4 American Jobs Centers. Please correct.</p>
72	<p>Goals of the Workforce Development system in Hawai'i – 2 – “To prioritize services to vulnerable populations, specifically homeless individuals and Native Hawaiians.”</p>	<p>Corrections – need to add:</p> <ul style="list-style-type: none"> <li>• To be business led and business demand-driven</li> <li>• Additional vulnerable populations: veterans and their spouses, ex-offenders and persons with disabilities</li> </ul>
72	<p>(4) Assessment – “describe how the state will assess the overall effectiveness of the workforce development system in the state in relation to the strategic vision and goals stated above, and how it</p>	<p>A description is missing.</p>

	will use the assessment results to make continuous or quality improvements.”	
73 & 74	“This system will address the US Dept of Labor’s six key elements of Career Pathways to ensure that those essential components are included:...”	The list is incomplete. Just five elements were listed.
82 & 83	“...DLIR had been using and will continue to use HireNet Hawai’i...”	<p>HireNet Hawaii is not working.</p> <p>A common criticism from business users is that they “hate it.”</p> <p>This system costs all counties and the state approximately \$500,000 per year.</p> <p>The Local Boards are looking into other companies to provide the software/reporting capabilities. Most of whom appear to have greater functionality, adaptability and customer service. All have the capability to plug-and-play with existing systems of the core partners.</p> <p>The Local Boards do not believe it is prudent to name a specific for-profit vendor by name (Geographic Solutions) in a planning document when this contract must go out to RFP.</p> <p>The plan must differentiate between the state’s name for the system currently called “HireNet Hawaii” versus the current vendor “Geographic Solutions”</p> <p>Remove “and will continue to use”</p>
87		

	<p>“Services to employers provided by core partners will be tracked in HireNet Hawai‘i so that core partner staff can better coordinate services and avoid or reduce duplication.”</p>	<p>Again, employers/businesses do not use HireNet Hawaii/Geographic Solutions even though posting job openings on it is free.</p> <p>Instead, businesses would rather pay out-of-pocket to list their job openings on other sites. Therefore, how can it be accurate, useable or business driven?</p>
123	<p>“Services are delivered “seamlessly” so that participants are unaware that the services provided at the One-Stop are being delivered by multiple agencies and through multiple funding streams.</p>	<p>Not accurate – participants are aware that multiple agencies participate in the One-Stop</p>
126	<p>(b) Adult and Dislocated Worker Program Requirements (1) Work-Based Training Models – If the State is utilizing work-based training models (e.g. on-the-job training, incumbent worker training, transitional jobs, and customized training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State’s strategies for how these models ensure high quality training for both the participant and the employer.</p>	<p>This statement does not answer the federal Unified Plan question.</p>
129	<p>(3) “Describe how the state will ensure that all 14 program elements described in WIOA section 129(c)(2) are made available and effectively implemented.”</p>	<p>This question was not answered.</p>

**From:** Ishimoto, Kimberly  
**Sent:** Tuesday, March 22, 2016 8:54 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Public Comments on the WIOA Unified State Plan

Hi Allicyn,

My name is Kim Ishimoto and I am a Planner at the Hawaii State Office of Planning, DBEDT. I am the Project Manager at the State working on the Comprehensive Economic Development Strategy (CEDs). I received your contact information from Mary Alice Evans, DBEDT's Deputy Director.

I was hoping you could consider DBEDT's input on two items:

- 1) In your report the Department of Business, Economic Development and Tourism (DBEDT) is referred to as DBED. Do you think this could be corrected to the correct acronym?
- 2) DBEDT releases a Targeted and Emerging Industries Report every year which is produced by our Research and Economic Analysis Department (READ). I know Scott Murakami has worked with them on the CEDs. DBEDT was hoping you might review their information and include them as a citation for the Unified Plan.  
[http://dbedt.hawaii.gov/economic/reports\\_studies/emerging-industries/](http://dbedt.hawaii.gov/economic/reports_studies/emerging-industries/)

Please feel free to call or email me if you have any questions. Thank you!

~Kim Ishimoto  
Office of Planning  
[REDACTED]