



Survival Coalition

of Wisconsin Disability Organizations

P.O. Box 7222, Madison, Wisconsin 53707

January 13, 2016

The Survival Coalition of more than 30 Wisconsin disability organizations thanks the Department of Workforce Development for allowing us to comment on the Wisconsin Workforce Innovation and Opportunity Act state plan. Overall, the Wisconsin plan contains a strong emphasis on prioritizing employment for people with disabilities, including those with the most significant disabilities. The Vocational Rehabilitation portion of the plan is clear in its strategies for diminishing the pipeline to sub-minimum wage facilities for youth with significant disabilities, and overviews many of the innovative practices that can lead to better job matches and sustained employment for people with disabilities. Here are some of our concerns and recommendations about Wisconsin's plan:

- Overall, the plan lacks integration and perpetuates the siloed response by systems that people with disabilities often experience. There is little to no reference in the sections outside the Vocational Rehab section about how people with disabilities can and should participate in the wide range of workforce programs and opportunities referenced in other sections of the plan. Nor are there outlined accommodations referenced that would invite and support people with disabilities to participate in the wide array of DWD employment programs outside Voc Rehab. For instance, no mention of how people with disabilities could participate in youth jobs programs, internships, work experiences, etc. outside DVR are mentioned. And no reference to how these programs could support people with disabilities, such as offering internships on bus routes or offering transportation to sites via Uber/Lyft private driving services or paratransit are mentioned. Offering mobile and on-line one-stops and Job centers also would help alleviate the added transportation barriers people with disabilities often face. It appears that the Voc Rehab section of the plan is expected to solely support the employment needs of people with disabilities in the state.
- Likewise, no representatives of DVR or individuals with disabilities are identified to serve on the Council on Workforce Investment. The voice of people living with disability and those who have expertise in serving the disability community are needed in this leadership/decision-making capacity.
- We appreciate the focus on partnerships with the juvenile facilities but read nothing about helping them specifically with education and transition. Youth with disabilities make up a disproportionate number of youth in juvenile facilities, and have additional barriers to employment. Specific supports to these facilities is necessary.
- The labor market information is described too narrowly. People with disabilities can be described in this plan as an under-tapped potential labor pool. The untapped potential of people with disabilities as workers is not acknowledged and could be. Some studies have shown that 70% of working-aged people with disabilities say

they want to work or want to work more than they currently do: a huge potential asset to Wisconsin with no overall details on how to tap into this resource.

- Programs across DWD, and particularly DVR, need to develop a rapid engagement strategy when working with businesses that can provide equipped workers with disabilities to meet employer needs. Repeatedly, our organizations meet with businesses who are ready and able to hire people with disabilities, yet need the support and technical assistance to find and train qualified workers. Businesses tell us they need employees in the next week or month, and cannot wait for lengthy meetings, paperwork, and protocols in order to fill positions.
- DVR continues to struggle with high counselor turnover rates, particularly in southeastern Wisconsin. This contributes to delays in developing and implementing a service plan, and often lengthy DVR experiences for clients before services begin. Unwieldy caseload numbers contribute to the problem. DVR needs to engage in a detailed self-examination of high counselor turnover, including exit interviews to explore why counselors are leaving. The Department also needs to commit to commensurate pay within industry standards for VR counselors who have master's degrees in their field. Few graduates of Wisconsin voc rehab master's programs are seeking employment in DVR, in large part because other jobs pay much higher than DVR counselor positions.
- Provider capacity continues to be a challenge in serving people with the most significant disabilities, particularly related to quality and number of supported employment vendors in the state. The plan needs to acknowledge the shortages in the current provider network, and provide a plan for increasing the pool, particularly in respect to the significant increase in youth who must be served, including youth with the most significant disabilities.

Survival Coalition is highly supportive of the direction DVR is taking in implementing WIOA, and many of the practices and goals identified in the VR section are models for the country. We believe that the inter-agency collaboration between DVR and other state agencies is at one of its highest levels ever, in part fueled by new federal requirements and federal grants such as PROMISE and Let's Get to Work that mandated inter-agency partnership in order to obtain funds. Survival Coalition would like to see that same level of cross-pollination and integration across all DWD employment programs so that people with disabilities benefit from the full array of employment opportunities and resources available from DWD, not just resources available through the Voc Rehab Division.

Thank you again for the opportunity to provide input on this very exciting and promising effort to maximize employment for all Wisconsin residents.

Survival Coalition is comprised of more than 30 statewide disability organizations that advocate and support policies and practices that lead to the full inclusion, participation, and contribution of people living with disability.

Sincerely,

Survival Co-Chairs:

Maureen Ryan, moryan@charter.net; (608) 444-3842;
Beth Swedeen, beth.swedeen@wisconsin.gov; (608) 266-1166;
Kristin M. Kerschensteiner, kitk@drwi.org; (608) 267-0214

Survival Coalition Issue Teams: education, employment, housing, long term care for adults, long term care for children, mental health, transportation, workforce, voting, Medicaid and health care.

Real Lives, Real Work, Real Smart, Wisconsin
Investing in People with Disabilities