

U.S. Department of Labor

Office of Inspector General—Office of Audit



INFORMATION ON DOL'S EFFORTS TO ENSURE ACCESS FOR PERSONS WITH DISABILITIES TO THE ONE-STOP CAREER SYSTEM

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**U.S. Department of Labor
Office of Inspector General
Office of Audit**

BRIEFLY...

Highlights of Report Number: 25-10-001-03-390 to the Assistant Secretaries for Employment and Training, Administration and Management, and Disability Employment Policy.

WHY READ THE REPORT

Unemployment among persons with disabilities remains high, with a reported unemployment rate of 13.8 percent in December 2009. Moreover, the Employment and Training Administration estimates that an additional 20 million working age individuals with disabilities have dropped out of the labor market.

The Workforce Investment Act of 1998 (WIA) was designed to provide employment and training services to assist eligible individuals in finding, and qualifying for, meaningful employment through a One-Stop service delivery system. Section 188 of WIA requires that recipients of WIA financial assistance provide persons with disabilities equal opportunity to participate in and benefit from One-Stop services.

WHY OIG CONDUCTED THE REVIEW

The review was initiated in response to a Congressional request, and addressed the following questions:

1. What are DOL's goals for serving persons with disabilities?
2. What information does DOL have regarding the characteristics and needs of persons with disabilities?
3. What types of services are persons with disabilities receiving from the One-Stop System?
4. What outcomes are achieved by persons with disabilities who use the One-Stop System?
5. What evaluations of WIA services to persons with disabilities has DOL conducted?

The review covered services and outcomes for exiters in the WIA Adult, Dislocated Workers, and Youth programs between Program Years 2003-2008. OIG based its review solely on information provided by DOL; we did not test its accuracy or reliability.

READ THE FULL REPORT

To view the report, please go to:

<http://www.oig.dol.gov/public/reports/oa/2010/25-10-001-03-390.pdf>

March 2010

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WHAT OIG FOUND

Except for veterans, for whom Federal law mandates priority of services, the One-Stop system as a whole does not give preference to serving any particular group, and the Department has not established quantifiable goals for serving persons with disabilities through the One-Stop system.

Information DOL has on the characteristics and needs of WIA participants with disabilities is limited. Disclosure of a disability is voluntary and many participants may not self-disclose, likely resulting in under-reporting of the number of participants with disabilities. The characteristics reported indicate whether a participant has a disability but not the nature of the disability. Information regarding the nature of the disability could help States and local workforce agencies to develop appropriate service strategies.

Overall, persons with disabilities receive the same basic services – such as job search, case management, and occupational skills training – as those without disabilities, although their rates of participation in those services may vary. DOL's most visible initiative for helping persons with disabilities access and benefit from the One-Stop system has been the Disability Navigator Program. Disability Navigator positions were established in 42 states, the District of Columbia, Puerto Rico, Guam and the U.S. Virgin Islands to better inform people with disabilities about the work support programs available at One-Stop Career Centers.

Program exiters with disabilities generally had lower entered employment rates compared to all exiters. For example, WIA Adult exiters with disabilities had a 53.4 percent entered employment rate compared to 68.1 percent for all exiters. However, the employment retention rate for exiters with disabilities was about the same as the retention rate achieved by all exiters.

Since 2003, the Department has conducted several independent evaluations of its initiatives to improve One-Stop services for persons with disabilities, including evaluations of the Disability Program Navigator initiative and various demonstration projects. Ongoing or planned evaluations include an evaluation of the \$24 million Disability Employment Initiative, and a review of strategies used by States that serve a high percentage of youth with disabilities while meeting their performance goals.

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U.S. Department of Labor

Office of Inspector General
Washington, D.C. 20210



March 10, 2010

Assistant Inspector General's Report

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This report is in response to a request from Congress to provide information about the Department of Labor's efforts to ensure that persons with disabilities have comprehensive access to the One-Stop Career System (One-Stop). Comprehensive access describes a range of positive actions that recipients of Workforce Investment Act (WIA) financial assistance might take to provide persons with disabilities equal opportunity to participate in One-Stop services. Examples of these positive actions include, but are not limited to, providing architectural access, program accessibility, and reasonable accommodation. We limited our review to comprehensive access for persons with disabilities in the WIA formula programs for Adults, Dislocated Workers, and Youth available through the One-Stop System.

Title I of the Workforce Investment Act (WIA) of 1998 provides funding to States to provide employment and training services to adults, youth, and dislocated workers. For Fiscal Year 2010, Congress approved a total of \$2.045 billion for the WIA formula programs. Section 188 of the Workforce Investment Act (WIA) of 1998 prohibits discrimination on the basis of disability and other factors such as age, gender, and race and national origin. The Department of Labor's (DOL) regulations implementing the nondiscrimination provisions of WIA state that any recipient of WIA financial assistance must ensure that persons with both physical and other disabilities (e.g., cognitive, mental health) are provided equal opportunity to participate in, and benefit from, WIA-financially assisted employment and training services offered through the One-Stop System.

Three DOL agencies currently play a role in promoting employment and training, or ensuring equal opportunity to receive employment and training, for persons with disabilities. The Civil Right Center (CRC), within the Office of the Assistant Secretary for Administration and Management (OASAM), is responsible for administering and enforcing WIA Section 188. The Employment and Training Administration (ETA) monitors States' and local workforce areas' compliance with WIA Section 188, and supports special initiatives to increase accessibility for persons with disabilities. The Office of Disability Employment Policy (ODEP) conducts research and evaluations to

guide the development of policies that promote WIA accessibility and employment for persons with disabilities.

Our objective was to obtain information from the Department to answer the following questions:

1. What are the Department's goals for serving persons with disabilities?
2. What information does the Department have regarding the characteristics and needs of persons with disabilities?
3. What types of services are persons with disabilities receiving from the One-Stop System?
4. What outcomes are achieved by persons with disabilities who use the One-Stop System?
5. What evaluations of WIA services to persons with disabilities has the Department conducted?

To achieve these objectives, we developed a list of questions covering each of the five areas. ETA, ODEP and CRC each provided written responses to the questions. The questionnaires and the agencies' responses are included as Appendices E, F, and G. We conducted follow-up interviews with appropriate program officials to obtain clarification of the information provided. We also reviewed relevant material and guidance provided by the agencies and information on the web sites of ETA, ODEP, and CRC, including data on services and outcomes for persons with disabilities reported by ETA through its Workforce Investment Act Standardized Record Data (WIASRD) system for Program Years 2003-2008.

We conducted our work at DOL headquarters in Washington, D.C., from December 2009 to February 2010. Our objective, scope, methodology, and criteria are detailed in Appendix B.

RESULTS IN BRIEF

Section 188 of the Workforce Investment Act and its implementing regulations require that recipients of WIA financial assistance provide persons with disabilities equal opportunity to participate in and benefit from the One-Stop services afforded to persons without disabilities. Except for veterans, for whom Federal law mandates priority of services, the One-Stop System as a whole does not give preference to serving any particular group with specific services, and the Department has not established quantifiable goals for serving persons with disabilities through the One-Stop System. The Department is considering establishing quantitative performance measures to chart the progress of the One-Stop System in providing comprehensive access to persons as part of the FY 2010 Disability Employment Initiative.

CRC is responsible for administering and enforcing the non-discrimination and equal opportunity provisions of WIA, including provisions designed to ensure that persons with disabilities have equal opportunity to participate in and benefit from the aid, benefits, training, and services afforded to those without disabilities. CRC assesses compliance with Section 188 of WIA through several methods. The primary method is through review of States' "Methods of Administration" (MOA).

The MOA is a document that the WIA nondiscrimination regulations require each State to develop and review every two years. The MOA must describe how the State will ensure that its agencies and recipients of WIA financial assistance are complying with the legal requirements set forth in WIA Section 188 and the WIA nondiscrimination regulations, including the requirements related to disability. Where a revised MOA, or a Governor's certification that no revision is necessary, indicates possible noncompliance, CRC investigates further, and works with the State until all identified violations have been corrected. According to CRC officials, once the MOA is approved, CRC uses it as a tool for monitoring compliance by the State and its recipients.

CRC stated it also conducts compliance reviews. Compliance reviews are investigations focused on an entity's, or specific entities', compliance with particular equal opportunity (EO) obligations. Such a review may be prompted by the filing of a complaint, or the receipt of other reliable information that indicates the possibility of a violation, as well as by information obtained during an MOA review. Alternatively, CRC may initiate a compliance review as part of an overall compliance monitoring plan or an agency initiative regarding a particular issue, such as disability or limited English proficiency. Depending on the circumstances, a compliance review may or may not include on-site visits.

CRC stated it relies on State and local workforce area Equal Opportunity Officers to conduct technical on-site assessments of recipients' compliance with *physical accessibility* obligations, including the obligations to provide both architectural and programmatic accessibility. Under *architectural accessibility* requirements, recipients must construct covered facilities, or portions of facilities, to comply with specific technical standards, similar to building codes, that have been developed by the U.S. Access Board and adopted by the General Services Administration (GSA). *Program, or*

programmatic accessibility, by contrast, generally does not require compliance with a specific set of technical standards. Rather, it permits a more flexible approach, under which a recipient may take various common-sense steps to ensure that the physical aspects of each covered program or activity are “readily accessible to” persons with disabilities “when each part is viewed in its entirety.” Such common-sense steps include “redesign of equipment, reassignment of classes or other services to accessible buildings, assignment of aides to beneficiaries, home visits, delivery of services at alternate accessible sites, alteration of existing facilities and construction of new facilities ... or any other method that results in making [a recipient’s] program or activity accessible to” persons with disabilities.

CRC said it also relies on ETA Federal Project Officers (FPO) to monitor WIA recipients’ compliance with WIA Section 188. According to ETA, during on-site monitoring, FPOs use a Core Monitoring Guide, which requires documenting whether or not the WIA recipient has policies and procedures in place to ensure compliance with Section 188. With regard to all other aspects of compliance with nondiscrimination requirements, including those related to disability, CRC said that it provides Federal-level oversight.

CRC also receives and processes complaints alleging violations of WIA Section 188 and its implementing regulations, including the disability-related provisions. CRC reported that it accepted 28 disability-related complaints for investigation during the period 2003 to 2009.

The information the Department has on the characteristics and needs of WIA participants with disabilities is limited. The characteristics reported indicate whether a participant has a disability but currently no information is collected on the nature of the disability. Additionally, ETA and ODEP indicated that many participants may not self-disclose their disabilities and as a result, the number of participants with disabilities is likely under-reported. An ongoing evaluation of the Disability Program Navigators (DPN) initiative, a planned revised reporting system, and the FY 2010 Disability Employment Initiative may provide better information on needs and characteristics in the future.

ETA indicated that overall, persons with disabilities who participate in WIA Adult, Dislocated Workers, and Youth Programs receive the same basic services — such as job search, case management and occupational skills training — as those without disabilities. In the Adult and Dislocated Worker programs, the PY 2008 rate of participation of persons with disabilities in WIA services varied compared with all WIA participants. In contrast to the WIA Adult and Dislocated Workers programs, PY 2008 data for youth with disabilities indicated that they participated in WIA services as much or more than all youth participants.

In the adult and dislocated worker programs, the core indicators of performance are the entered unsubsidized employment rate, retention in unsubsidized employment 6 months after entry, and earnings in unsubsidized employment 6 months after entry into employment. The core indicators of performance for youth include, among other measures, the entered unsubsidized employment rate, credential rate, skill attainment rate, and diploma attainment rate. Program exiters with disabilities generally had lower

entered employment rates compared to all exiters. For example, WIA Adult exiters with disabilities had a 53.4 percent entered employment rate compared to 68.1 percent for all exiters. However, the employment retention rate for WIA Adult exiters with disabilities was about the same as the retention rate achieved by all exiters. Another indicator of the outcome of DOL's efforts to serve participants with disabilities is data from the DPN initiative. ETA reported that for Program Years 2006 through 2007, the entered employment rate for local Workforce Investment Boards with a DPN was 65 percent compared to 56 percent to those without a DPN. Additionally, the retention rate was nearly identical — 79 percent for WIBs with the DPN and 80 percent for those without.

Since 2003, the Department has conducted several independent evaluations of its initiatives to improve One-Stop services for people with disabilities, including evaluations of the Disability Program Navigator initiative and various ODEP demonstration projects. Ongoing or planned assessments of how the One-Stop System provides access and services to persons with disabilities include an evaluation of the Disability Employment Initiative, and a review of strategies used by States that serve a high percentage of youth with disabilities while meeting their performance goals. ODEP also plans to evaluate its technical assistance centers and conduct a survey to assess One-Stop programmatic and physical accessibility.

RESULTS

1. What are the Department's goals for serving persons with disabilities?

There do not appear to be quantifiable goals or performance measures that assess DOL's progress in achieving its statutory responsibility to ensure comprehensive access for persons with disabilities. Under a joint \$24 million initiative launched in FY 2010, ETA and ODEP advised they will develop performance measures for state grantees that could potentially include information to assess the Department's progress in this area.

Although the Department does not have quantifiable goals for serving persons with disabilities through the One-Stop system, it has statutory responsibilities to ensure that recipients of WIA financial assistance provide persons with disabilities equal opportunity to participate in and benefit from the services afforded to persons without disabilities. The Department's Civil Rights Center, located in the Office of the Assistant Secretary for Administration and Management, enforces Federal statutes and regulations that require the One-Stop system to provide such equal opportunity. CRC's primary method for monitoring compliance is its reviews of each State's Methods of Administration. An MOA contains the State's plan for ensuring that it and its recipients will comply with these disability-related requirements, as well as other, more general Federal requirements related to equal opportunity and nondiscrimination. CRC also conducts compliance reviews at the State, local, and One-Stop Center/service provider levels, and investigates complaints of alleged violations of civil rights-related legal requirements in One-Stop programs, including disability-related complaints.

Goals

The Department does not have quantitative goals related to serving persons with disabilities in the WIA One-Stop System. ETA explained that the purpose of the WIA One-Stop System is to provide “universal” access to Federally-funded workforce services for all people. Except for veterans — for whom Federal law mandates priority of services — the One-Stop System as a whole does not give preference to serving any particular groups with specific services. Accordingly, ETA’s mission is to provide the same services to all targeted groups — populations that may face multiple barriers to employment. Persons with disabilities are one of these groups — along with others such as TANF recipients and older workers.

ETA stated that its goal for providing comprehensive access to the One-Stop System for persons with disabilities is to have a system that provides integrated, meaningful, and effective participation in all programs and activities for persons with a range of disabilities. ETA indicated that it uses the WIA performance measures and compiles qualitative and quantitative information from Disability Program Navigators (DPN), stakeholders, etc., to measure progress toward improving access to the One-Stop System. ETA stated that it has not conducted any risk assessments to identify factors that could limit accessibility of One-Stop services to people with disabilities.

The Office of Disability Employment Policy is the only DOL agency with explicit performance goals related to promoting training and employment for people with disabilities. ODEP’s role is focused mainly on developing policies and resources that the Department can implement and disseminate within the public workforce investment system. According to DOL’s FY 2009 Performance and Accountability Report, ODEP achieved its quantitative output goals related to the number of policy-related documents, formal agreements and effective practices issued. Since ODEP was established by Congress in FY 2001, the agency has funded numerous demonstration projects to increase training and employment opportunities for persons with disabilities. See Chapter 5 for more information on ODEP’s projects and related evaluations.

In December 2004, GAO issued a report entitled “Workforce Investment Act: Labor Has Taken Several Actions to Facilitate Access to One-Stops for Persons with Disabilities, but These Efforts May Not Be Sufficient.” GAO recommended that DOL develop and implement a long-term plan for ensuring that the One-Stops comply with the comprehensive access requirements. In March 2005, DOL responded to GAO and indicated that ETA, CRC and ODEP would work together to develop a comprehensive, long-term strategic plan to address the One-Stop’s system’s provision of services to people with disabilities. The response also indicated that DOL would begin by developing a framework for the plan. This framework, finalized and approved on October 1, 2008, set forth two overarching goals to promote the creation of a public workforce system that is fully inclusive of and able to effectively serve and meet the needs of people with disabilities:

1. Excellence in Service Delivery — Promote excellence in service delivery for persons with disabilities in the workforce investment system.
2. Promote Compliance — Develop and implement a long range, coordinated plan for oversight and enforcement of disability-related statutes and regulations, and build the system’s capacity to comply with those rules.

See Appendix H for a copy of the framework developed in response to the December 2004 GAO report.

Department-wide strategic planning efforts, as well as the Disability Employment Initiative that Congress included in DOL’s FY 2010 budget, suggest the Department may consider performance measures to chart progress in providing comprehensive access to the One-Stop System for persons with disabilities in the future.

For example, according to Department officials, for FY 2011 and beyond, ODEP has proposed a new model to measure its performance. This model uses “short-term (output), intermediate, long-term, and strategic measures” that will help ODEP to measure its impact on improving the accessibility of the WIA One-Stop System for persons with disabilities and their outcomes upon program exit.¹

Office of Disability Employment Policy				
Measures	Short-term (Output) Measures	Intermediate	Long-Term	ODEP Outcome / Strategic Goal
Explanations	Formal Agreements Effective Practices Policy Outputs	Increase the number of people with disabilities served by the One Stop Career Centers.	Increase the number of people with disabilities exiting the One Stop Career Centers employed at minimum wage or better.	Increase the labor market participation rate and earnings for people with disabilities

ETA and ODEP have also entered into a Memorandum of Agreement² to define the roles and responsibilities of the two agencies for the development and implementation of the joint Disability Employment Initiative. The purpose of this \$24 million initiative is to continue what ETA determined to be the promising practices implemented by DPN and build effective community partnerships that leverage public and private resources to better serve individuals with disabilities and improve employment outcomes. The agreement states that ETA and ODEP will establish performance measures for state grantees and objectives.

¹ Information on ODEP was provided in an email from the Director, Center for Program and Performance Results, to OIG on January 15, 2010.

² ETA officials state that the Memorandum of Agreement and the Report to Congress have subsequently been submitted to Congress.

In a draft copy of the implementation plan for the initiative, ETA and ODEP cited some possible measures to assess the success of the effort of the state grantees.

Participant Outcome Measures:

- Customer satisfaction
- Improvements in employment rate
- Improvements in employment retention rate
- Improvements in wages
- Improvements in enrollment in postsecondary education, including registered apprenticeship and other training through WIA

Workforce Development System Outcome Measures:

- Improved Capacity
- Increased Coordination
- Improved Quality of Services (Customization, Consumer Choice, Support Services, and Employer Supports)
- Adaptation and Evaluation of Effective Practices
- Dissemination of Effective Practices
- Sustainability

Assessing Compliance with Comprehensive Access Requirements

Although the Department does not have quantifiable goals for serving persons with disabilities through the One-Stop system, it has statutory responsibilities to ensure that recipients of WIA financial assistance provide persons with disabilities equal opportunity to participate in and benefit from the One-Stop services afforded to persons without disabilities. Section 188 of WIA, 29 U.S.C. 2938 (WIA Section 188), prohibits discrimination on the grounds of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and for beneficiaries only, citizenship or participation in a WIA Title I-financially assisted program or activity. Federal regulations to implement WIA Section 188³ include provisions requiring that recipients of Federal financial assistance must ensure both that their facilities comply with applicable standards for architectural accessibility, and that their programs and activities comply with program accessibility requirements. The regulations also require recipients to take additional positive actions to ensure equal opportunity for persons with disabilities, such as providing reasonable accommodations and modifications, ensuring equally effective communications, and providing services and information in the most integrated setting appropriate to the needs of persons with disabilities.

Under Federal regulations, the Department of Labor's Civil Rights Center is responsible for administering and enforcing WIA Section 188, which contains the non-discrimination and equal opportunity provisions of WIA, and the regulations enforcing implementation of that section, published at 29 CFR part 37. CRC is also responsible for developing and issuing policies, standards, guidance, and procedures for affecting compliance with WIA Section 188 and 29 CFR Part 37. CRC's jurisdiction covers all programs and

³ See 29 CFR Part 37.

activities offered by the One-Stop partners listed in Section 121(b) of WIA, including programs and activities whose primary source of financial assistance is another Federal Department or agency — such as the Department of Education or the Department of Housing and Urban Development.

CRC assesses compliance with WIA Section 188 primarily through biennial reviews of each State’s “Methods of Administration.” It also conducts compliance reviews and investigates complaints. The number and type of disability-related complaints CRC processes could be one indicator of how well One-Stops are providing comprehensive access.

Methods of Administration (MOA)

Each State’s Governor must develop an MOA, submit it to CRC for review, and conduct a biennial review of the document to determine whether any changes are necessary. The MOA describes how the State ensures that its own agencies and its recipients of WIA financial assistance — including One-Stop Career Centers — will comply with the nondiscrimination and equal opportunity requirements of WIA Section 188 and 29 CFR part 37, including the requirements related disability. The MOA must include a description of how the State will assure that covered recipients comply with specific disability-related requirements. At a minimum, the State must describe how it will ensure that recipients:

- meet their obligation not to discriminate on the basis of disability;
- provide reasonable accommodation and reasonable modification of policies, practices and procedures for individuals with disabilities;
- provide architectural accessibility for individuals with disabilities;
- administer WIA Title I financially-assisted programs and activities so persons with disabilities participate in the most integrated setting appropriate to that individual;
- communicate with persons with disabilities as effectively as with others;
- provide programmatic accessibility for persons with disabilities;
- provide for and adhere to a schedule to evaluate qualifications for employment with the recipient, and for participation in the programs and activities offered by the recipient, to ensure that the qualifications do not discriminate on the basis of disability;
- limit medical and disability-related inquiries to those permitted by, and in accordance with, applicable law; and

- ensure the confidentiality of all medical and disability-related information about individual customers, applicants, and employees.

CRC reviews and approves each State’s MOA, and to the extent the document indicates a deficiency in a State’s equal opportunity-related policies, practices, and procedures, works with the State to help bring it into compliance. The MOA becomes part of the WIA State Plan which is submitted to and approved by ETA.

The Department of Labor, States, and local workforce areas have responsibilities for ensuring that covered recipients are complying with the applicable requirements related to nondiscrimination and equal opportunity. The regulations implementing WIA Section 188 require that States and local workforce areas assign Equal Opportunity Officers (EOO) who are responsible for “[m]onitoring and investigating ... to make sure that the recipient and its subrecipients are not violating their nondiscrimination and equal opportunity obligations.”⁵

See the table below for a summary of the oversight responsibilities of various entities.

⁵ See Section 37.25(b) of 29 CFR Part 37, IMPLEMENTATION OF THE NONDISCRIMINATION AND EQUAL OPPORTUNITY PROVISIONS OF THE WORKFORCE INVESTMENT ACT OF 1998 (WIA).

Federal, State, and Local Responsibilities for Ensuring Equal Opportunity for Persons with Disabilities in the One-Stop System

US Department of Labor	
<i>Civil Rights Center</i>	<i>Employment and Training Administration</i>
Conducts biennial review of Methods of Administration (submitted by States)	During monitoring visits, ETA states that its Regional Office Federal Project Officers document whether or not recipients have policies and procedures in place to monitor their compliance with WIA Section 188 requirements.
Investigates complaints of alleged violations of WIA Section 188 and 29 CFR Part 37	
Conducts compliance reviews (reviews focused on an entity's, or specific entities', compliance with their equal opportunity [EO] obligations)	
State- and Local-Level Agencies	
<i>Office of the Governor</i>	<i>State Workforce Agencies and Local Workforce Boards</i>
<p>Oversees all WIA Title I-financially assisted programs to ensure compliance with legal requirements related to nondiscrimination and equal opportunity</p> <p>Ensures that recipients:</p> <ul style="list-style-type: none"> • collect and maintain required records • are able to provide required data and reports to CRC <p>Negotiates to obtain compliance by recipients found in violation</p> <p><u>When WIA first went into effect:</u></p> <p>Developed initial Methods of Administration (plan for ensuring compliance with legal requirements re: nondiscrimination and equal opportunity)</p>	<p>Equal Opportunity (EO) Officers monitor compliance with WIA Section 188 and 29 CFR Part 37 by covered entities within their jurisdiction, and ensure that any violations – including violations of the disability-related requirements – are remedied. CRC relies on States' and local areas' EO Officers, as well as ETA's FPOs, to conduct any on-site reviews of compliance with physical accessibility requirements that are appropriate.</p>

<p>Submitted MOA to Civil Rights Center for review</p> <p><u>Every two years:</u></p> <ul style="list-style-type: none"> • reviews the MOA and determines whether changes are necessary for the State to remain in compliance • submits either a revised MOA, or a certification that no changes are necessary, to CRC • works with CRC to remedy violations disclosed by MOA review 	
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To help EO Officers and their staffs reach and maintain a necessary level of competency, CRC conducts an annual National Equal Opportunity Professional Development Forum. The Forum provides the EO Officers and other interested stakeholders with training on various nondiscrimination topics, including topics related to disability. In addition, several times a year, CRC has provided on-site training on EO-related matters, including disability related topics, at various locations throughout the country, usually when requested to do so by a State-level recipient or regional group of recipients. CRC has recently provided such training via distance-learning methods, typically by webinar. Upon request, CRC staff members also provide one-on-one technical assistance, including assistance on disability-related matters, to large and small recipients at various levels of the One-Stop System.

Complaint Processing

CRC is responsible for processing complaints alleging violations of WIA Section 188 and its implementing regulations, including the disability-related provisions. CRC's complaint procedure includes the opportunity for the complainant and respondent to mediate. Where mediation is declined or fails, CRC conducts an investigation and, where discrimination is found, attempts to obtain voluntary compliance. Where those efforts fail, the recipient/respondent is given notice and the opportunity for a hearing before sanctions are imposed.

Between 2003 and 2009, CRC accepted 28 disability-related complaints for investigation. The following chart summarizes the disability-related complaints:

**Number of Disability-Related Complaints Accepted by the Civil Rights Center for Investigation
from FY 03 to FY 09, By Complaint Category and Region**

Yr	Complaint Category (Issues)	# of Individuals by Region						
		1	2	3	4	5	6	Total
FY03	Benefits; Enrollment; Training;						1	1
	Training; med. exam before training;	1						1
	Access/Accommodation;				1			1
	Promotion;		1					1
	Discipline; Harassment;	1						1
FY04	Access/Accommodation; Benefits; Enrollment; Harassment; Intimidation; Job Classification; Performance; Qualification/Testing; Seniority; Training; Transition; Wages;				1			1
	Access/Accommodation; Exclusion; Training;						1	1
	Access/Accommodation; Harassment;						1	1
	Access/Accommodation; Benefits; Harassment;				1			1
	Access/Accommodation; Harassment;				1			1
	Benefits; Discipline; Harassment; Performance; Termination; Training;					1		1
	Access/Accommodation;			1				1
	Discipline; Performance;				1			1
FY05	Benefits;						1	1
	Access/Accommodation; Benefits; Harassment;				1			1
	Access/Accommodation; Training;					1		1
FY06	Access/Accommodation; Benefits;					1		1
	Access/Accommodation; Intimidation; Other; separation from other participants;					1		1
FY07	Access/Accommodation; Benefits;	1						1
	Benefits;	1						1
FY08	Benefits;			1				1
	Termination;			1		1		2
FY09	Access/Accommodation;				1			1
	Access/Accommodation; Enrollment;						1	1
	Access/Accommodation; Promotion;						1	1
	Benefits;	1						1
	Termination;			1				1
Grand Total		5	1	4	7	5	6	28

Note that CRC does not maintain complaint information by Adult, Youth or Dislocated Worker Programs

Source: Table was provided by CRC, January 22, 2010

The above chart shows only those disability-related complaints filed directly with CRC that the agency accepted for investigation. According to CRC, a complainant can either file a complaint directly with CRC or with the recipient-level entity designated by the Governor in the MOA. States determine where people can file these complaints, and, because the One-Stop system is decentralized, each state handles this differently.

The WIA nondiscrimination regulations require recipients to maintain logs of the complaints that they receive and that allege discrimination on one or more of the bases prohibited by WIA Section 188. See 29 CFR 37.37(c). Recipients must submit those logs to CRC upon request. The logs must include information about the alleged basis for the discrimination (such as race, sex, or disability); a description of the complaint; the date the complaint was filed; the disposition and date of disposition of the complaint; and other pertinent information. CRC stated that in recent years, it has issued such requests on approximately an annual basis. Additionally, CRC has the authority to require recipients to provide other information about their complaint processing procedures overall, as well as their processing of specific complaints.

ETA's Role in Assuring Comprehensive Access

ETA's Regional Offices are also involved in making sure that local workforce areas are providing comprehensive access to the One-Stop System. ETA's Regional Federal Project Officers (FPOs) use a Core Monitoring Guide when conducting project site visits. The Core Monitoring Guide includes questions about accessibility for persons with disabilities and other questions pertaining to strategies to recruit and serve participants who meet the target group criteria identified in the grants. The Core Monitoring Guide states that "all findings and observations" related to compliance with applicable Federal civil rights laws (including those prohibiting discrimination against persons with disabilities) "need to be shared with the Civil Rights Center."

ETA has also worked toward increasing comprehensive access to the One-Stop System for persons with disabilities through the DPN initiative. Between 2003 and 2008, the Department of Labor and the Social Security Administration jointly provided \$137 million to 42 states, the District of Columbia, Puerto Rico, Guam, and the U.S. Virgin Islands to support more than 425 Disability Program Navigators for the One-Stop System.⁷ These cooperative agreements allowed States to establish a DPN position in local workforce investment areas to improve access to WIA workforce training, employment, and related services for jobseekers with disabilities.

ETA officials believe there has been progress toward increasing comprehensive access to the One-Stop System for persons with disabilities since Congress passed WIA in

⁷ ETA said that the DPN grants were awarded non-competitively via an invitation that went out to State WIBs and/or state DOL agencies (the state WIA-administering entity) in selected states asking them to respond to a Solicitation for a Cooperative Agreement proposal. ETA said that over four rounds of grants, all states and territories had been invited to apply for a DPN grant. According to ETA, the first round of states, which SSA jointly funds, were those that had demonstration projects with SSA or were phase One Ticket-to-Work implementation states. ETA said that the cooperative agreement mechanism allowed the ETA National DPN Program Office to provide more technical assistance to the grantees.

1998. ETA cites both requirements in the DPN application process and annual modification instructions and various on-site reviews to support this view.

According to ETA, annual modification instructions to existing grantees and applicants for new DPN funds were required to provide a comprehensive action plan that addressed the following: compliance with specific legal requirements related to architectural and programmatic accessibility of One-Stop Career Centers; provisions of equally-effective communication for and with individuals with disabilities; provision of reasonable accommodations and modifications; and general nondiscrimination and equal opportunity for individuals with disabilities. ETA also required applicants for DPN funds to confirm that all One-Stop Career Centers in the state complied fully with the applicable requirements related to architectural accessibility⁸, and provide plans for corrective action, if needed. According to ETA, Equal Employment Opportunity staff conducts reviews of accessibility regularly using the WIA Section 188 Checklist. The “checklist,” developed jointly by CRC, ODEP, and ETA, is based on the elements of the Methods of Administration, and can be located online at <http://www.dol.gov/oasam/programs/crc/section188.htm>.

⁸ As stated in 29 CFR 32.26 through 32.28.

2. What information does the Department have regarding the characteristics and needs of persons with disabilities?

The Department's primary sources of information regarding the characteristics and needs of job seekers with disabilities are the Workforce Investment Act Standardized Record Data (WIASRD) reported by the States, information contained in WIA State Plans, and information from Disability Program Navigator activities. This information is limited because disclosure of a disability is voluntary. ETA and ODEP stated that many participants with a disability may not self-disclose, and as a result, the number of participants with disabilities is likely under-reported. Characteristics reported through WIASRD indicate whether a participant has a disability but no information is collected on the nature of the disability. Characteristics that are captured for participants with disabilities provide the same demographic information that is collected for all participants. Information on characteristics and needs of participants with disabilities may also be found in the WIA State Plans that all states must submit to DOL. However, that information is not readily accessible and would require a review of each State plan to extract it. We did not do this. Additional information on needs of participants with disabilities was identified in various research cited by ETA and ODEP. The Department may collect additional disability-related information in the future, through a planned revised performance reporting system and the FY 2010 Disability Employment Initiative to be jointly administered by ETA and ODEP.

Current and reliable information on the characteristics and needs of persons with disabilities who are potential customers of the Workforce Investment Act (WIA) One-Stop System may serve two purposes. First, it helps the Department of Labor, States and local workforce areas to track use of the WIA system by this population and to ensure they have equitable access to services. Second, States and local workforce agencies can use the information to plan training and related services most appropriate to helping persons with disabilities obtain and retain employment.

Characteristics

The Workforce Investment Act of 1998 requires that all recipients of WIA funds collect and report information on characteristics of WIA participants. Under WIA Title I B, WIA recipients must maintain individual records showing characteristics, services received, and outcomes for persons who receive WIA services. Recipients, including States, report these data on WIA exiters⁹ to ETA through the Workforce Investment Act Standardized Record Data system. The data available about the characteristics of WIA exiters with disabilities is the same as that for all WIA exiters. Examples of these characteristics are: age, gender, race and ethnicity, veteran status, Unemployment Insurance status, educational attainment, employment status, low-income, homeless, offender, and receipt of public assistance. In the WIA Youth program, there are additional characteristics — such as pregnant or parenting teen and foster youth.

⁹ By definition, a WIA exiter is a participant that does not receive a service funded by the program or funded by a partner program for 90 consecutive calendar days and is not scheduled for future services. U.S Department of Labor. Employment and Training Administration. Training and Employment Guidance Letter 17-05.

WIASRD shows the number of WIA exiters, by program, who report they have a disability, but does not provide information on the nature of the disability. Both ETA and ODEP emphasized that disclosure of a disability is voluntary. They stated that many participants with a disability do not self-disclose and, as a result, the number of participants with disabilities is under-reported.

In PY 2008, ETA reported that 57,824 or 4.7 percent of the 1,234,178 WIA exiters had a disability. This is a decline since PY 2003, when 8.3 percent of the WIA exiters were persons with disabilities.

OIG asked ETA about the significant increase in all WIA exiters — especially in the WIA Adult program, ETA noted that more states are co-enrolling Wagner-Peyser (Employment Service) registrants together with WIA exiters, and this may explain the dramatic increase in the number of WIA exiters. Consequently, the increase in co-enrollment has also reduced the percentage of people with disabilities served.

OIG used data from the published WIASRD Data Book for PYs 2003 and 2008 for this review. The following charts present information on characteristics of WIA exiters with disabilities, as well as information on characteristics of all WIA exiters, for the Adult, Dislocated Worker and Youth programs.

Selected Characteristics of Adult Exiters (unaudited)				
	PY 2008		PY 2003	
Adult	Exiters With a Disability	All Exiters	Exiters With a Disability	All Exiters
Number of Exiters	33,890	849,738	14,056	219,979
Statewide Programs	728	13,787	3,254	25,904
Local Programs	33,220	838,691	10,904	195,463
Characteristics of All Exiters:	-	-		
<i>Age categories</i>				
18 to 21	5.9%	9.6%	9.7%	12.1%
22 to 29	17.1%	25.0%	18.7%	27.5%
30 to 44	33.3%	34.6%	41.2%	38.8%
45 to 54	26.5%	19.8%	22.3%	15.7%
55 and over	17.2%	10.9%	8.1%	6.0%
<i>Gender</i>				
Female	42.8%	46.6%	45.9%	55.7%
Male	57.2%	53.4%	54.1%	44.3%
<i>Race and Ethnicity</i>				
Black	25.3%	27.4%	30.5%	31.0%
Hispanic	10.6%	12.4%	13.2%	18.2%
White	58.5%	54.4%	50.6%	44.5%
Other	5.6%	5.8%	5.5%	6.2%
<i>Employed at Participation</i>				
Employed	12.2%	17.2%	12.7%	20.5%
Not Employed	87.8%	82.8%	87.3%	79.5%
<i>Characteristics of Exiters who Received Intensive or Training Services</i>				
Low Income	53.1%	44.1%	79.0%	68.3%
Public Assistance Recipient	24.7%	16.4%	22.4%	12.8%
TANF Recipient	3.6%	3.6%	7.3%	8.0%
Other Public Assistance	23.4%	15.4%	16.4%	5.6%
Homeless	3.0%	1.2%	NA	NA
Offender	8.1%	5.7%	NA	NA
<i>Highest Grade Completed</i>				
Less than High School	14.5%	13.5%	19.7%	2.9%
High School Equivalent	46.3%	50.8%	50.3%	54.4%
Post High School	39.2%	35.6%	29.9%	28.1%

Sources: U.S. Department of Labor, PY 2008 WIASRD Data Book Tables II-5 and II-6; PY 2003 WIASRD Data Book Table II-4

Selected Characteristics of Dislocated Worker Exiters (unaudited)

	PY 2008		PY 2003	
Dislocated Workers	Exiters With a Disability	All Exiters	Exiters With a Disability	All Exiters
Number of Exiters	9,185	293,614	6,972	187,664
Statewide Programs	416	13,380	1,007	23,034
Local Programs	8,613	278,956	5,711	158,557
National Emergency Grants	619	924	861	28693
Characteristics of All Exiters:		-		
<i>Age categories</i>				
Under 22	2.5%	3.3%	2.7%	2.40%
22 to 29	12.8%	16.9%	10.0%	14%
30 to 44	33.1%	36.6%	37.4%	43.70%
45 to 54	30.6%	26.4%	34.9%	28.80%
55 and over	20.9%	16.7%	15.0%	11.20%
<i>Gender</i>				
Female	43.5%	49.0%	42.0%	49.40%
Male	56.5%	51.0%	58.0%	50.60%
<i>Race and Ethnicity</i>				
Black	26.1%	23.6%	16.0%	18.50%
Hispanic	10.2%	13.6%	10.2%	14.40%
White	59.3%	55.8%	65.8%	60.30%
Other	4.4%	7.0%	5.3%	6.80%
<i>Employed at Participation</i>				
Employed	7.6%	4.5%	6.3%	7.30%
Not Employed	92.4%	95.5%	93.7%	92.70%
<i>Characteristics of Exiters who Received Intensive or Training Services</i>				
Limited English Proficiency	4.3%	4.4%	3.4%	5.80%
Single Parent	9.1%	10.0%	10.2%	11.80%
<i>UI Status</i>				
Claimant	58.6%	68.6%	65.8%	71.50%
Exhaustee	20.5%	27.0%	8.7%	6.30%
<i>Highest Grade Completed</i>				
Less than High School	12.6%	12.1%	9.9%	10.0%
High School Equivalent	46.0%	48.7%	48.5%	49.2%
Post High School	41.4%	39.2%	41.6%	40.7%

Sources: U.S. Department of Labor, PY 2008 WIASRD Data Book Tables III-7 and III-8; PY 2003 WIASRD Data Book Table III-5

Selected Characteristics of Youth Exiters (unaudited)

	PY 2008		PY 2003	
Youth	Exiters With a Disability	All Exiters	Exiters With a Disability	All Exiters
Number of Exiters	15,729	115,083	26,266	166,831
Statewide Programs	1,455	9,966	791	4,832
Local Programs	14,648	109,933	25,887	164,376
<u>Characteristics of All Exiters:</u>	-	-		
<i>Age categories</i>				
14 to 15	14.9%	12.4%	29.6%	32.0%
16 to 17	47.6%	41.5%	44.0%	37.7%
18	21.5%	19.7%	14.1%	12.4%
19- 21	16.0%	26.3%	12.2%	17.9%
<i>Gender</i>				
Female	41.6%	55.6%	38.3%	52.5%
Male	58.4%	44.4%	61.7%	47.5%
<i>Race and Ethnicity</i>				
Black	21.6%	33.0%	23.5%	36.0%
Hispanic	23.2%	32.3%	14.7%	28.5%
White	50.9%	29.8%	57.4%	30.3%
Other	4.3%	4.9%	4.4%	5.2%
<i>Employed at Participation</i>				
Employed	9.1%	10.2%	6.1%	5.8%
Not Employed	90.9%	89.8%	93.9%	94.2%
Homeless or runaway youth	1.9%	2.7%	1.5%	2.3%
Offender	8.2%	7.7%	9.0%	8.3%
Pregnant or parenting youth	4.1%	13.5%	3.4%	10.1%
Basic literacy skills deficient	68.0%	57.3%	73.7%	65.1%
Youth who needs additional assistance	66.5%	56.6%	63.3%	54.7%
Low Income	94.9%	94.5%	93.4%	92.7%
Highest Grade Completed (average)	10.1	10.4	9.6	9.7
Attending School	75.7%	57.7%	81.7%	70.3%
Not attending school	24.3%	42.3%	18.3%	29.7%

Sources: U.S. Department of Labor, PY 2008 WIASRD Data Book Table IV-5; PY 2003 WIASRD Data Book Table IV-4.

Following are some observations on the characteristics of participants with disabilities:

- In the WIA Adult Program, the percent of PY 08 exiters with a disability who were also offenders is higher than for all exiters (8.1% vs. 5.7%).
- Compared to all exiters in the WIA Adult Program, exiters with disabilities had about the same percent who said they were homeless, but a higher percent who were on some type of public assistance (24.7% vs 16.4%).
- Exiters with disabilities in the WIA Adult and Dislocated Workers Programs tended to be older (age 55 and above) than the population of all exiters (17.2% vs. 10.9% in the Adult Program, 20.9% vs. 16.7% in the Dislocated Workers Program).
- A lower percent of exiters with disabilities had exhausted their Unemployment Insurance benefits at time of enrollment compared to all exiters in the WIA Dislocated Workers Program (20.5% vs. 27.0%).
- Older youth (ages 19-21) with disabilities participated at a lower rate than all older youth (16.0% vs. 26.3%).
- Less than half of all youth exiters with disabilities were Black and Hispanic, but nearly two-thirds of all WIA Youth Program exiters were Black and Hispanic.
- While young women made up more than half of all exiters in the WIA Youth program, they were less than half of all youth exiters with disabilities.
- There was a lower percentage of youth with disabilities who were a pregnant or parenting teen than youth exiters as a whole (4.1% vs. 13.5%).
- The percent of low-income exiters with disabilities in the WIA Adult Program was lower in PY 2008 than in PY 2003 (53.1% vs. 79.0%).
- The percent of older (ages 19-21) youth exiters with a disability was higher in PY 2008 than in PY 2003 (16.0% vs. 12.2%).
- The percent of older exiters (55 years and above) with disabilities in the WIA Adult and Dislocated Worker Programs was higher in PY 2008 than in PY 2003 (17.2% vs. 8.1% in the Adult Program, 20.9% vs 15.0% in the Dislocated Workers Program).
- The percent of WIA Adult Program exiters with disabilities who were Black or Hispanic was lower in PY 2008 than in PY 2003 (25.3% vs. 30.5% for Black exiters, 10.6% vs. 13.2% for Hispanic exiters).

- The percent of youth exiters with a disability who did not have a high school diploma or equivalency was higher in PY 2008 than in PY 2003 (12.6% vs. 9.9%).
- The percent of exiters with a disability in the WIA Youth and Dislocated Workers Program who were employed at participation was higher in PY 2008 than in PY 2003 (9.1% vs. 6.1% for Youth, 7.6% vs. 6.3% for Dislocated Workers).

ETA and ODEP officials said they had not noticed significant changes since PY 2005 in the characteristics of persons with disabilities who used the One-Stop System. ODEP officials also said they have not researched the issue. ETA officials acknowledged that the stress of unemployment increases the likelihood that latent disability issues surface, or that new disabilities emerge.

ETA officials said they expect to see substantially more people with disabilities use the One-Stop System due to the poor economy in recent years. ETA cited the large incidence of disability among special populations with significant barriers to employment (e.g., public assistance recipients, ex-offenders, and the homeless). ETA further observed that the recession makes it less likely these individuals will be able to find and keep jobs that offer economic self-sufficiency. Consequently, more persons with disabilities will be in need of workforce training and employment services. ETA's observations are confirmed by December 2009 data from the Bureau of Labor Statistics, which reported that the unemployment rate of persons with a disability was 13.8 percent, compared with 9.5 percent for persons with no disability, not seasonally adjusted. ETA noted that that this unemployment rate does not take into account working-age individuals with disabilities that have dropped out of the labor market; more than 20 million working-age adults with disabilities are not counted in the labor force.

Information from WIA State Plans

Another potential source of information on the characteristics of persons with disabilities is the 5-year plans that all States submit to the Department of Labor in order to receive WIA formula funds. These plans are available on the DOL web site at: <http://www.doleta.gov/usworkforce/WIA/planstatus.cfm>. ETA does not formally extract and use the state-specific information. ETA explained that the States and local areas use the information for planning and delivering their services.

The State plans should have this information because DOL guidance specifically asks States to provide information about their plans to serve persons with disabilities. The most recent guidance for the WIA State plans is contained in TEGL 14-08. The following are examples of the information States must provide:

- *Vision for ensuring that youth with disabilities have opportunities to develop and achieve their career goals (Question I.E.)*
- *What approaches will be used to ensure funds are targeted to those most in need, including low-income, public assistance recipients, persons with disabilities, etc.?(Question IX.A.5.)*
- *Service Delivery to Targeted Populations*

Describe the state's strategies to ensure that the full range of employment and training programs and services delivered through the state's One-Stop delivery system are accessible to and will meet the needs of people with disabilities.

Indicate how the state will use Wagner-Peyser resources to support individuals with disabilities, such as funding disability program navigators in One-Stop Career Centers or assisting other targeted populations. (Question IX.C.4.a.)

We did not review all State plans; however, as an example, the Illinois 2007 State WIA Plan describes an initiative to pilot test a “strategy for full inclusion of people with disabilities in targeted sectors. The first sector to be developed is health care and it provides for projects that incorporate people with disabilities into proven models for training in health care occupations.”

States are also required to submit an annual report to ETA about their use of WIA funds. This annual report includes ETA Form 9091, which provides information on outcomes for special adult populations, including persons with disabilities. States often describe in their annual reports initiatives they supported specifically targeted to persons with disabilities and other special adult populations. For example, in its annual WIA report for 2008, the State of Illinois reported actions it took to expand programs and services to people with disabilities, such as:

- compiling best practices for recruiting people with disabilities into targeted employment sectors,
- collaborating with businesses to remove physical and attitudinal barriers to employment, and
- connecting businesses and providers through **disabilityworks**, as well as to WIA services through the **Illinois workNet** portal.

ETA noted that these activities are from a DPN project in Illinois. ETA also said that many states include a description of their DPN project activities in their Annual Reports.

OIG asked ETA if it collects and reviews additional information (in addition to WIASRD information) regarding sectors of the economy that are likely to hire persons with disabilities and what is known about employment histories of persons with disabilities. ETA stated that it has not conducted a systematic study of these issues.

The Bureau of Labor Statistics (BLS) has collected some information on employment of persons with disabilities by occupation and sector. For example, a November 2009 BLS report, based on data from the Current Population Survey, shows that 12.8 percent of persons with disabilities who were employed said they are self-employed in agriculture and related industries. In non-agricultural industries, 6.5 percent of those with disabilities described their situation as “unpaid family workers.” BLS does not publish these data on its web site, but provides it to ODEP, which shares the information with ETA.

Needs

Information on the needs of persons with disabilities in the WIA Adult and Dislocated Workers program is limited. More may be known about the needs of participants in the WIA Youth Program because WIA Section 129(c) (1) (A) requires that service providers provide an objective assessment of the “academic levels, skill levels, and service needs of each participant....” However, WIA regulations (Section 664.405) do not specifically require an assessment to determine potential disabilities. According to ETA, each state determines what to include in its assessment; some states may do an assessment for disabilities, but it is not specifically required.

Additionally, ETA indicates that many young people who enroll in WIA youth programs are referred by other agencies that work with at-risk youth — such as juvenile offenders, homeless youth, or those with learning disabilities. Consequently, as part of the referral process, these agencies may forward information about the young person’s situation — age, education, type of disability, and assessment results. The latter might identify education and career goals, and needs for support services or needs-based payments.

As previously noted, WIA State Plans may contain additional information on the needs of persons with disabilities, but the Department does not compile these state-level data. The data are only accessible by reviewing the individual state WIA plans. We did not review all State plans; however, as an example, the California WIA State Plan cites the “California Comprehensive Strategy for the Employment of People with Disabilities,” another document which may have more specific information about the needs of persons with disabilities that the state’s workforce programs should address.

Information from the Disability Program Navigator (DPN) Initiative

Between 2003 and 2008, the Department of Labor and the Social Security Administration jointly provided \$137 million (SSA provided \$12 million) to establish cooperative agreements with 47 states, the District of Columbia, Puerto Rico, Guam,

and the U.S. Virgin Islands supporting more than 425¹⁰ Disability Program Navigators for the One-Stop System.¹¹ The “cooperative agreements” allowed States to establish a DPN position at One-Stop Career Centers for an individual to help persons with disabilities access WIA workforce training, employment, and related services. The actual DPNs were employed by the state or local workforce system.

As the term “navigator” suggests, this individual’s main role was to help persons with disabilities “chart a course” at the One-Stop Centers where multiple Federal partner agencies (e.g., Department of Labor, Department of Education, Department of Housing and Urban Development, and Social Security Administration) offer services that can help individuals obtain and keep employment. Examples of the activities DPNs conduct include training front-line staff at the One-Stop Centers; doing outreach to governmental and non-governmental organizations that engage persons with disabilities; and building linkages with employers. Overall, the DPN’s goal is to “work to improve coordination across Federal, state, and local programs that impact the employability and career advancement of job seekers with disabilities.”¹²

A 2006 review of DPN activities in four states contained information about the needs of persons with disabilities who use WIA One Stop Centers. Evaluators interviewed a total of 16 participants in four states they visited. One of the questions the evaluators asked the participants was what types of changes to the DPN program or One-Stop Center would “increase meaningful participation in the workforce system?” The “customers” responses contain information that might suggest some of the needs that the WIA system could better address. Examples of these “needs” are as follows:

- **Location** — put centers in more accessible public places such as malls with signage and heightened visibility;
- **More community outreach** — there should be more “marketing” to community agencies in the area the One-Stop or DPN serves. Examples of these groups include the school system, National Federation for the Blind, and agencies that serve youth with disabilities.

¹⁰ ETA said that in PY 2008, there were 550 DPNs, but the number dropped to 425 in PY 2009 due to reduced funding.

¹¹ ETA said that the DPN grants were awarded non-competitively via an invitation that went out to State WIBs and/or state DOL agencies (the state WIA-administering entity) in selected states asking them to respond to a Solicitation for a Cooperative Agreement proposal. ETA said that over four rounds of grants, all states and territories had been invited to apply for a DPN grant. According to ETA, the first round of states, which SSA jointly funds, were those that had demonstration projects with SSA or were phase One Ticket-toWork implementation states. ETA said that the cooperative agreement mechanism allowed the ETA National DPN Program Office to provide more technical assistance to the grantees. (See EWP H.4.1)

¹² U. S. Department of Labor. Employment and Training Administration Disability Program Navigator Cooperative Agreement with the Social Security Administration to Enhance Service Delivery to Jobseekers with Disabilities through the National One-Stop Career Center Delivery System Solicitation for Statewide Cooperative Agreement Applications. SGA/DFA-08-01.

- **Internet** — customers suggest it should be easier to locate One Stop Centers on the state web sites. Internet information should be specific — Who do they contact for information? How can they reach a DPN?
- **Communication** — one suggestion was to have a “greeter” at the entry to the One-Stop to meet customers and direct them to the right person.
- **More direct communication between DPN and Customers** — people with disabilities suggest the DPNs should offer more guidance and support about disclosing a disability and offer assessments to help the individual identify their skills and the type of jobs they are best suited for.
- **Assistance for hearing-impaired** — One-Stop Centers should do more to accommodate those with hearing impairments and provide more resources and services for them.

Although most respondents said they did not experience discrimination in the workplace, seven said they did, and four people discussed it with the DPN. One of the frequently mentioned issues was “how, when, and how much” information to disclose about one’s disability to an employer. Others reported that an employer had limited their job opportunities or assignments rather than provide accommodation.

Supportive Services

Like other participants in One-Stop programs, persons with disabilities may require additional supportive services and needs-based payments to help them participate in employment and training programs. In PY 2008, ETA reported that of the 33,809 persons with disabilities who exited the WIA adult program, 7.5 percent received some type of needs-based payments or other supportive services. Examples of supportive services (as defined by WIA section 134 (e) (2)) include, but are not limited to: transportation, child care, dependent care, and housing. ETA does not report data in these specific categories, so it is not possible to determine which types of supportive services WIA exiters with disabilities received.

Impact of WIA Program Participation on Disability Benefits

One of the challenges for persons with disabilities may be understanding how participation in Federally-funded employment and training programs like those offered through WIA could affect their cash and health benefits. As ETA noted in its 2008 solicitation for DPN funds, “Complex rules surrounding entitlement to Federal, state, and local government programs designed to assist individuals with disabilities can make the decision to seek employment even more difficult. Fear of losing cash and health benefits is too often a determining factor for individuals with disabilities entering or returning to the world of work, and maintaining employment.” The DPN initiative may help persons with disabilities address these concerns. According to a DPN Fact Sheet, Disability Program Navigators’ activities include guiding One-Stop Career Center staff in

helping people with disabilities “access and navigate the various programs that impact their ability to gain/retain jobs.”

Although ETA has limited information on the needs of persons with disabilities, it does have some information on needs-based payments and other supportive services. In PY 2008, ETA reported that of the 33,809 persons with disabilities who exited the WIA Adult program, 7.5 percent received some type of needs-based payments or other supportive services. Examples of these supportive services (as defined by WIA section 134(e) (2)) include, but are not limited to, transportation, child care, dependent care, and housing. ETA does not report data in these specific categories, so it is not possible to determine which types of supportive services persons with disabilities used to participate in WIA programs.

Transportation Needs

ETA and ODEP officials cited research that suggests transportation service is a major need for persons with disabilities. According to a National Council on Disability Report (2005), “a national study conducted by the U.S. Bureau of Transportation Statistics in 2002 found that 6 million people with disabilities have difficulties obtaining the transportation they need. Research in the year 2000 conducted by the Harris Poll and funded by the National Organization on Disability established that nearly one-third of people with disabilities report having inadequate access to transportation.”

One of the government-wide efforts to address the need for transportation is the United We Ride (UWR) Program. According to ETA, there may be data in the Department of Transportation’s database for State and local-level UWR programs showing how many people with disabilities who use UWR transit services, but it would not identify WIA participants specifically. In addition, ETA said that the Telephone Survey conducted by the University of Iowa Law, Health Policy, and Disability Center, as part of its qualitative evaluation of the DPN initiative, identified transportation as one of the most significant barriers to accessing training and employment of people with disabilities.

Future Initiatives

The Department may obtain additional information on the characteristics and needs of persons with disabilities as the result of the DPN evaluation, a revised reporting system, and the joint ETA and ODEP Disability Employment Initiative.

ETA reported that it is in the process of conducting a quantitative evaluation involving four DPN state grantees using Mathematica Policy Research, Inc. (MPR). MPR will compare individualized WIA and Wagner-Peyser data on service levels and outcomes for persons enrolled in DPN sites against Social Security Administration’s (SSA) disability rolls. ETA expects to get the MPR report some time in April or May, and stated the SSA data may provide more information on characteristics of participants with disabilities, allowing for some analysis of trends.

ETA also may consider implementing a revised performance reporting system that could provide additional information about the characteristics and needs of persons with

disabilities using the One-Stop System. Under a previous ETA proposal, persons who self-identified as having a disability would have the option to provide additional information on the type of disability they have. Specifically, an individual could voluntarily disclose they had any of the following disabilities that substantially limited one or more major life activities: learning disability, hearing impairment, visual impairment, speech impairment, cognitive impairment, orthopedic impairment, mental/emotional/ psychological impairment, drug addiction or alcoholism, or other types of disability.

When ETA published its proposal in the Federal Register on July 16, 2004, ETA stated it “believes that collection of types of disability will have practical utility for focusing on, and evaluating the effectiveness of its programs in serving persons with a disability through the One-Stop System.” For example, an individual who is hearing or speech-impaired is likely to need assistive technology such as text telephone to communicate with staff at the One-Stop center or a WIA service provider.

On March 16, 2009, ETA announced on its web site that implementation of the new system — called Workforce Investment Streamlined Performance Reporting (WISPR) — had been suspended because of the higher priority of working with the WIA system to meet Recovery Act reporting requirements. According to ETA, the Department is reassessing the implementation of WISPR pending reauthorization of WIA so as to not overly burden the states with excessive reporting changes. The Department plans to consult with the state workforce agencies about the revised performance accountability framework.

Finally, the FY 2010 \$24 million Disability Employment Initiative (DEI) jointly administered by ETA and ODEP could provide more information on the characteristics and needs of persons with disabilities. The purpose of the initiative is to build on “lessons learned” from the Disability Program Navigator project and build the capacity of the One-Stop System nationwide to better serve persons with disabilities. According to a draft “implementation plan” that ETA provided to OIG, part of the evaluation of the DEI will include demographic data from WIASRD on people served, broken down by youth and adults, disability type, SSI/SSDI, and Vocational Rehabilitation (VR). The evaluation may provide more information on the characteristics of persons with disabilities served through the One-Stop System.

3. What types of services are persons with disabilities receiving from the One-Stop System?

Persons with disabilities who participate in WIA Adult, Dislocated Worker and Youth Programs receive the same services as those without disabilities, although their rates of participation in those services may vary. The Department's most visible initiative for helping people with disabilities access and navigate the One-Stop System has been the Disability Program Navigator. According to ETA, the DPN initiative was established in 14 states in 2003. By PY 2008, a total of 47 states, the District of Columbia, Puerto Rico, Guam and the U.S. Virgin Islands had a DPN initiative. The Department has also collected additional information on promoting increased access to service for individuals with disabilities from ODEP studies and demonstration programs, and an evaluation of the DPN initiative. Other initiatives to improve One-Stop services for persons with disabilities are ongoing.

Services Received

The following services are provided in the WIA Adult and Dislocated Workers Programs:

Core services — basic services such as job searches and labor market information. These activities may be self-service or require some staff assistance. WIA excludes job seekers who receive core services that are self-service and informational in nature from being included in the performance measures. However, the WIA nondiscrimination regulations require recipients to seek demographic information about such job seekers, including information about disability status, at the point when the job seekers provide personal information in response to a request from the recipient.

Intensive services — activities such as comprehensive assessment and case management, or activities that require greater staff involvement.

Training services — activities such as occupational skills or on-the-job training.

The next section highlights selected trends in services received by persons with disabilities in the WIA Adult and Dislocated Workers Programs. See Exhibits 1 and 2 for more detailed information.

As shown in the following table, there was a significant decrease in the percent of exiters in the WIA Adult and Dislocated Workers Program who received training from PYs 2003 to 2008.

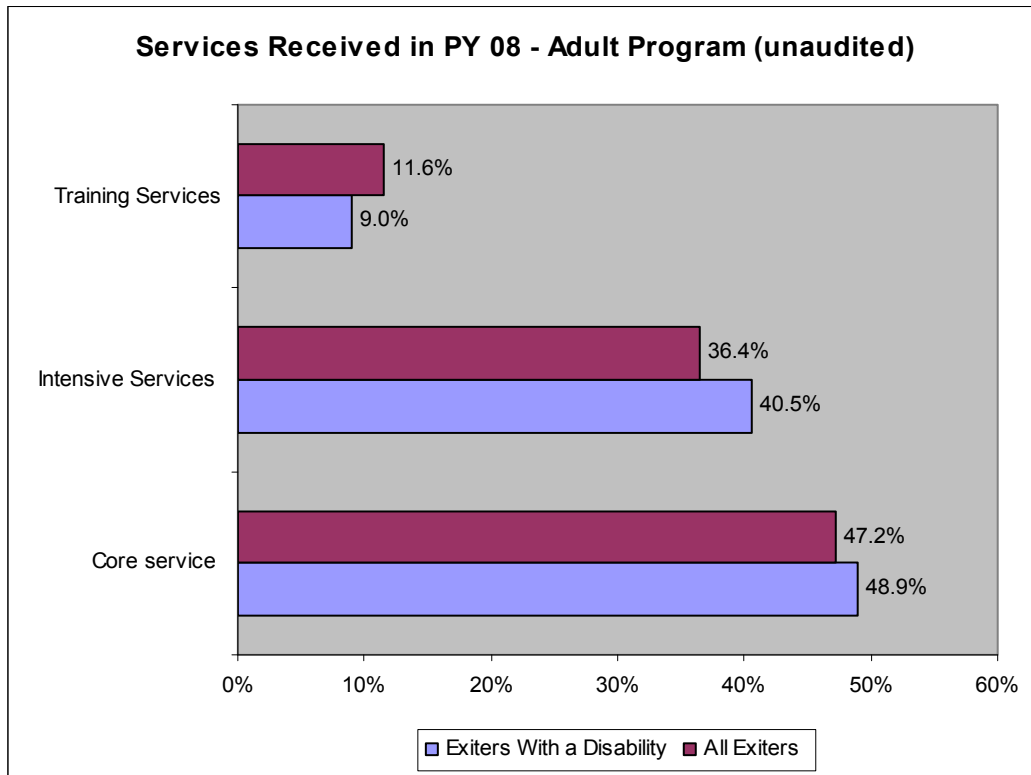
WIA Adult and Dislocated Workers Who Received Training (unaudited)

	PY 2003		PY 2008	
Program	Total Exiters	Received Training Services	Total Exiters	Received Training Services
Adult	219,979	46.8%	849,738	11.6%
Dislocated Workers	187,664	54.6%	293,614	18.7%

Source: U.S. Department of Labor. Employment and Training Administration.
PY 2003 WIASRD Data Book, II-16; III-17. PY 2008 WIASRD Data Book, Tables II-19; III-22.

WIA Adult Program

The chart below shows that persons with disabilities participated at a slightly lower rate (9 percent) in training services than all exiters (11.6 percent).



Sources: U.S. Department of Labor. Employment and Training Administration. PY 2008 WIASRD Data Book Tables II-18, II-19, PY 2003 WIASRD Data Book Tables II-16.

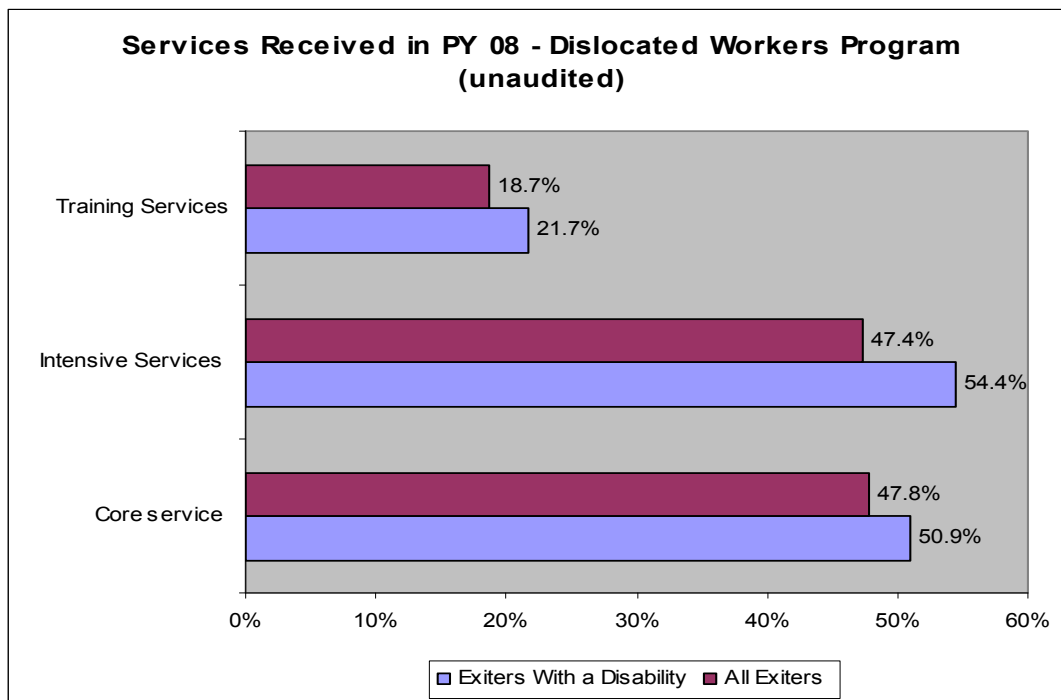
Other trends in selected services for exiters with disabilities in the Adult Program in PY 2008, compared to all WIA exiters, include:

- A slightly lower percentage of exiters with disabilities received on-the-job training (9.2% vs. 10.5%) and customized training (3.1% vs. 7.7%).
- A higher percentage of exiters with disabilities received skill retraining/upgrading (13.5% vs. 10.8%) and other occupational skills training (75.7% vs. 72.9%).
- A slightly lower percentage of exiters with disabilities received an Individual Training Account (6.4% vs. 7.0%).

See Exhibit 1 for additional information on Adult services.

WIA Dislocated Workers Program

More than half of all exiters with disabilities in the Dislocated Workers Program received Core and Intensive Services, as the chart below shows.



Sources: U.S. Department of Labor. Employment and Training Administration. PY 2008 WIASRD Data Book Tables III-22, III-21, PY 2003 WIASRD Data Book Tables III-17.

Other trends in selected services received by persons with disabilities in the Dislocated Workers Program, compared to all exiters, include:

- A higher percentage of exiters with disabilities received on-the-job training (17.3% vs. 8.0%).
- Participation rates in customized training were identical for both groups (1.5%).
- A slightly higher percentage of exiters with disabilities received ABE or ESL in combination with training (3.9% vs. 1.8%).
- A lower percentage of exiters with disabilities received Skill retraining/upgrading (13.0% vs. 14.7%) and other occupational skills training (66.7% vs. 77.2%).

A slightly lower percentage of exiters with disabilities received an Individual Training Account (12.8% vs. 13.9%).

See Exhibit 2 for additional information on Dislocated Workers services.

WIA Youth Program

The WIA Youth Program offers a different range of services. These services are:

Educational achievement services — Educational achievement services include, but are not limited to, tutoring, study skills training, and instruction leading to secondary school completion, including dropout prevention strategies; and alternative secondary school offerings.

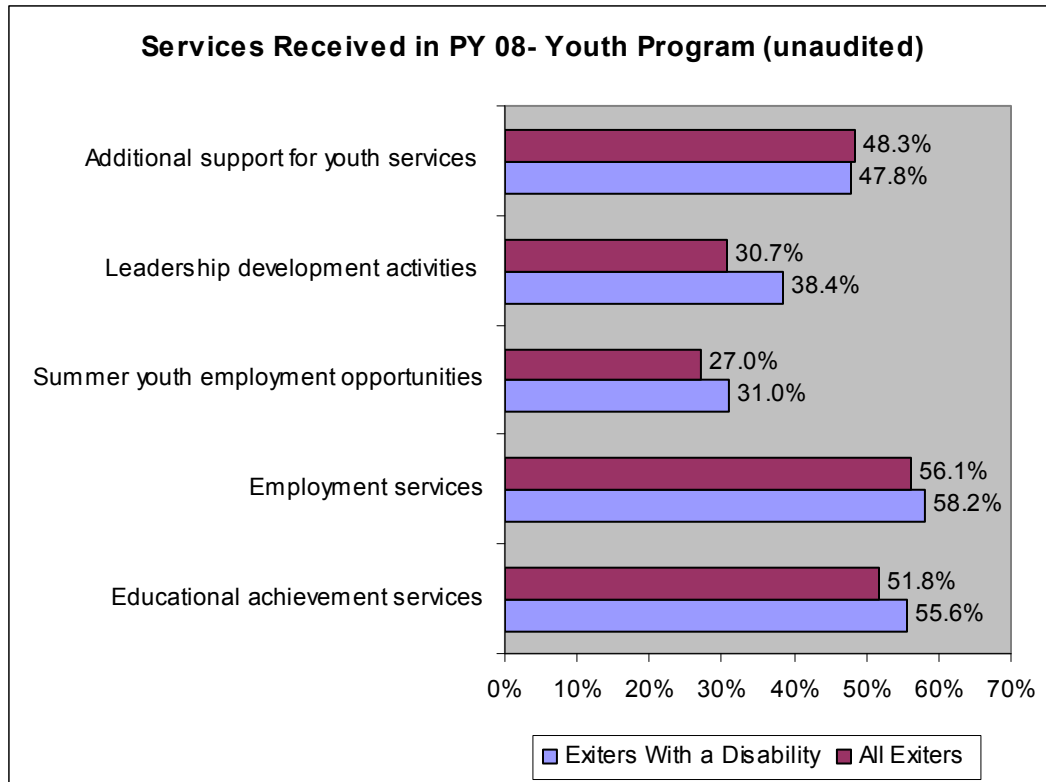
Employment services — Employment services include paid and unpaid work experiences, including internships, and job shadowing; and occupational skills training.

Summer youth employment opportunities — Summer employment opportunities directly linked to academic and occupational learning.

Leadership development activities — Leadership development opportunities include, but are not limited to, opportunities that encourage responsibility, employability, and other positive social behaviors such as (a) exposure to post-secondary educational opportunities; (b) community and service learning projects; (c) peer-centered activities, including peer mentoring and tutoring; (d) organizational and team work training, including team leadership training; (e) training in decision making, including determining priorities; and (f) citizenship training, including life skills training such as parenting, work behavior training, and budgeting of resources.

Additional support for youth services — Supports for youth services that include, but are not limited to, the following: (a) adult mentoring for a duration of at least twelve (12) months, that may occur both during and after program participation or (b) comprehensive guidance and counseling, including drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth.

In contrast to the WIA Adult and Dislocated Workers programs, youth with disabilities appear to participate in WIA services at least as much or more than all youth exiters.



Sources: U.S. Department of Labor. Employment and Training Administration. PY 2008 WIASRD Data Book Tables IV-1, PY 2003 WIASRD Data Book Tables IV-16

Other selected highlights from the PY 2008 WIASRD report on services to youth exiters include:

- Nearly the same percentage of youth with disabilities received 12 months of follow-up services as all youth exiters (37.2% vs. 38.3%).
- A higher percentage of youth with disabilities were enrolled in education¹³ compared to all exiters (82.5% vs. 72.7%).
- Nearly the same percentage of youth with disabilities received needs-based payments¹⁴ as all youth exiters (4.7% vs. 4.5%).

See Exhibit 3 for additional information on Youth services.

While WIASRD shows use of WIA services by disability status, variations within the population by race and ethnicity, gender, age, or employment status are not available.

ETA stated that it does not collect information that would explain differences in services used by persons with disabilities compared with persons without disabilities.

Disability Program Navigators

According to ETA, between 2003 and 2009, the Department of Labor, in collaboration with SSA, jointly provided \$137 million (\$12 million from SSA) to 47 states, the District of Columbia, Puerto Rico, Guam, and the U.S Virgin Islands. ETA's cooperative agreements with states were awarded incrementally over four rounds of solicitations in order to maximize the availability of funds. Existing DPN states were required to submit annual plans based upon ETA modification instructions prior to award of additional funding. In PY 2008, funds allowed for support of about 550 Navigators; in PY 2009, reduction in funding has allowed for support of 425 Navigators. ETA encouraged the hiring of people with disabilities in Navigator positions and an informal survey in 2009 indicated that more than 30 percent of them had a disability.

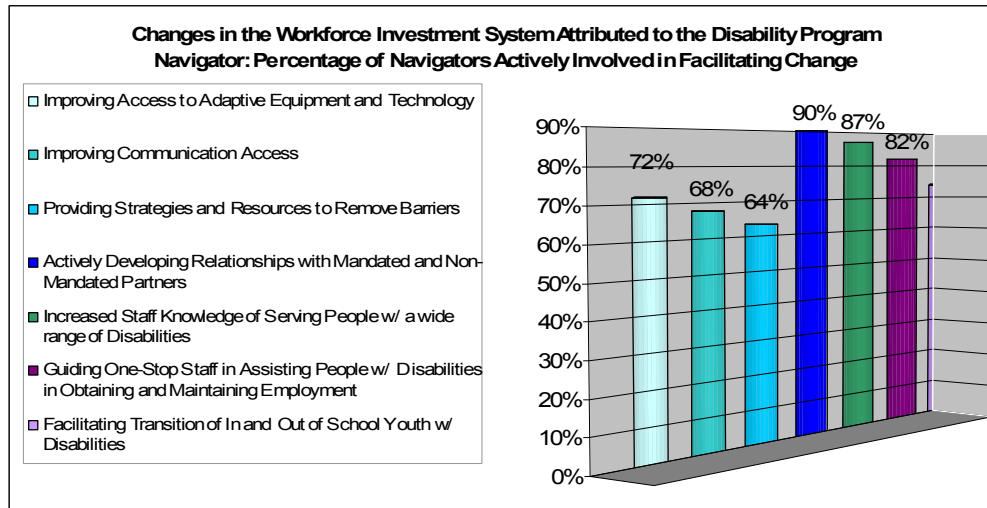
Examples of how DPNs help persons with disabilities use the One-Stop System include providing:

- access to adaptive equipment and assistive technology;
- guidance from One-Stop staff on how to use the various services and programs; offered by WIA One Stop partners;
- assistance in obtaining and retaining employment; and
- transition assistance for in- and out-of-school youth with disabilities.

The graph below shows the percent of DPNs who reported to ETA they engaged in various activities to help meet the needs of persons with disabilities:

¹³ According to the PY 2007 WIASRD Databook, "enrolled in education" describes an "individual enrolled in secondary school, post-secondary school, adult education programs, or any other organized program of study."

¹⁴ Needs-based payments under WIA are payments made to "enable the individual to participate in approved training funded under WIA Title IB."



Source: ETA response to OIG questions, Attachment I

As part of its written response to questions from OIG, ETA included information based upon informal surveys of 371 Disability Program Navigators DPN grantees. ETA collected the information from Round 1 and Round 2 DPN Quarterly Reports submitted between January 1, 2007, and December 31, 2007. The survey provides a “snapshot” of how the DPNs have worked to improve access for persons with disabilities to the One-Stop System and to increase their participation in WIA programs. DPNs reported they worked to make the One-Stop Career centers more accessible (physically and programmatically); provided One-Stop staff with tools and resources to serve persons with disabilities; helped youth to connect to the WIA system; and facilitated better coordination of One-Stop services and those offered by outside agencies.

The following chart summarizes the types of changes attributed to the DPN initiative and the activities that contributed to the changes. The chart also notes which activity was mentioned by the most DPNs in the survey.

Type of change	Activity	Mentioned most frequently
One-Stop Centers are more accessible (physically and programmatically)	Increased availability of adaptive technology and trained staff to use it.	✓
	Improved communication between One-Stop staff and other systems of support.	
	Identified strategies and resources to remove barriers to participation.	
One-Stop staff has more tools and resources to serve customers.	Built relationships with mandated and non-mandated One-Stop partners to collaborate in providing services.	✓
	Increased knowledge of staff in serving persons with different types of disabilities.	
	Guided One-Stop staff on how to help persons with disabilities access program to retain jobs.	
Youth with disabilities are being connected to the workforce system.	Facilitate transition of youth with disabilities to obtain employment and economic self-sufficiency. (Only activity listed in the summary.)	ETA reported that 74 percent of the DPNs cited this activity.
Increased collaboration between One-Stop and partner and community of services to reduce duplication of services.	Participated in local coalition to address “system-level barriers to employment” for persons with disabilities. (Only activity listed in summary.)	ETA reported that more than 80 percent of the DPNs cited this activity.

DPNs reported engaging the One-Stop Centers in other activities to assist persons with disabilities in becoming more economically self-sufficient. These services included providing on-site free assistance in filing for the Earned Income Tax Credit and other tax benefits.

For more results of the survey, please see the Attachment to ETA’s responses to OIG’s questions, in Appendix E.

According to ETA, some states have performed better than others and achieved greater overall success. The DPN Initiative was designed as a pilot program and has been generally identified as very successful. Based upon this success, ETA has encouraged States to continue funding the DPNs through other resources.¹⁵ ODEP, working with ETA, has recognized the successful results from the DPN initiative. ETA has shared the results of its DPN evaluation with ODEP and the two agencies have used this information to design FY 2010 collaborative plans.

¹⁵ Subsequent to providing OIG with written responses to our questions, ETA provided this clarification.

ODEP also acknowledged the role of the DPNs in building the One-Stop System's capacity to serve persons with disabilities. ODEP noted that several of its pilot demonstration programs (youth and adult) were located in the One-Stops. Final results from these programs identified that the DPNs were extremely useful in building capacity by helping to develop partnerships — with employers and community-based agencies — and sustaining effective practices.

Studies, Demonstration Programs, and Evaluations

Additional information on how the One-Stop Systems ensure that persons with disabilities have comprehensive access to WIA services can be found in a 4-year longitudinal study conducted by the Academy for Educational Development (AED) for ODEP, ODEP demonstration programs, and the evaluation of the Disability Program Navigator initiative.

AED's report on 12 local One-Stop Systems summarized mechanisms "that appear necessary to promoting increased access to services for individuals with disabilities." The 12 sites in the AED study were:

Adult Sites

1. Colorado Springs, Colorado: Pikes Peak Workforce Center
2. Los Angeles, California: MetroNorth WorkSource Center, and Hollywood WorkSource Center.
3. Rhode Island: netWORKri, Providence One-Stop Career Center
4. New Orleans, Louisiana: Job One One-Stop Career Center
5. Clark County, Washington: WorkSource Vancouver; Town Plaza WorkSource
6. Utica, New York: Utica Working Solutions One-Stop; Rome County Working Solutions One-Stop.

Youth Sites

7. Tucson, Arizona: Rico Neuvo and Ajo Way
8. Albany, Georgia: Albany One Stop
9. Waterloo, Iowa Hawkeye: Community College Workforce Development Center (HCCWD)
10. Syracuse, New York: CNYWorks

11. Providence, Rhode Island: netWorkri

12. Bellingham, Washington: Northwest Workforce Development Council (NWDC)

The AED study cited the following mechanisms that appear necessary to promoting increased access to services for individuals with disabilities.

Strong leadership. Staff from the local workforce investment boards and community-based organizations “championed” disability issues.

Use of data for decision-making and planning. Some sites used data for decision-making, and emphasized data collection. However, AED reported that most of the 12 sites could not accurately say how many persons with disabilities they had served, what types of disabilities people had, what types of services they had received, or what outcomes they had achieved. “The existing data management systems used by the sites were not set up to record such information, let alone track or analyze it,” AED reported.

Ongoing staff training. AED identified “considerable and continual professional development” as critical to effective service delivery. Specifically, front-line staff at One-Stop Centers needs training in doing appropriate assessments, using assistive technology, providing accommodations and appropriate interventions. ODEP told OIG that the Workforce Investment Act is the only Federal law appropriating funds for working with people with disabilities that does not contain funding specifically for staff training or requiring certification.

Work with employers. According to the AED study, “employer needs increasingly became the driving force that One-Stops and youth service providers considered when planning outreach and workforce development programming.” Some of the sites had business service representatives (BSR) who focused on addressing retention issues and worked with prospective employers to match the “skills sets” of persons with disabilities rather than “sell” the idea that firms should hire people with disabilities. The BSRs emphasized employers as “clients” and marketed the One-Stops as agencies to help firms meet their business need — not just human service organizations. BSRs worked with employers regarding “job-carving techniques and customized employment strategies” to accommodate workers with disabilities. According to ODEP, “job-carving” describes the process of modifying an “existing job description ... [so it contains] one or more, but not all, of the tasks from the original job description.” (Source: <http://www.dol.gov/odep/categories/workforce/CustomizedEmployment/what/index.htm>)

Both ETA and ODEP identified training of front-line staff at One-Stop Centers as essential to connecting persons with disabilities with appropriate workforce training and related services. According to ETA, front-line staff at One-Stop Career Centers that have Disability Program Navigators have received ongoing training. Reviewing how DPNs spent their time over a 6-year period, ETA reports that 87 percent said they worked to increase staff knowledge on serving customers with a wide range of

disabilities. A major role of the DPNs was to train One-Stop Career Center and partner staff on how to serve customers with disabilities, conduct assessments, do outreach, and to inform staff about community-based resources, disclosure, assistive technology/accommodations/universal design, work and tax incentives, Federal, state, and local services and benefits.

In addition to DPNs providing on-site training to staff, ETA provided other technical assistance to build staff capacity in serving people with disabilities. Examples include working with the Disability Business and Technical Assistance Coordinating (DBTAC) grants¹⁶ to develop a free, on-line training for One-Stop staff called “At Your Service.”

One-Stop staff has also participated in webinars on disability-related issues and may access material on ETA’s Workforce3One (<http://www.workforce3one.org/>), which includes videos and narratives on promising practices of working with individuals with disabilities in the workforce system.

Building relationships with employers is crucial to helping all WIA participants — especially those with disabilities — obtain and retain jobs. Both ETA and ODEP have supported initiatives targeted to increasing employers’ support for hiring persons with disabilities who are qualified for available positions.

According to ETA, several State and local Workforce Investment Boards have been active in engaging employers in planning WIA employment and training services to people with disabilities. Additionally, DPNs have worked with local Business Leadership Networks (BLN) and local Business Advisory Councils. ETA reports it also has developed resource materials targeting local firms on the business case for hiring persons with disabilities.

ODEP research has highlighted effective strategies of working with employers to hire persons with disabilities. The AED study reported that “using an employer language and ‘mindset’ — “solving retention problems and matching positions with skill sets” worked better than “selling” the hiring of people with disabilities. This approach increased employers’ awareness that One-Stops are “more than human service organizations.” According to AED, the “message” is that employers wanted to be treated as “clients.” For more information on the AED’s findings related to employer engagement, see the executive summary of the AED report (Appendix I).

¹⁶ The grants are funded through the U.S. Department of Education (ED). ED awards grants to 10 regions. Grantees use the funds to “provide technical assistance, information and training on interpretation and implementation of the Americans with Disabilities Act.” Examples of activities provided by grantees include: providing information, technical assistance and training to education-based entities on accessible information technology; conducting program evaluation research; and doing outreach, coordination and dissemination activities.
<http://www2.ed.gov/programs/dbtac/index.html>

One indicator of the outcome of DOL's efforts to work with employers on hiring and retaining workers with disabilities is data from the DPN initiative. ETA reported that for Program Years 2006 through 2007, the entered employment rate for local Workforce Investment Boards with a DPN was 65 percent compared to 56 percent to those without a DPN. Additionally, the retention rate was nearly identical — 79 percent for WIBs with the DPN and 80 percent for those without.

ETA stated that agency staff also works closely with One-Stop partners (e.g., Vocational Rehabilitation, Adult Education, TANF) and other Federal agencies to coordinate and leverage resources to improve employment outcomes for individuals with disabilities. ETA has been, and continues to be, involved in several major inter-agency initiatives with these Federal partners around disability and employment-related issues. Examples of other Federal agencies that ETA staff works with to improve workforce services for persons with disabilities include the National Institute on Corrections, Substance Abuse and Mental Health Services (SAMHSA), HHS, Transforming Mental Health Care in America Inter-Agency Partner Group, and United We Ride.

ODEP reports that nearly all of its work is done through partnerships with both Federal and non-Federal agencies. ODEP manages the web site www.Disability.gov, which links users to disability-related resources with at least 21 other Federal agencies. Other examples of ODEP's collaboration with Federal and non-Federal agencies include:

- Leadership of the Federal Partners in Transition Workgroup, which is comprised of staff from the Departments of Labor, Education, Health and Human Services (HHS), and the Social Security Administration. The Workgroup focuses on improving outcomes for transition-age youth with disabilities.
- Support of a national Technical Assistance Center housed at Rutgers University to encourage state workforce agencies to partner with other state systems, including those who are disability-specific (e.g., Vocational Rehabilitations) and more "generic" (e.g., Small Business). One of the goals is to document strategies for successful partnership development.
- Promotion of cross-systems work around disability in the areas of foster care, juvenile justice, education, and mental health with the support of ODEP's National Collaborative on Workforce and Youth. www.ncwd-youth.
- Chairmanship of a cross-agency workgroup on Asset Development and Financial Education. The group includes representatives of 18 Federal programs and agencies (e.g., VR, HHS, Commerce, Treasury, IRS and others). The workgroup's focus is to facilitate coordination of "Federal government research, policy, and programming in the areas of tax and financial incentives and asset development." The group recognizes that one of the challenges of workers with disabilities is to build their assets

and access financial services. More information is available at:
<http://www.dol.gov/odep/fineddev.htm>

- Partnership with the Centers for Medicare and Medicaid Services (CMS) to research and develop information to expand funding of supported and customized employment, including services offered through the One-Stop Systems.

Ongoing Initiatives

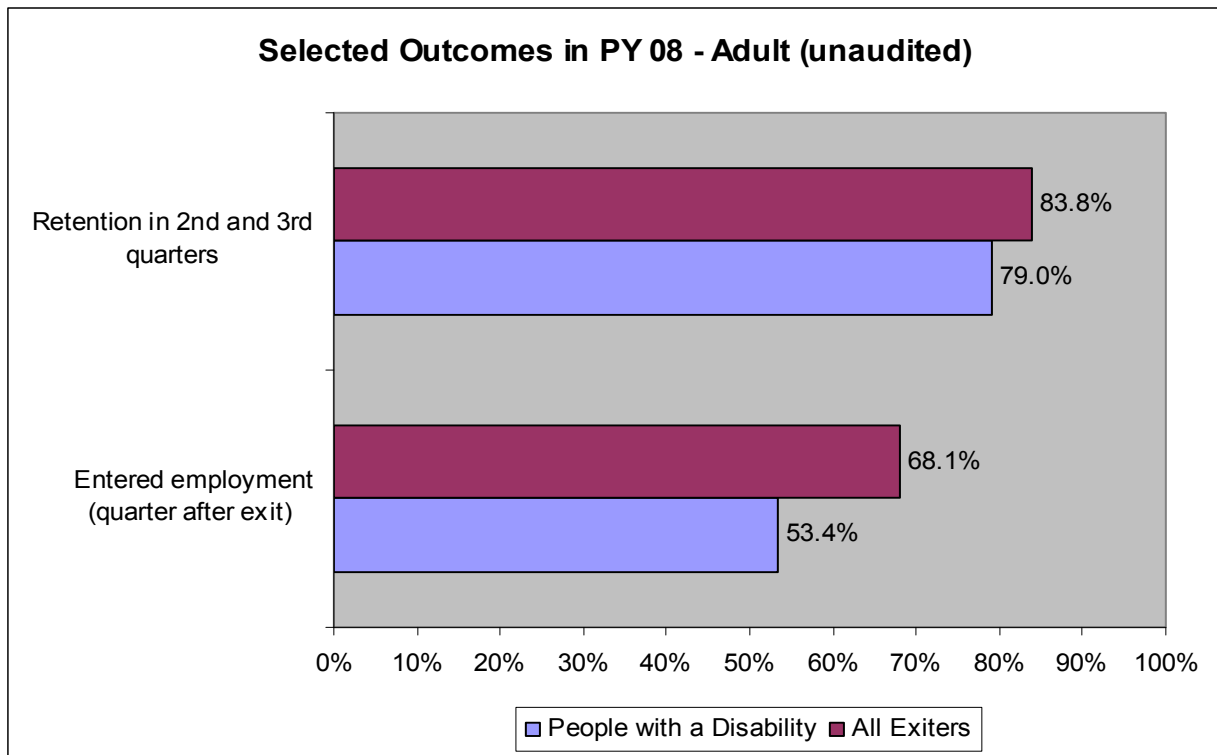
Based on some of the more promising practices of the DPN initiative, beginning in FY 2010, the Department began the Disability Employment Initiative, which is jointly administered by ETA and ODEP. DOL plans to use the \$24 million provided by Congress to support three “components:” competitive grants to States; technical assistance to the public workforce system, including development of training curriculum so that front-line One-Stop staff can better serve people with disabilities; and an evaluation of the initiative. To date, the Department has provided the Senate Committee on Appropriations with an MOU between ETA and ODEP that outlines each agency’s role and responsibilities in the project and a joint work plan.

Another recent initiative is ODEP’s cooperative agreement with the National Technical Assistance, Policy and Research Center at Cornell University. Under the agreement, Cornell is housing the Employer Assistance & Resource Network (EARN). Through EARN, ODEP hopes to expand “promising practices” of working with employers and provide them with “free consulting services and resources to support the recruitment and hiring of people with disabilities.” More information about the services for employers is available at: <http://www.earnworks.com/>.

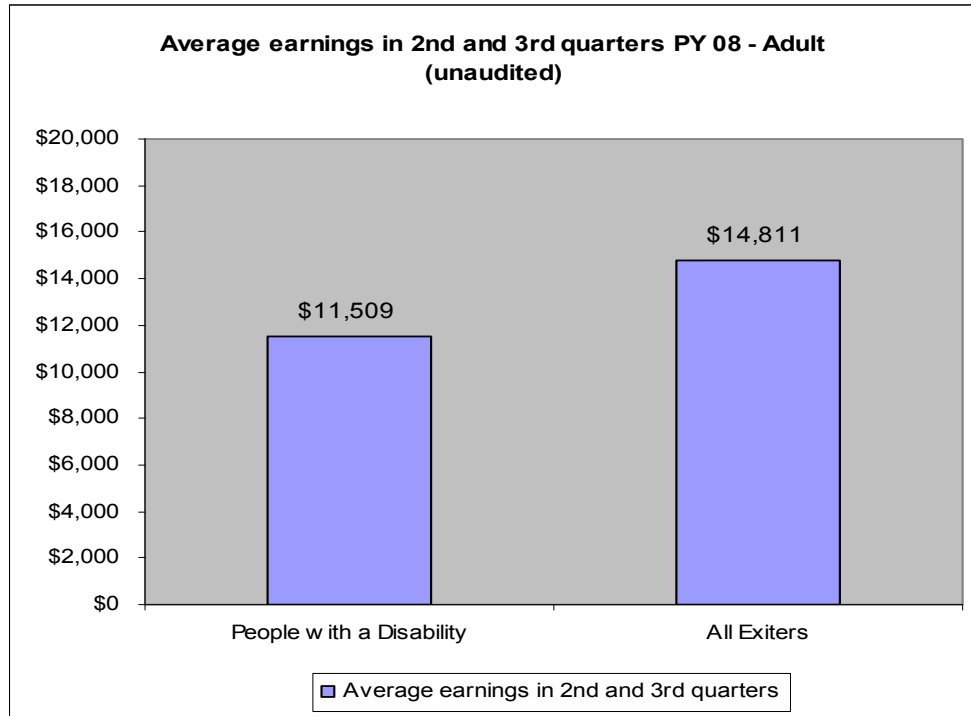
4. What outcomes are achieved by persons with disabilities who use the One-Stop System?

As required by WIA Section 136, the core indicators of performance for adults and dislocated workers are the entered unsubsidized employment rate, retention in unsubsidized employment 6 months after entry, and earnings in unsubsidized employment 6 months after entry into employment.

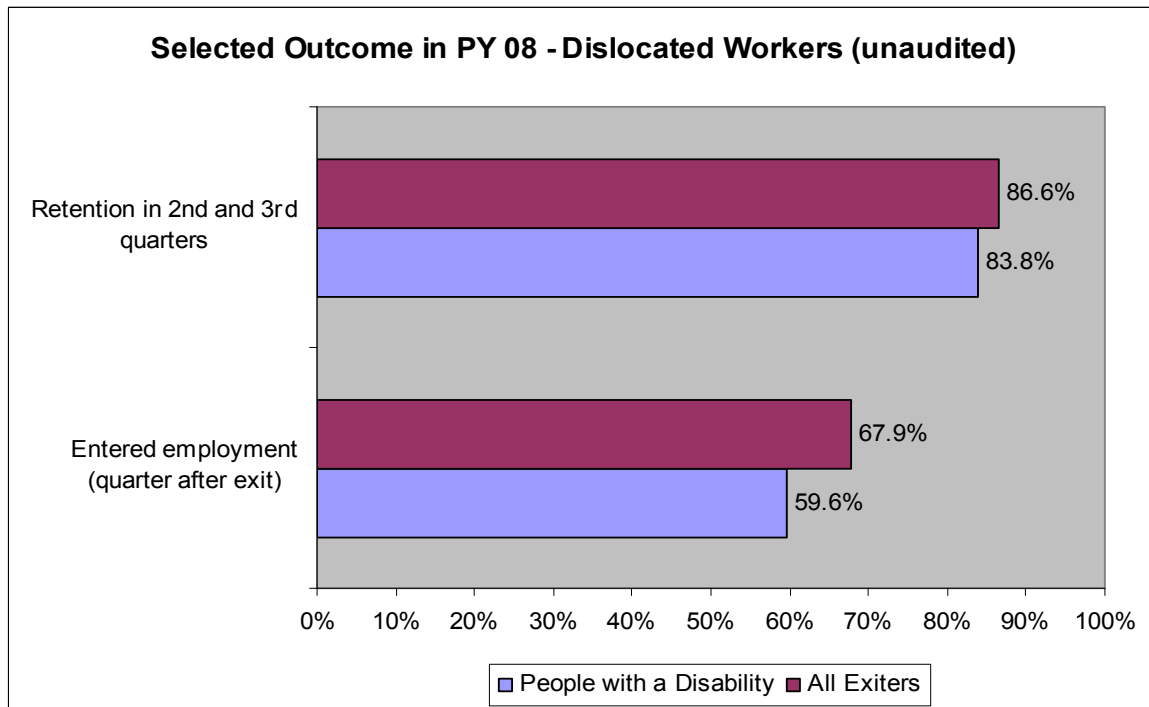
The following charts present the outcomes achieved for the core indicators of performance in the adult and dislocated worker programs in PY 2008 for program exiters who self-reported disabilities and for all program exiters.



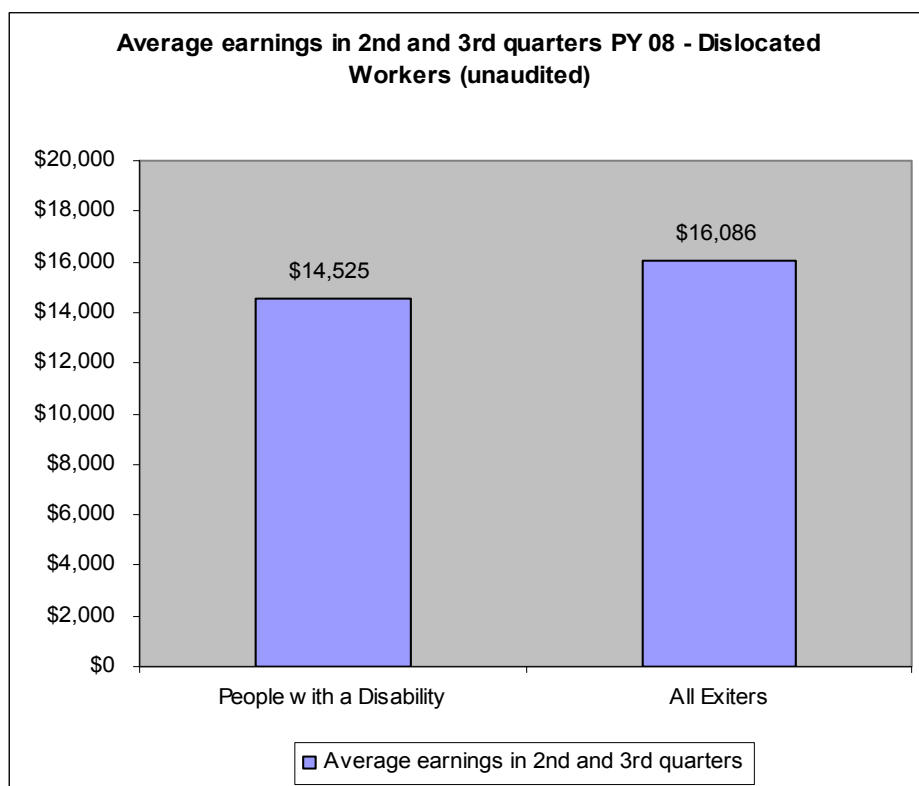
Source: U.S. Department of Labor. Employment and Training Administration. PY 2008 WIASRD Data Book Tables II-29, II-30, PY 2003 WIASRD Data Book Tables II-26.



Source: U.S. Department of Labor. Employment and Training Administration. PY 2008 WIASRD Data Book Tables II-29, II-30, PY 2003 WIASRD Data Book Tables II-26.



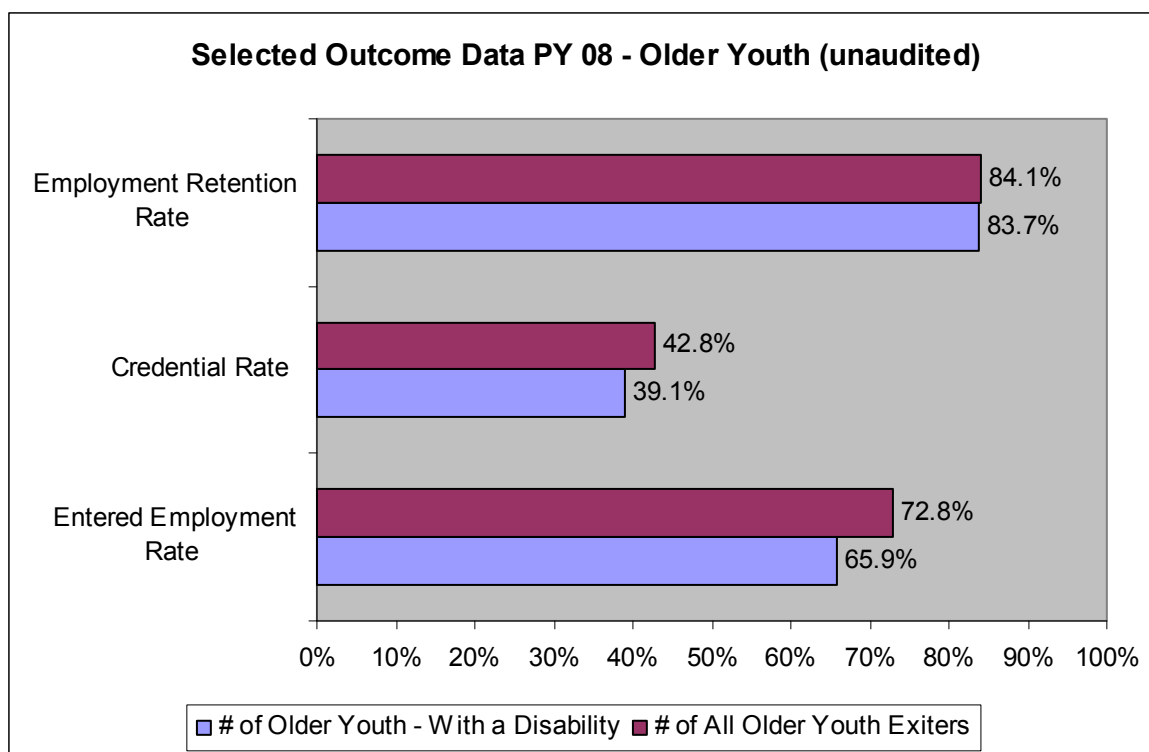
Source: U.S. Department of Labor. Employment and Training Administration. PY 2008 WIASRD Data Book Tables III-33, III-34, PY 2003 WIASRD Data Book Tables III-27.



Source: U.S. Department of Labor. Employment and Training Administration. PY 2008 WIASRD Data Book Tables III-33, III-34, PY 2003 WIASRD Data Book Tables III-27.

The core indicators of performance for older youth are the entered unsubsidized employment rate, credential rate, retention in unsubsidized employment 6 months after entry, and earnings change.

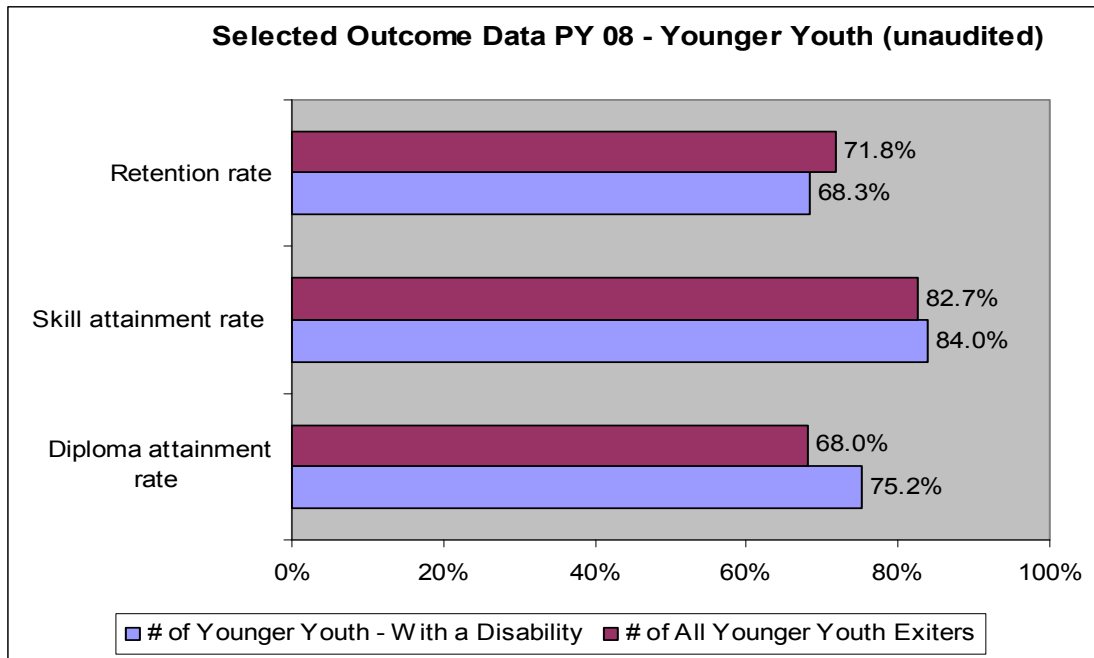
The following chart presents the outcomes achieved for the core indicators of performance by older youth in PY 2008 for program exiters who self-reported disabilities and for all program exiters.



Source: U.S. Department of Labor. Employment and Training Administration. PY 2008 WIASRD Data Book Tables IV-44, IV-40, PY 2003 WIASRD Data Book Tables IV-36, IV24.

The core indicators of performance for younger youth are the retention rate, diploma attainment rate, and skill attainment rate.

The following charts present the outcomes achieved for the core indicators of performance by younger youth in PY 2008 for program exiters who self-reported disabilities and for all program exiters.



Source: U.S. Department of Labor. Employment and Training Administration. PY 2008 WIASRD Data Book Tables IV-44, IV-40, PY 2003 WIASRD Data Book Tables IV-36, IV24.

Additionally, ETA collects and reports through WIASRD the occupation of employment for individuals who obtain unsubsidized employment. The occupations reported are managerial, professional and technical; service occupation; sales and clerical; farming, fishing, forestry, construction and extraction; installation, repair, production, transportation, and material moving; and nontraditional employment. Based on our review of the data reported, there did not appear to be significant differences in the occupations of employment obtain by WIA exiters with disabilities compared with all WIA exiters.

Exhibits 4, 5, and 6 present selected outcome data for PYs 2003 and 2008.

ETA stated that it had no additional outcome data on exiters with disabilities beyond what is reported in WIASRD, and did not have data on the status of participants with disabilities that did not “exit” from the Adult, Dislocated Worker, and Youth programs. ETA stated it provides state and local workforce entities informal guidance and available resources on serving the neediest of youth, including youth with disabilities. In addition, ETA issued Training and Employment Notice No. 10-09: “Toolkit and White Paper on Improving Transition Outcomes of Youth with Disabilities through Apprenticeship.” This tool focuses on expanding apprenticeship opportunities for youth and young adults with disabilities.

One possible additional indicator of the outcome of DOL’s efforts to work with employers on hiring and retaining workers with disabilities is data from the DPN initiative. ETA reported that for Program Years 2006 through 2007, the entered employment rate for local Workforce Investment Boards with a DPN was 65 percent

compared to 56 percent to those without a DPN. Additionally, the retention rate was nearly identical — 79 percent for WIBs with the DPN and 80 percent for those without.

5. What evaluations of WIA services to persons with disabilities has the Department conducted?

Timely and relevant program evaluation helps Federal agencies know if investments are achieving the desired goals and objectives, and identifies changes that can be made to improve outcomes. Program evaluation is most useful when agencies review and consider the findings and recommendations in strategic planning and decision-making related to budgets, program design, and service delivery.

Since 2003, the Department has conducted several independent evaluations of its initiatives to improve WIA services to persons with disabilities. These include an evaluation of the Disability Program Navigator initiative and ODEP demonstration projects. Additionally, the Government Accountability issued its review of DOL efforts to ensure One-Stop accessibility for this population.

The evaluation of the DPN initiative and ODEP projects identified “promising practices” of what the One-Stop System can do to help persons with disabilities access appropriate workforce training, employment, and related services. One of the cross-cutting findings was that front-line staff in One-Stop Career Centers can benefit from more training on how to work effectively with people who have different types of disabilities. DOL received \$24 million from Congress for its FY 2010 budget to implement a Disability Employment Initiative that ETA and ODEP are jointly administering. The purpose of the initiative is to build on “lessons learned” from the DPN grants and to build the capacity of the One-Stop System nationwide to better serve persons with disabilities.

DOL plans to continue its assessment of how the One-Stop System provides access and services to persons with disabilities. ETA will evaluate the initiative with ODEP and review strategies in States that serve a high percentage of youth with disabilities while meeting performance goals. ODEP plans to evaluate its technical assistance centers and do a survey to assess One-Stop programmatic and physical accessibility. ETA’s 5-year evaluation plan notes that a comprehensive evaluation of WIA programs could include an assessment of how One-Stop Career Centers are assisting job seekers with complex barriers to employment — including those with disabilities. However, the WIA Gold Standard Evaluation of WIA due in 2015 does not include that component.

Summary of Selected Evaluations

The following table summarizes selected independent evaluations DOL has conducted that contain information on how the One-Stop System can better serve persons with disabilities.

Table: Summary of Selected Independent Evaluations of Department of Labor Initiatives to Provide WIA Services to persons with Disabilities

Name of Evaluation	Objective(s)	Summary of Selected Findings
Analysis of Change: A Four-Year Longitudinal Study of One-Stop Systems Serving Youth and Adults with Disabilities, by the Academy for Educational Development (2008). See Appendix H for a copy of the Executive Summary.	The objective was to identify supports that are needed to provide efficient and universal access in serving individuals with disabilities through the WIA's One-Stop Career System. Researchers assessed One-Stop services at 12 local sites.	Multiple strategies may improve access and outcomes. Examples include: accountability policies for serving individuals with disabilities, procedures and policies related to customers with disabilities, disability point persons, engaging employers, focusing on universal service delivery, leveraging on non-WIA resources, and providing for continual professional development.
Serving People with Disabilities through the Workforce Investment Act's One-Stop Career Centers, by The Urban Institute (2004). See Appendix I for a copy of the Executive Summary.	Researchers looked at “ the extent to which people with disabilities are served through WIA's One-Stop System and its capacity to serve people with disabilities who desire employment assistance, both in terms of common barriers to access as well as promising strategies to improve service delivery to [this population].”	Researchers found that the One-Stop System as a whole — often with the help of special grant funding such as the DPNs — has made significant strides since WIA's inception in reducing barriers pertaining to physical access and inability to address special accommodation needs. Although there is no comprehensive source of information available to determine how fully programmatic accessibility has been achieved across the One-Stop System, various case studies of One-Stop Career Centers suggest that progress has been made in this area as well-although generally not as much as with improving physical and technological access....”
Chronic Homelessness Demonstration Program: A Synthesis of Key Findings, Issues, and Lessons Learned, by Westat (2009). See Appendix J for a copy of the Executive Summary.	Researchers assessed the extent to which the five demonstration sites improved capacity, coordinated services, provided quality services, helped participants obtain jobs, and sustained their work after the grant ended.	More than half of the participants (58 percent) obtained some type of employment — nearly 44 percent obtained a competitive employment position. Examples of factors contributing to positive outcomes included promoting partnerships with both governmental and community-based agencies and providing training to One-Stop staff and those at partner agencies.

Table: Summary of Selected Independent Evaluations of Department of Labor Initiatives to Provide WIA Services to persons with Disabilities

Name of Evaluation	Objective(s)	Summary of Selected Findings
Labor Has Taken Several Actions to Facilitate Access to One-Stops for Persons with Disabilities, but These Efforts May Not Be Sufficient, GAO-05-54 (2004). See Appendix K for a copy of the Executive Summary.	GAO examined efforts by DOL, the States and One-Stops to facilitate comprehensive access to the One-Stop System for people with disabilities. Additionally, auditors looked at what DOL has done to ensure that the One-Stops are meeting the comprehensive access requirements (WIA Section 188) and the factors that have affected efforts to ensure compliance.	GAO recommended that DOL should develop and implement a long-term plan for ensuring that the One-Stops comply with the comprehensive access requirements. According to GAO and DOL, a work group provided GAO with a “framework” for this effort.
Disability Program Navigator Project Prospects for Systems Change – 2005, by Law, Health Policy and Disability Center, University of Iowa College of Law, University of Colorado at Denver and Health Sciences Centers Colorado WIN Partners (2006). See Appendix L for a copy of the Executive Summary.	Evaluators interviewed 117 people in four states about their experiences of the implementation phase of the DPN initiative.	Examples of key findings include: more than a third of respondents said the DPN made the One-Stops more accessible; respondents in all states said more persons with disabilities were seeking services through the One-Stops as a result of the DPNs; and collaboration and communication in the local workforce network had improved.
Evaluation of Disability Employment Policy Demonstration Programs: A Preliminary Synthesis of Findings from the Independent Evaluation of the ODEP Demonstration Program by Westat, Inc. (July 2007). See Appendix M for a copy of the Report Summary.	The evaluation examined practices and outcomes from sites involved in various ODEP demonstration projects such as: Customized Employment, Chronic Homelessness, and Mentoring and Youth State Intermediary programs. Researchers focused on “challenges and success of local workforce development systems in effectively serving people with disabilities.”	Researchers found that a “major deterrent” to serving people with disabilities was that One-Stop staff lacked “knowledge and understanding” on how to assist this population. Some sites developed innovative curricula and competency requirements to use in staff development. Examples of other findings were: among program participants served by the projects, nearly 45 percent were placed in some form of employment; more than 95 percent earned more than minimum wage; and nearly 74 percent had retained their job for 12 months or more.

Highlights of these evaluations include:

- Disability Program Navigators were extremely useful in building systems capacity, including partnerships, capacity building, and sustainability of effective practices in local workforce areas that were sites in some of the ODEP demonstration projects.
- More than a third of 117 people interviewed in a 4-state study of the DPN initiative credited the DPNs with making the One-Stop Centers more accessible.
- Several studies (AED, Urban Institute, Westat, and University of Iowa) cited the importance of training One-Stop staff to work more effectively with people with disabilities.

ETA is awaiting final results from its evaluation of the DPN. According to ETA officials, Mathematica Policy Research, Inc., is in the process of comparing individualized WIA and Wagner-Peyser data on service levels and outcomes against Social Security Administration's disability rolls in four states that had DPN grants. ETA expects the results by March 2010.

DOL Actions Resulting from Evaluations

As previously reported, ETA and ODEP have launched a joint \$24 million Disability Employment Initiative to build on "lessons learned" from the DPN and to expand its promising practices to the One-Stop System nationwide. Components of the initiative will be competitive state grants, technical assistance, including the development of training curricula for front-line One-Stop staff, and an evaluation. Although the two agencies have not finalized the grant solicitation, ETA shared a draft implementation plan with OIG showing that grantees will be required to use effective practices identified in the DPN and research with One-Stop Career Centers.

According to the draft plan, examples of these "promising and validated practices" include, but are not limited to:

- One Stops registering as Employment Networks under the Ticket to Work Program;
- conducting outreach to the disability community that improves access to One-Stop Career Center services
- marketing to the business community to promote the hiring and retention of people with disabilities;
- One-Stops increasing their use of Universal Design in the organization and implementation of services; and
- increasing collaboration with programs serving youth in order to increase participation of youth with disabilities in One-Stop programs and services.

ODEP reports it has used information from evaluation of its demonstration programs to issue various materials for technical assistance (e.g., briefs, youth “guideposts.”) Examples of these resources and publications are available on ODEP’s web site at:

<http://www.dol.gov/odep/categories/youth/>
<http://www.dol.gov/odep/pubs/publicat.htm>

Upcoming Evaluations and Studies

In addition to evaluating the joint \$24 million ETA and ODEP initiative, the Department is planning to continue its assessment of how the One-Stop System provides WIA services to persons with disabilities.

ODEP has contracted with the Institute for Educational Leadership (IEL) to review strategies used by States that served a high percentage of youth with disabilities in the WIA Youth Program and also met their performance goals in PY 2007. The IEL study will include seven local Workforce Investment Boards that served at least 150 youth in the WIA Youth Program with at least 25 percent having reported disabilities. The study addresses the issue that a possible disincentive for enrolling hard-to-place participants in WIA programs is that States and local areas will not meet negotiated performance goals.

ODEP has plans to evaluate its technical assistance centers. Under contract with ODEP, Social Dynamics, Inc., will review areas such as progress toward meeting the project’s goals and objectives, services provided, customer satisfaction with services, and identification of promising practices.

ETA’s 5-year pilot demonstration and evaluation strategic plan for 2007-2012 states that one of its future research priorities is “increasing labor market participation of underutilized populations” — including people with disabilities. The plan also states that:

“One-Stop Career Centers could also be essential in demonstrating the universal strategies that have proven successful in assisting job seekers with complex barriers to employment (such as individuals with disabilities, homeless individuals, TANF recipients, and older workers) to successfully achieve employment outcomes. An examination of these issues could be included as part of a comprehensive evaluation of the WIA programs.”

The current WIA Gold Standard Evaluation of WIA, being conducted by Mathematica Policy Research, Inc., will not look specifically at issues related to programmatic accessibility for persons with disabilities. The evaluation will collect employment and earnings results for individuals with disabilities who participated in the WIA program, but for informational purposes only. The final report is due in 2015.

We appreciate the cooperation and courtesies that ETA, ODEP and CRC personnel extended to the Office of Inspector General during this project.



Elliot P. Lewis
Assistant Inspector General
for Audit

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Exhibits

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WIA Adult Program: Services Received (unaudited)

Adult	PY 2008		PY 2003	
	Exiters With a Disability	All Exiters	Exiters With a Disability	All Exiters
Number of Exiters	33,809	849,738	14,056	219,979
<u>Services Received</u>				
Core service	48.9%	47.2%	20.2%	19.9%
Intensive Services	40.5%	36.4%	37.2%	33.3%
ITA established	6.4%	7.0%	20.8%	26.2%
Training Services	9.0%	11.6%	42.6%	46.8%
<i>On-the-Job Training</i>	9.2%	10.5%	7.2%	10.6%
<i>Skill upgrading and retraining</i>	13.5%	10.8%	17.1%	6.8%
<i>Entrepreneurial training</i>	0.5%	0.4%	NA	NA
<i>ABE or ESL in combination with training</i>	1.7%	1.1%	NA	NA
<i>Customized training</i>	3.1%	7.7%	NA	NA
<i>Other occupational skills training</i>	75.7%	72.9%	20.8%	26.2%

Sources: U.S. Department of Labor. Employment and Training Administration. PY 2008 WIASRD Data Book Tables II-18, II-19, PY 2003 WIASRD Data Book Tables II-16.

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WIA Dislocated Workers Program: Services Received (unaudited)

Dislocated Workers	PY 2008		PY 2003	
	Exiters With a Disability	All Exiters	Exiters With a Disability	All Exiters
Number of Exiters	9,185	293,614	6,972	187,664
<u>Services Received</u>				
Core service	50.9%	47.8%	20.0%	12.6%
Intensive Services	54.4%	47.4%	33.3%	32.8%
ITA established	12.8%	13.9%	27.8%	37.6%
Training Services	21.7%	18.7%	46.7%	54.6%
On-the-Job Training	17.3%	8.0%	6.4%	6.5%
Skill upgrading and retraining	13.0%	14.7%	NA	NA
Entrepreneurial training	1.5%	1.0%	NA	NA
ABE or ESL in combination with training	3.9%	1.8%	NA	NA
Customized training	1.5%	1.5%	NA	NA
Other occupational skills training	66.7%	77.2%	27.8%	37.6%

Sources: U.S. Department of Labor. Employment and Training Administration. PY 2008 WIASRD Data Book Tables III-22, III-21, PY 2003 WIASRD Data Book Tables III-17.

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WIA Youth Program: Services Received (unaudited)				
Youth	PY 2008		PY 2003	
	Exiters With a Disability	All Exiters	Exiters With a Disability	All Exiters
Number of Exiters	15,729	115,083	26,266	166,831
<u>Services Received (Youth Activities)</u>				
Educational achievement services	55.6%	51.8%	55.6%	55.9%
Employment services	58.2%	56.1%	59.1%	55.5%
Summer youth employment opportunities	31.0%	27.0%	33.8%	33.7%
Leadership development activities	38.4%	30.7%	30.4%	27.4%
Additional support for youth services	47.8%	48.3%	36.6%	35.2%

Sources: U.S. Department of Labor. Employment and Training Administration. PY 2008 WIASRD Data Book Tables IV-17, PY 2003 WIASRD Data Book Tables IV-14

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WIA Adult Program: Selected Outcomes (unaudited)

Adult	PY 2008		PY 2003	
	Exiters with a Disability	All Exiters	Exiters with a Disability	All Exiters
Common Measure				
Number of exiters	31,591	786,653	15,677	253,053
Entered employment (quarter after exit) ¹	53.4%	68.1%	60.9%	72.5%
Retention in 2nd and 3rd quarters ²	79.0%	83.8%	80.2%	84.0%
Average earnings in 2nd and 3rd quarters ²	\$11,509	\$14,811	--	--
Information about Employment in Quarter after Exit				
<i>Occupation of Employment¹</i>				
Managerial, professional and technical	21.4%	24.5%	17.3%	20.0%
Service occupation	27.2%	23.6%	28.3%	23.6%
Sales and clerical	22.0%	20.8%	27.1%	25.1%
Farming, Fishing, Forestry, construction and extraction	3.8%	4.5%	2.9%	4.2%
Installation, Repair, Production, Transportation, and Material Moving	25.6%	26.7%	24.4%	27.0%
Nontraditional Employment	1.1%	0.5%	3.4%	2.8%

Source: U.S. Department of Labor. Employment and Training Administration. PY 2008 WIASRD Data Book Tables II-29, II-30, PY 2003 WIASRD Data Book Tables II-26.

¹ Based on exiters from October 2007 to September 2008

² Retention Rate is based on exiters from April 2007 to March 2008

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WIA Dislocated Workers Program: Selected Outcomes (unaudited)

Dislocated Workers	PY 2008		PY 2003	
	Exiters with a Disability	All Exiters	Exiters with a Disability	All Exiters
Common Measure				
Number of exiters	9,142	248,809	7,366	195,553
Entered employment (quarter after exit) ¹	59.6%	67.9%	76.7%	80.7%
Retention in 2nd and 3rd quarters ²	83.8%	86.6%	88.2%	89.8%
Average earnings in 2nd and 3rd quarters ²	\$14,525	\$16,086	--	--
Information about Employment in Quarter after Exit				
<i>Occupation of Employment¹</i>				
Managerial, professional and technical	23.3%	23.7%	20.9%	24.5%
Service occupation	16.8%	14.7%	14.5%	12.7%
Sales and clerical	25.7%	24.5%	24.5%	26.3%
Farming, Fishing, Forestry, construction and extraction	3.3%	3.6%	4.3%	3.3%
Installation, Repair, Production, Transportation, and Material Moving	30.9%	33.5%	35.7%	33.2%
Nontraditional Employment	0.9%	1.1%	3.2%	3.50%

Source: U.S. Department of Labor. Employment and Training Administration. PY 2008 WIASRD Data Book Tables III- 33, III-34, PY 2003 WIASRD Data Book Tables III-27.

¹ Based on exiters from October 2007 to September 2008

² Retention Rate is based on exiters from April 2007 to March 2008

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WIA Youth Program: Selected Outcomes (unaudited)				
PY2008	Older Youth Exiters With a Disability	All Older Youth Exiters	Younger Youth Exiters With a Disability	All Younger Youth Exiters
Number of Exiters	2,673	31,501	13,220	84,761
Entered Employment Rate (%) ¹	65.9%	72.8%		
Credential Rate (%) ¹	39.1%	42.8%		
Employment Retention Rate (%) ²	83.7%	84.1%		
Earning Change (\$) ²	\$3,714	\$4,027		
Retention rate ²			68.3%	71.8%
Diploma attainment rate ³			75.2%	68.0%
Skill attainment rate ³			84.0%	82.7%
PY 2003	Older Youth Exiters With a Disability	All Older Youth Exiters	Younger Youth Exiters With a Disability	All Younger Youth Exiters
Number of Exiters	3,265	31,017	20,362	133,749
Entered Employment Rate (%) ¹	62.2%	70.0%		
Credential Rate (%) ¹	45.1%	46.4%		
Employment Retention Rate (%) ²	82.0%	81.5%		
Earning Change (\$) ²	\$2,572	\$3,131		
Retention rate ²			60.8%	59.4%
Diploma attainment rate ³			69.7%	60.9%
Skill attainment rate ³			85.8%	84.3%

Source: U.S. Department of Labor. Employment and Training Administration. PY 2008 WIASRD Data Book Tables IV-44, IV-40, PY 2003 WIASRD Data Book Tables IV-36, IV24.

¹ Based on exiters from October 2007 to September 2008

² Retention Rate is based on exiters from April 2007 to March 2008

³ Retention Rate is based on exiters from April 2008 to March 2009

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Appendices

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Appendix A

Background

The Workforce Investment Act of 1998 (WIA) was designed to provide a streamlined system of employment assistance that integrates many employment and training programs through a One-Stop service delivery system for employers and job seekers, including job seekers with disabilities. WIA is intended to provide employment and training services to assist eligible individuals in finding, and qualifying for, meaningful employment and to help employers find the skilled workers they need to compete and succeed in business. DOL's ETA is responsible for administering the programmatic aspects of WIA at the Federal level, while the Civil Rights Center (CRC) is responsible for administering and ensuring compliance with the statute's nondiscrimination and equal opportunity requirements. WIA goals are to:

- increase employment, as measured by entry into unsubsidized employment;
- increase retention in unsubsidized employment six month after entry into employment;
- increase earnings received in unsubsidized employment for dislocated workers; and
- enhance customer satisfaction for participants and employers.

The One-Stop delivery system provides a full menu of job training, education, and employment services at a single neighborhood location where adults, veterans, dislocated workers, and youth receive skills assessment services, information on employment and training opportunities, unemployment services, job search and placement assistance, and up-to-date information on job vacancies.

The Adult and Dislocated Worker programs are authorized under Title IB of WIA. WIA provides for formula-based funding to State Workforce Agencies to design and operate both programs. The Adult program provides employment and training activities for adults, including low income individuals and public assistance recipients. The category of "public assistance recipients" includes disabled individuals receiving SSI. The Dislocated Worker program provides reemployment services and retraining assistance to individuals permanently dislocated from their employment. State Workforce Agencies can use Dislocated Worker program funds for rapid response assistance to help workers affected by mass layoffs and plant closures.

WIA programs provide for three tiers, or levels, of service for adults and dislocated workers:

Core services — include basic services such as job searches and labor market information. These activities may be self-service or require some staff assistance. WIA excludes job seekers who receive core services that are self-service and informational in nature from being included in the performance measures.

Intensive services — include such activities as comprehensive assessment and case management, or activities that require greater staff involvement.

Training services — include such activities as occupational skills or on-the-job training.

Under Title I of the Workforce Investment Act of 1998 (WIA), Youth Activities funds are allocated by formula to state and local areas to deliver a comprehensive array of youth workforce investment activities. WIA authorizes services to low-income youth (ages 14 through 21) with barriers to employment. Eligible youth are deficient in basic skills or are homeless, are runaways, are pregnant or parenting, or are offenders, school dropouts, or foster children. The program serves both in- and out-of-school youth, including youth with disabilities and other youth who may require additional assistance to complete an educational program or to secure and hold employment. Service providers prepare youth for employment and post-secondary education by stressing linkages between academic and occupational learning. They also assist youth by providing tutoring, alternative secondary school services, summer employment, occupational training, work experience, supportive services, leadership development opportunities, mentoring, counseling, and follow-up services.

The following table provides appropriated funding for the Adult and Dislocated Worker programs for fiscal years 2007 through 2010.

Table 6: Funding for WIA Adult, Dislocated Workers, and Youth Programs (Formula Funds) for FYs 2007-2010 (does not include Recovery Act funds)

Program	FY 2007	FY 2008	FY 2009	FY 2010
Adult	\$ 864,604,000	\$ 849,101,000	\$861,540,000	\$861,540,000
Dislocated Workers	\$ 1,439,201,000	\$1,446,189,000	\$1,341,891,000	\$1,413,000,000
Youth	\$942,081,000	\$924,069,000	\$924,069,000	\$924,069,000
Total	\$3,245,886,000	\$3,219,359,000	\$3,127,500,000	\$3,198,609,000

Source: FY 2009 Congressional Budget Justification. Employment and Training Administration. Overview; FY 2010 Congressional Budget Justification. Employment and Training Administration. Overview; FY 2011 Congressional Budget Justification. Employment and Training Administration. Overview.

Both Section 188 of WIA, 29 U.S.C. 2938 (WIA Section 188), and Section 504 of the Rehabilitation Act of 1973 (Section 504), as amended, 29 U.S.C. 794 (Section 504) prohibit discrimination on the basis of disability by covered recipients of Federal financial assistance. Specific obligations regarding accessibility are imposed by regulation.

The regulations implementing WIA Section 188 (29 CFR part 37) incorporate by reference the accessibility provisions of Section 504 regulations, found in Subpart C of 29 CFR part 32. Under these provisions, covered recipients of financial assistance must ensure both that their facilities comply with applicable standards for architectural accessibility, and that their programs and activities comply with program accessibility requirements.

The Civil Rights Center in the Office of the Assistant Secretary for Administration and Management is responsible for developing, implementing and monitoring DOL's civil rights enforcement program under all equal opportunity and nondiscrimination requirements applicable to programs or activities that are financially assisted or conducted either by DOL or One-Stop partners listed in WIA Section 121(b) that offer programs. These equal opportunity and nondiscrimination requirements include WIA Section 188 and Section 504 of the Rehabilitation Act of 1973 (29 U.S.C.794).

The Office of Disability Employment Policy (ODEP) was established in FY 2001 in the Omnibus Consolidated Appropriations Act (P.L. 106-554) to bring a permanent focus within DOL and across the Federal government to develop and disseminate policy that addresses the significant barriers to employment faced by individuals. ODEP supports DOL's efforts to serve people with disabilities in the One-Stop System through policy research and analysis, pilot demonstration programs, technical assistance, and outreach related to the employment of people with disabilities. Some examples of ODEP's efforts are its adult and youth technical assistance centers, which work with employers to promote WIA employment and training services. In FY 2009, ODEP provided technical assistance within the workforce system to improve post-school outcomes for youth with disabilities through improved professional development of youth service workers, the use of individual learning or graduation plans, and innovative job training service models for transitioning youth, including those involved in foster care, juvenile justice and mental health systems. ODEP also identified customized and self-employment strategies, effective models, and policy and technical assistance for the workforce system to improve the employment outcomes for youths and adults with disabilities, utilizing its partnerships with ETA, the Department of Education, the Small Business Administration and others.

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Appendix B

Objectives, Scope, Methodology, and Criteria

Objectives

In response to a Congressional request, we obtained information from the Department to answer the following questions:

1. What are the Department's goals for serving persons with disabilities?
2. What information does the Department have regarding the characteristics and needs of persons with disabilities?
3. What types of services are persons with disabilities receiving from the One-Stop System?
4. What outcomes are achieved by persons with disabilities who use the One-Stop System?
5. What evaluations of WIA services to persons with disabilities has the Department conducted?

Scope

The review covered Department of Labor (DOL) practices, policies, and procedures — in place or planned as of December 31, 2009 — related to serving persons with disabilities through the WIA One-Stop System.

We conducted interviews with officials from the Employment and Training Administration (ETA), Office of Disability Employment Policy (ODEP), and the Civil Rights Center (CRC) — within the Office of the Assistant Secretary for Administration and Management — to gain an understanding of the Department's goals, responsibilities, and programs for ensuring that persons with disabilities have both physical and programmatic access to WIA One-Stop services. We reviewed CRC's compliance assistance and enforcement activities related to Section 188 of the Workforce Investment Act, including its processing of complaints filed by persons with disabilities who allege discrimination in obtaining services from the WIA One-Stop System. We reviewed evaluation reports related to DOL's activities to ensure WIA One-Stop accessibility to persons with disabilities, and interviewed DOL officials about how the Department considers the reports' findings and recommendations in strategic planning. We reviewed relevant material and guidance on the web sites of ETA, ODEP, and CRC, including the WIA Section 188 checklist and on-line training that CRC offers on compliance with WIA Section 188.

We also reviewed selected data on exiters from the WIA Adult, Dislocated Worker and Youth Formula-funded programs from Program Years 2003-2008 to compare services and outcomes for persons with disabilities and all exiters.

Fieldwork was conducted during December 2009 and January 2010 in Washington, D.C., at the Employment and Training Administration, the Office of Disability Employment Policy, and the Civil Rights Center in the Office of the Assistant Secretary for Administration and Management.

Methodology

To answer the objectives, we initially developed a list of 30 questions covering the following areas: DOL goals for serving persons with disabilities; characteristics and needs of jobseekers with disabilities; WIA One-Stop services for persons with disabilities; Outcomes for persons with disabilities that use the WIA One-Stop System; and evaluation of WIA One-Stop services to persons with disabilities.

After holding entrance conferences with ETA, ODEP, and CRC, we sent each agency a revised and “customized” list of questions based on our preliminary understanding of their role in ensuring WIA One-Stop accessibility. We asked the agencies to address the questions and to provide material (or references) to support their answers. The questionnaires and the responses provided by ETA, ODEP, and CRC can be found in Appendices D, E, and F, respectively.

We did not conduct fieldwork to verify the accuracy or reliability of information in the agencies’ answers. We conducted follow-up interviews with officials from the three agencies.

To understand the services and outcomes for persons with disabilities who use the WIA One-Stop System, we reviewed selected data collected from the States and reported by ETA through its Workforce Investment Act Standardized Record Data system. OIG reviewed these data for Program Years 2003-2008.

Criteria

We used the following criteria to accomplish our review:

- Workforce Investment Act of 1998
- Final Regulations, Workforce Investment Act of 1998
- 29 CFR, Part 37 – Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Investment Act of 1998

Appendix C**Acronyms**

AED	Academy for Educational Development
BLS	Bureau of Labor Statistics
CFR	Code of Federal Regulations
CMS	Centers for Medicare and Medicaid Services
CRC	Civil Right Center
DOL	Department of Labor
DPN	Disability Program Navigator
EARN	Employer Assistance & Resource Network
ED	U.S. Department of Education
ETA	Employment and Training Administration
EOO	Equal Opportunity Officer
FPO	Federal Project Officer
FY	Fiscal Year
GAO	Government Accountability Office
HHS	U.S. Department of Health and Human Services
MOA	Methods of Administration
MOU	Memorandum of Understanding
MPR	Mathematica Policy Research, Inc.
OASAM	Office of the Assistant Secretary for Administration and Management
IRS	Internal Revenue Service
ITA	Individualized Training Account
ODEP	Office of Disability Employment Policy
OIG	Office of Inspector General
PY	Program Year
SSDI	Supplemental Security Disability Income
SSI	Supplemental Security Income
Section 504	Section 504 of the Rehabilitation Act of 1973
UWR	United We Ride
VR	Vocational Rehabilitation
WIA	Workforce Investment Act
WIASRD	Workforce Investment Act Standardized Reporting Data
WISPR	Workforce Investment Streamlined Performance Reporting

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Appendix D

Glossary¹

Architectural accessibility requirements: Under these requirements, recipients of Federal financial assistance must provide physical accessibility in their covered facilities, or portions of facilities, by constructing or altering them to comply with specific technical standards. These standards, similar to building codes, have been developed by the U.S. Access Board and adopted by the General Services Administration (GSA).²

Comprehensive access requirements: A general term referring to the range of positive actions that covered recipients of Federal financial assistance must take in order to provide people with disabilities with equal opportunity to participate in and benefit from the programs, activities, and/or employment offered by the One-Stop system – in other words, to “level the playing field” for individuals with disabilities. Examples of such actions include providing architectural accessibility,³ program accessibility,⁴ reasonable accommodations or modifications,⁵ service delivery in integrated settings,⁶ and equally effective communications.⁷

Financial assistance: Under the Federal disability nondiscrimination laws that apply to the One-Stop Career Center system, the term “financial assistance” refers to more than just dollars and cents; it also includes nonmonetary, or “in-kind,” forms of assistance. For example, a business or organization receives Federal “financial assistance” if it uses the services of Federal personnel; if it is permitted to buy or use real or personal property (such as space in a One-Stop Center or other Federally-assisted facility) for free or at below-market rates; or if it is included on a list of eligible training providers. The agreement or arrangement for the Federal financial assistance need not be in writing in order for the recipient of the assistance to be covered by the applicable disability laws.⁸

One-Stop Career Center system (also referred to as “One-Stop system”): The national workforce preparation and employment system created by the Workforce Investment Act of 1998 (WIA). The system is based on the “One-Stop” concept:

¹ Source: The definitions below were provided by CRC.

² See Final Rule, “Federal Management Regulation; Real Property Policies Update,” 70 FR 67786 *et seq.* (November 8, 2005), adopting the Americans with Disabilities Act (ADA) - Architectural Barriers Act (ABA) Accessibility Standards for facilities that are subject to the ABA. Because they have been adopted by GSA, these standards are applicable to entities covered under the WIA nondiscrimination regulations. See 29 CFR 32.28(c), in DOL’s regulations interpreting Section 504 of the Rehabilitation Act of 1973. Subparts B and C and Appendix A of these regulations are incorporated by reference in the WIA nondiscrimination regulations. 29 CFR 37.3(b).

³ 29 CFR 32.28(c).

⁴ 29 CFR 32.27.

⁵ 29 CFR 37.8.

⁶ 29 CFR 37.7(a)(4), (c), (d), and (f).

⁷ 29 CFR 37.9.

⁸ See 29 CFR 37.4, definitions of “financial assistance” and “financial assistance under Title I of WIA.”

making information about, and access to, a wide array of job training, education, and employment services available for customers at a single neighborhood location, known as a “One Stop Career Center.”⁹ Under WIA, a wide range of previously-fragmented programs, which receive financial assistance from the Department of Labor or other Federal departments and agencies, must be offered through the One-Stop system; other programs and activities may also be offered through the system, with the approval of the local workforce investment board and local elected official.¹⁰ The programs providing services through the One-Stop system are referred to as One-Stop partners. All services designated as “core services” by WIA must be provided through not less than one physical One-Stop Center in each local area, which may be supplemented by multiple additional sites and technological networks.

Physical accessibility: This term is a general term for the condition under which a particular built environment is as usable by persons with various types of disabilities or impairments as it is by persons without such disabilities or impairments. Under the Federal disability nondiscrimination laws that apply to the One-Stop Career Center system, there are two types of physical accessibility requirements: *architectural accessibility* requirements, and *program, or programmatic*, accessibility requirements.

Program, or programmatic, accessibility requirements: Like architectural accessibility, programmatic accessibility is a form of physical accessibility.¹¹ Unlike architectural accessibility, providing programmatic accessibility generally does not

⁹ Government Accountability Office Report GAO-05-54, “Workforce Investment Act: Labor Has Taken Several Actions to Facilitate Access to One-Stops for Persons with Disabilities, but These Efforts May Not Be Sufficient” (December 2004), at page 1, “Results in Brief”; see generally Employment and Training Administration (ETA), “The ‘Plain English’ Version of the Workforce Investment Act of 1998” (September 1998, last updated January 07, 2010), available at <http://www.doleta.gov/usworkforce/wia/Runningtext.cfm> (last accessed March 4, 2010), sections entitled “Empowering the Nation’s Jobseekers” and “A Customer-Focused System: ‘One-Stop’ Approach,” and Appendix, section entitled “‘One-Stop’ Service Delivery.”

¹⁰ ETA, “Summary of Workforce Development Provisions of The Workforce Investment Act Of 1998 (P.L. 105-220)” (last updated January 07, 2010), available at <http://www.doleta.gov/usworkforce/wia/summarywia.cfm> (last accessed March 4, 2010), section entitled “Establishment of One-Stop Delivery Systems.”

¹¹ See, e.g., U.S. Access Board, “Accessible Rights-of-Way: A Design Guide” (November 1999), Section 2.3, “Program Accessibility in Existing Facilities” (detailed discussion of program accessibility in the ADA context), available at http://www.access-board.gov/prowac/guide/PROWGuide.htm#2_3, and sidebar to Section 2.3 (explanation of first use of concept of “program accessibility”), available at <http://www.access-board.gov/prowac/guide/sidebarp20.htm> (both pages last accessed March 4, 2010); U.S. Access Board on-line publication “About ADAAG: Frequently Asked Questions” (“ADAAG FAQ”), available at <http://www.access-board.gov/adaag/about/FAQ.htm#g13> (last accessed December 30, 2009), responses to Questions 13 and 14; U.S. Department of Justice publication “ADA Guide for Small Towns,” Part One, Section 1, “Existing Facilities: Program Accessibility” (last update: August 20, 2007), available at <http://www.ada.gov/smtown.htm#anchor12335> (last accessed March 4, 2010); DBTAC National Network of ADA Centers, “FAQs: Frequently Asked Questions for State and Local Government on the ADA,” response to question “What is program access? How can State and local government agencies ensure programs and services are accessible to individuals with disabilities?” available at <http://adacourse.org/solutions.php> (last accessed March 4, 2010) (“As a general rule, a public entity may not deny the benefits of its programs, activities, and services to individuals with disabilities because its facilities are physically inaccessible”).

require compliance with a specific set of technical standards. Rather, it permits a more flexible approach, under which a recipient may take various common-sense steps to ensure that the physical aspects of each covered program or activity are “readily accessible to” persons with disabilities “when each part is viewed in its entirety.”¹² Such common-sense steps include “redesign of equipment, reassignment of classes or other services to accessible buildings, assignment of aides to beneficiaries, home visits, delivery of services at alternate accessible sites, alteration of existing facilities and construction of new facilities . . . or any other method that results in making [a recipient’s] program or activity accessible to” persons with disabilities.¹³

¹² 29 CFR 32.27(a).

¹³ 29 CFR 32.27(c).

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Appendix E

ETA Questionnaire and Responses

**WIA SERVICES FOR PERSONS WITH DISABILITIES
QUESTIONS FOR THE EMPLOYMENT AND TRAINING ADMINISTRATION**

I. Department of Labor's Goals for Serving People with Disabilities

1. What are ETA's goals for providing comprehensive access to the WIA One-Stop system for persons with disabilities?

Answer: ETA's goal is to have a One-Stop Career Center system that provides integrated, meaningful, and effective participation in all WIA-funded programs and activities that are physically, programmatically, communications accessible to persons with a range of disabilities.

2. What does ETA know about the States' goals for providing comprehensive access to the WIA One-Stop system for persons with disabilities?

Answer: WIA requires states to submit 5-year State Plans. After PY 2010, State Plans will have to be submitted at least every two years, and a "rolling submissions" option will allow states flexibility to update their State The state plan requirements include that states: identify major customer segments (including persons with disabilities), their needs, and the state's ability to meet them; and provide information on how they will implement services to "special populations," including adults and youth with disabilities. The state plans are reviewed by the National and Regional ETA Offices. In addition, the ETA Regional Federal Project Officers (FPOs) use a Core Monitoring Guide, when conducting project site visits. This Guide includes questions about accessibility for persons with disabilities (i.e., Objective 2.3, Civil Rights, Indicator 2.33 relates to whether the "grantee location and facility, or part of the facility, is accessible and useable by persons with disabilities.") and other questions pertaining to strategies to recruit and serve participants who meet the target group criteria identified in the grant (i.e., Indicator 4.13). The FPOs report on this element in their monitoring reports.

Lastly, to receive DOL/ETA funding under the Disability Program Navigator (DPN) grant initiative, the states must:

"Provide a comprehensive action plan, which addresses compliance with specific legal requirements related to architectural and programmatic accessibility of One-Stop Career Centers, provisions of equally-effective communication for and with individuals with disabilities, provision of reasonable accommodations and modifications, and general nondiscrimination and equal opportunity for individuals with disabilities.

Applicants must confirm that all One-Stop Career Centers in the state comply fully with the applicable requirements related to architectural accessibility, as set forth at 29 CFR 32.36 through 32.28. If all the One-Stops do not comply fully with the applicable accessibility requirements, applicants should identify any outstanding accessibility issues of non-compliance in the state, including: (a) plans for corrective action, such as addressing communication elements and features; (b) a time-line by which the corrective action will occur; and (c) the approximate level of funds that are required for completion. The timeline for completion must not exceed six months following the award.” (DPN SGAs, 2003-2008). The DPN state grantees have indicated to the National DPN Program Office that their state undergoes annual or bi-annual EEO compliance reviews, including accessibility.

Based upon the DPN annual grant submissions (which include approximately 42 state grantees), reviews of accessibility are conducted regularly by EEO staff or others utilizing the Section 188 Checklist or other approved assessment tool. ETA’s information about the States’ goals for providing comprehensive access to the WIA One-Stop system for persons with disabilities is derived from the above-mentioned sources. This information leads ETA to believe that there has been significant improvement in the One-Stop Career Center’s accessibility since the passage of WIA in 1998.

Also, states are required to have a Methods of Administration (MOA), which details how the state will ensure compliance with the Nondiscrimination and Equal Opportunity Regulations for WIA, including Section 188 of WIA and its implementing regulations (29 CFR part 37), that pertains to people with disabilities. The Civil Rights Center (CRC), ETA, and ODEP, issued the Section 188 Disability Checklist, July 22, 2003, which was designed to assist recipients of WIA Title I Federal financial assistance ensure that their Stop Career Center delivery system is accessible. All Governors must submit an MOA that has been approved by the CRC Director at least very two years

ETA and ODEP are also working on a joint collaboration as part of the FY/PY 2010 appropriation language. Plans include an evaluation of accessibility in One-Stop Career Centers. Results are expected to be available in FY 2011.

3. How does ETA measure progress towards improving access to the WIA One-Stop system by people with disabilities?

Answer: By using the WIA performance measures and compiling qualitative/anecdotal information from the DPN grantees, stakeholders, etc.

4. Has ETA conducted any risk assessment to identify factors that could limit accessibility of WIA One-Stop services to people with disabilities? Has ETA developed a risk management plan to address them?

Answer: No

5. In a December 2004 Report (“Labor Has Taken Several Actions to Facilitate Access to One-Stops for Persons with Disabilities, but These Efforts May Not Be Sufficient,” GAO-05-54), GAO recommended that DOL should develop and implement a long-term plan for ensuring that the one-stop system complies with the comprehensive access requirements for people with disabilities. GAO subsequently reported that DOL had developed a framework, finalized and approved the then ETA Assistant Secretary, which sets forth the ideal goals that DOL seeks to accomplish to promote excellence in service delivery for people with disabilities in the One-Stop Career Center system. Is the framework that GAO references a written document? If so, please provide a copy.

Answer: Yes. OPDR has the final copy, which was signed off on by ETA, CRC, and ODEP.

II. Characteristics and Needs of Jobseekers with Disabilities

1. For each of the following items, what additional information does ETA collect and review, in addition to WIASRD, about the characteristics and needs of jobseekers with disabilities that use the WIA One-Stop system?
 - What sectors of the economy are likely to hire persons with disabilities?
 - What is known about employment histories?

Answer: ETA has not conducted a systematic study of these issues. However, there has been limited information compiled on these questions from ETA’s DPN state grants. WIASRD data is limited and does not include specific disability characteristics such as sensory or mobility limitations. In addition, many individuals with disabilities that access the One-Stop system do not disclose their disability.

ETA is in the process of conducting a quantitative evaluation involving four DPN state grantees utilizing Mathematica Policy Research, Inc. which will take individualized WIA and Wagner-Peyser data on service levels and outcomes and comparing these against Social Security Administration’s disability rolls. ETA expects to get the MPR report some time in February or March. There will be more characteristic information in the SSA data and may provide some analysis of trends.

2. Has ETA noticed any change in the characteristics of this group since PY 2005?

Answer: Not specifically. However, there is accepted knowledge in the workforce and disability fields that unemployment increases the likelihood of

latent disability issues surfacing that were previously dormant or new disabilities emerging due to stress of unemployment. Given the state of the economy over the past two years, there is likely a substantial increase in job seekers with disabilities who are accessing the One-Stop system. It is also known that many populations with significant barriers to employment, such as TANF and ex-offenders, have a large incidence of disability. The current economy makes it less likely that these individuals will be able to obtain self-sustaining employment and will be in need of training and support services through the workforce system.

3. How does ETA use these data to plan WIA services to meet the needs of jobseekers with disabilities that use the One-Stop system?

Answer: The planning and delivery of services is established at the state and local level under the WIA.

1. What does ETA know about similar information that the States may collect and use in planning employment and training services (both WIA and non-WIA) to people with disabilities?

Answer: This information is compiled on a limited basis from the DPN state grantees. It would also be included in the state WIA plans and annual reports.

III. WIA One-Stop Services to Jobseekers with Disabilities

Statutory Responsibilities and Oversight

1. What are ETA's statutory responsibilities to ensure States and local workforce investment areas (LWIAs) provide physical and programmatic access for persons with disabilities?

Answer: WIA, Section 188, 29 CFR 32.36 through 32.28.

2. What role does ETA play to ensure the States and LWIAs are complying with Section 188 of WIA (e.g., CRC enforcement, ETA Regional Office monitoring)? What guidance has ETA issued on Section 188 compliance?

Answer: Refer to answer #1. ETA, CRC, and ODEP issued a Memorandum and WIA Section 188 Disability Checklist to all: State Workforce Liaisons, Workforce Agency Administrators, One-Stop Career Center Leads, State EO Officers, Job Corps Contractors, Job Corps Center Directors, and National Program Grantees, on July 22, 2003. The Regional Offices conduct comprehensive reviews of states, using the Core Monitoring guide, which includes compliance with sec. 188.

Use of WIA Services by People with Disabilities

1. Is use of WIA Adult and Dislocated Worker Program services (e.g., Core, Intensive, Training, ITAs) by individuals with disabilities significantly different than use by those without disabilities, and what factors may explain any differences?

Answer: ETA does not collect data that would support or refute this statement.

2. Is use of WIA Youth Program services (e.g., education, employment services, youth development) by individuals with disabilities significantly different than use by those without disabilities, and what factors may explain any differences?

Answer: There are much higher reported numbers of youth with disabilities accessing WIA services than adults with disabilities. The reasons may be because: youth with disabilities transitioning from special education into the WIA system are already self-identified as having a disability (i.e., have an IEP) and eligibility for WIA youth services permit a youth with a disability to be a family of one, thereby easing income eligibility. Utilization of specific services by youth have not been analyzed.

3. What percent of individuals with disabilities, that used training services, received an Individual Training Account? What did they get trained for? What types of jobs did they obtain (e.g., occupation of employment)?

Answer: ETA will provide the information that is available at a later date.

4. Does training for WIA One-Stop staff include how to work more effectively with jobseekers with disabilities?

Answer: Yes, in those One Stop Career Centers that have Disability Program Navigators. A major role of the DPNs was to train One-Stop Career Center and partner staff on how to serve customers with disabilities, assessments, outreach, community-based resources, disclosure, assistive technology/accommodations/universal design, work and tax incentives, Federal, state, and local services, benefits, etc.

ETA also worked with the Disability Business and Technical Assistance Coordinating (DBTAC) grants to develop a free, on-line training for One-Stop staff called "At Your Service". ETA has also hosted many webinars on disability related issues on Workforce3One which is available to One-Stop staff. ETA has recently implemented a community of practice platform page on Workforce3One that includes videos and narratives on successful practices when working with individuals with disabilities in the workforce system. Further, the new ETA-ODEP Disability and employment Coordination Initiative plans to develop a curriculum module for front-line One-Stop Career Center staff on serving customers with disabilities.

5. Have local workforce areas that received “Disability Navigator” grants achieved their objectives?

Answer: Some states have performed better than others and achieved greater overall success. The DPN Initiative was designed as a pilot program and has been generally identified as very successful. Based upon this success, ETA expects the states to fund the DPNs on a permanent basis through other workforce resources.

6. Did “Disability Navigator” grants result in expanded system capacity to serve people with disabilities?

Answer: Please see attachment which provides information that is based upon informal surveys of DPN grantees.

One-Stop Partners

1. What activities has ETA conducted to engage employers in planning WIA employment and training services for people with disabilities? What are the outcomes of these efforts?

Answer: ETA has engaged employers in planning WIA employment and training services to people with disabilities mainly on the State and Local/WIB levels, through the work of the DPNs, including their work with local Business Leadership Networks (BLNs) and local Business Advisory Councils. There has been an increased number of training (including the development of materials) targeted to local business on the business case for hiring persons with disabilities/ROI.

2. What procedures does ETA have in place to assess and improve how it works with other One-Stop partners that can provide services to people with disabilities (e.g., Vocational Rehabilitation, Adult Education, and TANF)?

Answer: ETA staff work closely with other Federal partners (e.g., VR, Adult Education, TANF, SSA, etc.) to coordinate and leverage resources to improve employment outcomes for individuals with disabilities. ETA has been and continues to be involved in several major inter-agency Initiatives with these Federal partners around disability and employment-related issues.

IV. Outcomes for People with Disabilities That Use WIA One-Stop System

1. In addition to data reported in WIASRD, does ETA have additional information on the following questions:
 - What are the outcomes for people with disabilities that “exit” from the WIA One-Stop system?

Answer: No.

- For those “exiters” who obtain employment, what types of jobs do they obtain (e.g., occupation of employment)?

Answer: No.

2. Has ETA provided guidance to local workforce areas on how to work with employers and other agencies to increase retention and earnings for people with disabilities?

Answer: No

3. What does ETA know about the impact of providing this guidance (e.g., has it increased retention and earnings)?

Answer: No.

4. What is the status of participants with disabilities that did not “exit” from the programs?

Answer: ETA does not have data on this.

V. Evaluation of WIA Services to People with Disabilities

1. What independent evaluations has ETA done to assess the WIA One Stop system’s capacity to serve jobseekers with disabilities?

Answer: As mentioned above, ETA is conducting an independent evaluation of the DPN initiative under a contract with MPR. Other independent evaluations have been conducted under other entities such as the Urban Institute report for the Ticket to Work and Work Incentives Advisory Panel entitled, “Serving People with Disabilities Through the Workforce Investment Act’s One-Stop Career Centers,” November 4, 2004.

2. What are the evaluations’ objectives?

Answer: DPN evaluation is to determine the impact of the DPNs on workforce services and outcomes for Social Security Administration disability beneficiaries. Specifically, ETA expects to see the level of usage of WIA and Wagner-Peyser services by these beneficiaries, the extent to which these individuals disclose their disability, any characteristics information that impacts services and outcomes, and the extent to which these beneficiaries obtain employment and exit the SSA rolls.

3. What were the outcomes of the evaluations (e.g., findings and recommendations)?

Answer: N/A (The Report cited above stated that “The One-Stop system as a whole-often with the help of special grant funding [ETA- funded WIGs and DPNs] has made significant strides since WIA’s inception in reducing barriers pertaining to physical access and inability to address special accommodation needs. There also appears to be growing recognition that the focus on accessibility for people with disabilities with respect to the One-Stop system must move beyond physical and technological access to include a broader effort to address programmatic access. Although there is no comprehensive source of information available to determine how fully programmatic accessibility has been achieved across the One-Stop system, various case studies of One-Stop Career Centers suggest that progress has been made in this area as well-although generally not as much as with improving physical and technological access....” (Page #2)

4. What actions have ETA taken or plan to take as a result of evaluation findings and recommendations?

Answer: Although ETA has not conducted independent evaluations to assess the WIA One Stop system’s capacity to serve jobseekers with disabilities, it has listened to disability stakeholders, the One-Stop Career Centers staff, and other reports and responded by funding the Work Incentive Grants (WIGs) from 2000-2006 and the DPN grants from 2003-until 2010; both of these initiatives focused on expanding the capacity of the One-Stop Career Center system to serve persons with disabilities by: promoting physical, programmatic, and communications accessibility; training front-line One-Stop and partner staff; purchasing assistive technology; developing with community-based organizations and mandated and non-mandated One-Stop partners; conducting outreach to persons with disabilities; conducting outreach to employers.

Additional Questions for ETA:

1. How does ETA coordinate and communicate with CRC and ODEP in ensuring that States and LWIAs are complying with Section 188?

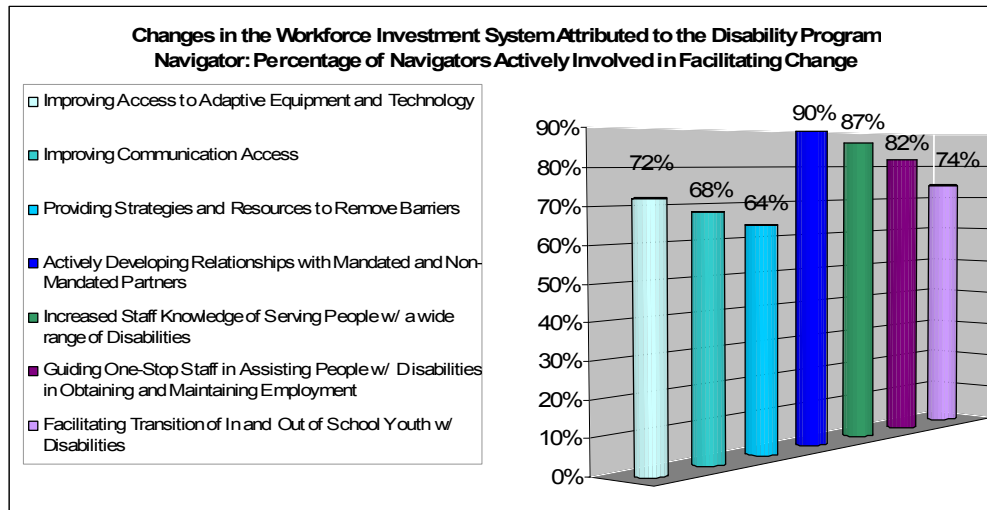
Answer: ETA meets and consults with both CRC and ETA on an as needed basis on issues related to accessibility of the One-Stop Career Centers. There have been joint webinars, conference workshops and grantee teleconferences conducted jointly with CRC and ODEP. If CRC finds any Section 188 violation in a state’s One-Stop system, it informs ETA and both agencies (including the Regional Office) try to work on a resolution of the issue.

2. What are the goals and plans for the joint \$24 million project with ODEP “built on lessons learned” from the Disability Program Navigator grants?

Answer: In anticipation of the new funding, ETA and ODEP established a collaborative, integrated team composed of representatives from both agencies and have met a number of times to determine the approach to the use of the funds. A Report to Congress is due Jan 15, 2010 and this is currently in DOL clearance. ETA and ODEP are also in the process of finalizing a Memorandum of Agreement on coordination activities. This is also in clearance. A work plan has also been developed that includes timelines and implementation activities.

Evaluation of the DPN Initiative

Data collected over the past 6 years provides a strong picture of improved access and an increase in the effective and meaningful participation of individuals with disabilities in the workforce investment system through the work of the Disability Program Navigators.



Changes in the Workforce Investment System attributed to the Navigator:

- One Stop Career Centers are more accessible (physically, programmatically and attitudinally).
 - 72% are working to ensure that adaptive equipment and technology is readily available in One Stop Career Centers and to make sure the staff is trained in its use.
 - 68% are working to improve communication between the staff in the One Stop Career Center and other systems of support.
 - 64% are working to identify strategies and resources that remove barriers to program access and services.
- One Stop staff has more tools and resources to serve all customers.
 - Developing relationships with mandated and non-mandated partners to foster collaboration in the delivery of services for a diverse population of customers, 90%.
 - Increasing staff knowledge on serving customers with a wide range of disabilities, 87%.
 - Guiding One Stop staff in helping people with disabilities access and navigate the various programs that impact their ability to retain employment, 82%.
- Youth with disabilities are being connected to the workforce investment system.
 - 74% are facilitating the transition of in or out of school youth with disabilities to obtain employment and economic self-sufficiency.

- The Navigator is helping to build the bridge between partner and community agencies and the One Stop to reduce duplication of services.
 - Over 80% of Navigators have established or participate on a local interagency action committee to address systems level barriers to employment for groups of job seekers with disabilities on a regular basis. The primary partners represented in these working groups include: VR Counselor (68%); community based organizations (64%); and One Stop WIA Counselors.

Building System Capacity through Connections with Other Initiatives

Promotion of employment as a means to advance economic self-sufficiency for all people, including people with disabilities, ties into asset building strategies (Individual Development Accounts, Earned Income Tax Credit), and the workforce system becoming Employment Networks (ENs) through SSA's Ticket to Work Program.

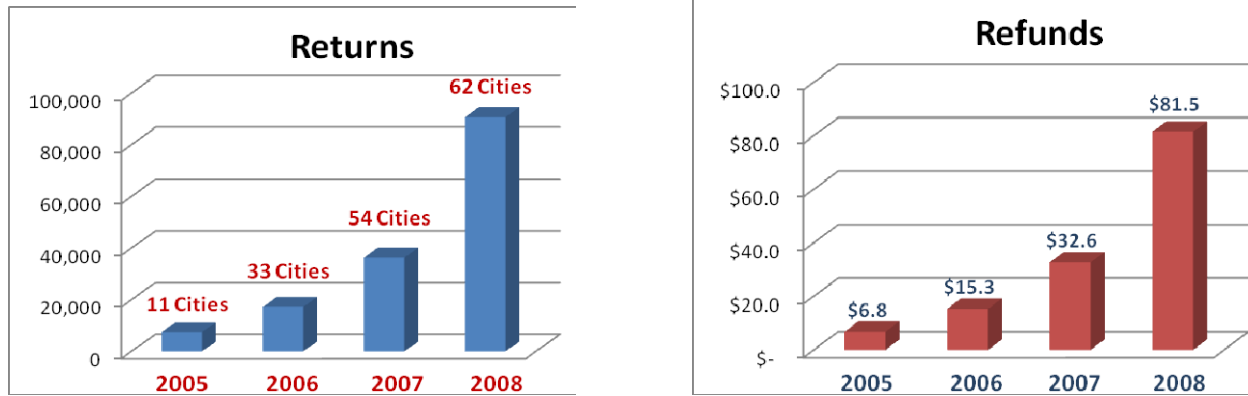
Through building relationships with other programs, the DPN Initiative has served as the liaison to the workforce investment system to help expand opportunities for job seekers with disabilities. Navigators are involved in these collaborative efforts to leverage resources and create system change. Two such efforts include the aforementioned asset building strategies and the Ticket to Work Program.

Real Economic Impact Tour (REI Tour)

The National Disability Institute and Internal Revenue Service (IRS) through the Real Economical Impact Tour (REI Tour) is bringing free tax preparation and other asset building strategies to workers, with and without disabilities, with low incomes. The national DPN Program Office is working with this initiative to show how the public workforce investment system can assist in creating economic transformation in regional economies across the nation through innovative asset building strategies.

Through this relationship, DPNs have been instrumental in connecting One Stop Career Centers to this tour to help build partnerships that are contributing to their region's economic development vision through free tax preparation (Volunteer Income Tax Assistance and use of the Earned Income Tax Credit (EITC), other asset building strategies, referral, and resource information dissemination.

- Since 2005, the REI Tour provided free tax-filing assistance to 151,751 taxpayers with disabilities with refunds of \$136,374,700.
 - The REI Tour grew from 11 cities in 2005 to 62 cities in 2008.
- In the 2008 filing season, REI Tour partners prepared over 90,000 tax returns with over \$81 million in refunds received by persons with disabilities.
 - Of the 62 REI Tour cities, DPNs were national partners in 39 (63%).



Source: *Building a Better Economic Future for Americans with Disabilities Annual Progress Report on the 2007 - 2008 Real Economic Impact Tour*. National Disability Institute. Available at <http://www.reitour.org/>

- In 2009, there are 84 participating cities.
 - DPNs are national partners in approximately 66 (79%).

Most Significant REI Tour Accomplishments in 2008

- Increased free tax returns prepared by 150% from 2007, and assisted 90,653 persons with disabilities in 2008.
- Increased refunds to taxpayers with disabilities from 2007 to 2008, from \$32.6 million to \$81.5 million.
- Created over 2,016,165 outreach contacts in asset building education and media information in 2008.
- Convened national veteran workgroup that is building strategies to better serve veterans with disabilities in the 2009 filing season.

Ticket to Work Program

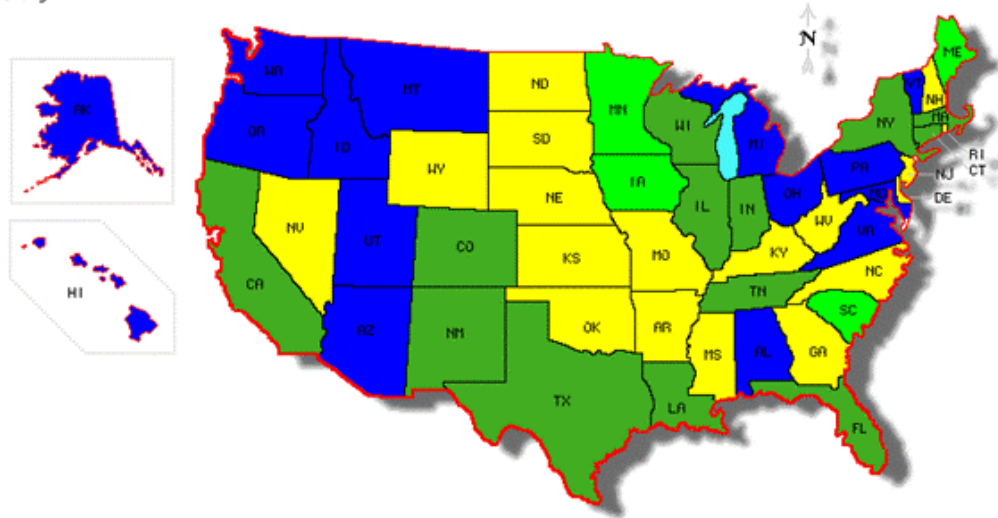
The 2005 proposed changes to the Ticket to Work regulations established a renewed enthusiasm for the potential benefit of the Ticket to Work program for both Ticket Holders and Employment Networks that provide the services to meet their return to work needs. Since the passage of the 1999 Ticket to Work and Work Incentives Improvement Act, the Social Security Administration has contracted with several entities to support the administration of the Ticket program. In November 2007, National Disability Institute became a sub-contractor of one such entity, CESSI, to educate local and State Workforce Boards on how the proposed changes impact their role in the Ticket program and to support them in making the decision to serve Ticket Holders as an Employment Network (EN).

Working in close partnership with the Disability Program Navigator Initiative, DOL-ETA, CESSI, SSA, and other contracted partners, success has been achieved through a strategic approach of national training, state directed training, individual technical assistance, Workforce specific marketing materials, the inclusion of national partners and the leveraging of trusted relationships.

- To date, NDI in partnership with the national DPN Program Office has utilized state and local level DPN grantees to engage Workforce Systems in 40 of the 50 states, the District of Columbia and Puerto Rico to explore the option of becoming an EN.
- Over the past 19 months, 6 State Workforce entities and Regional entities have become ENs, resulting in 119 new One Stop locations in 16 States, Puerto Rico and the District of Columbia that accept Tickets.
 - In 2008, nearly 30% of the 292 new Employment Networks in 399 locations were workforce investment entities.
 - Since the promotion of changes to the regulations in 2008, 21% of the 638 new EN locations (or 135 new EN locations) are workforce investment entities.

Recruitment of Workforce Partners

- - EN at State Level
- - EN at Regional Level
- - RFP in Process
- - Exploring



NOTES:
The District of Columbia is an EN at the "State" level with 2 locations. Puerto Rico is an EN at the "State" level with 16 locations

6-5-09

Ticket to Work Impact Study

NDI provided support to one state, Iowa, and one region, Jacksonville, to study the impact of the proposed Ticket payments on customers served by the One Stop system in 2006. The data generated by the study confirms that One Stop Career Centers provide services to a pool of Ticket Holders that did not identify themselves as having a disability. These individual were successful in securing employment through the One Stop system and worked at a level that would provide an EN payment to the One Stop as an EN.

- In Florida, 1,009 potential Ticket holders returned to work through services received as One Stop customers in 2006. The potential revenue, under the proposed Ticket regulations, for serving these Ticket Holders is \$1,679,770.

- In Iowa, 1,777 potential Ticket holders returned to work through services received as One Stop customers in 2006. The potential revenue, under the proposed Ticket regulations, for serving these Ticket Holders is \$2,586,665.

June 2, 2009

Appendix F

ODEP Questionnaire and Responses

**WIA SERVICES FOR PERSONS WITH DISABILITIES
QUESTIONS for ODEP**

I. Department of Labor's Goals for Serving People with Disabilities

1. What are the Department of Labor's (DOL) goals to serve people with disabilities through the WIA One-Stop system?

Specific Questions for ODEP: How does ODEP support the DOL in answering achieve its goals to serve people with disabilities through the WIA One-Stop System (strategic plan)

ODEP supports DOL's efforts to serve people with disabilities in WIA One-Stop System through policy research and analysis, pilot demonstration programs, technical assistance, and outreach related to the employment of people with disabilities.

2. What does DOL know about the States' goals for providing employment and training services to people with disabilities?

Specific Questions for ODEP: What does ODEP know about the States' goals?

States do not set specific goals or targets for serving people with disabilities. Through our technical assistance efforts, ODEP works with states to increase their service capacity and coordination efforts across the workforce development systems (e.g., vocational rehabilitation, mental health, etc.) to serve people with disabilities.

3. How does DOL measure progress towards achieving its goals for serving people with disabilities through the WIA One-Stop system?

Specific Questions for ODEP: How does ODEP measure its progress towards achieving its goals for serving people with disabilities?

The WIA does not specify goals or targets for service delivery. ODEP does not provide direct service to people with disabilities. ODEP's work is focused on policy, research, evaluation, and analysis of the systems that provide services. ODEP's long term outcome goal is "implementation of ODEP identified disability employment-related policy and practices by targeted agency partners, and public and private employers." This goal is measured by achieving system-wide change through the "number of targeted Federal, state, and local agencies and employers implementing ODEP identified disability employment-related policy and practices."

4. Has DOL conducted any risk assessment to identify factors that could prevent achieving these goals? Has DOL developed a risk management plan to address them?

Specific Questions for ODEP: Has ODEP done any risk analysis related to identifying factors that could prevent achieving these goals?

ODEP, in collaboration with CPPR, has conducted evaluations designed to assess the effectiveness of the agency's performance measurement and results. An assessment completed in 2008 by Eastern Research Group, Inc., resulted in a recommendation to conduct an evaluation of ODEP's redefined performance measures and supporting processes. In FY 2010 ODEP plans another evaluation to conduct an "Agency-wide look-back study to assess ODEP's impact on disability employment and related systems" that is aligned with ODEP's new performance measurement system.

II. Characteristics and Needs of Jobseekers with Disabilities

1. What information does DOL (ETA, **ODEP**, and CRC) collect and/or review about the characteristics and needs of jobseekers with disabilities that use the WIA One-Stop system?

In general ETA's WIASRD data collection system collects general disability status of jobseekers with disabilities. The data are not categorized into disability-specific categories.

- What data are available about the characteristics of disabled job seekers?

Characteristics include state and local program exiters with disabilities, age, gender, race/ethnicity, veteran status, number of exiters, employed at participation, wages, limited English language proficiency, single parents, UI status, public assistance recipient, homeless, offender, and education attainment,

- What are the variations by gender, race, etc.?

In 2008 43% of adult exiters were women; 57% were men. 9.7% were Hispanic; 1.6% were American Indian or Alaskan Native; 1.3% were Asian; 27.6% were African American; 57.1% were White; and 2.4% were more than one race. The data also indicate that 14.5% of youth served had a disability.

- What is known about employment histories?

The 2008 data indicates that 12.2% of jobseekers with disabilities were employed at the time of program participation; and 87.8% were not employed or received a layoff notice.

- What sectors of the economy are likely to hire persons with disabilities?

This data is not collected.

2. How have the characteristics of this group changed since implementation of WIA?

Although we have not conducted extensive research on this, ODEP has no evidence that these characteristics have significantly changed over time.

3. How does DOL use these data to plan WIA services to meet the needs of jobseekers with disabilities that use the One-Stop system?

This question is more appropriate for ETA, as the role of ODEP is strictly the provision of technical assistance and research to support their efforts.

4. What does DOL know about similar information that the States collect and use in planning employment and training services (both WIA and non-WIA) to people with disabilities?

Again, this question is more appropriate for ETA.

III. WIA One-Stop Services to Jobseekers with Disabilities

Statutory Responsibilities and Oversight

No questions for ODEP at this time

Use of WIA Services by People with Disabilities

1. Have local workforce areas that received “Disability Navigator” grants achieved their objectives?

Specific Questions for ODEP: Has ODEP conducted any evaluations on the Disability Navigator grants? What are the goals of the \$24 million FY2010 initiative with ETA to build on “lessons learned” from the DNP grants?

ODEP has not conducted any evaluations of the DPN initiative. The goals of the FY 2010 initiative are to develop a: (1) design for a strategic approach to accomplishing the expressed Congressional intent in order to achieve Good Jobs For All – including Persons with Disabilities; (2) work plan and timeline for implementing the activities in the overall design, including mechanisms and

processes necessary for implementation; and (3) Memorandum of Agreement between our two agencies to formally establish the collaboration and set the parameters for oversight and accountability.

2. Did “Disability Navigator” grants result in expanded system capacity to serve people with disabilities?

Specific Question for ODEP: What does ODEP know about the grant results?

ODEP, working with ETA, has recognized the successful results from the DPN initiative. ETA has shared the results of its DPN evaluation with ODEP and we have used this information to design our FY 2010 collaborative plans.

In addition, prior ODEP pilot demonstration programs (youth and adult) were located in the One-Stops. Final results from these programs identified that the navigators were extremely useful in building systems capacity, including partnerships, capacity building, and sustainability of effective practices.

One-Stop Partners

1. What activities has DOL (ODEP) conducted to engage employers in planning WIA employment and training services for people with disabilities? What are the outcomes of these efforts? Are you aware of any additional activities that DOL has done?

ODEP currently funds an Employer Technical Assistance Center. The work of this center has just recently started (October 2009). We are currently working with the grantee on it’s work plan (final is due in January 2010). In collaboration with ETA, ODEP will ensure that the work plan includes employer engagement with the WIA system. In addition ODEP’s adult and youth technical assistance centers work with employers to promote WIA employment and training services.

2. What procedures does DOL (ODEP) have in place to assess and improve how it works with other One-Stop partners that can provide services to people with disabilities (e.g., Vocational rehabilitation, Adult Education, TANF)?

ODEP has an MOU with the Department of Education that outlines the procedures ODEP will put into place to enhance One-Stop partnerships with other Federal, state, and local agencies. For example, ODEP is aware that co-locating these agencies to improve access for people with disabilities is a somewhat effective practice. VR is a mandated WIA partner and we work with the Rehabilitation Services Administration to promote this and other identified best practices.

ODEP leads the “Federal Partners in Transition Workgroup,” which is comprised of staff from DOL, ED, HHS, and SSA. The Workgroup focuses on improving outcomes for transition age youth with disabilities.

ODEP is currently working through our national Technical Assistance Center housed at Rutgers University to promote leadership in state workforce agencies to partner with other state systems, including those that are disability specific (such as rehabilitation, social security etc) as well as generic (commerce, small business, TANF, etc.). Multiple strategies are being documented for successful partnership development through this activity.

ODEP also implements a cross-agency workgroup on Asset Development and Financial Education composed of 18 federal programs and agencies (including, VR, HHS, CMS, SAMHSA, Commerce, Treasury, IRS and others). The focus of this cross agency work group is to coordinate and leverage activities with a focus on enhancing employment profitability for people with disabilities, including through activities of the One-Stop and their state and local partners.

ODEP is partnering with the Centers for Medicare and Medicaid Services (CMS) to research and develop necessary information for expanded funding of supported and customized employment, including through the One Stop systems. This research will be completed later this year.

IV. Outcomes for People with Disabilities That Use WIA One-Stop System

No questions for ODEP at this time.

1. What are the outcomes for people with disabilities that “exit” from the WIA One-Stop System?
2. For those “exiters” who obtain employment, what types of jobs do they obtain (e.g., occupation of employment)?
3. Has DOL provided guidance to local workforce areas on how to work with employers and other agencies to increase retention and earnings for people with disabilities?
4. What does DOL know about the impact of providing this guidance (e.g., has it increased retention and earnings)?
5. What is the status of participants with disabilities that did not “exit” from the programs?

Specific Question for ODEP: In addition to the information within WIASRD, does ODEP have any additional questions on outcomes related to the above questions?

ODEP does not have additional questions at this time.

V. Evaluation of WIA Services to People with Disabilities

5. What independent evaluations has DOL (ODEP) done to assess the WIA One-Stop system's capacity to serve jobseekers with disabilities?

ODEP is in the process of designing a survey to assess One-Stop programmatic and physical accessibility using the 188 regulations and "Check List" developed several years ago.

ETA currently is conducting a longitudinal evaluation and the results are expected in the Spring of 2010.

ODEP conducted an independent evaluation of its pilot demonstration programs from 2000 through 2008. This evaluation documents the extent to which projects built systems capacity of those One-Stop Centers to provide meaningful and effective services to people with disabilities. Systems change includes information on models of partnership across systems, universal design of programs and services, and successful models for service delivery for people with disabilities.

Specific Question for ODEP: Are you aware of any other evaluations performed outside DOL, including those done by the States?

ODEP is not aware of additional evaluations that specifically investigated WIA services to job seekers with disabilities.

6. What are the evaluations' objectives?

Not applicable.

7. What were the outcomes of the evaluations (e.g., findings and recommendations)?

Not applicable

8. What actions has DOL taken as a result of the evaluations?

Not applicable.

Additional Questions for ODEP

1. Since FY 2005, how has ODEP supported WIA One-Stop System accessibility through its grants program and other activities?

ODEP's pilot demonstrations programs were completed in 2008. Since that time, ODEP's support to WIA One-Stop System accessibility has been achieved through on-going technical assistance and research.

2. What have been the results of these grants and activities?

ODEP's technical assistance centers' (Adult and Youth) results are currently being evaluated through an independent evaluation. This evaluation should be completed by April 2010.

3. How does ODEP work with ETA and CRC to ensure WIA One-Stop System accessibility for people with disabilities?

ODEP collaborates with CRC and ETA on an ongoing and regular basis. One result has been the proposed expansion of data collection of characteristics of jobseekers with disabilities in the WISPR data system. ODEP has also collaborated with ETA and CRC on the design of the survey previously mentioned. Finally ODEP, ETA, and CRC have collaborated on numerous TENS and TEGLS and other policy documents to the system.

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Appendix G

CRC Questionnaire and Responses

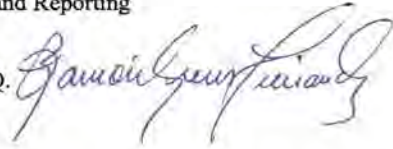
U.S. DEPARTMENT OF LABOR

Office of the Assistant Secretary
for Administration and Management
CIVIL RIGHTS CENTER
200 Constitution Ave, NW, Room N-4123
Washington, DC 20210



JAN 11 2010

MEMORANDUM FOR: DAVID STERLING
Acting Director
Office of Policy, Audit Management and Reporting
Office of Inspector General

FROM: RAMON SURIS-FERNANDEZ, ESQ. 
Director
Civil Rights Center

SUBJECT: Responses to OIG Questions Re: WIA Services For Persons With Disabilities

By memorandum dated December 7, 2009, Assistant Inspector General for Audit Elliot P. Lewis advised that the Office of Inspector General's (OIG's) Office of Audit was initiating a review of "the Department of Labor's [DOL's] efforts to ensure physical and programmatic access to the One-Stop Career System" for persons with disabilities. As agreed in our discussion with you at the December 14 entrance conference for this review, the Civil Rights Center (CRC) is providing the following responses to questions you conveyed to us by e-mail on December 18. A list of exhibits is appended to the end of this memorandum.

I. Department of Labor's Goals for Serving People with Disabilities

1. What are the Department of Labor's (DOL) goals related to serving people with disabilities through the WIA One-Stop system?

(Specific Question for CRC: How does CRC support the Department achieving these goals? Where can we find more information? (e.g. strategic plan, annual workplan?)

DOL's disability-related goals for the system include (but are not necessarily limited to) the following:

- The system is fully accessible and available to all people, including persons with disabilities.
- The workforce system targets in-school and out-of-school at-risk youth, including those with disabilities.

CRC's performance goals for FY 2011 include two goals that support the achievement of these DOL-wide goals:

- 1) Addressing the new responsibilities imposed on the Department by the passage of the Americans with Disabilities Act Amendments Act of 2008 (ADAAA or Amendments Act), which transformed the Federal disability nondiscrimination laws implemented and enforced by CRC; and

- 2) Re-focusing on enforcement of the nondiscrimination and equal opportunity laws that apply to external recipients of Federal financial assistance, including the laws that impose obligations related to disability.

Documents containing information regarding these goals include CRC's Congressional Budget Justification Narrative for FY 2011, attached as Exhibit 4.

2. How does DOL measure progress towards achieving its goals for serving people with disabilities through the WIA One-Stop system?

(Specific Question for CRC: What is CRC's understanding of how DOL measures its progress in serving people with disabilities through the WIA One-Stop System?)

Progress is measured via the performance accountability system required by WIA Section 136. Under ETA's TEGL No. 17-05 and follow-up documents, States and direct grantees of DOL employment and training programs must collect and report data on all participants, in order to provide an assessment of program impact. WIA Section 136 explicitly requires collection of data, and reporting of performance, regarding individuals with disabilities. *See, e.g.,* WIA Section 136(d)(2)(F), 29 U.S.C. 2871(d)(2)(F). Examples of indicators of progress include entry by participants who have completed training services into unsubsidized employment related to the training received. WIA Section 136(d)(2)(A), 29 U.S.C. 2871(d)(2)(A).

3. What is the status of the Department of Labor's agreement to develop and implement a long-term plan for addressing comprehensive access within the WIA One-Stop system, as recommended by the Government Accountability Office in its December 2004 report? ("Labor Has Taken Several Actions to Facilitate Access to One-Stops for Persons with Disabilities, but These Efforts May Not Be Sufficient?" GAO-05-04)?

DOL established a working group to develop the recommended long-term plan. Initially, the working group included representatives from ETA, ODEP, and CRC. This group developed a framework that delineated an overarching structure for the full work plan, and that included both the workgroup's goals and high level strategies for accomplishing those goals. CRC's then-Director approved the proposed framework in May 2005. It is CRC's understanding that management of both ODEP and ETA also gave their approval, and that the framework was submitted to and approved by GAO.

The most recent information CRC has with regard to the status of the work plan is contained in an October 21, 2008, memorandum from former Assistant Secretary for Administration and Management (ASAM) Patrick Pizzella to Brent R. Orrell, former Deputy Assistant Secretary (DAS) for Employment and Training. The memorandum stated that it was sent in response to an October 1, 2008, memo from DAS Orrell to ASAM Pizzella, conveying a copy of the aforementioned framework. ASAM Pizzella's responsive memorandum expressed concurrence with the high level goals set forth in the framework, as well as interest in having CRC contribute to the further development of the plan as part of a work group led by ETA.

CRC continues to work, both independently and in collaboration with ODEP and ETA, to achieve full compliance with disability-related requirements in the One-Stop system. Those efforts are described throughout this document.

II. Characteristics and Needs of Jobseekers with Disabilities

Not applicable to CRC.

III. WIA One-Stop Services to Jobseekers with Disabilities

Statutory Responsibilities and Oversight

1. What are DOL's statutory responsibilities to ensure States and local workforce investment areas (LWIAs) provide physical and programmatic access for persons with disabilities?

See section titled "Source of accessibility requirements and other disability-related requirements" in attached summary memo.

2. How does DOL (CRC, ETA, ODEP) ensure that States and LWIAs are complying with Section 188 of WIA related to One Stop Center accessibility (e.g., CRC enforcement, ETA Regional Office monitoring)?

As described in detail in our response to Question III(2)(d), CRC reviews Methods of Administration (MOA) documents submitted by States to ensure that the States have taken adequate measures to ensure compliance with nondiscrimination requirements, including requirements related to programmatic and architectural accessibility. CRC also receives and processes complaints alleging various violations of the nondiscrimination requirements, including those related to accessibility. *See* response to Question III(2)(a) below.

Additionally, under an informal arrangement between CRC and ETA, ETA's Federal Project Officers (FPOs) conduct on-site reviews of the compliance of recipients' facilities with applicable architectural and programmatic accessibility standards, during their visits to recipients' facilities to carry out their monitoring duties. CRC has trained, and supplied reference materials to, FPOs regarding the overall nondiscrimination and equal opportunity requirements of WIA Section 188 and its implementing regulations. The training and materials have included information about the accessibility requirements.

In addition, the WIA nondiscrimination regulations require State- and local-level agencies administering WIA financial assistance to designate Equal Opportunity (EO) Officers.¹ These agencies and their EO Officers have an independent obligation to assess compliance with nondiscrimination laws by covered entities within their jurisdictions, and to ensure that any violations -- including violations of the accessibility requirements -- are remedied. CRC reviews

¹ 29 CFR 37.23.

the State level compliance with this requirement during the MOA review process, during complaint investigations, and during compliance reviews.

Specific Questions for CRC:

a. What are CRC's written policies and procedures re: complaint processing re: Section 188?

The WIA nondiscrimination regulations at 29 CFR part 37 provide the underlying framework for CRC's processing of complaints filed under WIA Section 188. The specific provisions governing CRC's processing of complaints are found in 29 CFR 37.70 through 37.75 and 37.79 through 37.89. These provisions cover such topics as who may file a complaint, when a complaint must be filed, what information a complaint must contain, and what the CRC Director must do if he or she determines that a complaint will not be accepted.

CRC's complaint processing manual, first developed in 1983, is modeled after the U.S. Department of Justice's (DOJ's) procedural manual for processing complaints filed pursuant to Title VI of the Civil Rights Act of 1964. Since the initial CRC manual was produced, staff have revised various sections to clarify or modify the procedures. A copy of the current manual is attached as Exhibit I.

b. What are CRC's compliance assistance activities to ensure that WIA One Stop System is accessible to people with disabilities?

CRC staff members provide one-on-one technical assistance, including assistance on disability-related matters, to large and small recipients at various levels of the One-Stop system. This assistance is provided via phone, e-mail, or (in at least one recent instance) webinar. On average, CRC receives requests for such assistance several times a week. In addition, as discussed in detail in the response to the next question, CRC includes a page of Compliance Assistance Tools on its website.²

c. What written guidance has CRC, or CRC in coordination with ETA and ODEP, provided to the One Stop System on accommodations and other comprehensive access requirements?

Materials developed by CRC: CRC's disability-related compliance assistance tools are available on the agency's website at <http://www.dol.gov/oasam/programs/crc/Compassis.htm#Disability>. At present, the primary tool is a complete set of training materials, developed and distributed by CRC, regarding the disability-related requirements that apply to the One-Stop system. Those materials are available in the Disability section of the Compliance Assistance Tools page under the heading "Section 188 Disability Checklist Training." <http://www.dol.gov/oasam/programs/crc/Sec188.htm> The materials have been used by CRC to conduct major, two-to-three-day training sessions for State- and local-level recipients about the disability issues addressed in the Checklist. Staff of ODEP and ETA have assisted in presenting this training.

² This response does not address CRC's training activities, discussed in the response to Question V(4).

The training materials go into detail about compliance with various obligations imposed by the WIA nondiscrimination regulations. CRC has grouped related obligations (and the regulatory provisions that impose them) together by topic; the topics are known as Elements.³ Disability-related obligations are grouped into sub-elements under Element 5: for example, the requirements related to programmatic and architectural accessibility fall under Elements 5.6 and 5.7. See, e.g., PowerPoint presentation on “Elements 5.6 and 5.7: Programmatic and Architectural Accessibility,” <http://www.dol.gov/oasam/programs/crc/dElement5.67.ppt>. This presentation explains the “hierarchy of obligations” regarding architectural accessibility requirements, as well as the relationship between architectural and programmatic accessibility requirements.

The disability section of CRC’s Compliance Assistance Tools page also contains the WIA Section 188 Disability Checklist (see discussion below) and a PowerPoint presentation explaining the legal requirements related to collection, disclosure, and storage of medical and disability-related information. This presentation, also developed by CRC, is titled “Disability-Related Information: Asking, Telling, Using, Storing.”

<http://www.dol.gov/oasam/programs/crc/AskingTellingUsingStoringOct05.ppt>

Materials developed by CRC in coordination with ETA and ODEP: CRC has been a primary partner with ETA and ODEP in developing and issuing several documents providing guidance for complying with the disability-related requirements.

CRC, ODEP, and ETA collaborated to produce the above-mentioned WIA Section 188 Disability Checklist, issued in 2003. The Checklist summarized the basic disability-related requirements imposed by WIA Section 188 and its implementing regulations at 29 CFR part 37, and provided examples of policies, procedures and other steps that recipients could follow “to ensure equal access to programs and services under WIA for people with disabilities.” The Checklist may be found on CRC’s website at <http://www.dol.gov/oasam/programs/crc/section188.htm>; the memorandum introducing and explaining the Checklist is at <http://www.dol.gov/oasam/programs/crc/WIASection188DisabilityChecklist.htm>.

The Checklist was issued well before the Americans with Disabilities Act Amendments Act of 2008 (ADAAA) made significant changes to the text and interpretation of Federal disability nondiscrimination laws, including those applicable to the One-Stop system. Other aspects of the Checklist are also outdated.⁴ CRC intends to initiate revision and reissuance of the Checklist after the Equal Employment Opportunity Commission, the Department of Justice, and CRC itself publish final rules implementing the regulatory changes necessitated by the ADAAA.

³ The system of Elements was originally developed for use in the Methods of Administration (MOA) documents that must be submitted or revised periodically by each State’s Governor under the WIA nondiscrimination regulations. See response to Question 2(d) in main text.

⁴ For example, with regard to architectural and programmatic accessibility, the Checklist refers users to outdated guidance materials on the website of the U.S. Access Board. Those materials are designed to help assess compliance with the Uniform Federal Accessibility Standards (UFAS), which were replaced by the Architectural Barriers Act (ABA) Accessibility Standards as of 2006 and 2007. See <http://www.access-board.gov/ada-aba/aba-standards-gsa.cfm>.

Another guidance document, entitled “Demystifying the Rehabilitation Act: What Faith-Based and Community Organizations Need to Know,” was issued by DOL in April 2007. <http://www.dol.gov/opa/media/press/odep/archive/odep20070512.htm> Written in user-friendly language, the document was designed to help recipients of Federal financial assistance (including faith-based and community organizations) comply with disability-related legal requirements. Among other subjects, the document explains the circumstances under which the facilities used by recipients must comply with architectural accessibility requirements, and explains the difference between architectural and programmatic accessibility. The document was widely publicized by DOL when it was first issued, and is posted on ODEP’s website. <http://www.dol.gov/odep/pubs/fact/faith.htm> Although CRC, ODEP, and ETA all contributed to the development of the document, much of the text was drafted by CRC.

CRC has also helped plan the structure and substance of, contributed substantive text to, and/or participated in editing, various guidance documents being developed by ODEP, ETA, their contractors, or other DOL agencies. Examples include an “Info Brief” entitled “Disability Inquiries in the Workforce Development System” (available at http://www.ncwd-youth.info/assets/info_briefs/infobrief_issue9.pdf), which was credited to a staff member at the National Collaborative on Workforce and Disability for Youth, but written largely by CRC; the Data Collection Handbook prepared by a contractor for ETA’s Senior Community Service Employment Program (SCSEP); and an eLaws Advisor on disability nondiscrimination laws that was initiated by ODEP, but developed and drafted by representatives from the Office of the Assistant Secretary for Policy (ASP) and Office of the Solicitor (SOL), as well as ODEP and CRC. (The latter Advisor has not yet been posted on DOL’s website.)

d. What is CRC’s process for reviewing and monitoring of the Methods of Administration (MOA) (where is this requirement listed, what are source of criteria?)

The WIA nondiscrimination regulations set forth the basic requirements re: MOA submission. See 29 CFR 37.52, 37.54, and 37.55. The MOA is essentially a nondiscrimination plan: it must describe the actions a State will take to ensure that its WIA Title I-financially assisted programs, activities, and recipients are complying, and will continue to comply, with WIA Section 188 and its implementing regulations – including the requirements related to disability. See 29 CFR 37.54. A more detailed explanation of CRC’s expectations regarding MOAs appears in a guidance document published in the Federal Register in 2000, “State Guidance for Developing Methods of Administration (MOA) Required by Regulations Implementing Section 188 of the Workforce Investment Act of 1998,” 65 FR 51984 (August 25, 2000) (“MOA Guidance”). This document is attached as Exhibit 2, and is also available on CRC’s website at http://www.dol.gov/oasam/regs/fedreg/notices/State-MOA_EO-Guidance.htm (last accessed January 5, 2010).

The WIA nondiscrimination regulations are also the underlying source of the criteria for reviewing each MOA. The specific criteria used, however, are set forth in the MOA Analysis Checklist, attached as Exhibit 3, and also available on CRC’s website at <http://www.dol.gov/oasam/programs/crc/MOAChecklist.htm> (last accessed January 5, 2010).

The major phases of the MOA review process:

1. CRC reminds States of their due dates, offers technical/compliance assistance, and encourages States to make all revisions to MOAs prior to the submission deadline.
2. Under cover letter from Governor or Governor's designee, State makes formal submission of either revised MOA or certification that previous MOA remains in effect.
3. CRC reviewer/point of contact conducts a cursory review of the submission to make sure it meets minimum requirements for initiation of full review. These requirements include sufficient narrative and supporting documentation.
4. Formal review conducted. Criteria used for review are set forth in the MOA Analysis Checklist, and, if appropriate in a given case, the WIA Section 188 Disability Checklist. Review is expedited by use of telephonic and email requests for additional information and changes.
5. The State must make the requested changes and resubmit relevant portions of the revised MOA in a neat and orderly manner. The changes must be labeled specifically with instructions pertaining to their location in the overall MOA document. CRC consults with the State by telephone and e-mail regarding the resubmitted material. Where no additional or revised material is submitted upon request, or where the additional or revised material is inadequate to demonstrate compliance, CRC will issue a letter informing the State of the actions that must be taken to bring its MOA into compliance.
6. When the review is finalized and the MOA is ready to be approved, the CRC reviewer signs the copy of the MOA Analysis Checklist that documents the review, and prepares the MOA approval letter. The letter should cite the date the MOA was received, include references to all related incoming correspondence, and address any significant issues of noncompliance that were identified in the review process.
7. The MOA and all associated documents, including the signed MOA Analysis Checklist, are filed as appropriate. Hard copies are placed in the CRC file room.

3. Does DOL's Civil Rights Center have data available to do a trend analysis of complaints it receives?

Yes. CRC maintains an electronic database of complaints it receives that allege violations of Federal nondiscrimination law by recipients of Federal financial assistance. The database on these complaints presently contains data going back to 1995. Improvements to the database, to improve the data collected and reflect procedural changes, have been ongoing.

If so, what analyses does CRC do?

CRC's annual report regarding enforcement of statutes that prohibit discrimination in Federally assisted programs, submitted to the Department of Justice (DOJ) pursuant to Executive Order 12250, contains information about which types of disability-related allegations appear most frequently in the complaints CRC receives.

Specific Question for CRC:

a. What information does CRC compile about complaints received related to alleged violations of WIA accessibility?

CRC maintains a database of information about complaints alleging that a recipient of Federal financial assistance has violated applicable nondiscrimination requirements. This database allows for the following information to be maintained about each complaint: complainant's contact information; identity of complainant's representative; identity of respondent entity; date complaint was filed; date of alleged discrimination; additional bases of discrimination alleged in the complaint;⁵ issues related to the discrimination; remedies sought by complainant; and other venue(s) where the complainant may have filed a discrimination complaint.

In addition to filing complaints with CRC, complainants have the option of filing at the recipient level. The WIA nondiscrimination regulations require recipients to maintain, and to submit to CRC upon request, a log of complaints they receive that allege discrimination on the bases prohibited by WIA Section 188. 29 CFR 37.37(c). The complaint log must contain the following information: date the complaint was filed; name and address of the complainant; grounds of the complaint (the alleged bases for discrimination); description of the issue(s); disposition of the complaint; and date of disposition. *Id.* The complaint log, records of complaints, and records of actions taken regarding complaints must be maintained for a minimum of three years from the date of resolution of the complaint. 29 CFR 37.39(b).

IV. Outcomes for People with Disabilities That Use WIA One-Stop System

Not applicable to CRC.

V. Evaluation of WIA Services to People with Disabilities

1. Has OASAM/CRC ever had an independent evaluation conducted of its work related to Section 188 enforcement to identify areas for improvement? Evaluation of its compliance assistance activities?

CRC voluntarily participated in the American Customer Satisfaction Index (ACSI) process in 2004 and 2005. Produced by the University of Michigan in partnership with the American Society for Quality (ASQ) and CFI Group (an international consulting firm), the ACSI is described in its publications as a "uniform, national, cross-industry measure of satisfaction with the quality of goods and services available in the United States."⁶ According to an ACSI news release, the government ACSI "reflects user evaluations of government services measured through a econometric model that captures key components of service that collectively determine

⁵ In addition to disability, WIA Section 188 and its implementing regulations prohibit discrimination based on race, color, religion, sex, national origin, age, political affiliation or belief, and, for beneficiaries only, citizenship or participation in any WIA Title I-financially assisted program or activity. WIA Section 188(a)(2), (a)(4) [29 U.S.C. 2938(a)(2), (a)(4)]; 29 CFR 37.5.

⁶ See, e.g., "Citizen Satisfaction with Federal Government Improves, Correlation between User Satisfaction and Trust in Government, According to ACSI," available at <http://www.theacsi.org/images/stories/images/govsatscores/1208Govt.pdf> (last accessed January 5, 2010).

overall citizen satisfaction.”⁷ The ACSI methodology “uses customer interviews as input to a multi-equation econometric model”⁸ that is adjusted for use in the public sector.⁹ The publications further note that “[i]n 1999, the federal government selected ACSI to be a standard metric for measuring citizen satisfaction.”¹⁰

For the 2004 CRC ACSI, State-level Equal Opportunity (EO) Officers were surveyed about their satisfaction with the information and assistance provided by CRC.¹¹ The resulting score of 79 ranked CRC second not only among Federal agencies in the “Information Providers/Technical Assistance/Supply” category, but among all Federal agencies that do not deliver benefits.¹² The ACSI Commentary on the 2004 Federal Government Scores singled CRC out for special mention.¹³ On the 2005 ACSI, CRC received a slightly-lower score of 74¹⁴ from the local-level recipients¹⁵ who were surveyed.

Additional Questions for CRC:

1. How does ODEP work with ETA and CRC to ensure . . . WIA One-Stop-System accessibility?

These activities are described throughout our responses.

2. How does OASAM/CRC assess the effectiveness of its compliance assistance activities re: WIA Section 188 specifically related to WIA One-Stop accessibility? How does CRC use the information for program planning?

⁷ “Customer Satisfaction with Federal Government Dips Slightly, According to Latest American Customer Satisfaction Index,” available at http://www.theacsi.org/index.php?option=com_content&task=view&id=141&Itemid=112 (last accessed January 5, 2010).

⁸ “ACSI Methodology,” in “About ACSI,” on ACSI website at http://www.theacsi.org/index.php?option=com_content&task=view&id=48&Itemid=41 (last accessed January 5, 2010).

⁹ “ACSI Model for Most Government Agencies,” in “ACSI Scores and Commentary: Government Satisfaction Scores,” on ACSI website at http://www.theacsi.org/index.php?option=com_content&task=view&id=30&Itemid=150 (last accessed January 5, 2010).

¹⁰ See “Citizen Satisfaction with Federal Government Improves,” cited in Footnote 1.

¹¹ See “ACSI Scores for U.S. Federal Government 2004,” available at http://www.theacsi.org/index.php?option=com_content&task=view&id=119&Itemid=130 (last accessed January 5, 2010).

¹² *Id.*

¹³ See http://www.theacsi.org/index.php?option=com_content&task=view&id=152&Itemid=62 (last accessed January 5, 2010).

¹⁴ See “ACSI Scores for U.S. Federal Government 2005,” available at http://www.theacsi.org/index.php?option=com_content&task=view&id=118&Itemid=129 (last accessed January 5, 2010).

¹⁵ Although the 2005 report identifies the “customer segment” surveyed as “[l]ocal level recipients of information from CRC” (see http://www.theacsi.org/index.php?option=com_content&task=view&id=118&Itemid=129), we assume that the reference to recipients “of information” was inserted erroneously by ACSI, and that the correct reference is to recipients of Federal financial assistance under the Workforce Investment Act. CRC customarily uses the term “recipients” to refer to the latter group.

Much of CRC's compliance assistance activity is provided on a one-on-one basis, as described in the response to Question III(2)(b). Therefore, CRC is in a position to obtain direct feedback about the utility and effectiveness of the assistance provided, and to use that feedback to assess its compliance assistance approach. *See also* the response to Question V(1). With regard to training, see the response below to Question V(4).

3. What is the status of CRC's plan (in budget request) to "re-vamp regional civil rights officer program?"

The positions were not funded for FY 2010.

4. What training does CRC provide to WIA One-Stop staff to ensure physical and programmatic accessibility [for] persons with disabilities? How does CRC assess effectiveness of this training?

See the discussion about Section 188 Disability Checklist Training in the response to Question III(2)(c), under the heading *Materials developed by CRC*.

In addition, CRC conducts an annual National Equal Opportunity Professional Development Forum in the Washington, DC, area. The multi-day Forum provides the EO Officers discussed in the response to Question III(1), and other interested stakeholders, with intensive training on various nondiscrimination topics, including topics related to disability. CRC and its partner in presenting the Forum, the Equal Opportunity Committee of the National Association of State Workforce Agencies (NASWA), celebrated the 20th anniversary of the Forum in 2009.

Several times a year, CRC has also provided on-site training on EO-related matters, including disability-related topics, at various locations throughout the country, usually when requested to do so by a State-level recipient or regional group of recipients. In such cases, audiences have generally included EO Officers and other representatives (including front-line staff) from local-level, as well as State-level, recipients.

Furthermore, beginning in March 2009, CRC has offered webinars and in-person training sessions about the significance for the One-Stop system of the changes to Federal disability nondiscrimination law wrought by the Americans with Disabilities Act Amendments Act of 2008 (ADAAA), discussed in the attached summary memo. Response to these sessions has been enthusiastic: according to the host site, at one point during the initial offering of the webinar, 359 different registered sites were signed in.

At all in-person training sessions, CRC distributes an evaluation form, collects and reviews the responses, and uses the information thus garnered to make changes to its training plans. In FY 2008, CRC added a customer satisfaction measure to its performance goals in order to report on the results of participant surveys from its Annual Forum. During that year, 98 percent of survey respondents indicated that the information provided at the Forum will enhance their job performance. As CRC's goal had been receiving positive responses from 85 percent of survey respondents, the goal was exceeded by 13 percent.

Information / Data Request from CRC:

- *CRC's annual work plan (mentioned in the Fiscal Year 2010 budget request)*

Incorporated in CRC's Congressional Budget Justification Narrative for FY 2011, attached as Exhibit 4.

- *Current organizational chart*

See Chart attached as Exhibit 5.

- *Policies and Procedures for CRC staff to carry out the following work:*

- a) *On-site reviews to ensure compliance with Section 188 of the Workforce Investment Act of 1998*

Equal Opportunity Guidebook for Recipients of Financial Assistance Under the Job Training Partnership Act, attached as Exhibit 6.

- b) *Process for reviewing and addressing complaints related to alleged violation of WIA Section 188*

Complaint Processing Manual, U.S. Department of Labor, Office of the Assistant Secretary for Administration and Management, Office of Civil Rights¹⁶, attached as Exhibit 1.

Flow chart, "External Enforcement Complaint Processing Procedures," attached as Exhibit 7.

Flow chart, "OEE Complaint Intake Process," attached as Exhibit 8.

Flow chart, "Office of External Enforcement Investigative Procedures," attached as Exhibit 9.

Chart of timelines for complaint processing, attached as Exhibit 10.

Complaint Investigation Quality Control Review Checklist, attached as Exhibit 11.

- c) *Review of States' "Methods of Administration" (MOAs)*

MOA Analysis Checklist, attached as Exhibit 3, also available on CRC's website at <http://www.dol.gov/oasam/programs/crc/MOAChecklist.htm> (last accessed January 5, 2010).

¹⁶ "Office of Civil Rights" is a name by which CRC was previously known.

- *Independent evaluations that CRC has contracted for related to its role in enforcing WIA Section 188 compliance.*

- *Title of the evaluation*

See response to question V(1).

- *Contract award (amount, contractor, and year awarded)*

Not applicable.

- *Status of evaluation – completed or in process (expected date of completion)*

Completed. See response to question V(1).

- *Final or interim evaluation report(s)*

See response to question V(1).

- *Written guidance that CRC has issued to States on processes to review and update their MOAs.*

- “State Guidance for Developing Methods of Administration (MOA) Required by Regulations Implementing Section 188 of the Workforce Investment Act of 1998 (WIA),” 65 FR 51984 (August 25, 2000) (“MOA Guidance”), attached as Exhibit 2, also available on CRC’s website at http://www.dol.gov/oasam/regs/fedreg/notices/State-MOA_EO-Guidance.htm (last accessed January 5, 2010).

- MOA Analysis Checklist, attached as Exhibit 3, also available on CRC’s website at <http://www.dol.gov/oasam/programs/crc/MOAChecklist.htm> (last accessed January 5, 2010).

- CRC Directive No. 2009-02, “Requirements for the Biennial Review of the MOA and Submission of MOA Revisions and Certifications” (August 13, 2009), attached as Exhibit 12.

- MOA WIA Train-the-Trainer Course Materials, including Participant Guide, Trainer’s Guide, and PowerPoint slide presentations on the nine MOA Elements discussed in Exhibit 2, the MOA Guidance. All materials attached as Exhibit 13; also available on CRC website at <http://www.dol.gov/oasam/programs/crc/moawia.htm> (last accessed January 5, 2010).

- Sample letter reminding State of approaching deadline for MOA submission, from Acting CRC Director Willie Alexander to Clark Bishop, Commissioner,

Alaska Department of Labor and Workforce Development (January 15, 2008),
attached as Exhibit 14.

**Responses of Civil Rights Center (CRC)
To OIG Questions Dated December 18, 2009
Re: WIA Services for Persons with Disabilities**

Exhibit List

- | | |
|------------|--|
| Exhibit 1 | Complaint Processing Manual, U.S. Department of Labor, Office of the Assistant Secretary for Administration and Management, Office of Civil Rights |
| Exhibit 2 | “State Guidance for Developing Methods of Administration (MOA) Required by Regulations Implementing Section 188 of the Workforce Investment Act of 1998,” 65 FR 51984 (August 25, 2000) |
| Exhibit 3 | MOA Analysis Checklist |
| Exhibit 4 | CRC’s Congressional Budget Justification Narrative for FY 2011 |
| Exhibit 5 | CRC’s current organizational chart |
| Exhibit 6 | Equal Opportunity Guidebook for Recipients of Financial Assistance Under the Job Training Partnership Act |
| Exhibit 7 | Flow chart, “External Enforcement Complaint Processing Procedures” |
| Exhibit 8 | Flow chart, “OEE Complaint Intake Process” |
| Exhibit 9 | Flow chart, “Office of External Enforcement Investigative Procedures” |
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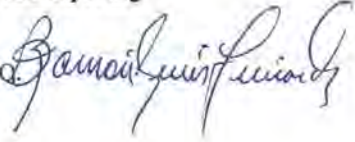
U.S. DEPARTMENT OF LABOR

Office of the Assistant Secretary
for Administration and Management
CIVIL RIGHTS CENTER
200 Constitution Ave, NW, Room N-4123
Washington, DC 20210



JAN 11 2010

MEMORANDUM FOR: DAVID STERLING
Acting Director
Office of Policy, Audit Management and Reporting
Office of Inspector General

FROM: RAMON SURIS-FERNANDEZ, ESQ. 
Director
Civil Rights Center

SUBJECT: CRC Mission and Scope of Authority, and Source of
"Accessibility" and Other Disability-Related Requirements
Applicable to One-Stop Career Center System

By memorandum dated December 7, 2009, Assistant Inspector General for Audit Elliot P. Lewis advised that the Office of Inspector General's (OIG's) Office of Audit was initiating a review of "the Department of Labor's [DOL's] efforts to ensure physical and programmatic access to the One-Stop Career System" for persons with disabilities. As agreed in our discussion with you at the December 14 entrance conference for this review, we are providing the following summary of the mission and scope of authority of the Civil Rights Center (CRC) with regard to ensuring such access. We are also providing the source of the accessibility requirements and other disability-related requirements applicable to the One-Stop system.

Accessibility and Other Disability-Related Requirements

Source of accessibility requirements and other disability-related requirements. Both Section 188 of the Workforce Investment Act of 1998 (WIA), 29 U.S.C. 2938 (WIA Section 188), and Section 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. 794 (Section 504), prohibit discrimination on the basis of disability by covered recipients of Federal financial assistance. Specific obligations regarding accessibility are imposed not by statute, but by regulation. The regulations implementing WIA Section 188, promulgated by CRC and published at 29 CFR part 37, incorporate by reference the accessibility provisions of DOL's Section 504 regulations, found in Subpart C of 29 CFR part 32. See 29 CFR 37.3(b). Under these provisions, covered recipients of financial assistance must ensure *both* that their facilities comply with applicable standards for architectural accessibility, *and* that their programs and activities comply with program accessibility requirements. Both types of accessibility requirements relate to *physical* access for persons with disabilities.¹ Recipients must also comply with other disability-related requirements.

¹ See, e.g., 29 CFR 32.27(a); U.S. Access Board on-line publication "About ADAAG: Frequently Asked Questions" ("ADAAG FAQ"), available at <http://www.access-board.gov/adaag/about/FAQ.htm#g13> (last accessed December 30, 2009), responses to Questions 13 and 14.

CRC Responsibilities

CRC responsibilities: Secretary's Order. Section 5(A)(1) of Secretary's Order 04-2000² (the Secretary's Order), in pertinent part, delegates authority and assigns responsibility to the Director of CRC for "[d]eveloping, implementing, and monitoring DOL's civil rights enforcement program under all equal opportunity and nondiscrimination requirements applicable to programs or activities financially assisted or conducted by DOL." The listed "equal opportunity and nondiscrimination requirements" with regard to which the Order delegates authority and assigns responsibility to the Director include Section 504 and WIA Section 188.

- "Establishing and formulating all policies, standards, and procedures for, as well as issuing rules and regulations governing, the civil rights enforcement programs under" the listed legal provisions;
- "Achieving compliance [with the listed legal provisions] through pre-approval and post-approval reviews, complaint investigations and other compliance monitoring techniques, negotiations, mediations, and other alternative dispute resolution techniques, conciliation proceedings, and the application of appropriate sanctions and remedies";
- "Cooperating and coordinating with DOL Agencies, the Office of the Inspector General, the Department of Justice, the Department of Health and Human Services, the Equal Employment Opportunity Commission, and other agencies in connection with the administration of [unspecified] nondiscrimination and equal opportunity laws";
- "Developing and conducting training and providing technical assistance for CRC staff, as well as for DOL Agency program staffs, recipients of Federal financial assistance from DOL, and beneficiaries of that assistance, programs or activities conducted by DOL"; and
- "Developing, implementing, and maintaining a management information and case tracking system that can be used to assess the effectiveness of the DOL Civil Rights program."

CRC responsibilities: WIA nondiscrimination regulations. The WIA nondiscrimination regulations provide that CRC is "responsible for administering and enforcing" Section 188 and its implementing regulations, and "developing and issuing policies, standards, guidance, and procedures for effecting compliance."³ However, the Secretary of Labor may assign such responsibilities to "officials of other departments or agencies of the Government (with the consent of such department or agency)."⁴

Breadth of programs and activities covered. All programs and activities that are offered through the One-Stop system by One-Stop partners listed in Section 121(b) of WIA are covered by – and therefore must comply with – the WIA nondiscrimination regulations.⁵ These programs and activities are therefore within CRC's jurisdiction, even if their primary source of financial assistance is another Federal Department or agency.

² Issued November 07, 2000.

³ 29 CFR 37.12.

⁴ 29 CFR 37.13(a).

⁵ See 29 CFR 37.3(a)(2), 37.4 (definition of "recipient," final paragraph).

General compliance assessment: MOA reviews. CRC's primary method of assessing overall compliance with the WIA nondiscrimination regulations is via its biennial review of documents known as Methods of Administration (MOAs). Under 29 CFR part 37, subpart C, each State Governor must submit to CRC an MOA that describes the actions his or her State has taken to ensure that its WIA Title I-financially assisted programs, activities, and recipients are complying, and will continue to comply, with WIA Section 188 and its implementing regulations – including the requirements related to disability. See 29 CFR 37.54(d)(2)(v). CRC reviews each MOA and, to the extent the document indicates a deficiency in the State's equal opportunity (EO)-related policies, practices, and procedures, works with the State to help bring it into compliance.

With regard to the DOL-conducted Job Corps program, one of CRC's major projects during FYs 2008 and 2009 was to work with the Office of the Assistant Secretary for Administration and Management's (OASAM's) Office of Acquisition Management Services to ensure that the required assurance is included in all covered Job Corps contracts. CRC also trained Job Corps Contracting Officers about the assurance and its significance.

Compliance assessment and enforcement: Equal Opportunity Officers. The WIA nondiscrimination regulations require State- and local-level agencies administering WIA financial assistance to designate Equal Opportunity (EO) Officers.⁶ These agencies and their EO Officers have an independent obligation to assess compliance with nondiscrimination laws by covered entities within their jurisdictions, and to ensure that any violations -- including violations of the accessibility requirements -- are remedied.⁷ CRC relies on these State- and local-level agencies and their EO Officers to conduct any on-site compliance reviews that are appropriate.

CRC-conducted training. To help these EO Officers and their staffs reach and maintain a necessary level of competency, CRC conducts an annual National Equal Opportunity Professional Development Forum in the Washington, DC, area. The multi-day Forum provides the EO Officers and other interested stakeholders with intensive training on various nondiscrimination topics, including topics related to disability.

In addition, several times a year, CRC has provided on-site training on EO-related matters, including disability-related topics, at various locations throughout the country, usually when requested to do so by a State-level recipient or regional group of recipients. In such cases, audiences have generally included EO Officers and other representatives from local-level, as well as State-level, recipients. CRC also has recently provided such training via distance-learning methods, typically via webinar.

Technical assistance. Upon request, CRC staff members provide one-on-one technical assistance, including assistance on disability-related matters, to large and small recipients at various levels of the One-Stop system. This assistance is provided via phone, e-mail, or (in at least one recent instance) webinar. Additionally, in at least one instance, CRC has required, and provided, intensive, in-person training and technical assistance to a Local Workforce Investment Agency (LWIA) in which a compliance review disclosed extensive noncompliance with disability-related requirements.

⁶ 29 CFR 37.23.

⁷ E.g., 29 CFR 37.25(b), 37.51, 37.54(d)(2)(v).

Complaint processing. CRC also processes complaints alleging violations of the WIA nondiscrimination regulations, including the disability-related provisions. The complaint procedure includes an investigation and, where discrimination is found, the opportunity for alternative dispute resolution and for a hearing before sanctions are imposed on the recipient/respondent.

Appendix H

Framework Developed in Response to GAO Report

U.S. Department of Labor

OCT 1 2008

Employment and Training Administration
200 Constitution Avenue, N.W.
Washington, D.C. 20210



MEMORANDUM FOR:

NEIL ROMANO
Assistant Secretary
Office of Disability Employment Policy

PATRICK PIZZELLA
Assistant Secretary
Administration and Management

FROM:

BRENT R. ORRELL *Brent R. Orrell*
Deputy Assistant Secretary

SUBJECT:

Response to Government Accountability Report
"Workforce Investment Act: Labor Has Taken Several
Actions to Facilitate Access to One-Stops for Persons with
Disabilities, but These Efforts May Not Be Sufficient" issued
December, 2004

The purpose of this memorandum is to share with you the framework to develop an interagency work plan to promote excellence in service delivery for people with disabilities in the One-Stop Career Center system.

This framework was developed in response to the Government Accountability report "Workforce Investment Act: Labor Has Taken Several Actions to Facilitate Access to One-Stops for Persons with Disabilities, but These Efforts May Not Be Sufficient" (December 2004) by a workgroup comprised of staff from the Department of Labor (DOL), Employment and Training Administration (ETA), Office of Disability Employment Policy, and the Office of the Assistant Secretary for Administration and Management, Civil Rights Center in consultation with the Veterans' Employment and Training Service, the Social Security Administration, and the U.S. Department of Education, Office of Special Education and Rehabilitation Services. ETA will reconvene the workgroup to develop the work plan and identify individual tasks and timelines.

The Department has undertaken an ambitious project in developing a comprehensive work plan. The framework sets forth the ideal goals DOL is striving to accomplish and promote within the One-Stop Career Center system. As DOL moves forward, it may be necessary to prioritize and/or modify these goals, depending on available resources in the coming months and years. ETA is committed to collaborating with our Federal partners to leverage resources in order to maximize the Federal government's ability to help the One-Stop Career Center system serve people with disabilities.

Please let me know if you have any questions, concerns, or would like to discuss further.

Attachment

Framework for the Interagency Work Plan to Promote Excellence in Service Delivery for People with Disabilities in the One-Stop Career Center System

Background

President George W. Bush's *New Freedom Initiative* urges Federal agencies to collaborate to remove any remaining barriers that prevent Americans with disabilities from living full and independent lives. In order to implement the President's directive, our nation's One-Stop Career Center system, authorized by the Workforce Investment Act of 1998, must be fully inclusive of and welcoming to all customers, including individuals with disabilities. The Department of Labor (DOL) has undertaken many initiatives through the Employment and Training Administration (ETA), Office of Disability Employment Policy (ODEP), Office of the Assistant Secretary for Management and Administration, Civil Rights Center (CRC), and the Veterans' Employment and Training Service (VETS) to ensure that the One-Stop Career Center system is able to successfully serve individuals with disabilities.

However, in its December 2004 report, "Workforce Investment Act: Labor Has Taken Several Actions to Facilitate Access to One-Stops for Persons with Disabilities, but These Efforts May Not Be Sufficient," the Government Accountability Office (GAO) recommended that DOL "develop and implement, using the expertise of staff from ETA, CRC, and ODEP, a long-term plan for ensuring that [One-Stop Career Centers] comply with comprehensive access requirements."

In March 2005, DOL responded to GAO and indicated that ETA, CRC and ODEP will work together to develop a comprehensive, long-term strategic plan to address the One-Stop system's provision of services to people with disabilities. The response indicates that this plan will include input from other appropriate Federal agencies and programs. The response also indicates that DOL will begin by developing a framework for the plan.

A workgroup comprised of staff members from ETA, CRC and ODEP met to draft a framework for the work plan. The workgroup recognized a need to coordinate many activities to promote quality services for people with disabilities, in addition to activities to ensure compliance with GAO's recommendation. Therefore, in addition to acting on GAO's recommendation, the three agencies agreed to work to coordinate additional policies, activities and funding. Once the initial draft framework was developed, staff from VETS, the Social Security Administration (SSA), and the U.S. Department of Education, Office of Special Education and Rehabilitation Services (OSERS) joined the workgroup. Representatives from these agencies reviewed and commented on the draft framework, and their comments were incorporated.

Work Plan Mission

The mission of the workgroup developing the interagency work plan is to promote excellence in service delivery for people with disabilities in the One-Stop Career Center system. By promoting excellence, DOL seeks to:

- Ensure that people with disabilities have equal opportunity¹ to benefit from the programs and services available through the system; and
- Promote meaningful and effective career opportunities for people with disabilities.

To accomplish this mission, the workgroup, which includes DOL's ETA, CRC, ODEP and VETS, is developing a multi-year strategic plan, including a coordinated implementation strategy that will:

- Identify, coordinate, and maximize the use of agency resources;
- Ensure compliance with applicable disability-related statutes and regulations; and
- Promote quality in service delivery for people with disabilities.

Overarching Goals:

DOL has developed two overarching goals to promote the creation of a public workforce system that is fully inclusive of and able to effectively serve and meet the needs of people with disabilities. These goals are what DOL hopes to promote or accomplish through the work plan:

1. *Excellence in Service Delivery*² – Promote excellence in service delivery for persons with disabilities in the workforce investment system.
2. *Promote Compliance* – Develop and implement a long range, coordinated plan for oversight and enforcement of disability-related statutes and regulations, and build the system's capacity to comply with those rules.

1. Excellence in Service Delivery:

To promote excellence in service delivery for persons with disabilities in the workforce investment system, DOL will explore opportunities to:

¹ Providing people with disabilities an "equal opportunity to benefit" from programs and services is different from "equal treatment." Because people with disabilities face additional barriers to participation, providing an "equal opportunity to benefit" requires taking positive actions (such as providing communication aids and reasonable accommodations) to "level the playing field" for people with disabilities.

² This document uses the term *excellence* to refer to the highest capacity for both providing quality services through the One-Stop Career Center system and achieving quality outcomes for individuals with disabilities. In DOL's view, the disability-related statutes and regulations that apply to the One-Stop system set forth the *minimum* standards and requirements that must be met in order to ensure nondiscrimination and equal opportunity for individuals with disabilities within the system. Therefore, DOL views *compliance* as achievement of those minimum standards, and *excellence* as the ultimate goal for the system.

- A. Provide guidance that defines excellence in facilities, access, service delivery and design, employer services, integration, and other key workforce areas, and communicate those definitions to the system as a clear set of expectations.
- B. Establish processes to reinforce the expectations for excellence at the Federal, state and local levels. The agencies will establish a communication plan in coordination with other agencies to ensure the system is informed and trained on the expectations, as well as strategies to achieve the excellence standard(s).
- C. Establish a system that rewards excellence and stimulates change among poor performers.
- D. Improve the quality of employment outcomes for people with disabilities through the public workforce development system by:
 - i. Meeting the needs of business by promoting the development of skilled employees, including individuals with disabilities. DOL will incorporate the goal of quality employment for people with disabilities into current DOL initiatives to promote a demand-driven focus for the public workforce investment system and to respond to the needs of local and regional economies.
 - ii. Promoting integrated employment opportunities in all industries and types of jobs which provide competitive wages, benefits and career advancement, as opposed to jobs which do not.
 - iii. Including disability issues in the development and modification of performance measures and performance reporting systems, as applicable.
 - iv. Promoting access to a variety of skills-based training, including on-the-job training, work experience, Individual Training Accounts, or Career Advancement Accounts that lead to quality employment outcomes.
 - v. Promoting access to essential, employment-related support services, including health care, housing and transportation.
 - vi. Developing or building upon training curricula and/or providing information/guidance to the front-line and other staff in the One-Stop Career Center system, and to build their capacity to provide quality employment services for people with disabilities.
 - vii. Promoting the development of a customer-responsive system, for both employers and persons with disabilities, that incorporates a continuous improvement process based on customer feedback and evaluation.

- viii. Promoting effective services for youth with disabilities within the public workforce investment system so that they can effectively transition from school to work or to post-secondary education.
- E. Integrate people with disabilities into the mission of the One-Stop Career Center delivery system. Examples include: developing and fostering a common understanding across partners and stakeholders of the need to integrate people with disabilities into their missions; encouraging the use of the principles of universal design to create a One-Stop delivery system in which the facilities, programs, and activities, as well as the administrative structure, meet the needs of people with the widest range of skills, learning styles, and abilities; and considering the needs of people with disabilities, including youth and adults with disabilities, in designing the system's mission, services, and administrative structure.
- F. Encourage the selection, acquisition, and utilization of facilities for One-Stop Career Centers to best meet the needs of a broad range of customers and service providers, even where not specifically legally required.
- G. Instill a customer-centered, rather than disability-centered, approach to system administration and service delivery. Integral parts of this customer-centered approach include reinforcing an understanding of legal requirements, and serving individuals with disabilities alongside those without disabilities to the maximum extent possible.

2. Compliance

As noted above, DOL's second goal is to develop and implement a long-range, coordinated plan for oversight and enforcement of disability-related statutes and regulations, and build the system's capacity to comply. To accomplish this goal, DOL will explore opportunities to:

- A. Define and establish roles and responsibilities within DOL and among various Federal agencies within the One-Stop delivery system.
- B. Identify ways of leveraging resources through communication, coordination, and cooperation between the various Federal agencies (both inside and outside DOL) with regard to data collection, monitoring/complaint investigation/compliance reviews, conciliation, and enforcement.
- C. Jointly develop and implement regulations and related policies of any of the operating offices within DOL.
- D. Build the capacity of persons at all levels of the One-Stop system (including, but not limited to, government administrators, workforce investment board members, One-Stop Career Center managers, supervisors, front-line service providers and youth service providers) to address the needs of persons with disabilities.

- E. Promote the effective provision of reasonable accommodations and modifications for people with disabilities at all levels of the system.

Overarching Strategies:

As DOL moves forward, the five overarching strategies outlined below will be utilized to help accomplish the mission of the work plan:

1. Environmental Scan:

Identify existing Federal, state, and local efforts to improve One-Stop Career Center services for people with disabilities.

- A. Examine current policies, activities and funding to identify what issues are currently being addressed and what gaps, duplication, and/or conflicting policies or financial investments, if any, exist. This environmental scan will build off of similar efforts conducted in the past.
- B. Identify funding and other resources that are available outside of DOL resources to build upon (*e.g.*, other Federal agencies, research institutions, etc.), and to avoid duplication.

2. Relationships:

Develop and strengthen the myriad of relationships needed to facilitate effective management and services for people with disabilities. The following are three primary areas upon which DOL will build through the work plan:

- A. Develop, maintain and leverage relationships and resources within and across the public workforce investment system and its partners at all levels. This may include Federal, state and local workforce investment system partners, and public and private entities, including service providers and faith-based and community-based organizations.
- B. Develop, maintain, and leverage relationships with customers of the workforce system, including employers, youth and adults with disabilities, family members, representatives, advocates, and other appropriate individuals and entities.
- C. Develop and implement strategies for facilitating the leveraging of resources at the Federal level, by maximizing Federal investments and coordinating Federal efforts such as evaluation, data collection, service delivery and information sharing.

3. Communication:

- A. Facilitate effective communication for and with individuals with disabilities, emphasizing at all levels that the system has a legal obligation to ensure

communication with people with disabilities is *effective*, and encouraging all levels of the system to establish procedures for responding to specific requests for the use of alternative communication methods.

- B. Develop and communicate departmental guidance to the public workforce investment system on serving individuals with disabilities that, where appropriate, is agreed upon by the agencies participating in the workgroup.
- C. Develop and implement ongoing training and education for people at all levels of the One-Stop Career Center system regarding legal requirements, awareness of support programs for people with disabilities, understanding of issues related to employing and serving people with disabilities, and understanding of barriers facing people with disabilities.

4. Outreach:

Conduct outreach to traditional and non-traditional partners at the Federal level, and encourage encouraging states and locals workforce investment entities to conduct outreach to additional partners. Promote outreach efforts that specifically target disability-related service providers, among others.

5. Inter-Agency Relationship Strategies:

Among ETA, CRC, ODEP and VETS, DOL plans to:

- A. Establish a model for ongoing communication and cooperation among the three agencies.
- B. Develop a shared vision and vocabulary, and common interpretations of statutes, regulations, and rules related to serving people with disabilities.
- C. Develop a process for evaluation and continuous improvement of the work plan.

6. Additional Federal Involvement:

As DOL continues developing this plan, additional Federal agencies, including OSERS, SSA, and other stakeholders will be engaged, as appropriate.

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Appendix I

AED Longitudinal Study

**Analysis of Change:
A Four-Year Longitudinal Study of One-Stop Systems
Serving Youth and Adults with Disabilities**

Executive Summary

A publication of:

U.S. Department of Labor
Office of Disability Employment Policy
Washington, DC

April 2008

This is a publication of the Academy for Educational Development (AED) and has been funded by the Office of Disability Employment Policy of the U.S. Department of Labor, through Contract # DOLF059621987 with the Academy for Educational Development. The opinions expressed herein do not necessarily reflect the position or policy of the U.S. Department of Labor, nor does mention of trade names, commercial products, or organizations imply endorsement by the U.S. Department of Labor.

The Academy for Educational Development (AED) gratefully acknowledges the efforts, expertise, and contributions of its partners in producing this report: the Institute for Community Inclusion (ICI) and the Institute for Educational Leadership (IEL).

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EXECUTIVE SUMMARY

In the fall of 2002 the Academy for Educational Development (AED) began a multi-year study to identify supports that are needed to provide efficient and universal access in serving individuals with disabilities through the Workforce Investment Act (WIA)'s One-Stop Career Centers (hereafter referred to as One-Stops) and WIA-assisted youth service providers. This work was conducted in conjunction with the Institute for Community Inclusion (ICI) and the Institute for Educational Leadership (IEL), and with the U.S. Department of Labor's (DOL) Office of Disability Employment Policy (ODEP) and the Office of the Assistant Secretary for Administration and Management. AED's research focused on serving youth with disabilities while the ICI's research focused on serving adults with disabilities. This Executive Summary presents the *combined* findings of these two separate studies.

THE SITES SELECTED

In 2002, 12 One-Stop delivery system sites around the country were selected for participation—6 for the adult study and 6 others for the youth study. These are listed below and represent, for the adult study, a total of 26 comprehensive One-Stop Career Centers; the 6 youth sites encompass 10 full-service and 5 satellite One-Stops. Brief overviews of these sites are provided in Appendix A (adult) and Appendix B (youth) of this report. The selected sites were:

Adult Sites

1. Colorado Springs, Colorado: Pikes Peak Workforce Center
2. Los Angeles, California: MetroNorth WorkSource Center, and Hollywood WorkSource Center.
3. Rhode Island: netWORKri, Providence One-Stop Career Center
4. New Orleans, Louisiana: Job One One-Stop Career Center
5. Clark County, Washington: WorkSource Vancouver; Town Plaza WorkSource
6. Utica, New York: Utica Working Solutions One-Stop; Rome County Working Solutions One-Stop.

Youth Sites

7. Tucson, Arizona: Rico Nuevo and Ajo Way

8. Albany, Georgia: Albany One Stop
9. Waterloo, Iowa Hawkeye: Community College Workforce Development Center (HCCWD)
10. Syracuse, New York: CNYWorks
11. Providence, Rhode Island: netWorkri
12. Bellingham, Washington: Northwest Workforce Development Council (NWDC)

METHODOLOGY SUMMARIZED

Each site was visited once a year by a team of experts in the area under focus for that site (i.e., either the employment of adults with disabilities or service delivery to youth with disabilities). The study occurred within the following time frame:

Study Year	Calendar Year
Year 1	October 2002-September 2003
Year 2	October 2003-September 2004
Year 3	October 2004-September 2005
Year 4	October 2005-September 2006

In each round of data collection, staff and individuals with disabilities (either youth or adult) were questioned on what assistance was being offered and what supports were needed to meet the unique needs of customers with disabilities. These included:

- Members and staff of the local workforce investment boards (LWIBs);
- Individuals with disabilities who have used the One-Stop or WIA-assisted youth service provider;
- Employers who have used the One-Stop or WIA-assisted youth service provider;
- Vocational Rehabilitation (VR) staff;
- Community rehabilitation provider staff who are partnering with the One-Stop or WIA-assisted youth service provider;
- Youth Council members (*youth site only*);
- Disability point persons or staff whose role was to help individuals with disabilities negotiate the workforce investment system; and
- Front-line workers in the One-Stop or WIA-assisted youth service provider.

RESEARCH QUESTIONS

At the outset of the study, ODEP framed six research questions that have guided the study. These are:

1. What specific context and conditions are necessary to promote increased access to services for individuals with disabilities?
2. What strategies, including policies and practices, are being used to improve access and outcomes?
3. What is the evidence of change relative to these strategies?
4. Are individuals with disabilities satisfied with the services they receive and are they making progress towards their education and work preparation goals?
5. With regard to policies and practices, what supports/constraints (including costs) influence implementation?
6. How can the information in Questions 1-5 be used systematically to provide technical assistance and training, disseminate information, and inform practice?

THE EMERGENCE OF COMMON ISSUES

Data collection across all years of the study revealed common areas that represent challenges for sites. Interestingly, these areas were strikingly similar in both the adult and the youth sites. These major issues were:

Adult Issues	Youth Issues
Leadership	Leadership
Human Resources	Human Resources
Universality and Accessibility	Accessibility and Disclosure
Collaboration	Partnerships
Engaging Employers	Employer Issues
Resources	Fiscal Matters
Results and Performance	Results and Performance

FINDINGS

Four years of investigation lead back to the beginning—to the original six research questions that prompted DOL to fund this investigation. Those six questions now provide the structure for this Executive Summary’s discussion section, with the answers leading to specific recommendations related to policy and practice, which are provided at the end of this chapter.

1. What specific context and conditions are necessary to promote increased access to services for individuals with disabilities?

This study reveals that there are several specific contexts and conditions that appear necessary to promoting increased access to services for individuals with disabilities. These conditions are summarized below.

LEADERSHIP THAT MAINTAINS A FOCUS ON DISABILITY

Individual adult and youth site leadership varied in the degree to which they maintained a focus on disability issues. This variety of emphasis offers this study visible evidence of the difference that having a strong disability focus can make in promoting accessibility of services to customers with disabilities. LWIBs for the adult sites played an especially strong role in maintaining a focus on disability issues and accessibility. In one site in particular, LWIB staff were the ones who initiated work around disability issues, working jointly with the One-Stop delivery system to create policy, establish goals, and provide oversight.

BRIDGEBUILDERS THAT PUSH DISABILITY ISSUES

At several of the sites, both adult and youth, there were staff who specifically championed disability issues. These staff were not necessarily mandated partners in the One-Stop delivery system—often, they were from disability community-based organizations and yet worked to strategically develop relationships and promote disability issues. These individuals created consensus, built local communities, and fostered sustainable change. Their vision, perseverance, and direction mobilized groups, spearheaded initiatives, and, in some cases, transformed systems. We characterized these individuals as “bridgebuilders.” Bridgebuilders “got things done.”

ACCURATE DATA TO DRIVE DECISION MAKING

Being able to make decisions based upon accurate data is important within the workforce investment system, as elsewhere. Yet being able to do so was an area of difficulty for adult and youth sites alike, and not for lack of willingness. Adult sites in particular could be seen clearly moving from making decisions on an ad hoc basis toward using a more informed approach where data were used to inform decision making and policy development. This trend was consistent with an increased emphasis on data collection. Greater connection was also seen between data and the certification process of One-Stop operators.

So—if willingness to utilize data in decision making wasn't the issue, per se, what was?

Collecting the data, surprisingly. In both adult and youth sites, collecting necessary information on customers with disabilities was quite difficult. Most sites could not accurately say how many customers with disabilities they had served, what disabilities those customers had, what types of services they had received, or what outcomes they had achieved. The existing data management systems used by the sites were not set up to record such information, let alone track or analyze it. This directly affected data-driven decision making with respect to disability issues and services.

This condition will hopefully be addressed via the final rule on the Department of Labor's reporting and recordkeeping system called Workforce Investment Streamlined Performance Reporting (WISPR)¹ (originally called EMILE when DOL requested public comment in July 2004). A public comment notice for this system was published on November 6, 2006, as this study came to a close. WISPR is expected to assist sites in addressing the data collection issues that have been noted as a constant challenge through this study.

RELATIONSHIP BUILDING WITH PARTNERS AND BEYOND TO MAXIMIZE RESOURCES

Over time, collaboration with all types of organizations and agencies increased at the 12 sites. The relationships they pursued and built became instrumental in their ability to support a range of job seekers, maximize their own resources, and "share the scope" of what it takes to provide workforce development services.

PROFESSIONAL DEVELOPMENT TO BUILD DISABILITY CAPACITY

Considerable and continual professional development emerged as a requisite for effective service delivery. Individuals with disabilities present unique challenges to WIA programming; professional development provides staff with the knowledge they need to provide key services, such as assessment, assistive technology supports, accommodations, and appropriate interventions.

LONGER-TERM INTERVENTIONS

Service delivery within the workforce investment system is implemented via short-term programs of skill building or job placement activities. For youth with disabilities, however, this short-term approach to results is not truly appropriate. As the data from the youth case studies illustrate, a longer-term intervention brings with it the types of support that promote success and serve to usher youth with disabilities through the transition from secondary school into the world of work. Without those supports, many of the youth involved in this study lost the progress they had made.

ADDITIONAL SUPPORTS

Also with respect to serving youth with disabilities, within their context of daily living and the barriers they confront, additional supports appear necessary to increasing youth access to and utilization of WIA services. These are non-employment supports such as housing, transportation, health care, and child care. Transportation in particular showed itself to be a substantial obstacle to continued involvement.

¹ The final rule for WISPR is available online at: www.dol.gov/OMB/CN/OMB%201205-0NEW-WISPR.cfm

2. What strategies, including policies and practices, are being used to improve access and outcomes?

Numerous strategies emerged as pivotal in improving access and outcomes for individuals with disabilities within the workforce investment system. These are summarized below.

CONTINUED AND CONSISTENT FEDERAL POLICY

Federal policy provides the guidance and leadership that an ambitious program such as WIA needs. Within the reality of reduced budgets and the multitude of competing demands and performance requirements, decision making and resource allocation are necessarily influenced by what federal policy emphasizes. Current federal framework appears to be sufficient for improving access and outcomes. It mandates both adults and youth with disabilities as customers of the workforce investment system. It also appears there are no countervailing policies that would prohibit serving individuals with disabilities. For example, in other federal policies, schools are charged with preparing youth with disabilities for the transition into the post-school world, VR agencies are charged with the provision of employment services for those with disabilities (although from state to state VR defines “youth” and “eligibility” differently and is subject to Order of Selection protocols that make partnership with One-Stops difficult at times), and the Social Security Administration (SSA) provides a series of work incentives meant to support individuals with disabilities entering the workforce while not jeopardizing their benefits.

One area in which federal action has most recently occurred may be especially helpful in addressing a persistent challenge faced by all sites across all years of the study. It is listed next.

ACCOUNTABILITY POLICIES FOR SERVING INDIVIDUALS WITH DISABILITIES

Current accountability policies regarding individuals with disabilities—or more specifically, the *lack* of accountability policies—detract from improving their access and outcomes within the workforce investment system. The work that DOL has been doing with respect to modifying the accountability system to collect and report disability data is right on target with what the field needs. The final rule for a streamlined performance reporting system, called WISPR, was published last year (November 6, 2006). This means that policies are now in place at the federal level that support the collection and reporting of disability data. When the system itself is fully implemented, sites will have the accountability policies they need for serving individuals with disabilities.

PROCEDURES AND POLICIES RELATED TO CUSTOMERS WITH DISABILITIES

All of the sites have done an excellent job in making their facilities and equipment accessible, a necessary first step and strategy in serving individuals with disabilities. However, physical accessibility is only a first step. The disability competencies that staff need to effectively serve customers with disabilities, the knowledge that employers need, the *institutionalization*, if you will, of a disability-ready perspective require much more. The sites that have been most effective in creating an environment ready to address the special needs of customers with disabilities are those that have developed formal procedures and practices for all of their employees.

DISABILITY POINT PERSONS

Over the course of the study, sites acquired disability point persons (often through the Navigator initiative²) who have contributed greatly to promoting and improving access for customers with disabilities. It has been interesting and informative to watch the role of disability point persons change over time with respect to service delivery to customers, working with other staff, and influencing system change. Their primary tasks have centered on helping job seekers with disabilities to negotiate the system; supporting systems change; and building the capacity of the One-Stops and youth service providers to work with adults and youth with disabilities. At the local level, staff holding these positions have demonstrated positive contributions to improved service delivery for people with disabilities. They have increased service coordination for job seekers with disabilities; disability awareness among One-Stop staff, youth service providers and partners; and collaboration among One-Stop partners and disability entities. Without a doubt, this is a staff member who has a great deal to contribute to improve access and outcomes for WIA customers with disabilities—youth and adults alike.

ENGAGING EMPLOYERS: MATCHING JOB SEEKERS WITH LABOR MARKET NEEDS

Across the years of this study, employer needs increasingly became the driving force that One-Stops and youth service providers considered when planning outreach and workforce development programming. Strategies for effectively engaging employers and responding to their needs ranged from market planning, designating outreach teams for high-demand industries, establishing services specifically for the benefit of employers, and involving employers in front-line services.

From the adult sites comes a strategy of particular interest and effectiveness in improving access and outcomes: developing ongoing relationships through which business service representatives (BSRs) become embedded into businesses. Using an employer language and "mindset," BSRs concentrate on solving retention problems and matching positions with skill sets rather than on "selling" the hiring of people with disabilities. These strategies have addressed employers' reported needs to be treated as clients and also increased awareness that One-Stops are more than human service organizations.

Working directly with industry as they do, BSRs are also able to educate and train employment staff on how to partner using a business-centered communication strategy. The linkages they have built with the business community, and their subsequent knowledge and familiarity with employers, have enabled them to address labor market needs. With respect to customers with disabilities, employment staff in turn have educated BSRs on job-carving techniques and customized employment³ strategies so that, when they are embedded in businesses, BSRs can

² Navigators are disability point person positions funded through a joint initiative of U.S. Department of Labor's Employment & Training Administration, and the Social Security Administration (SSA). Established in 2003, the purpose of the program is to provide information about the work supports services available to SSA beneficiaries and others with disabilities through the One-Stop system. Funds have been made available to create these positions in One-Stops to not only guide individual job seekers but to also to support systems change and capacity building around disability issues.

³ Customized employment means individualizing the employment relationship between job seekers and employers to meet the needs of both. It is based on a personalized determination of the strengths, requirements, and interests of a person with a complex life. The customized employment process is a flexible blend of strategies, services, and supports designed to increase employment options for job seekers with complex needs through voluntary negotiation of the employment relationship.

simultaneously focus on business needs *and* consider the needs of job seekers, including those that might benefit from less traditional approaches.

FOCUSING ON UNIVERSAL SERVICE DELIVERY

Universal services can be defined as those services that benefit all customers. Over the past four years, we have noted movement within the adult One-Stop sites (and, to a lesser degree, within the youth sites) towards universality, or towards focusing broadly on the needs of all customers rather than on specific populations. Often, the supports that make sense for people with disabilities contribute to better workforce development services overall. One way this has been demonstrated is the increased emphasis adult sites have put on meeting the needs of a diverse workforce. The One-Stops are focusing on the diversity of their customer base and addressing disability within that context. For example, the training they offer on diversity includes disability components, and marketing efforts are inclusive of all, with additional efforts toward certain groups.

One possible reason this critical paradigm shift has not been observed as strongly in the youth sites is that youth with disabilities appear to benefit more from longer-term interventions, as was mentioned under Question 1. “Disability within diversity” may not be as appropriate or effective in a context where extensive additional support is indicated.

LEVERAGING OF NON-WIA RESOURCES

Sites are very effectively collaborating with other organizations and leveraging non-WIA resources. Such leveraging supplements services directly related to gaining employment and/or wraps other support services around customers with disabilities.

PROVIDING FOR CONTINUAL PROFESSIONAL DEVELOPMENT

All sites understood the importance of professional development in building the disability-related capacities of their staff. From site to site, however, the intensity of professional development offered varied, as did the recourse that staff had to additional technical assistance. Interestingly, training at the adult sites has become centered on the philosophy of “good customer service,” which is in keeping with their shift toward concepts of universality. Training is also disability-specific, often provided by the disability point persons or VR. In addition, sites have proactively reached out to community partners for their expertise in disability issues. Training activities have been both formal (such as online training and written disability protocols) and informal (such as the collaboration that all sites undertake with VR staff around specific customers).

3. What is the evidence of change relative to these strategies?

Although evidence of change is mostly anecdotal, some hard evidence does exist that sites are seeking out and serving both youth and adults with disabilities.

Examples

All sites have actively pursued the task of making their physical premises accessible to customers who have disabilities. Entrances with accessible doors, totally new facilities that are fully accessible, Braille readers, specialized computer software to enlarge print or read text, work stations revamped to accessible heights for customers in wheelchairs or with other special needs—all are examples of the attention that sites have paid to ensuring that customers with disabilities can walk through their doors and be served.

Many sites have targeted specific disability entities in the community, conducted outreach to those entities regarding WIA services, and set up formal and informal mechanisms to recruit and serve clients of those entities. This has included working with community mental health centers, county Transition Councils, High School/High Tech programs, Goodwill Industries, independent living centers, special education classes in the local schools, disability services in postsecondary institutions, and much more.

Sites have also increased their formal partnerships with community-based disability organizations through a variety of grant activities and shared endeavors. The Waterloo One-Stop (youth site), VR, and Iowa Black Hawk Independent Living, for example, wrote a collaborative grant that resulted in funding the position of Benefits Planner, whose direct responsibilities include helping customers with disabilities understand disability benefits and related issues. The planner is housed in the One-Stop.

Considerable energy has been directed toward building the disability capacity of staff. The *Legacy* Training in Los Angeles (adult site), which combines online and in-person training, has expanded to include three levels of skills for workforce personnel, depending on their job needs. A series for Human Resource personnel has also been developed. The online component has been expanded statewide so that personnel in centers around the state can be trained.

Online training is also available to, and utilized, by the youth site in Bellingham, WA. Additionally, the state makes available a toll-free technical assistance line for WIA programs to access when they have disability-related questions.

In keeping with the evolving commitment to universality and “disability as diversity,” many adult sites are working with community entities whose work is not necessarily

disability-focused but, rather, on hard-to-serve populations (which will often include individuals with disabilities). These include organizations addressing ex-offenders, the homeless, victims of domestic violence, and the like. Clark County, WA uses a performance grid with the LWIB and the One-Stop staff to emphasize the commitment to individuals who are considered hard to serve *and* services to employers that meet their needs—both customers of the workforce investment system.

4. Are individuals with disabilities satisfied with the services they receive, and are they making progress towards their education and work preparation goals?

Findings at the Adult Sites:

In order to be successful, One-Stops must know who their customers are, as well as those customers' expectations for service delivery. Sites obtained customer feedback and used this valuable information to continuously improve service delivery.

In Years 1-3 of the study, we interviewed job seekers at each site about their satisfaction with services and found that most were satisfied with their overall experience with the One-Stop. In some cases, satisfaction was related to how successful individuals felt in finding a job with the support of the One-Stop. Respondents spoke of the efficiency of One-Stops and the convenience of having multiple agencies co-located. They indicated that collaboration between the staff of different agencies helped ease the transition. Satisfaction was also associated with a warm and friendly atmosphere that One-Stops created for customers. While most comments about staff were positive, a few customers were dissatisfied with the staffing changes at the One-Stops.

Interviewees reported receiving a variety of services from One-Stop staff and felt that staff opened new doors by simply educating job seekers about the resources and services available at the One-Stop. Giving job seekers the right tools was seen as the first step in the job search process. What was important was that staff not only provided the resources, they also worked with customers on using those tools.

Generally, customers also found the One-Stops accessible and accommodating for people with disabilities. Accommodations such as interpreting services contributed to how job seekers felt about the services they received. Some individuals spoke of the accessibility of offices, equipment, and computers. Others commented on the usefulness of attending an orientation to the resource room and the technology. One interviewee who used a wheelchair was satisfied with the accessibility of the One-Stop and felt that it met her mobility needs:

That place is very, very accessible, when it came to me and my wheelchair. The doors all had automatic doors. It was very big. It was spacious, so I wasn't cramped. I used the computer a couple times when I was waiting for my appointment, and they have a specific place where I could go. They had a lower desk, and I could access the

computer easily, and that was always [available for] use....They were very considerate. They were very, very helpful. And it was really accessible. It was.

Findings at the Youth Sites:

On the whole, and consistent from year to year, youth interviewees tended to be highly supportive of the programs in which they participated. Year 3 marked the first time that any of the youth interviewed in this study registered dissatisfaction with the services they had received.

Two findings of the study are appropriate to note here, however, as caveats to the conclusion that youth are satisfied with services and making progress toward their goals.

- Very few youth with physical disabilities seem to be utilizing WIA Title IB services, and none before Year 4 of this study. Whether this is because they are instead being served through VR is not known, but no data or opinions from the sites exist to otherwise explain their absence.
- As the youth interviewees age and leave the supports of programs, they appear to regress or hit new barriers that prevent them from pursuing employment. Yet, when asked, they are very satisfied with the services they previously received.

5. With regard to policies and practices, what supports/constraints (including costs) influence implementation?

We have already discussed many of the factors that support WIA services for individuals with disabilities: leadership that maintains a focus on disability, bridgebuilders, disability point persons, integrating needs of individuals with disabilities into broader context of hard-to-serve populations, leveraging of non-WIA resources, and continual professional development. The following *constraints* also exist and are clearly affecting success of implementation efforts.

PERFORMANCE MEASURES

Performance measures are critical in developing accountability across programs. Throughout this research, all sites have struggled with creating an integrated system built on separate funding and performance measures. Program funding and performance measures have also been cited as barriers to collaboration and, thus, system integration. In a time of decreased budgets, many partners become protective of their own funding, concentrating on meeting their performance goals rather than on collaborating with other partners or sharing financial resources. As a One-Stop manager described the impact of financial pressure on the system: “And when things get tight... everybody goes back to their silo.”

Respondents in this study felt that complying with performance measures was particularly challenging when trying to serve individuals with more complex needs. While there is a need to offer persons with disabilities support, and a strong desire by the staff to meet their needs, One-Stops and youth service providers are also accountable to their performance standards. These performance measures are currently primarily targeted at the “universal” job seeker and do not take into consideration the employment issues faced by special populations. Sites felt that the accountability

system and the performance measures need to include factors that reward sites for serving hard-to-serve customers.

And what happens when a site fails to meet performance measures? This occurred in at least three youth sites across the course of the study. In each, the failure led to the creation of a new, very intense monitoring presence as well as entirely new projects designed to hit placement goals rather than support readiness activities. Faced with consequences of this sort, some sites are predicting that, as the performance standards become tougher, youth with disabilities will be among the first to be left out of the program. Given that one of the objectives of WIA is to serve the “most in need” or the “hardest to serve,” many sites feel that the performance measures are counter-productive because they will lead to serving only the easiest to serve.

FUNDING ISSUES

Reductions in funding has caused pressure to mount and morale to drop as staff tried to meet the needs of all customers. Funding reductions meant that non-mandated partners could not maintain their positions within the site. There were fewer training dollars available, making professional development more difficult. Limited funds also meant that staff had to stretch to find opportunities for people with disabilities with fewer collaborators.

This reduction in funding has led to a “streamlining” of services and an intense search for new, non-WIA funding. Private funds have been used to underwrite job development activities in several sites. Less dramatic, but still quite effective, are the many ways in which sites now braid and leverage resources of other organizations into their own programmatic efforts.

SHORTER V. LONGER INTERVENTIONS FOR YOUTH

For youth with disabilities, as has been noted, WIA’s shorter-term service delivery approach is not truly appropriate and can be seen to operate as a constraint upon their success. The longer-term intervention approach used by one youth site in particular has brought with it the types of support that promote success and serve to usher youth with disabilities through the transition from secondary school into the world of work. At other sites, without those supports, many of the youth lost the progress they had made.

LOSS OF PERSONNEL AND STAFFING SHIFTS

In addition to funding reductions, there was mounting pressure to meet federal standards with fewer well-trained staff. Attrition and staff reduction took a toll at all levels, affecting front-line staff, leadership, and those working as disability point persons. Staff reductions were the result of state budget challenges as well as the ending of grants that funded staff. The loss of human resources was extremely difficult for the staff who remained. In many cases, positions were not re-filled; job duties had to be absorbed by those that remained.

LACK OF TRUE INTEGRATION: “TURF MENTALITY”

Staff turnover and fiscal challenges also negatively affected connections between partner agencies. Most sites reported that they would like to see more large-scale integration between partners so that different organizations could network, share job leads, and learn more about one another. The more that partners knew each other and built relationships, the easier it was to deal with fiscal challenges and staffing issues.

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POLICIES REGARDING SERVING IN-SCHOOL YOUTH

State policies constrain VR in its service delivery to youth until they are close to or have left secondary school. VR's Order of Selection and its performance standards for staff necessarily focus staff upon job placements, not on the kind of group support activities that are part of many youth preparation and leadership programs. Such youth policies definitely operate as a constraint to youth programming.

6. How can the information in Questions 1-5 be used systematically to provide technical assistance and training, disseminate information, and inform practice?

Information on effective strategies needs to be shared through both the workforce investment system and the disability provider network so that each group is better prepared to work individually and together. Two specific and interconnected activities are indicated, and are summarized below.

FULL UTILIZATION OF PRIMARY DISSEMINATION CHANNELS

In order to maximize technical assistance and training to the field, full utilization of, and concerted outreach efforts to, the primary dissemination channels is strongly recommended, including all of the following:

- The *U.S. Department of Labor*, which has a well-established system it uses to communicate with the field. This includes its main website, the websites of its many offices (e.g., Employment and Training Administration, Office of Disability Employment Policy, Job Corps, Youth Services), and the Training & Employment Guidance Letters (TEGLs) it disseminates.
- The *National Institute on Disability and Rehabilitation Research (NIDRR)* and the *Rehabilitation Services Administration (RSA)*, both within the U.S. Office of Special Education and Rehabilitative Services (OSERS), both of which conduct and support disability-related activities intended to improve employment outcomes for people with disabilities. RSA's major funding program, for example, provides funds to state vocational rehabilitation (VR) agencies.
- Other government hubs of disability-related activity and information, such as *DisabilityInfo.gov*
- Major employment- and disability-related *conferences*, such as DOL's Workforce Innovations Annual Conference, RSA's National Employment Conference, and the many conferences held by other organizations and agencies listed here.

- *The two national collaboratives*, the National Collaborative on Workforce and Disability for Youth (NCWD/Youth) and the National Center on Workforce and Disability/Adult (NCWD/Adult): These Centers were created to provide technical assistance to organizations for the purpose of assisting in the improvement of employment outcomes for disabled youth and adults.
- *The National Association of Workforce Boards (NAWB)*: NAWB is a 650-member organization representing the state and local workforce boards. Its constituency is eager for information and examples from other communities that have been creative in addressing some of the challenges they face. Dissemination resources through NAWB would include the annual conference, a bi-weekly e-newsletter, and the integration of information into NAWB's training curricula.
- *The National Association of Workforce Development Professionals (NAWDP)*: NAWDP provides information and assistance to staff who work at a direct service level. Practical suggestions for working with individuals as well as working more effectively with partner organizations would be extremely useful to this audience of front-line workers. In addition to its annual conference, NAWDP has recently launched a new professional journal for its membership.
- *The independent living center network*, beginning with the National Council on Independent Living (NCIL), which represents over 700 organizations and individuals including: Centers for Independent Living (CILs), Statewide Independent Living Councils (SILCs), individuals with disabilities, and other organizations that advocate for the human and civil rights of people with disabilities throughout the United States.
- *Disability and Business Technical Assistance Centers (DBTACs)*, a network of 10 regional centers funded by NIDRR (the National Institute on Disability and Rehabilitation Research) to provide information, training, and technical assistance to employers, people with disabilities, and other entities with responsibilities under the Americans with Disabilities Act (ADA).
- *Job Accommodation Network (JAN)*, a free consulting service provided by ODEP and designed to increase the employability of people with disabilities.
- *The National Disability Rights Network*, which includes the Client Assistance Programs (CAP) and those within the Protection and Advocacy System (P&A) in all states: Both of these groups—CAP and the P&As—are congressionally mandated, legally based disability rights agencies.
- *The National Dissemination Center for Children with Disabilities (NICHCY)*, whose service scope includes youth in transition, their parents, and the school and community professionals who help them prepare for life after secondary school.
- *Disability-specific organizations* nationwide and at the state level, which communicate regularly and proactively with their own audiences about disability-related resources and can be encouraged to spread the word about WIA-Title IB services for youth with disabilities. The spectrum of individuals with disabilities can be reached via these groups, and the expertise in

specific disabilities that they possess can be accessed for the benefit of service providers under WIA and the customers with disabilities they serve.

PUBLICATIONS

Topical briefs and other publications will need to be developed and disseminated through the vehicles listed above. These briefs should focus on new and promising practices that programs can use to improve their service delivery to youth with disabilities. These briefs are already in the process of being developed and, at the moment, are focused on such topics as professional development, performance measures, funding issues, and the role of disability specialists.

Beyond the immediate publication of topical briefs, the field would definitely benefit from the availability of training materials, including video and online seminars, on disabilities in general and on the many facets of service delivery that are affected by disability. Providing the field with such a tool would not only send a system-wide message about serving customers with disabilities, but it would also equip the workforce investment system with ready-to-use onsite disability expertise and the means of continually building capacity in this area.

WEB-BASED ACTIVITIES

The Internet represents an ever-growing land of opportunity for disseminating information and building capacity within the workforce investment system and beyond. Not only does the Internet make it possible to communicate simultaneously with a multitude of audiences via email and newsletters, it also makes training a possibility in the same manner. Webinars, online training workshops, discussion groups, communities of practice—all are fertile grounds to be explored and utilized in providing technical assistance and training, disseminating information, and informing practice.

RECOMMENDATIONS FOR POLICY AND PRACTICE

Recommendations for policy and practice have been generated based on all the findings presented thus far in this Executive Summary as well as in the much more detailed reports from each year of the youth and adult studies. For each recommendation, “action statements” are presented in three groups—federal, state, and local—corresponding to the levels at which action on the recommendation would most naturally or appropriately fall.



1—COLLABORATION MUST BE ACTIVELY PURSUED IN PRACTICE AND CONCRETELY SUPPORTED VIA POLICY INCENTIVES.

The sites involved in the youth and adult studies have offered us an amazing view of what collaboration and partnership can achieve. Recognizing the promise that effective partnerships hold in WIA’s implementation, we will begin this recommendations section by emphasizing the need to

support collaboration as fully and as powerfully as possible. Specific concrete actions and policy initiatives, discussed below, would do much to actualize this recommendation. Most, but not all, speak to the elements that divide systems and partners and undermine collaboration.

AT THE FEDERAL LEVEL

As federal legislation, the Workforce Investment Act actively supports—and in fact requires—partnership as an underpinning of operation. Additional actions at the federal level will strengthen the message as well as equip the field with more tools by which to forge effective partnerships. Specific actions at the federal level include:

- *Provide training and technical assistance on successful partnering practices.*
Currently, around the country there are examples of creative practices that have led to win/win situations for public and private agencies, increased resources, and better outcomes for adults and youth with disabilities. We recommend that DOL develop a compendium of these practices and disseminate the compendium to key leaders within the workforce investment system, accompanied by technical assistance.
- *Take a hard look at restrictive policies and consider how they might be reduced.*
Federal regulations that act as a barrier to collaboration and to serving a diverse customer base should be examined for their impact on systems partnerships. One example is VR's limitations under "Order of Selection." Many of the mandated partners under WIA face similar restrictions in their authorizing legislation, which then work at odds with the central tenets of partnership inherent in the WIA. Funding silos that restrict the ability of mandated partners to work together on jointly funding individual services need to be reviewed. Agencies need to be encouraged to develop a unified, continuum of services in which all can play a role without jeopardizing their core mission. The Department of Labor should work with entities such as the Rehabilitation Services Administration to eliminate legislative language that inadvertently prohibits greater collaboration.
- *Continue to provide seed money for innovative collaborations.*
In the adult study, many innovative partnerships were developed between mandated One-Stop partners and community-based organizations, often as the result of groups getting together to pursue grant funding. The Department of Labor should continue to develop requests for proposals for grant activities with the specific goal of partnership, and engage in joint funding of initiatives that cross multiple populations. The shared youth vision approach led by ETA's Youth Office is a good example of promoting collaboration among federal agencies as well as supporting the field.
- *Support data initiatives around collaboration and seamless services, but ensure that disability issues are addressed.*
Performance measurement is an integral part of the Employment & Training Administration's accountability system that includes "other data on program activities, participants, and outcomes necessary for program management." Policy guidance needs to explain federal expectations regarding these data and how they can be disaggregated to better understand the experiences of individuals with barriers to employment.

AT THE STATE LEVEL

Much of the authority for how WIA is implemented resides at the state level, and for this reason, the bulk of action steps recommended in this section have been placed under actions “At the State Level.”

- *Make partnering a subject of staff training.*
Equipping state-level staff with a knowledge base about effective partnership practices provides them with tools and strategies for starting the conversation, building common ground, developing interagency agreements, addressing fiscal matters, and sustaining relationships.
- *Arrange for ongoing training from and about other agencies.*
In this study, cross-agency training tended to focus on giving overviews of each other’s policies and operational guidelines. While this type of information is necessary for staff to understand the basics of working with a specific agency, it stops short of providing needed *content* knowledge. Other agencies can serve as valuable partners and experts in staff capacity-building. At the state level, this may be especially important in implementing any of the recommendations in this synthesis report regarding aligning different systems and minimizing restrictive policies that limit partnerships.
- *Require grant applicants to demonstrate a successful history of collaboration.*
Developing grant/funding requirements that require successful applicants to demonstrate a successful history of working with other organizations would put teeth into partnership policies from the very beginning of the funding cycle. A potential model for this can be found in the Independent Living Center grant process, where an organization’s history of collaboration is part of the scoring criteria for funding.
- *Issue specific partnership-focused RFPs.*
Requests for proposals for grant activity with the specific goal of partnership would further underpin collaboration as a priority under WIA, as would joint funding of initiatives that cross multiple populations.
- *Align systems to maximize collaboration.*
States are at the helm of responsibility for how most federal legislation is carried out and the level at which different systems can be aligned. Within this study, numerous systems converge but reach limits of interaction due to differing eligibility criteria, age mandates, definitions of disability, confidentiality restrictions, data systems, reporting requirements, and the like. The state, as the responsible entity, is the most appropriate place at which to address these barriers to collaborative undertakings. Most immediate and central to WIA are policies associated with how the state implements VR (and where), public transportation, education, alternative high school and post-secondary education initiatives addressing low-income and at-risk populations, and services to residents with disabilities. States need to examine how and to what extent these systems can be brought into alignment and, as recommended at the federal level above, how and to what extent restrictive and separating policies and practices between them can be reduced.

AT THE LOCAL LEVEL

While the 12 sites are to be commended for the ingenuity and commitment they have shown in pursuing partnerships for the benefits they can bring to shrinking budgets, service delivery, and staff capacity, concrete action steps to consider at the local level include the following:

- *Make partnering a subject of staff training.*
Forming partnerships and working collaboratively are not necessarily skills that people take to naturally. Equipping staff with a knowledge base about effective partnership practices provides them with tools and strategies for starting the conversation, building common ground, developing interagency agreements, addressing fiscal matters, and sustaining relationships.
- *Provide all staff with regularly updated resource listings of community, regional, and state agencies and organizations offering information and services relevant to workforce development planning and service delivery.*
All new staff need to receive an organizational resource list of partnerships and community services to which they can refer in the course of performing their jobs. Compiling the list and maintaining its accuracy are important elements in site effectiveness and in offering customers an array of services.
- *Arrange for ongoing training from and about other agencies.*
Agencies can draw upon each other's expertise to systematically build staff capacity. Doing so, with a focus on content knowledge as opposed to primarily organizational procedures, will substantially bolster local-level capacity across a range of content issues.

**2—MAKE UNIVERSALITY A CLEAR, UNEQUIVOCAL GOAL.**

This study has focused on how the One-Stop delivery system is responding to WIA's objective to include youth and adults with disabilities in its customer mix. Part of that response has been to address disability within the broader concept of diversity and viewing it as one facet of a more sweeping mandate; ensuring that customers have universal access to workforce development services. Operating the workforce investment system on principles of universality takes nothing away from the task of making it available and accessible for customers with disabilities—but it *does* accent their legitimacy as customers. As well documented in both the adult and youth case study reports, what the sites have done to assure accessibility of their services is not about providing special treatment to one constituency; their efforts are intended to assure that individuals with disabilities have a level playing field upon which to enter and be served as customers.

Specific concrete actions and policy initiatives, discussed below, can do much to actualize the recommendation that universality be made a clear and unequivocal goal of the workforce investment system.

AT THE FEDERAL LEVEL

- *Align compliance with principles of universality.*
Compliance around nondiscrimination for special populations should look at WIA-supported services across *multiple* populations rather than at each population individually. DOL's Section 188 Disability Checklist⁴ provides a procedure for measuring compliance with Section 188 regulations that pertain to people with disabilities. A more universal document that measures compliance for all of those groups with barriers to employment may be a more useful tool for understanding the system's progress in accessible programs that serve all customers.
- *Expand the role of navigator to support hard-to-serve customers.*
Throughout the report, we have documented a shift towards disability as considered within diversity. We advocate for an approach that considers more generally hard-to-serve customers. The disability point person position (e.g., Disability Navigators) that evolved at the sites could be expanded to address the needs of not only people with disabilities but more broadly those who experience employment challenges. Because this position is intended to help guide customers through complex systems, it would be beneficial to have these resources for all customers in need of support.
- *Fund research into the impact of longer versus shorter interventions for youth with disabilities and other hard-to-serve populations.*
Youth with disabilities and other hard-to-serve populations appear to need supports and services that are more intensive and longer in duration than those beneficial to customers who do not have disabilities. It is recommended that the Department of Labor support research focused on the long-term nature of supports and services that are needed for an individual to successfully transition from secondary school into the world of work. Case studies that detail the practices of organizations taking a longer-term approach to intervention and service provision, and the outcomes they achieve, could do much to inform both policy and practice about what it takes to effectively address the barriers facing customers with disabilities and other hard-to-serve populations.

AT THE STATE LEVEL

- *Broaden outreach to community organizations.*
In keeping with the evolving commitment to universality and "disability within diversity," states should promote greater inclusion of various community organizations in state plan development. Engaging community entities that work with hard-to-serve populations (often including individuals with disabilities) provides a more global perspective on communities' needs. These include organizations working with ex-offenders, people who are homeless, individuals experiencing domestic violence, and the like.
- *Address services from a universal design perspective.*
Universal access is not about retro-fitting, but about designing services that are accessible to the broadest audience. While universal design will not eliminate the need for all

⁴ <http://www.dol.gov/oasam/programs/crc/WIASection188DisabilityChecklist.htm>

accommodation since some job seekers may need more individualized assistance, more universal services should make the process for making accommodations simpler and more intuitive for staff. To achieve true universal access, state plans should support the use of universal design in the planning and implementation of local services.

- *Award higher points for specific types of activities or successes.*
Criteria for certification and assessment of WIA service providers and their staff can be used to reward desired outcomes. For example, the system might award higher point values for placing job seekers with disabilities (and other hard-to-serve populations) in high-priority jobs (e.g., jobs that provide employees with health care and other fringe benefits). States might also include in a local area evaluation a weighting for the total percentage of youth or adults with disabilities served. The more such individuals a local area serves, the more points that the local area would accrue toward being “successful” in serving a range of job seekers, including those perceived as traditionally more difficult to support.

AT THE LOCAL LEVEL

- *Focus on overall customer flow and access.*
Accessibility for all ensures access for people with disabilities. At the sites in this study, this universality extended to considerations for making the environment friendly and welcoming, providing good customer service, and achieving smooth customer flow. Standardized customer flow, grounded in universal design, provides a roadmap for how customers would ideally move through the system. This should become standard operating procedure for all One-Stop customers, and staff should be oriented and trained to conduct each step.
- *Be aware that assistive technology can be helpful to customers without disabilities, too.*
Assistive technology has typically been viewed as specialized equipment to be used only by individuals with disabilities. As a result, this equipment is being under-utilized, and staff have limited experience and comfort in its use. Technology such as a document reader, which can electronically read aloud whatever appears on the computer screen, is a considerable resource for individuals with visual impairments—and *also* effective for individuals who cannot read the material because of limited literacy or limited English proficiency. Using technology across an array of customers, not just those with disabilities, can free up staff time and allow individuals more autonomy in job searching or information gathering.
- *Emphasize good customer service.*
Concepts around universality extend beyond physical considerations and encompass the cultural environment, a focus on good customer service, and equipping staff with the tools to serve all customers. Thinking beyond standard door-width issues, staff should concern themselves with more subtle issues such as limited paperwork for customers and overall usefulness of services to the widest range of people possible.



3—DATA COLLECTION AND PERFORMANCE MEASURES NEED TO SUPPORT THE FOCUS ON UNIVERSAL ACCESS.

The goal of universal access with the workforce investment system must be supported and not hindered by data collection processes and accountability to performance measures. To that end, the following recommendations targeted at the federal, state, and local level are intended to promote change that parallels the system's aims of fully supporting all of its customers.

AT THE FEDERAL LEVEL

- *Reinforce official guidance against performance measures that discourages "creaming."*
There is considerable pressure on states, local workforce areas, and their contractors to meet the performance measures under WIA. This can have the unintended consequence of what is called "creaming," or serving those who are most likely to achieve the performance levels negotiated under WIA in a reasonable amount of time. The Department of Labor should reinforce its guidance to the states that "creaming" is an unacceptable approach to meeting the performance measures. They can go further by asking states and their local workforce areas to set goals around serving hard-to-serve populations, including people with disabilities, and by being willing to make adjustments to the performance level for states that meet or exceed these target levels.
- *Include disability in data collection systems.*
As has been explored in this synthesis, the current data collection system is expected to be adapted to include data collection and report on customers who have disabilities, including youth. The Department of Labor's 2004 request for public comment on a new, streamlined reporting system specifically addressed this vital point, among others. The final rule for that system, called WISPR, was published on November 6, 2006. At the time of this writing, no information is yet available on site implementation of WISPR, which includes disability data as part of its data collection scope.
- *Adjust formulas.*
Formulas for distributing funds need to be consistent with the accountability weightings developed as part of a reconceptualized performance measurement system. As a 2004 GAO report⁵ states:

To address this issue, we recently recommended that the Secretary of Labor develop an adjustment model or other systematic method to account for different populations and local economic conditions when negotiating performance levels. In commenting on our recommendation, Labor agreed with the importance of taking economic conditions and characteristics of the population into account when setting performance expectations and

⁵ Government Accountability Office (GAO). (2004, December). *Workforce Investment Act: Labor has taken several actions to facilitate access to one-stops for persons with disabilities, but these efforts may not be sufficient* (GAO-05-54). Washington, DC: Author. (Available at: www.gao.gov/new.items/d0554.pdf)

had commissioned a study of adjustment models that could better take these differences into account. (p. 33)

AT THE STATE LEVEL

The authority to make needed critical changes that will foster universality of access lies primarily with the state. Specific actions to be taken at the state level, then, include the following:

- *Include disability in state data collection systems.*
States hold the authority for specifying for local service providers what types of data they need to report. At the current time and repeatedly documented across four years of case studies, states are not asking for these data. These systems clearly need to incorporate disability data—at a minimum, how many customers had disabilities and what kinds of disabilities they had. With the November 2006 publication of the final rule on the Department of Labor’s WISPR reporting system, this situation will hopefully resolve itself as WISPR becomes the standard reporting system across multiple WIA programs, including those serving adults and youth.
- *Revise the accountability system so it recognizes progress short of achieving a final outcome.*
Many of the sites indicated that a shortcoming of the current accountability system is that it does not recognize progress unless customers accomplish specific final outcomes. Measures need to be developed that positively reinforce significant progress even if that progress does not reach the final positive outcome. Using alternate assessments, as described in DOL’s TEGL 17-05,⁶ only partially addresses this issue; while a customer with a disability can now demonstrate what he or she knows or can do, outcome reporting is still the same—did the individual meet the target outcome or not?—and that is the crux of the sites’ concern. A graduated accountability system would provide reinforcement for local WIA service providers to work with youth and adults with disabilities who are more at risk than others.
- *Adjust formulas.*
Formulas for distributing funds need to be consistent with the accountability weightings developed as part of a reconceptualized performance measurement system. This was observed above, under the Federal Level recommendations, but applies here at the State Level as well.

AT THE LOCAL LEVEL

In this study, it is at the local level that difficulties in data collection and performance measurement played out. Local leaders and front-line staff expressed considerable frustration over the need to provide universal access to premises and services in the midst of accountability systems and performance measures that could not capture or reward these efforts. As a means of addressing these matters, specific actions to be taken at the local level, then, include the following:

- *Use what data are available to inform program planning.*
The lack of disability-related data has been repeatedly mentioned, especially at the youth sites. WISPR may be significant in addressing this problem, but it is not yet implemented. In the

⁶ Employment and Training Administration, Department of Labor. (2006, February). *Common measures policy for the ETA’s performance accountability system and related performance issues* [Training and Employment Guidance Letter No. 17-05]. Washington, DC: Author. (Available online at: http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2195)

meantime, programs do not have to operate in an information vacuum; they either can collect their own data as best they can, recognizing the issue of self-disclosure (some sites already do this), or make use of what data *do* exist from other sources. An excellent example is in the number of youth receiving special education and related services in area schools. These figures must be regularly reported by schools and will include breakouts by type of disability as well. While these data are not perfect, they can nonetheless be used to guide program planning and resource allocation, especially when the alternative is to develop and pursue plans based on *no* data.

- *Provide training to staff regarding talking about disability.*
At many of the sites, staff continued to express confusion and discomfort about asking about disability when working with customers. Many staff still believed that they were unable to directly ask about disability. LWIBs and One-Stops should ensure that training occurs for every staff person regarding talking with customers about disability.



4—FULLY SUPPORT THE WORKFORCE DEVELOPMENT SYSTEM.

The policy recommendations contained in this report cannot be effectively implemented without resources to support the workforce investment system in full. In support of WIA, then, the following recommendations and action statements are made:

AT THE FEDERAL LEVEL

- *Establish a permanent stream of funding for ongoing professional development of One-Stop delivery system staff or consider a state-matching fund.*
One of the most important resources in the workforce investment system is its staff. This study brings into sharp focus both their commitment to effective service delivery and their ingenuity in finding alternative ways to provide it despite budget constraints. From the federal level down to the local, these are resources that no system can afford to lose.

All 12 sites in this study identified professional development of staff as an ongoing priority. Therefore, federal funding initiatives targeted specifically at helping states provide ongoing professional development within the workforce investment system would be very beneficial to and supportive of programs and customers alike. A portion of this could be earmarked to address professional development with respect to disability. State set-aside dollars might be utilized, as they currently are in many states, to support any requirement that states match federal funds provided.

- *Fund research into the effectiveness of tools commonly understood to “improve outcomes.”*
This synthesis and the yearly case study reports on which this synthesis is based have provided extensive descriptions of a number of tools and strategies that are commonly understood to improve outcomes. But are these, in fact, effective in improving outcomes? *Which* tools and strategies? With which customers? And to what extent? Systematic research is needed before these questions can be answered with authority.

- *Fund research in other critical areas.*

The research recommended above is only one area among many critical ones. Other areas of considerable interest and concern that would be greatly informed by systematic research include:

The impact of collaboration. The Workforce Investment Act assumes that collaboration is a major policy instrument that, when implemented soundly, increases outcomes for all job seekers, including those with disabilities. Future research should focus on a systems-level study of the measurable impacts of collaboration on customers, with a specific emphasis on those with barriers to employment such as individuals with disabilities.

The impact of increasing services to employers. While time shows that sites are increasingly being driven by services to businesses, it is important to consider the impact of this focus on customers with barriers to employment. There is a danger that One-Stops will focus so deliberately on employers that they lose their emphasis on addressing the needs of job seekers, especially those with more complex barriers. Additional research should focus on measuring the outcomes of job seekers at One-Stops that are identified as primarily focused on their business customers.

The impact of disability point person positions. A concern among some of the sites is the capacity for systems change within the disability point person model. Sites that use the model may be replacing the practice of automatically referring people with disabilities to the VR counselor with the practice of referring them to the disability point person. Research could target two issues: the specific outcomes of those customers who use the point persons versus those who do not; and whether this model contributes to, or is intended to contribute to, systems collaboration and systems change.

Outcomes within an increasingly technology-driven system. One-Stops are becoming increasingly sophisticated with the type and magnitude of technology that is being used in the centers and by youth service providers. While technology can enhance access to workforce development services and employment as a whole, there is concern that people with disabilities and other access barriers may be on the other side of the digital divide. Additional research should consider the effect of an increasingly technology driven workforce investment system on job seekers who experience barriers to employment.

AT THE STATE LEVEL

- *Commit the resources necessary to provide staff with tools for serving customers with disabilities.*

The case study reports in this study have documented several statewide initiatives designed to provide One-Stop delivery system staff in the state with professional development in, or ongoing access to, disability-related information. Taking a statewide approach offers the dual benefits of efficiency and cost-effectiveness, while at the same time sending out a consistent message about disability to all. This might include providing a clearinghouse that would provide models of reasonable accommodation procedures and policies. Online training is also an excellent vehicle for building and sustaining disability-specific expertise within One-Stop delivery system staff.

- *Develop career ladders and other incentives for staff.*

Adequate financial compensation of staff, as well as career ladders within One-Stops and WIA youth service providers, would help to raise the caliber of staff attracted to the positions and maintain staff with expertise and experience.

AT THE LOCAL LEVEL

- *Invest the time and money in professional development.*

At the local level, where customers are waiting to be served, it may be difficult to schedule time or spend limited finances in pursuit of professional development, but it is also where capacity building in disability and other workforce development issues is most needed and immediately beneficial.

- *Encourage entrepreneurship among LWIBs and One-Stops.*

Some sites were creative in accessing a diversity of funding streams, resulting in a more stable service delivery base for their customers. One-Stops should be encouraged to seek out other funding mechanisms besides federal grants and actively partner with business and industry to increase their overall resource pool.

- *Continue leveraging the expertise of others to provide training.*

As discussed in Section II (adult) and Section III (youth), sites in this study were creative and persistent in leveraging the expertise of their partners and others to provide staff with training in content, policies, and workforce trends. The scope of disability experts that could be accessed, however, is much broader and should be fully utilized. Several resources are identified in both the adult and youth findings (see Sections II and III)—disability-specific organizations, the National Association of Workforce Development Board (NAWB), and the National Association of Workforce Development Professionals (NAWDP)—and are recommended here as valuable sources of information on serving youth and adults with disabilities.

- *Identify online resources for training.*

Increasingly, the Internet is proving itself to be a place to find training modules across an extremely broad range of topics. Developing a list of available training online, then, on topics of high interest or recurring need, becomes an efficient way to continually build capacity in staff across a wide array of subjects and skills.

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Appendix J

Urban Institute Report (Executive Summary 110404)

**Serving People with Disabilities through the Workforce Investment
Act's One-Stop Career Centers**

November 4, 2004

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This paper was prepared for the Ticket to Work and Work Incentives Advisory Panel. The authors gratefully acknowledge the valuable input of the many individuals who were consulted over the course of preparing this paper, particularly Sheila Fesko (Institute for Community Inclusion), as well as the support of the Panel and its staff. The opinions and conclusions are solely those of the authors and should not be construed as representing the opinions or policy of any agency of the federal government or the Urban Institute.

Executive Summary

The Workforce Investment Act of 1998 is designed to provide a streamlined system of assistance that integrates many employment and training programs through a One-Stop delivery system for employers and job seekers, including job seekers with disabilities. There are currently over 3,000 One-Stop Career Centers operating across the country. Like the Ticket to Work (TtW) program, the One-Stop system offers the promise for a new source of employment assistance to people with disabilities, including the potential for One-Stops to serve in the capacity of approved “Employment Network” (EN) providers under the TtW program.

This paper examines the extent to which people with disabilities are served through WIA’s One-Stop system and discusses its capacity to serve people with disabilities who desire employment assistance, both in terms of common barriers to access as well as promising strategies to improve service delivery to people with disabilities. The main findings are as follows:

- The WIA program enrolls a number of people with disabilities, but such individuals comprise a small proportion the customers served. In PY 2002 (July 1, 2001, through June 30, 2002), nearly 46,000 people with disabilities exited the WIA program. People with disabilities made up about 8 percent of all exiters for PY 2002. Not all the customers with disabilities had disabilities that were considered a barrier to employment; there were about 16,500 exiters in PY 2002 who had disabilities that they considered a barrier to employment.
- The Department of Labor does not track enrollment by beneficiary status. We estimate that fewer than 2,400 exiters from the adult program in PY 2002 may have been SSI beneficiaries. The trend in services to people with disabilities is mixed. For the adult program, the total number of exiters increased each year, but the number of exiters with disabilities only increased between 2000 and 2001. Once enrolled in WIA, the services received for customers with disabilities, including those with substantial barriers to employment, are close to the figures for the overall population. Exiters with disabilities have lower employment and earnings than other customers who exit the program, but they have greater earnings changes from the pre-program period. The ability to track services to SSI and SSDI beneficiaries in WIA programs would be greatly enhanced if the Department of Labor modified its reporting system to specifically note if individuals served are beneficiaries.
- At the same time, it is important to note that the estimated number of SSI beneficiaries is not that small in comparison the approximately 5,000 “tickets” that have been assigned thus far under the TtW program. Further research is needed to better determine what an appropriate target level should be for WIA.

Several different kinds of barriers to serving people with disabilities may help explain why their enrollment in WIA and its One-Stop Career Centers is so low:

- Particularly during the early years of WIA, the One-Stop Career Centers where WIA services are offered were not particularly accessible to customers with disabilities. Barriers included access to the facilities, presence of appropriate hardware and software for customers with disabilities to access information on computers and in hard copies, and ignorance by One-Stop staff regarding how identify and serve customers with disabilities.
- Upon entering a One-Stop Career Center, customers are generally expected to use the computers and printed material in a resource room on their own. It is difficult to identify people with disabilities who need special assistance or who need to be directed to special equipment, and this may discourage potential customers with disabilities from using the One-Stop Career Centers.
- Interviews conducted for this paper indicate that prospective WIA customers at One-Stop Career Centers are often referred to VR without adequately determining if they might be better served in part or completely by WIA.
- Many local WIA programs place time and dollar limits on training their customers can receive. Training for customers with disabilities is sometimes more expensive, and this may make it difficult to serve such customers with WIA funds.
- State and local WIA programs are subject to performance standards relating to employment, earnings, and credentials of customers who exit the program. There are no adjustments for serving groups that face discrimination and other barriers to employment. States and local WIBs that fail to meet standards two years in a row are subject to sanctions, including loss of the right to operate the program. The literature on training programs indicates that local programs often engage in “creaming” because of the performance standards, whereby they tend to serve fewer customers with barriers, including people with disabilities.

Although there is unquestionably still room for improvement, there appears to be general consensus that the One-Stop system as a whole—often with the help of special grant funding—has made significant strides since WIA’s inception in reducing barriers pertaining to physical access and inability to address special accommodation needs. There also appears to be growing recognition that the focus on accessibility for people with disabilities with respect to the One-Stop system must move beyond physical and technological access to include a broader effort to address programmatic access. Although there is no comprehensive source of information available to determine how fully programmatic accessibility has been achieved across the One-Stop system, various case studies of One-Stop Career Centers suggest that progress has been

made in this area as well—although generally not as much as with improving physical and technological access.

One-Stop Career Centers have pursued several different strategies to make their physical and programmatic environment more accessible and responsive to people with disabilities. Many have taken advantage of special funding initiatives sponsored by both Department of Labor (DOL) and, more recently, by the Social Security Administration (SSA) to stimulate capacity building and systems changes for the express purpose of making the One-Stop service delivery system more accessible and responsive to the needs of people with disabilities. Of most relevance of these initiatives are the Work Incentive Grants (WIGs), the Disability Program Navigator (DPN) demonstration program, and the Customized Employment Grants (CEGs).

- Since 2000, the DOL Employment and Training Administration, has funded four rounds of Work Incentive Grants (WIGs). In general, the first two rounds of WIG grantees focused heavily on increasing access to One-Stop Career Centers by using grant funds to purchase and install assistive technology in resource room and to train frontline staff on the use of assistive technology and virtual accessibility for people with disabilities. More recently, the focus has shifted to supporting a specialized “disability navigator” position within One-Stop Career Centers to address programmatic access and capacity issues.
- In 2003, the DOL Employment Training Administration and the SSA Office of Program Development and Research jointly created a grant program to fund Disability Program Navigators (DPN) at WIA One-Stop Career Centers. The strategy is to place an individual at local One-Stop Career Centers to serve as an expert on workforce development issues for persons with disabilities, and facilitate access to relevant supports and services.
- The Customized Employment Grant Program, begun by the DOL Office of Disability Employment Policy in 2001, supports local Workforce Investment Boards (WIBs) in a consortium or partnership of public and private entities, to build the capacity of local programs to deliver services to significantly disabled and disadvantaged individuals who are not usually targeted for services. Customized employment strategies include job carving, self-employment, supported employment, job restructuring, developing partnerships with local businesses, and assigning personal agents for customers.

Although many of the evaluations of these activities are ongoing, the studies that are available plus discussions with government officials and other experts indicate that the programs have made a discernible and positive impact on improving the capacity of the One-Stop Career Centers for serving customers with disabilities. One-Stops benefiting from these special grants, as well as other One-Stop Career Centers that have made efforts to improve their service capacity for people with disabilities, have engaged in multi-pronged strategies that include

multiple and ongoing training of in-house One-Stop staff to increase awareness and knowledge of disability issues, resources, and needs; ongoing use of accessibility checklists; and greater collaboration with the Vocational Rehabilitation (VR) agency and other disability-serving agencies in the community.

There had been hope that the One-Stop Career Centers and local WIBs would become participants in the TiW program by becoming ENs and expand their services to people with disabilities through this additional revenue source. Thus far, few One-Stop Career Centers have enrolled as ENs, and very few tickets have been assigned to One-Stop ENs, and the vast majority of tickets have been assigned to state VR agencies. Although some factors that inhibit participation are specific to the One-Stop Career Centers and WIBs, such as charters that prohibit undertaking the financial risks associated with accepting a ticket, the evaluations we reviewed and interviews with federal and state officials indicated that One-Stop Centers, like other potential ENs, generally do not participate because of factors such as high risk, low payments, and long delays in payments. Even if One-Stops largely opt not to become ENs, ticket holders can still benefit from the One-Stop Career Centers by virtue of the fact that core services are available to everyone, through collaboration and service delivery coordination between One-Stop Career Centers and their mandatory VR partners, and collaboration/coordination between One-Stop Career Centers and other ENs as well as SSA-sponsored Benefits Planning, Assistance, and Outreach offices (BPAOs) in the community.

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I. Introduction

The Workforce Investment Act of 1998 was designed to provide a streamlined system of employment assistance that integrates many employment and training programs through a One-Stop service delivery system for employers and job seekers, including job seekers with disabilities. There are currently over 3,000 One-Stop Career Centers operating across the country. Like the Ticket to Work (TtW) program, the One-Stop system offers the promise of a new source of employment assistance to people with disabilities, including the potential for One-Stops to serve in the capacity of approved "Employment Network" providers (ENs) under the Ticket to Work program.

The purpose of this paper is to examine the One-Stop system and its capacity to serve people with disabilities who desire assistance in preparing for and obtaining jobs. Our discussion and findings are based on an analysis of selected WIA program data, a review of existing literature, and discussions with a wide range of individuals knowledgeable about different aspects of the WIA's One-Stop Career Center system in connection with people with disabilities (see appendix A).

The paper is organized as follows. First, a general overview of the Workforce Investment Act (WIA) and the role of One-Stop Career Centers is provided, highlighting issues of special importance to people with disabilities. Section II examines available data through the WIA system to assess the extent to which WIA has served people with disabilities and the characteristics of those served. This is followed by a discussion of key factors that impede effective service delivery for people with disabilities by the One-Stop system as well as various strategies that have been used to alleviate or overcome these barriers. We then examine the interaction between the TtW program and WIA. The final section provides conclusions.

II. Background on the Workforce Investment Act

WIA is the nation's premier publicly funded workforce investment program, and it became effective in all states on July 1, 2000.¹ WIA was enacted to replace the Job Training Partnership Act (JTPA), which had been in effect since 1982. This section provides background information on the Workforce Investment Act (WIA), Public Law 105-20, which was signed into

¹ Some states elected to implement earlier than the July 1, 2000, date.

law on August 7, 1998. Where relevant, issues of special importance to the disability community are indicated.² WIA is based on seven guiding principles.³

- **Streamlined services.** Multiple employment and training programs are integrated at the “street level” through the One-Stop delivery system. This was intended to simplify and expand access to services for job seekers and employers.
- **Individual empowerment.** Individuals are empowered to obtain the services and skills they need to enhance their employment opportunities. This empowerment is accomplished through Individual Training Accounts (ITAs), which enable eligible participants to choose the qualified training program that best meets their needs. The development of “consumer reports” containing information for each training provider allows individuals to make informed training choices.
- **Universal access.** Through the One-Stop system, every individual has access to core employment-related services. Customers can obtain job search assistance as well as labor market information about job vacancies, the skills needed for occupations in demand, wages paid, and other relevant employment trends in the local, regional, and national economy.⁴
- **Increased accountability.** States, localities, and training providers are held accountable for their performance.
- **A strengthened role for local Workforce Investment Boards (WIBs) and the private sector.** Local boards are business-led “Boards of Directors” for the local areas.
- **Enhanced state and local flexibility.** States and localities have flexibility to build on existing reforms in order to implement innovative and comprehensive workforce investment systems. Through such mechanisms as unified planning, waivers, and Work-Flex, states and their local partners have the flexibility to tailor delivery systems to meet the particular needs of individual communities.
- **Improved youth programs.** Youth programs are linked more closely to local labor market needs and the community as a whole, and will provide a strong connection between academic and occupational learning. In addition, traditional employment and training services will be augmented by an array of youth development activities.

² The National Center on Workforce and Disability has prepared a paper describing all aspects of how WIA relates to disability issues, and some of the linkages noted in this section are based on that document. See Robert Silverstein (undated).

³ These principles are from the WIA implementation white paper available at <http://www.doleta.gov/usworkforce/documents/misc/wpaper3.cfm> on August 11, 2004.

⁴ Some observers have interpreted the “universal access” language in WIA to require that services be made available to people with disabilities. In fact, the universal access provision is intended to open up the adult and dislocated worker programs to the entire labor market. As discussed below, obligations to serve people with disabilities equitably is covered in Section 188 of the Act.

As described below, these principles led to a number of changes in how workforce programs are organized and delivered in the United States.

The Workforce Investment Act includes five titles, and the Act's authority goes beyond the WIA program itself. Title I authorizes the workforce investment system. Three separate funding streams for programs to be operated by states and local workforce investment areas are established as part of WIA Title I: adults, dislocated workers, and youth. In addition to these three funding streams, the legislation establishes a number of national programs, including the Job Corps, the Native American Program, the Migrant and Seasonal Farmworker Program, Veterans' Workforce Investment programs, and the Youth Opportunity grants pilot program.⁵ This report focuses on the funding streams for adults and dislocated workers authorized by Title I of WIA.⁶

Funding. Funds for the three programs (adult, dislocated worker, and youth) are distributed first to states and then to local workforce investment areas by formulas based on the numbers of low-income and unemployed individuals in an area. Funding for the program has been slightly over \$3 billion since the program's inception, with a slight decline in funds each year. For FY 2004, the appropriations were \$995 million for youth activities, \$899 million for adults, and \$1,178 million for the dislocated worker formula funds.⁷

WIA Administrative Structure. Like its predecessor, JTPA, WIA involves federal, state, and local governments. The law requires establishment of workforce investment boards (WIBs) at both the state and local level, with members appointed by the governor and chief elected official(s), respectively. The boards function as policy bodies for the governor and local areas, respectively. The boards may have their own staff or rely on government agencies or contractors for support. Local workforce investment areas are intended to comprise labor market areas as

⁵ Title I also establishes national efforts such as research, demonstrations, technical assistance, evaluation, and national emergency grants for dislocated workers. Title II of WIA authorizes the Adult Education and Literacy programs, and Title III amends the Wagner-Peyser Act to require that the Employment Service (Job Service) activities become part of the One-Stop Career Center system (described below). Title IV reauthorizes Rehabilitation Act programs, and Title V contains miscellaneous provisions, including authority for state unified plans for workforce programs and incentive payments to states exceeding their performance standards in three workforce programs. In this report, the focus is on the funding streams for adults and dislocated workers authorized by Title I of WIA.

⁶ Youth programs are not required to be operated through the One-Stop Career Centers, and the programs serve in school as well as out-of-school youth. Because of these differences, the focus in this paper is on the adult and dislocated worker programs.

⁷ See www.doleta.budget for budget details. In addition to the dislocated worker funds to be distributed by formula to the states, there was an additional \$277 million in the national reserve account to be distributed by the Department of Labor.

designated by the governor, and there are over 600 local workforce areas designated under WIA. A majority of the members of the WIBs must be representatives of the private sector.

States must either include the head of the State Vocational Rehabilitation (VR) agency on the state board or explain how the interests of people with disabilities are represented in the state plan (Dew, McGuire-Kuletz, and Alan 2001). Local boards are required by the statute to include a representative of the VR agency. There is no direct mention of a requirement for the VR agency to be represented on the state board, but a guidance letter from the Employment and Training Administration stated “stand-alone VR agencies, including the Blind agencies, must be on the State Board consistent with the provisions of section 111(b)(1)(C)(vi)(I) and (2) of WIA” (U.S. Department of Labor 2000). Because WIA does not explicitly require the membership of the State VR agency director, or directors (in the case of states having a separate state VR agency for the blind) on the state board, it is not surprising that a study (Elliot et al. 2002) involving nine states found only two had a representative of vocational rehabilitation on the state board.

WIA Service Delivery: The One-Stop System. Services for adults and dislocated workers are primarily provided through One-Stop Career Centers. Each local workforce investment area is required to have at least one full-service One-Stop Career Center where customers are provided information and access to a wide array of workforce programs. The local WIB, which oversees operation of the WIA Title I funds for the workforce investment area, is responsible for selecting an operator or operators for the One-Stop Career Centers in the area. One-Stop operators include state and local government agencies, nonprofit organizations, community colleges, and for-profit firms.

It is important to keep in mind that One-Stop Career Centers are places, not programs. The WIA legislation specifies that some government programs are “mandatory partners,” and those programs are required to have a presence at one or more One-Stop Career Centers in the workforce investment area. VR is the only required partner under WIA that is solely focused on people with disabilities.⁸

⁸ Other mandatory partners specified in the statute include adult, dislocated worker, and youth activities under WIA, the Employment Service (or other Wagner-Peyser Act grantee), adult education, postsecondary vocational education, Welfare-to-Work (now phased out), Title V of Older Americans Act (Senior Community Service Employment Program or the Older Workers Program), Trade Adjustment Assistance and NAFTA-TAA Veterans Employment and Training Programs, Community Services Block Grant, HUD-Administered Employment and Training Programs, and Unemployment Insurance.

In addition, state and local boards can authorize or require other partners to participate in the One-Stop Career Centers. Non-mandatory partners that are commonly present at One-Stop Career Centers include employment and training programs for recipients of Temporary Assistance for Needy Families (TANF) and Food Stamp Employment and Training, community colleges, and community-based organizations. Other organizations serving people with disabilities that sometimes serve as partners at the One-Stop Career Centers include state or county mental health agencies, state mental retardation/developmental disabilities agencies, and community-based organizations. In some instances, organizations that specialize in providing services to people with disabilities operate the One-Stop Career Centers.⁹

There are a number of options for non-partner organizations, both public and private, to work collaboratively with the workforce investment system and One-Stop Career Centers without being partners. Examples include serving as a provider for the One-Stop Career Center for services such as assessments and training, acting as a resource and consultant to the One-Stop Career Center on approaches to meeting the accessibility and service needs of people with disabilities, and assisting WIA service providers in meeting the needs of customers with disabilities (Hoff 2000).

The WIA statute requires that partners in the One-Stop Career Centers enter into a Memorandum of Understanding (MOU). The MOU functions as a contract between the One-Stop Career Center and the partner to indicate the services provided by each partner and the financial arrangements among the parties. The Act states that infrastructure costs for the One-Stop Career Centers are to be shared among the partners, and the MOU indicates the arrangement that has been agreed upon by the partners. MOUs can also be executed at the state level to discuss state agency roles and responsibilities, although state-level MOUs are not required.¹⁰ A study on the early implementation of WIA from a disability perspective found that the greatest value of the MOUs at both the state and local levels was educational—by negotiating the financial and programmatic responsibilities in advance, the parties were able to learn about each other and avoid potential conflicts in the future (Elliott et al. 2002). Interviews conducted

⁹ For example, local chapters of Goodwill Industries operate a number of One-Stop Career Centers across the country.

¹⁰ For a discussion of MOUs between state rehabilitation agencies and One-Stop Career Centers see U.S. Department of Education (1999) and Drew et al. (2001).

for the study indicated that the state MOUs remained largely symbolic, but the locally negotiated MOUs sometimes provided detailed working agreements.

WIA Provisions for Services to Persons with Disabilities. The WIA statute has several references to individuals with disabilities (see box).¹¹ As there are no statutorily required special programs for individuals with disabilities, the references in the statute mainly serve to get states and local workforce investment areas to include specific plans for serving people with disabilities and reporting how well they are serving such people. The statute also allows states and localities to serve people with disabilities who might otherwise not be eligible. In addition to the statutory references to people with disabilities, WIA regulations include a number of provisions that are relevant for customers with disabilities.

Section 188 of WIA is particularly important in assuring adequate access to people with disabilities. This section prohibits discrimination, and one aspect of compliance with this section is avoiding discrimination against people with disabilities. In addition, WIA customers are protected by the Americans with Disabilities Act and the Rehabilitation Act. The Department of Labor has issued a WIA Section 188 Disability Self-Assessment Tool that provides detailed information on the types of actions One-Stop Career Centers must take to be in compliance.¹² The regulations for WIA state that the facilities and services at the One-Stop Career Centers must be accessible to all customers, including customers with disabilities.

Statutory References to Disability in the Workforce Investment Act of 1998

- Section 101(25) modifies the definition of a “low-income individual” for individuals with disabilities to permit people with disabilities to use their own income to qualify as a low-income person rather than total family income.
- Section 112(17) requires governors to indicate in their state plans how they will meet the needs of individuals with “multiple barriers to employment...including individuals with disabilities.”
- Section 117(b) requires that local WIBs include representatives of community-based organizations representing individuals with disabilities and all One-Stop partners, which includes the vocational rehabilitation agency.
- Section 120 permits youth programs to enroll up to 5 percent of the participants youth who do not meet the low-income requirement so long as they meet another specified criterion, including being an individual with a disability.
- Section 136(d) requires governors to include in their annual performance report information on their performance for individuals with disabilities.
- Section 188(a) prohibits discrimination against a number of groups, including individuals with disabilities.

¹¹ See Robert Silverstein (undated) for an excellent summary.

¹² The Self-Assessment Tool was issued on May 17, 2004, and state and local workforce agencies are required to complete the tool by August 27, 2004, to the Department of Labor's Civil Rights Center.

One publication (Hoff 2002) summarizes the requirements of the WIA regulations as:

- People with disabilities have a right to use the services of the One-Stop system.
- One-Stop Career Centers must be readily accessible to people with disabilities.
- People with disabilities are entitled to reasonable accommodations and modifications when using One-Stop services.
- People with disabilities should not be automatically referred to the public Vocational Rehabilitation system for services.

Types of Services in WIA The Act specifies that services for adults and dislocated workers are classified as core, intensive, and training services, and that they are to be received in sequence. *Core services* are the least costly services and include eligibility determination, outreach, intake and orientation, initial assessment, job search and placement assistance, career counseling, access to employment statistics, access to performance and cost information on training providers, information on local area results on WIA performance measures, information on supportive services, information on filing Unemployment Insurance (UI) claims, assistance in establishing eligibility for Welfare-to-Work and financial aid, and follow-up services for 12 months after placement (65 FR 49317 (August 11, 2000)). Core services are universally available to all individuals interested in learning more about the labor market or employment opportunities. These services are often self-directed, but individuals who experience difficulty or prefer to work with a staff member may receive “core assisted services.”

Unemployed individuals who cannot find a job through core services alone are eligible to receive *intensive services*. The intensive services provided under WIA are more personalized and generally require more resources than core services (U.S. Department of Labor 1998). Examples of intensive services include comprehensive assessments of skills and service needs, development of individual employment plans, group counseling, individual counseling and career planning, case management, and short-term prevocational services.

Finally, individuals who cannot obtain a job after receiving core and intensive services are eligible for training services. *Training* includes both classroom training and on-the-job training, and provision is made for the use of customized training developed to meet the needs of specific employers. If sufficient funds are not available to serve all potential customers, priority for intensive and training services is to be given to public assistance and other low-income customers. Most training under WIA is provided through the use of individual training accounts

(ITAs), which give the customer flexibility in selecting a training vendor that meets the customer's interests and aptitudes. Authorized vendors and their programs are listed in a consumer report card that lets the WIB and the customer see how well the vendor has fared in serving WIA customers and others in the past. The ITAs are usually not an unrestricted voucher. Most WIBs have funding caps that limit how much the training can cost. If several vendors offer the same or similar training programs, the WIB might require that the ITA be used at the least expensive vendor. Finally, the WIBs typically use a "guided choice" approach to the vouchers whereby they only permit the customer to use the ITA for a program that the WIB believes will result in a job with adequate pay.¹³

Customer Flow in One-Stop Career Centers. There is no single pattern that One-Stop Career Centers follow in serving their customers, but the requirement for sequencing of services results in many similarities. In the typical One-Stop Career Center, when a customer enters the building, he or she is met by a "greeter," who welcomes the customer, asks that the customer register with the One-Stop, and shows the customer where the resource room is located. Registration at the One-Stop Career Center is *not* the same as enrollment in WIA; enrollment in WIA only takes place if the customer receives assisted core services or intensive services.

The greeter mentions the resources that are available in the resource room and indicates that the customer should speak to one of the staff members walking around the resource room if he or she needs assistance or cannot find the desired services. Resource rooms typically have a wealth of paper and software products available to customers. The customer can use personal computers to search job banks developed by the local WIB, the state Employment Service, or government and private national databases such as monster.com. The customer also can access labor market information indicating occupations with the greatest projected growth, current job openings, wage rates for various occupations, and the offerings of various training institutions and their success at placing their students. Self-service software is often available to help customers develop and print resumes, determine their interests and aptitudes, and improve their typing (or keyboarding) skills. Resource rooms also have other resources such as local newspapers, print versions of the labor market information products, and books on how to find a job and how to conduct oneself at an interview.

¹³ The Act specifies somewhat different requirements for the youth program. The youth programs need not be delivered through the One-Stop Career Centers, so they are not a focus of this report.

The resource room usually has one or more staff members who circulate among the customers to see if anyone requires assistance. These workers assist the customers in using any of the resources available and provide guidance on how to obtain intensive services or training. Customers who receive assisted core services are supposed to be enrolled in WIA, but visits to a number of One-Stop Career Centers by the authors indicate that there is wide variation in the extent to which this rule is followed. Customers may return to the resource room as often as they desire. When it becomes clear to the customer and One-Stop staff that the customer is unlikely to find a job with only core services, the customer can receive intensive services.

Intensive services include individualized counseling and assessment, and there is a great deal of variation in the amount and type of testing that is performed as well as the type and frequency of counseling. Because the WIB is held accountable in their performance standards for customers who receive intensive services, many WIBs require the customer to show a level of commitment before providing intensive services. This commonly involves requirements that the customer attend one or more workshops before being permitted to meet with a counselor on an individual basis. Customers generally continue to make use of core services such as job banks and resume preparation software while they are receiving intensive services.

If the core and intensive services fail to lead to a job, the WIB can offer the customer access to classroom or on-the-job training. Training is not an entitlement under WIA, and the statute states that if there are insufficient funds to provide training to all suitable customers, preference is to be given to low-income individuals. As mentioned above, customers selected for training opportunities are provided with individual training accounts, and they may select their program under the guidance of the staff at the One-Stop Career Center.

Performance Standards. WIA increases the use of market mechanisms, with the intention of improving the quality of programs and customer choices. An important market mechanism that is used under WIA is performance management. There are 17 performance measures for the three programs (U.S. Department of Labor 2000). The measures include entry into unsubsidized employment, employment retention for six months, earnings six months after employment, attainment of appropriate credentials, and customer satisfaction. States and local areas that achieve or exceed their performance standards can receive additional funds, but there are serious consequences for failing to meet standards for two consecutive years: states and local areas can lose some of their funding, and they can lose the right to operate the WIA program.

III. Services to People with Disabilities under the Workforce Investment Act

This section provides information on the numbers, characteristics, and outcomes of people with disabilities under WIA. For the most part, information here is restricted to the adult program.¹⁴ Reporting under WIA is based on “exitors,” which are defined as participants who no longer are receiving services from the WIA program. The exit date is the last date that services were received, and participants must be designated as exitors if they receive no services for 90 days.¹⁵ There are several important limitations to the WIASRD data. First, the system does not track customers who receive only unassisted core services. Thus, the data understate the total number of customers served by the One-Stop Career Centers. Second, customers with disabilities are determined through self-identification. Many individuals with disabilities do not volunteer this information for fear of being discriminated against, so the WIASRD data may undercount the number of customers with disabilities, particularly disabilities that are not physical in nature. In spite of these limitations, the data are useful for obtaining a picture of how well the program is serving people with disabilities.

Table 1 shows the trends for the first three years of WIA operation.¹⁶ SSI and SSDI beneficiaries are most likely to be served through the adult program, but table 1 provides information on the numbers served by all three major WIA funding streams for the first three years for readers interested in all services to people with disabilities provided through WIA.

¹⁴ Data on participants are from the Workforce Investment Act Standardized Record Data (WIASRD). WIA data are generally reported for individuals who terminate from the program (termed *exitors*) during a “program year,” which runs on a July 1 through June 30 basis. The program year begins on July 1 of the same calendar year, so program year 2000 runs from July 1, 2000, through June 30, 2001. As discussed in the previous section, WIA services are divided into core, intensive, and training services. The WIASRD excludes individuals who only receive unassisted core services. In addition to tracking all people with disabilities, the WIASRD tracks “disabled exitors with substantial barriers,” and this is defined as those whose disabilities are likely to affect their ability to work.

¹⁵ The definition for exitor and all other terms used in WIA reporting can be found in Training and Employment Guidance Letter 14-00, Change 1 Appendix E issued November 19, 2001.

¹⁶ Recall that although WIA was enacted in 1998, it did not become operational in all states until July 1, 2000.

Table 1: Exiters by Disability Status by Program and Year

Group	Program Year		
	2000	2001	2002
Total Exiters	326,702	475,282	575,442
Adult	109,868	188,202	239,252
Dislocated	99,490	142,996	178,493
Youth	119,904	148,255	164,266
Disabled Exiters	32,662	40,704	45,620 ¹⁷
Adult	9,778	13,927	13,840
	8.9%	7.4%	5.8%
Dislocated	4,179	5,577	6,783
	4.2%	3.9%	3.8%
Youth	18,705	21,200	25,297
	15.6%	14.3%	15.4%
Disabled Exiters with Substantial Barriers	13,970	15,226	16,469
Adult	3,406	4,329	4,196
	3.1%	2.3%	1.8%
Dislocated	1,691	2,002	2,142
	1.7%	1.4%	1.2%
Youth	8,873	8,895	10,020
	7.4%	6.0%	6.1%

Source: 2002 WIASRD Data Book

¹⁷ The number of adults, youth, and dislocated workers totals to 45,980, but the WIASRD report indicates a total of 45,620 with no explanation of the discrepancy.

The number of exiters increased substantially over the three-year period: there were 326,000 exiters from all three programs combined in PY 2000 and 575,000 in PY 2002. Some of the increase may be an artifact due to problems in implementing the data system in the first two years. Several facts and trends are apparent from the WIASRD data:

- People with disabilities constitute a small share of the exiters in the three funding streams. They are most common in youth programs, where they constitute approximately 15 percent of the exiters, and least common in the dislocated worker programs, where they are only 4 percent of the exiters across the three years.
- The trend in services to people with disabilities is mixed. For the adult program, the total number of exiters increased each year, but the number of exiters with disabilities only increased between 2000 and 2001.
- The proportion of exiters with a disability decreased each year, beginning at 8.9 percent in PY 2000 and falling to only 5.8 percent in PY 2002.
- The number of exiters with disabilities in the dislocated worker program increased each year, but there was a steady decline in the proportion of exiters with disabilities. Over the three years, the proportion with disabilities fell from 4.2 percent in PY 2000 to 3.8 percent in PY 2002.

The WIASRD also tracks the number of disabled exiters with substantial barriers to employment. Only a very small proportion of WIA exiters meet this criterion, and well over half are in the youth program. The total number of exiters in the adult program who had disabilities that were considered a substantial barrier to work was 3,406 in PY 2000 and increased to 4,307 in PY 2002. As a proportion of all exiters from the adult program, disabled exiters with a substantial barrier declined from 3.1 percent in PY 2000 to 2.3 percent in PY 2001 and 1.8 percent in PY 2002. For the youth program, the number of participants with a disability that constituted a substantial barrier increased and the proportion declined as well. Disabled exiters with a substantial barrier from the youth program increased from 8,873 in PY 2000 to 10,020 in PY 2002, but the proportion of all exiters from the youth program with a substantial barrier declined from 7.4 percent in PY 2000 to 6.1 percent in PY 2002.

Characteristics of exiters from the adult program in PY 2002 by disability status are shown in table 2.

Table 2: Characteristics of PY 2002 Adult Exiters by Disability Status

	Group		
	All	Any Disability	Substantial Barrier
Total Exiters	239,252	13,840	4,196
<u>Characteristics of Exiters</u>			
Age Categories			
18 to 21	12.7	8.7	10.2
22 to 29	27.7	17.8	20.6
30 to 44	38.9	42.2	42.3
45 to 54	15.2	23.0	20.0
55 and over	5.6	8.3	6.9
Gender			
Female	56.1	46.8	48.2
Male	43.9	53.2	51.8
Individual with a Disability			
Substantial barrier	1.8	30.3	100.0
Other disabilities	4.0	69.7	0.0
Race and Ethnicity			
Hispanic	21.4	15.6	13.3
Non-Hispanic			
American Indian/Alaskan	1.4	1.5	1.9
Asian	3.6	2.2	1.4
Black or African American	33.3	30.7	29.8
Hawaiian or Pacific Islander	0.6	0.3	0.5
White	39.0	48.3	51.5
More than one race	0.7	1.6	1.6
Veteran			
Disabled veteran	0.5	5.2	3.9
Campaign veteran	2.6	7.5	5.8
Vietnam-era veteran	1.3	4.1	3.8
Recently separated veteran	0.6	1.0	0.8

Table 2: Characteristics of PY 2002 Adult Exiters by Disability Status (cont.)

	Group		
	All	Any Disability	Substantial Barrier
Employed at Registration			
Employed	18.4	13.0	15.3
Not employed	81.6	87.0	84.7
Average Preprogram Quarterly Earnings			
None	36.1	49.4	46.2
\$1-\$2,499	29.1	26.9	27.8
\$2,500-\$4,999	18.8	13.6	15.9
\$5,000-\$7,499	8.7	5.4	6.3
\$7,500-\$9,999	3.8	2.6	2.4
\$10,000 or more	3.5	2.1	1.4
Limited English Proficiency			
	7.6	5.2	6.5
Single Parent			
	24.4	21.2	19.4
UI Status			
Claimant	15.4	13.4	12.8
Claimant referred by WPRS	2.5	1.7	1.7
Exhaustee	3.2	4.4	2.7
Low Income			
	70.2	80.8	81.0
Public Assistance Recipient			
	13.8	28.6	25.1
TANF	9.4	10.8	12.2
Other public assistance	5.4	19.8	15.1
Pell Grant Recipient			
	4.7	4.0	4.4
Highest Grade Completed			
8th or less	3.7	3.9	3.7
Some high school	15.8	15.7	15.9
High school	49.0	46.6	45.3
GED	6.9	5.2	5.6
Some college	17.4	21.2	22.3
College graduate	7.1	7.4	7.2

Source: 2002 WIASRD Databook

Exiters with disabilities differ from the general population of exiters in some respects. The exiters with disabilities are more likely to be older, male, non-minority, a veteran, and low-income than other exiters. On most other characteristics, exiters with disabilities and other exiters are fairly similar.

Table 3 shows the type and characteristics of services received for exiters from the adult program in PY 2002 by disability status.

Table 3: Services Received by PY 2002 Adult Exiters by Disability Status

	Group		
	All	Any Disability	Substantial Barrier
Total Exiters	239,252	13,840	4,196
Co-enrollment			
WIA dislocated worker	1.8	1.3	1.0
WIA youth	0.9	1.2	1.5
Partner program	26.5	24.1	22.8
Wagner-Peyser	13.5	12.5	11.2
Veterans programs	1.7	3.0	2.0
Adult education	3.1	2.9	2.1
Welfare to Work	1.4	0.9	0.8
Other DOL-funded	1.0	1.0	0.8
Other partner programs	10.8	9.8	10.4
Weeks Participated (Average)	40.4	44.0	50.8
26 or fewer weeks	44.6	45.2	38.5
26 to 52 weeks	25.6	22.5	22.9
More than 52 weeks	29.7	32.3	38.6
Service Category			
Core services only	17.8	15.0	21.5
Intensive and core services only	37.2	40.9	33.4
Training services	45.0	44.1	45.1
Basic skills	6.6	14.2	13.2
On-the-job	11.7	8.2	10.0

Table 3: Services Received by PY 2002 Adult Exiters by Disability Status (cont.)

	Group		
	All	Any Disability	Substantial Barrier
Occupational and other	87.7	90.7	89.8
ITA Established	25.6	21.3	22.6
Occupation of Training			
Managerial, professional, technical	28.6	27.9	31.3
Service occupations	22.0	23.4	18.9
Sales and clerical	20.0	23.6	26.6
Farming, fishing, forestry, construction, and extraction	0.2	0.1	0.0
Installation, repair, production, transportation, material moving	29.1	25.0	23.2
Needs-Related Payments	3.9	3.4	3.9
Other Supportive Services	18.9	21.4	25.1

Source: 2002 WIASRD Databook

WIA customers can be co-enrolled in other WIA programs or partner programs. Co-enrollment patterns for exiters with disabilities are similar to the patterns for all exiters, and very few WIA adult customers are co-enrolled in vocational rehabilitation—only 10 percent of the disabled exiters are reported as being co-enrolled in “other” programs, including vocational rehabilitation.^{18, 19}

Exiters with disabilities participate longer than the general population, and those with substantial barriers participate longer still. The mean length of participation for all exiters in PY 2002 was 40 weeks, but exiters with disabilities remained 44 weeks on average, and those with substantial barriers remained 51 weeks.

¹⁸ The other programs included along with vocational rehabilitation are vocational education, employment and training programs carried out under the Community Services Block Grant Act, employment and training programs carried out by the Department of Housing and Urban Development (HUD), Food Stamps Employment and Training, and other non-DOL programs. See Social Policy Research Associates (2004). *PY 2002 WIASRD Data Book*. Oakland, CA: Social Policy Research Associates, May 6, 2004, p. 231.

¹⁹ Discussions with DOL staff indicate that co-enrollments are not always reported, so the figures here might understate the extent that WIA customers are co-enrolled in VR programs.

Table 4 compares the outcomes for exiters with disabilities from adult programs from October 1, 2001, to September 30, 2002, with the outcomes for the general population of exiters. (Note that these data cover a different period than the other tables so the number of customers included is different.) Customers with disabilities have lower entered employment rates than other exiters, and their post-program earnings are lower than the earnings of other exiters. However, exiters with disabilities who are placed have greater earnings gains.²⁰ These differences in outcomes are of particular importance because states and local programs face performance standards on their customers' employment and earnings and can lose the right to operate the programs if they fail to meet their standards.

It would be desirable to report post-program earnings on a monthly basis so that earnings could be compared with the substantial gainful activity levels that are used in determining continued eligibility for disability payments (\$810 a month for non-blind beneficiaries and \$1,350 a month for blind beneficiaries), but the data for table 4 were obtained from state unemployment insurance wage records, which are only available in most states on a quarterly basis. Monthly figures can be obtained by dividing the quarterly earnings by 3, but this is only an approximation because the earnings may not have occurred evenly over the quarter. Thus, the approximate level of monthly earnings for exiters with a substantial barrier to work was \$1,253 in the first quarter after exit, \$1,299 in the second quarter after exit, \$1,328 in the third quarter after exit, \$1,343 in the fourth quarter after exit, and \$1,377 in the fifth quarter after exit for those with earnings.

Table 4: Outcomes of Adult Exiters by Disability Status from 10/01 to 9/02

	Group		
	All	Any Disability	Substantial Barrier
Total Exiters	202,844	14,308	4,334
WIA Performance and 12-Month Outcomes			
Entered employment	74.4	63.5	67.7
Retained employment 3rd quarter after exit	82.8	79.0	83.2

²⁰ Exiters with disabilities have greater earnings changes because they have lower pre-program earnings than exiters without disabilities.

Table 4: Outcomes of Adult Exiters by Disability Status from 10/01 to 9/02 (cont.)

	Group		
	All	Any Disability	Substantial Barrier
Retained employment 5th quarter after exit	73.9	67.8	71.8
Earnings change			
2nd and 3rd quarters after exit	\$3,045	\$2,927	\$3,483
4th and 5th quarters after exit	\$2,806	\$2,731	\$3,543
Credential and employment rate	60.9	50.8	53.4
Information about Employment in Quarter after Exit			
Occupation of Employment			
Managerial, professional, and technical	19.6	17.3	16.8
Service occupations	24.5	27.8	26.4
Sales and clerical	25.7	27.1	28.3
Farming, fishing, forestry, construction, and extraction	0.6	1.0	0.7
Installation, repair, production, transportation, and material moving	29.6	26.8	27.8
Training-Related Employment	76.9	73.6	73.8
Nontraditional Employment	3.3	3.7	4.8
Males	2.6	3.6	6.2
Females	3.8	3.9	3.6
Employment			
Quarter after exit	76.0	65.5	69.7
Third quarter after exit	69.6	58.2	64.2
Fifth quarter after exit	63.1	52.1	58.6
Average Earnings (among Earners)			
Quarter after exit	\$4,302	\$3,813	\$3,759
Second quarter after exit	\$4,493	\$3,903	\$3,896
Third quarter after exit	\$4,604	\$4,018	\$3,985
Fourth quarter after exit	\$4,686	\$4,139	\$4,028

Table 4: Outcomes of Adult Exiters by Disability Status from 10/01 to 9/02 (cont.)

	Group		
	All	Any Disability	Substantial Barrier
Fifth quarter after exit	\$4,552	\$4,309	\$4,131
Earnings First Quarter after Exit			
\$1 to \$2,499	31.5	38.3	36.8
\$2,500 to \$4,999	35.3	34.7	36.8
\$5,000 to \$7,499	20.4	17.6	17.7
\$7,500 to \$9,999	7.5	5.7	5.3
\$10,000 or more	5.3	3.8	3.4
Earnings Third Quarter after Exit			
\$1 to \$2,499	29.2	36.6	35.7
\$2,500 to \$4,999	33.5	33.1	34.7
\$5,000 to \$7,499	21.9	18.9	19.4
\$7,500 to \$9,999	8.9	7.0	6.2
\$10,000 or more	6.5	4.3	4.1
Attained Credential	72.7	66.9	68.7
High school diploma/GED	2.9	1.9	1.8
AA, AS, BA, BS or other college degree	4.7	6.8	8.1
Occupational skills license/credential/certificate	54.7	47.7	47.5
Other	10.4	10.5	11.3

Source: 2002 WIASRD Databook

In summary, there appears to be more of a problem with access to the WIA program for customers with disabilities than with the services received once enrolled. Individuals with disabilities in general and those with substantial barriers to employment in particular are not served in large numbers.²¹ At the most, about 2,400 or slightly less than 1 percent of the adult

²¹ In many interviews we heard that One-Stop Career Centers often refer people with disabilities to VR agencies rather than serve them with WIA funds.

exiters in 2002 may have been SSI beneficiaries.²² As discussed later, the numbers served by TiW and VR are somewhat greater, but not substantially so. Although the number of exiters with disabilities has increased over the life of WIA, the proportion of WIA exiters who have disabilities or substantial barriers to employment has decreased. In PY 2002, only 5.8 percent of all adult exiters had a disability and only 1.8 percent of adult exiters had a disability that created a substantial barrier to employment. However, once enrolled in WIA, the services received for customers with disabilities, including those with substantial barriers to employment, are similar to the figures for the overall population. Exiters with disabilities have lower employment and earnings than other customers who exit, but they have higher earnings changes from the pre-program period.

IV. Challenges and Strategies for Achieving Effective One-Stop Service Delivery for Persons with Disabilities

This section focuses on factors that create barriers to effective service delivery for people with disabilities by the One-Stop system as well as strategies that have been used to alleviate or overcome these barriers. Our discussion primarily draws upon the work of several research projects involving case studies of One-Stop Career Centers and the insights and observations of knowledgeable researchers and practitioners in the field.

Key Challenges and Barriers. The key challenges and impediments to providing people with disabilities services through the One-Stop system stem from a variety of factors. Some issues that present challenges are relatively specific to addressing the special needs of people with disabilities. Others, however, are less about challenges related to serving people with disabilities per se than difficulties that are inherently embedded in attempting to create a seamless and effective One-Stop workforce development system out of a fragmented patchwork of programs and services.

²² This is based on the proportion of exiters with a disability that is a barrier to work and who receive public assistance other than TANF. There is no way to estimate the proportion of WIA customers who are SSDI beneficiaries.

Conflicting Philosophy and Programmatic Priorities

The underlying philosophy and priorities of the workforce development system was not developed to be responsive to the needs of people with disabilities versus other kinds of job seekers. It is a generic model based on short-term services with the goal of immediate employment when appropriate, and intensive services and training when the core services are insufficient. Core services promote the use of self-directed, self-paced and self-managed services, all of which may be difficult for people with disabilities to access and navigate. Limited funding has led many workforce boards to limit the time and resources for intensive services and training.

In short, the WIA One-Stop system model is not designed to address the need for a wide array of accommodations and other supports that people with disabilities may need to achieve employment or to work with individuals along a long-term career path, complete with long-term supports. This means that without collaboration with entities that do possess disability expertise, the ability of One-Stop Career Centers to increase their capacity to serve those with disabilities is constrained.

However, differences in philosophies guiding the service approaches adopted by the One-Stop system and disability serving agencies also present significant challenges for their collaboration in service delivery (Cohen et al. 2003). Vocational rehabilitation and other disability serving agencies are “specialized” service providers and, as such, are very sensitive to the potential for services to people with disabilities to suffer as a result of increased involvement with a generic One-Stop system.

In particular, although a mandatory partner in the One-Stop system on paper, the underlying philosophy that shapes VR’s long-term rehabilitation model, including ongoing case management, is often viewed to be fundamentally at odds with the emphasis on self-service and job placement in full-time employment that drives the one-stop system. Further, these systems have different funding streams, client bases, and incentives for serving clients that support their particular underlying service philosophy but which create additional challenges and disincentives for collaboration.

Access and Accommodation Barriers

From a disability perspective, ensuring full access to services provided through the One-Stop system is the foremost requisite for fulfilling WIA's promise of a workforce development system that is capable of serving the needs of all job seekers, *including* those with disabilities.

The issue of accessibility is often framed in terms of physical and technological accommodation. The concept of a centralized location offering information and resources for finding employment is attractive for people with disabilities in that it theoretically reduces the need to travel to different places for employment assistance. However, in the absence of specific efforts to identify and eliminate physical barriers, the buildings in which One-Stop Career Centers operate might not always be structurally accessible or accessible by public transportation. Similarly, lack of assistive technology—computer software, height-adjustable work stations, assistive listening devices screen readers, alternative keyboards, and Braille signage—is often cited as another common access barrier.

Beyond physical and technological accommodation issues, there are many barriers to access of a programmatic nature that may impede the ability of individuals with disabilities to take advantage of the full range of One-Stop services. Under the Job Training Partnership Act (JTPA), the predecessor of WIA, employment and training services were typically provided by staff with little or no experience with working with people with disabilities or addressing their employment needs. People with apparent or self-disclosed disabilities were often considered the responsibility of the vocational rehabilitation (VR) system and therefore issues of programmatic accessibility simply had not received attention. In addition, some disabilities, particularly mental disabilities, are often difficult to identify and hence remain “hidden.”

When One-Stop staff, particularly receptionists (the “greeters”) and resource room staff lack familiarity or experience with disability issues, they are more likely to be uncomfortable dealing with people with disabilities. Lack of training coupled with lack of awareness on disability-related issues also make it less likely that One-Stop staff will be able to help people with disabilities access core services through the use of assistive technologies or identify a hidden disability, and more likely to automatically refer the individual to VR rather than encourage them to explore the resource room, attend orientation sessions, and take full advantage of the variety of One-Stop services (Fesko et al. 2003).

A related barrier is limited staffing in the One-Stop Career Center resource rooms. The self-service features of One-Stop resource rooms generally diminish the need for staff. However, resource rooms must have sufficient trained staff on hand to provide one-on-one assistance in the use of the assistive technology available when an individual with a disability does attempt to take advantage of One-Stop core services. In many cases, people with disabilities may need special accommodations, such as a reader or some type of physical support to access the information provided in the resource rooms. Unfortunately, it is not possible to fully equip each resource room with every possible accommodation.

The potential for delivering effective services for people with disabilities may be undermined because One-Stop staff is unaware that a customer has a disabling condition. Although some disabilities are easy to observe, many are not. The customer may not want his or her disabilities to be known for fear of being discriminated against by employers. Although One-Stop staff is legally permitted to inquire about the presence of a disability, the decision to disclose rests upon the customer. Thus One-Stop staff may not even be aware that the customer they are assisting could benefit from any special assistive technologies or other services that the Career Center is equipped to provide.

Finally, another barrier is that people with disabilities or the organizations that traditionally serve them may lack knowledge or have misperceptions about the kinds of services One-Stop Career Centers can provide or a negative perception of the One-Stop system (Fesko et al. 2003). In Bader's study (2003) of One-Stop best practices, anecdotal information suggested that while some people with disabilities fully expected to be able to access and use One-Stop services, others totally rejected the idea of seeking assistance from One-Stop Career Centers due to negative word of mouth from disability service providers and others in the disability community. Others interviewed for this study noted that bad or disappointing experiences with One-Stop Career Centers, particularly during the early implementation period, led to a generally negative or at best skeptical perception of One-Stop Career Centers among disability serving organizations and decreased the likelihood of their encouraging their clientele to seek out One-Stop Career Centers service offerings.

Collaboration and Service Coordination Challenges

The ability of the One-Stop Career Centers to truly provide seamless services depends in large part on the extent to which mandatory and non-mandatory partner agencies are able to engage in productive collaboration and coordination. There are many systemic barriers to service coordination that apply to One-Stop Career Centers that affect service delivery in general and are not specific to people with disabilities. Differences in philosophies and organizational culture, turf issues, statutory and regulatory requirements, as well as different target populations (with different needs), funding streams, and reporting requirements are commonly mentioned in the literature that identifies service coordination barriers, including those found within the One-Stop system (Holcomb et al. 1993; Martinson 1999).

Of particular relevance for this paper is the role of the state vocational rehabilitation (VR) partner agency within the One-Stop system and barriers to collaboration between VR and the larger One-Stop system. In a 2002 survey of disability-serving organizations, the majority of respondents (80 percent) strongly or somewhat agreed that most people with disabilities entering the One-Stop system are referred to VR or other disability-specific agencies (35 and 45 percent, respectively). Only 8 percent neither agreed nor disagreed with that statement, while another 8 percent disagreed that VR would handle most job seekers with disabilities who enter the One-Stop system. In a survey conducted by the same organization of One-Stop managers and operators, 70 percent agreed or strongly agreed that VR would handle most job seekers with disabilities, with 17 percent remaining neutral and 13 percent disagreeing (Funaro and Dixon 2002).

If all individuals that enter One-Stop Career Centers are automatically referred to VR, then the One-Stop system is merely another conduit to VR rather than an additional resource for people with disabilities. However, if the VR agency is truly a collaborative partner in the One-Stop system, then there is the potential for people with disabilities to benefit from an increased menu of service options and expertise that they would not otherwise be afforded.

One-Stop Career Centers can (and do) offer services to those with less significant disabilities in need of employment assistance who may not be eligible for VR services. They can also provide an additional resource for those who are eligible for VR services but may not be interested in participating in VR services or cannot because VR agencies have had to impose

“order of selection.”²³ VR clients can also benefit from additional employment assistance resources (e.g., job listings, labor market information, and workshops on interviewing skills) available through the one-stops. One-Stop Career Centers can benefit from the disability expertise of VR staff on accessibility and accommodations. For example, a study of WIA implementation and its effect on the Vocational Rehabilitation program found that VR’s participation in the One-Stop system led to the provision of technical assistance and advice, particularly regarding access issues, to One-Stop Centers and their partner programs (Elliot et al. 2002).

Defining the role of VR within the One-Stop system and establishing effective collaborative partnerships has presented formidable challenges. Interviews with both federal and state officials acknowledged that VR agencies have been critical or skeptical of many aspects of WIA and One-Stop Career Centers and generally resistant to collaboration. The degree to which VR and One-Stops have been able to overcome challenges to collaboration and establish effective partnerships appears to vary extensively across states and across localities within states.

An examination of key issues for delivering VR within the WIA One-Stop system noted that a chief challenge for successful partnership between the One-Stop system and VR is finding a way for the One-Stop Career Center to fulfill its mission to address the unique needs of persons with disabilities with intensive service needs while participating in a generic system that is supposed to serve everybody, including those with disabilities. VR is often viewed as a partner that does not fit well within the One-Stop Career Centers (Barnow and King 2003).

In addition, collaboration has proven difficult because VR program participation in the One-Stop system must be consistent with VR program requirements in the Rehabilitation Act, meaning that VR staff and funds cannot be used to meet the needs of non-VR clients. This raises general cost allocation issues as well as staffing issues, such as whether and how VR staff can be used in One-Stop Center resource rooms or participate in the range of workshops offered at the One-Stop Career Centers (Dew et al. 2001; Institute for Community Inclusion 2002).

Barriers to Participation in Intensive and Training Services

Although core services are supposed to be made available to anyone, funding constraints in combination with performance standards that reward employment outcomes can lead states to

²³ Order of selection is a requirement that VR agencies with insufficient resources must develop criteria to select those with the greatest impairments for services.

establish narrower eligibility requirements for intensive and training services. For states that have imposed fixed periods of time people can spend in training and fixed amounts of dollars that can be spent per person on training, those with disabilities are less likely to be helped. For training to be meaningful and effective, it is likely that people with disabilities will need training that ultimately costs more than what the cap allows and lasts longer than two years.²⁴

In addition, the training programs on the eligible training provider list may not be conducive to people with disabilities. Training is typically classroom based with completion tied to a diploma/certificate (e.g., like those provided through community colleges). Thus, unless state and local WIBs are willing to consider alternatives to classroom training and extend time limits on training, the extent to which people with disabilities can really make use of WIA training is limited.

As noted previously, WIA performance standards are not adjusted to reflect any additional costs or difficulties associated with serving customers with disabilities. There is widespread concern that the existing performance measures, and the pressure placed on One-Stop operators and staff to meet these performance standards, produces a powerful disincentive for One-Stops to serve people with disabilities and reinforces simply referring those with disabilities who come through the One-Stop door over to the VR agency.

The perception that individuals with disabilities are less likely to achieve successful outcomes, as was documented in table 4, can also make One-Stop staff reticent to provide people with disabilities the opportunity to engage in WIA funded intensive services or training services as well as undermining interest for One-Stop operators to initiative creative and proactive strategies to improve services to people with disabilities at every level (Bader 2003; Fesko et al. 2003; U.S. GAO 2002). The most serious problem is that many people with disabilities are unable to work sufficient hours to earn enough to meet the WIA earnings performance measures. In addition, some people with disabilities who could work full time are reluctant to do so for fear of losing the health benefits provided by Medicaid or Medicare.

Strategies for Improving One-Stop Service Delivery to People with Disabilities. Overall, there is widespread recognition that people with disabilities are not going to use or benefit from One-Stop Career Centers on a widespread basis unless the One-Stop system makes a

²⁴ The average cost for VR cases that were reimbursed by SSA in 2004 was \$12,500, which exceeds the cap for ITAs in many local workforce investment areas.

commitment to address existing barriers to service by people with disabilities that is accompanied by a proactive effort at the local level to take needed steps to accomplish this. The specific mix of challenges and the specific combination strategies and resources needed to respond to these challenges varies in part because the One-Stop system itself is so decentralized and rich in variation. One-Stop Centers are at many points in the spectrum in terms of how much emphasis and attention has been given to trying to make WIA and the services delivered through One-Stop Career Centers responsive to the needs of people with disabilities.

Since 2000, an overarching effort undertaken at the federal level is to use targeted federal grant initiatives to stimulate capacity building and systems changes for the express purpose of making the One-Stop service delivery system more accessible and responsive to the needs of people with disabilities. Of most relevance to this paper are the Work Incentive Grants (WIGs), the Disability Program Navigator (DPN) demonstration program and the Customized Employment Grants (CEGs) (see boxes).

A review of available studies and interviews with key state WIA respondents with DPN and/or WIG grants and other key respondents suggests that these disability-targeted resources have made a positive difference. Sources indicate that the grantees have been able to make significant progress in filling gaps in resources, expertise, and capacity that commonly exist in One-Stop Career Centers. Several respondents noted that while it is difficult to make generalizations about One-Stop Career Centers due to their decentralized decisionmaking and service delivery structure, there was a notable difference between One-Stop Centers that had benefited from these additional disability-targeted resources and those that had not. One respondent noted that these grants were not merely providing glue to shore up weak links in current capacity and services, but also giving One-Stops “the resources and freedom to innovate.” It should also be noted that some One-Stop Career Centers have benefited from multiple grants over a period of years, which has allowed sites to build and expand on previous disability-related work and benefit from the cumulative impact of these efforts.

**Department of Labor and Social Security Administration
Disability Program Navigator Initiative**

In July 2003 the Department of Labor, Employment Training Administration and Social Security Administration, Office of Program Development and Research jointly created the Disability Program Navigator Initiative, a two-year grant demonstration project that support the use of a specialized “navigator” position within One-Stop Career Centers. The DPN initiative is designed to provide seamless and comprehensive services to persons with disabilities in One-Stop Career Centers; increase employment and self-sufficiency for Social Security beneficiaries and others with disabilities; facilitate access to programs and service; and facilitate linkage to the employer community. Navigators are hired by the state or local workforce development WIA system, and receive relevant training by federal program staff and technical assistance consultants.

Recognizing that disabled job seekers often face a complex set of rules in navigating the complex provisions of various programs that impact their ability to transition to work, Navigators provide information and referrals to customers with disabilities and help build the capacity of One-Stop staff to better serve these customers. Additionally, the Navigator functions as a liaison with multiple agencies in the community and broader workforce development system. As there are ongoing efforts at many One-Stop Career Centers to improve services to individuals with disabilities and improve community collaborations, the Navigator position is supposed to complement rather than duplicate these efforts.

The role of the Navigators, for example, can include

- helping disabled customers leverage available funds and services including cash assistance, housing, transportation, and other public and private resources;
- training other staff within and outside of One-Stop center on activities, services, and resources available for disabled customers or employees;
- promoting the hiring of people with disabilities among employer and employer organizations, and facilitating job placement;
- serving as a resource to other workforce investment staff in the community;
- helping prepare Memorandums of Understanding (MOU) with other agencies regarding sharing customers, resources and information;
- helping prepare the One-Stop Career Center’s application to become an Employment Network under the Ticket to Work program, and developing One-Stop capacity for serving Ticket to Work beneficiaries;
- providing ongoing assessment of One-Stop center facilities, services, programs, equipment, communications and policies to ensure they are appropriate for customers with disabilities.

The Rehabilitation Research and Training Center on Workforce Investment and Employment Policy for Persons with Disabilities at the Law, Health Policy & Disability Center at the University of Iowa College of Law is conducting a process evaluation of the DPN initiative.

Eligible Applicants

Grants are awarded to state Departments of Labor or other state entity administering Title I WIA programs and Wagner-Peyser, or local workforce systems.

Length of Grant

Grants are for two-year pilot demonstrations.

Amount

The total grant amount awarded have doubled from \$6 million in 2003 to \$12 million in 2004.

Grants Awarded

Approximately 221 DPN Navigator positions have been established so far in 14 states in which SSA is undertaking employment support initiatives: AZ, CA, CO, DE, FL, IL, IN, IO, MA, MD, MS, NC, NJ, NM, NY, OK, SC, TN, TX, UT, VT, WA, and WI.

This section describes some promising strategies that are being undertaken to make the One-Stop system more responsive to the employment needs of people with disabilities. These include the use of a specialized disability navigator staff position; improving physical access and accommodations; increasing staff capacity to respond to people with disabilities within the One-Stop Career Centers; and expanding service and training capacity through better collaboration with disability-serving organizations and blending funding from different programs.

Use of “Disability Navigators” to Improve One-Stop Service Capacity

The Disability Navigator position has been viewed as a promising strategy for helping One-Stop Career Centers address both accommodation and access issues in ways that increased system capacity and encouraged systems change. While the disability-related work funded by DOL under the early WIG grants focused heavily on increasing access to One-Stop Career Centers by purchasing and installing assistive technology and training frontline staff on the use of assistive technology, some One-Stop Career Centers that received WIG grants (as well as other kinds of grants seeking to effect systems change) also experimented with dedicating a staff person to serve as a disability resource specialist. Over time, a more concerted effort has been made to expand the number of Disability Navigator-like positions and explore how this position can serve as an effective model for addressing programmatic access and capacity issues within the One-Stop system.

Specifically, the focus of the most recent two rounds of WIG grants (i.e., 2003 and 2004) has increasingly shifted toward using grant awards to support more specialized “disability navigator” positions within One-Stop Career Centers. In addition, the implementation of a disability navigator model is the focus of a relatively new Disability Program Navigator pilot initiative jointly funded by the Department of Labor and the Social Security Administration that began in mid-2003. There are approximately 348 navigator positions in 36 states that are currently funded either through WIG grants or DPN grants.

Navigators, regardless of the particular funding source, engage in a wide range of activities, including collaboration with other partners and service providers (e.g., VR, Mental Health); training and education on disability issues for One-Stop staff, e.g., providing staff information and assistance on identifying hidden disabilities, assistive technologies, and

Department of Labor Work Incentive Grants

The Work Incentive Grant (WIG) program, begun by the Department of Labor, Employment and Training Administration in 2000, has awarded four rounds of grants to enhance employment and career advancement opportunities for people with a wide range of disabilities at WIA One-Stop centers. The WIG program aims to build infrastructure at existing workforce development sites to address deficiencies in how the workforce development system handles job seekers with disabilities, including psychiatric and other hidden disabilities.

Funds can be used generally to facilitate a seamless workforce development system of universal access for adults and youth with disabilities, including

- augmenting disabled individuals' physical and programmatic access to the system
- ensuring access to knowledgeable benefit counselors
- establishing a strategy for and carrying out outreach to the disability community
- developing linkages and coordination with other public and private programs and service providers that can support the work integration of disabled individuals
- providing training and education to frontline staff and business groups to be better able to identify and assist people with disabilities
- providing assistive and adaptive technologies to accommodate the needs of disabled customers
- developing One-Stop Career Center capacity as a provider for Ticket to Work beneficiaries

In general, the first two rounds of WIG grantees focused heavily on increasing access to One-Stop Career Centers by using grant funds to purchase and install assistive technology in resource room and to train frontline staff on the use of assistive technology and virtual accessibility for people with disabilities. More recently, the focus has shifted to increasing outreach, establishing collaboration with multiple agencies that serve jobseekers with disabilities, and expanding the use of "disability navigators" within One-Stop Career Centers to spearhead and foster these kinds of capacity-building activities. This specialized staffing model is also the focus of the jointly funded SSA-DOL Disability Program Navigator (DPN) initiative (see DPN box for a fuller description of activities carried out disability navigators.) There are currently approximately WIG-funded 126 navigator-like positions.

The Rehabilitation Research and Training Center on Workforce Investment and Employment Policy for Persons with Disabilities at the Law, Health Policy & Disability Center at the University of Iowa College of Law is conducting a process evaluation of the WIG grant initiative. Process evaluation findings from the first two rounds of WIG grantees can be accessed at <http://disability.law.uiowa.edu/lhpdc/projects/doltech.html>.

Eligible Applicants

State departments of labor or other state entity administering Title I WIA programs and Wagner-Peyser; state-level Workforce Investment Boards (WIB); local WIBs or a consortia of local public and private nonprofit entities in partnership with a One-Stop career center. Preference is given to workforce investment areas that have not previously received a WIG.

Length of Grant

Grants are for 24 to 30 months.

Amount

Awards range from \$100,000 up to \$1,000,000. Over \$75 million has been awarded from 2000 through 2004.

Grants Awarded

Work Incentive Grants have been awarded to 113 boards and consortia since 2000 in 44 states and the District of Columbia: AL, AK, AR, AZ, CA, CO, CT, DC, FL, GA, HI, IL, IN, IO, KA, KY, LA, MA, ME, MD, MA, MI, MN, MO, MT, NC, NE, NH, NJ, NM, NY, OH, OK, OR, PA, RI, SD, TN, TX, UT, VA, VT, WA, WI, and WV.

accommodations; providing information on SSA work incentives and employment support programs; conducting outreach and networking with employers; identifying and reducing accessibility barriers; and providing information about and referral to disability resources.

Based on our review of available studies and interviews with knowledgeable respondents, Disability Navigators have played an instrumental role in establishing and facilitating partnerships with VR and other partners that serve people with disabilities. Bader's study of disability-related best practices that facilitate the use of One-Stop Career Centers by people with disabilities noted that "the role and importance that disability resource specialists hold within the centers is key to the inclusion of people with disabilities in its services" and that "almost all key informants for the study stated that the disability resource specialists and the grant program that created the position at the One-Stop is the reason that their One-Stop Career Center is viewed as effectively serving individuals with disabilities." The Navigator concept has only been implemented in a small share of One-Stop Career Centers nationwide but appears to be a promising approach worth continued assessment and investment.

Increasing Access to One-Stop Career Center Services

A key strategy for improving service delivery to people with disabilities is to increase staff awareness and knowledge on a host of disability-related issues through a variety of training opportunities. Typical topics covered in training include general disability awareness and sensitivity, compliance with provisions of the Americans with Disabilities Act (ADA), identifying and assessing hidden disabilities, disability resources in the community, SSA work incentive programs and benefits planning services, and using assistive technology and adaptive equipment. Training staff on how to help people use assistive technology has also been found to be critical; if staff cannot help people with disabilities use the assistive technology available to them in the One-Stop Career Centers, the investments that One-Stop Career Centers have made in this area are significantly compromised. Cross training between One-Stop staff and other disability serving agencies (including but not limited to VR) allows staff from all agencies to become familiar with each other's services and to appreciate the potential for greater collaboration.

Department of Labor Customized Employment Grants

In October 2001, the Office of Disability Employment Policy (ODEP) at the U.S. Department of Labor began a grant initiative with the goal of building the capacity of local One-Stop Career Centers to develop and implement customized employment services to persons with disabilities. The first year of awards was for customized employment projects and in subsequent years the initiative has expanded to address additional populations including individuals with significant disabilities who are covered under the Olmstead Supreme Court decision and individuals with disabilities who are chronically homeless.

Customized Employment Projects

The Customized Employment Projects are strategic planning, demonstration, and systems change grants intended to improve the quality of employment outcomes for people with disabilities, resulting in competitive jobs, in integrated employment settings in the community, that provide career advancement and pay at least minimum wage. These projects achieve these outcomes through the provision of customized employment services delivered via the One-Stop delivery system. Customized employment services may include strategies such as job carving, self-employment, supported employment, job restructuring, providing natural supports, and other job development strategies that are individually determined and customized to the needs of the individual. Grants are awarded to local Workforce Investment Boards.

Grants Awarded

2001—\$4.4 million: Malden MA, Napa CA, Blaine MN, Knoxville TN, Marietta GA, Fairfax VA, San Diego CA

2002—\$5.4 million: Hempstead NY, Richmond VA, Kennewick WA, Montgomery AL, Detroit MI, El Paso TX, Indianapolis IN, Anchorage AK

2003—\$3.4 million: Chicago IL, Rockville MD, Utica NY, Flint MI, Helena MT

Olmstead WorkFORCE Action Grants

WorkFORCE grants are designed to support the coordination and delivery of employment opportunities for persons with disabilities who are interested in moving from institutional settings to independent living and competitive employment through utilization of customized strategies. Grant recipients are community-based organizations that work in conjunction with their local Workforce Investment Board and One-Stop Career Centers. The target groups to be served are people with disabilities who are either unemployed or underemployed and who are:

- In non-work, segregated work, or transitioning to work settings; Expected to be or are determined to be covered under the Olmstead decision and/or Executive Order, and therefore part of the state overall Olmstead planning process; or
- Awaiting employment service and supports following a move from a residential facility, or a part of a plan to move into a community under the Supreme Court decision in Olmstead and/or Olmstead Executive Order.

Grants Awarded

2002—\$1.9 million: Boston MA, Peoria IL, Decatur GA

2003—\$1.7 million: Fredrick MD, Nashville TN, Vancouver WA

**Department of Labor
Customized Employment Grants (cont.)**

Ending Chronic Homelessness through Employment and Housing Projects

The Office of Disability Employment Policy (ODEP) and its partners within DOL, the Veterans Employment and Training Service (VETS) and the Employment and Training Administration (ETA), in cooperation with the Department of Housing and Urban Development (HUD), funded projects to increase and improve employment opportunities for chronically homeless individuals with disabilities through a local partnership with HUD housing providers. The goal of the DOL cooperative agreements is to enable persons who are chronically homeless to achieve employment and self-sufficiency, thereby preventing unnecessary institutional placements. The DOL awards are supplemented by parallel HUD permanent housing grants. These demonstration grants will begin or expand the delivery and implementation of "customized employment" strategies for homeless individuals with disabilities so that they may live, work, and fully participate in their communities.

Grants Awarded

2003—\$3.1 million: Portland OR, Boston MA, San Francisco CA, Indianapolis IN, Los Angeles CA

Length of grants for all three Customized Employment Grant programs

Funding is for one year, and may be renewed annually for up to four years, depending upon the availability of grant funds and efficacy of grant activities.

Overall, training on these issues makes staff more knowledgeable about the issues and barriers people with disabilities face and the services that can be provided through the One-Stop Career Center, partner services, and community resources. Case studies of One-Stops that have made a serious commitment to providing various kinds of disability-related training suggest that these efforts result in staff no longer automatically referring customers to VR without stopping to consider whether the person wanted or needed VR services, and instead trying to provide services that are available within the One-Stop delivery system, including coordinating additional services from various community partners (Riley et al. 2004).

In conjunction with training, the development and use of assessment and training tools help staff identify job seekers with hidden disabilities. In addition, awareness and etiquette training can give staff a better understanding of hidden and undisclosed disability and can increase their ability to identify hidden and undisclosed disabilities during initial intake and assessment. In the ODEP customized employment sites, training appears to have significantly improved awareness and willingness to work with people with disabilities as evidenced by the increased number of people with disabilities coming to the One-Stop Career Centers as well as by the increased number of people with disabilities on WIA staff (Riley et al. 2004).

At least among One-Stop Career Centers that have received disability-related federal grants, considerable effort has been spent on improving programmatic accessibility. The majority

of WIG grants, for example, developed and used accessibility checklists and survey tools to evaluate both physical and program access barriers and taken steps to reduce/eliminate those barriers. Sites with customized employment grants conducted ongoing needs assessments through a variety of methods—focus groups, staff meetings and surveys, and interagency meetings (Riley et al. 2004). In some One-Stop Career Centers, VR is credited with playing an instrumental role in providing consultation on access issues that resulted in programmatic and physical modifications to increase access (Elliott et al. 2002).

In addition, the relatively recent issuance of the WIA Section 188 disability checklist in 2003 is a potentially valuable tool for increasing awareness of and guidance on meeting standards to ensure nondiscrimination and equal opportunity to persons with disabilities participating in programs and activities operated by local workforce investment boards that are part of the One-Stop delivery system.²⁵ The Checklist covers requirements applicable to local WIA boards regarding the operation of their programs and activities and includes descriptive examples of concrete actions that comply with some of the basic requirements imposed by Section 188 and the regulations. The Checklist also includes examples of policies, procedures, and other steps that One-Stop Centers can take to ensure that people with disabilities have equal programmatic and physical access to WIA Title I programs and activities. Some One-Stop Career Centers use the WIA Checklist as a tool for conducting accessibility assessments and are taking steps to improve physical and programmatic access. .

There are also benefits to infusing a disability lens into the general fabric of One-Stop operations. For example, it can encourage One-Stop staff to think more broadly about providing services to all customers of the One-Stop Career Centers, including those who are perceived as having a disability but nonetheless experience significant barriers to employment. Incorporating disability awareness and sensitivity training into regular One-Stop Career Center customer service training for staff also helps reinforce the idea that people with disabilities are just one of many different kinds of customers that One-Stop Career Centers are expected to serve. Integrating information about accommodations into One-Stop orientation sessions for customers

²⁵ The WIA Section 188 Disability Checklist provides the Department of Labor's Civil Rights Center with a uniform procedure for measuring compliance with those provisions of Section 188 of WIA and the implementing regulations pertaining to persons with disabilities. The Checklist identifies the basic requirements under Section 188 of WIA, including references to regulations implementing Section 504 of the Rehabilitation Act; it can be accessed at www.dol.gov/oasam/programs/crc/section188.htm

can benefit those who may not want to disclose a disability or had not realized such services might be available (Fesko et al. 2003).

While One-Stop Career Centers have taken proactive measures to ensure physical and programmatic accessibility, how much progress has actually been made appears to vary not only by location, but also by who is making that judgment. An Internet survey of One-Stop operators and a survey of disability serving agencies suggest a sizable discrepancy between One-Stop operators' views about the extent to which centers are largely accessible and disability serving agencies' views. The One-Stop managers and operators who responded to a survey of One-Stop Career Centers (175 responses from 36 states, with a 16 percent response rate) in 2002 reported that their centers were largely accessible, with 94 percent reporting that their sites were physically accessible, 44 percent providing a fully accessible computer workstation, and 78 percent agreeing that their One-Stop Career Center has the technology available to allow people with disabilities to use computers and web sites (Storen et al. 2002).

However, in a survey of disability serving organizations conducted by the same organization, nearly three-quarters of respondents reported that the One-Stop system needs to improve physical and virtual accessibility. Only 17 percent of disability-serving agencies reported that One-Stop Career Centers were fully accessible. Twenty-six percent reported that One-Stop Career Centers were physically accessible, but that some services were not accessible, and 54 percent reported that some One-Stop Career Centers needed to become more physically or virtually accessible (Funaro and Dixon 2002).

Facilitating Collaboration between One-Stops and Disability-Serving Agencies

The degree to which VR and One-Stop Career Centers at the local level are able to effectively collaborate versus merely co-exist affects how people with disabilities will make use of the One-Stop system. A well developed partnership between VR and WIA allows for a broader but potentially more efficient distribution of resources and expertise whereby more severely disabled clients can benefit from VR services, less severely disabled can benefit from One-Stop services, or the services of each can be used in combination with one another (Hoff 2000).

Despite the philosophic, funding, and programmatic barriers to collaboration that exist between VR and WIA, there are examples at the local level that suggest that successful partnerships between VR and one-stops can occur. A case study of 12 One-Stop Career Centers

found that the following practices facilitated collaboration between One-Stop Career Centers and VR (as well as other partner agencies): ongoing joint orientation and training sessions and regularly scheduled meetings, e-mail networks, electronic listservs and publications, cross-partner teams and committees, standardized practices, common intake and application forms that standardize practices, and data sharing (Fesko et al. 2003).

Another mechanism for improving collaboration is physical colocation of staff and services. Although colocation is by no means a magic bullet, it does appear to provide a fruitful avenue for building closer collaborative relationships. The extent of colocation of One-Stop Career Centers and VR varies significantly, with some VR agencies running all their operations through the One-Stop Career Centers, while others have only one or two staff members at the One-Stop Centers on a part-time basis. Some benefits of full-time colocation of VR staff within the one-stop agency are that the close physical proximity encourages greater utilization and sharing of resources for the benefit of their clients (including equipment, services, and information), increased awareness between VR and One-Stop staff of each other's services, and more opportunity to collaborate on specific cases (Fesko, Cohen, and Timmons 2003).

Some case studies of One-Stop Career Centers noted that VR staff appeared to have greater input into and received more benefit from operational and administrative decisions of One-Stop managers when colocated in One-Stop Career Centers. Other One-Stop staff reported a greater awareness of VR program resources and procedures than in those instances where VR staff is located off-site or on a limited itinerant basis. Other advantages included the availability of a wider array of assistive technology at the One-Stop Career Center, more immediate access to VR personnel resources, and greater exposure for VR consumers to the range of services offered through the One-Stop Career Centers (Fesko et al. 2003; Elliott 2002).

The Navigator positions funded through WIG grants and the DPN demonstration initiative are another mechanism for facilitating closer partnership and collaboration between One-Stop Career Centers and VR. For example, over the first quarter of 2004, 54 of the DPNs ($n = 124$) reported significant activity with developing systems relationships with Vocational Rehabilitation Counselors (while 31 reported significant activity with limited outcomes). One hundred and eleven (111) Navigators reported that the group that sought their assistance the most to problem solve individual or systems collaboration issues was Vocational Rehabilitation Counselors (followed by the Mental Health Agency). While there was considerable interaction

between Navigators and Vocational Rehabilitation Counselors, the need for greater clarification between their respective roles was also noted by some DPN sites (Morris and Farah 2004).

In addition to establishing effective collaborative partnerships with VR, people with disabilities can be better served by the workforce development system if One-Stop Career Centers reach out to and establish partnerships with community-based disability organizations and other disability-serving organizations. One-Stop Career Centers that have made efforts to reduce physical and programmatic barriers to access and increase capacity to serve people with disabilities need to reach out to the disability-serving organizations in their communities to increase their knowledge of One-Stop services and promote referrals of people with disabilities who might benefit from these services.

Conducting outreach to this broader circle of agencies that works with people with disabilities is important, particularly because underutilization of One-Stop Career Centers by people with disabilities is attributable in part to negative perceptions sometimes held by disability-serving organizations of One-Stop Career Centers. Similar to VR, community-based disability organizations can also be instrumental in equipping One-Stop staff with the skills and resources they need to better serve people with disabilities. For example, they can help One-Stop Career Centers identify and address accessibility and accommodation issues, provide access to employers, and assist with marketing and outreach to the disability community (Fesko et al. 2003). The process evaluation of the Customized Employment grant sites also found that teaming arrangements with community providers gave clients access to available community resources that are not typically available at the One-Stop Center (e.g., clothing, housing assistance) but are needed forms of employment support (Riley et al. 2004).

One promising linkage to increase the capacity of One-Stop Career Centers to serve people with disabilities is interaction and coordination between One-Stop Career Centers and Benefits Planning, Assistance, and Outreach (BPAO) staff.²⁶ Returning to work for SSI and SSDI recipients raises complex benefits issues that One-Stop staff are not equipped to address. BPAOs can be colocated full-time or on a regularly scheduled basis. If this occurs, the number of individuals with disabilities who have contact with and use the One-Stop Center services likely will increase. In addition, BPAO staff working in a coordinated fashion with One-Stop staff can

²⁶ Authorized under the TTW legislation, SSA awarded 116 cooperative agreements to community based organizations to operate Benefits Planning Assistance, and Outreach (BPAO) projects. These projects, run through cooperative agreements with a variety of community-based organizations, provide all SSA beneficiaries with disabilities help with work incentives and assistance services.

address concerns and misinformation that an individual with disabilities is likely to have regarding how employment would affect benefits and health care coverage (Bader 2003).

Disability Navigator-type staff can also facilitate the link between One-Stops and BPAOs. For example, over the course of the January-March 2004 quarter of the DPN initiative, 102 Navigators reported that the greatest linkage they experienced with the SSA's BPAO Program was through shared information, followed by training (88). Sixty Navigators reported that the BPAO had sought their assistance to problem solve individual or systems collaboration issues over the course of a quarter (Morris and Farah 2004). Several experts interviewed for this report noted that the potential partnership between One-Stop Career Centers and BPAOs constitutes an important collaboration that warrants further attention and development.

Finally, collaboration between One-Stops and other agencies can open the door for exploring ways to blend funding to increase the supply of services and training beyond those available through limited WIA funds as well as overcoming some of the constraints described earlier associated with ITAs for those with disabilities. Overall, blended funding is currently the exception rather than the rule. Blending resources from different funding streams and programs typically occurs on a case-by-case basis and requires a relatively high degree of coordination and collaboration on the part of staff from different programs; cross-program knowledge about potential options, rules, and constraints on use of funding; and motivation to think creatively about how to leverage resources in a coordinated fashion to address the needs of a particular customer.

Case studies conducted for the ODEP customized employment grant evaluation found examples of effective blending of resources to provide successful employment outcomes as a result of collaborative partnerships. For example, one site blended WA ITAs for training opportunities, customized employment grant project funded ITAs to purchase additional resources, and VR funding to pay for on-the-job training (OJT) supports such as job coaching (Riley et al. 2004). Similarly, Bader (2003) found that blending resources was typically the only way a person with a disability was served through an ITA in the four One-Stop Career Centers examined in her study.

Because WIA's application process for training typically takes less time than VR, an individual could apply for training through both programs, enter a training course supported through a WIA ITA, and then, once approved by VR, shift funding for continued participation in the training course over to VR or have VR pay for additional support services and assistive

technology. Another creative example of blended funding reported by Bader (2003) is the use of WIA ITA funds to pay for training up to the time limit in the local area and then use VR funding to extend the period in which training can be provided as needed. In the course of conducting this study, we did not uncover any examples of blended funding that included Ticket to Work funding, but it is worth exploring how TTW could be another potential source for expanding training opportunities through blended funding arrangements.

V. The Ticket to Work Program and the Workforce Investment Act

The Ticket to Work (TtW) program was established by the Ticket to Work and Work Incentives Improvements Act of 1999. Prior to implementation of TTW, federal funds to provide rehabilitation services to disabled beneficiaries went almost exclusively to state vocational rehabilitation agencies (VR), so the underlying concept was to unleash market forces to bring competition to the rehabilitation area.²⁷ Some observers hoped that TtW would offer new opportunities for the One-Stop Career Centers mandated by WIA to increase services to disabled beneficiaries. This section briefly describes the TtW program and its interaction to date with the WIA system.

Eligibility for TtW is based on several factors. Individuals must be SSI or SSDI beneficiaries between the ages of 18 and 64, and those with non-permanent disabilities must have been found to have either no improvement in their health or improvement that was insufficient to allow them to return to work. Participation in the program is completely voluntary. The Social Security Administration (SSA) mails eligible beneficiaries a “ticket,” and if the beneficiary is interested using the ticket, he or she then “assigns” the ticket to one of the eligible vendors or a consortium of vendors.

Organizations and consortia of organizations that wish to be eligible to participate in the program must enter into an agreement with SSA and be designated as an “employment network” (EN). An EN can be a single organization or a consortium of organizations. The state VR agency can be an EN by itself or in combination with other government, nonprofit, and for-profit organizations. Thus, local workforce investment boards, their agencies, and One-Stop Career Center operators can all serve as ENs. Once an EN has accepted a ticket, the beneficiary and EN

²⁷ Beginning in 1994, beneficiaries were permitted to use “alternate providers” for rehabilitation services, but the program was not used much, in part due to limited awareness. The alternate provider program is being phased out as TtW is implemented. For more information, see Gina Livemore et al., 2003, *Evaluation Design for the Ticket to Work Program: Preliminary Process Evaluation*, Falls Church, VA: The Lewin Group.

jointly develop an individual work plan (IWP). The IWP specifies services to be provided by the EN, the state VR agency, and other providers to help the beneficiary achieve employment.

Two types of payment schemes are available to ENs, an outcome payment system and an outcome-milestone payment system. Under the outcome payment system, the EN receives 40 percent of average SSI or SSDI benefits, depending on which program the beneficiary is enrolled in, for each month the beneficiary does not receive benefits due to employment. ENs can collect payments for up to 60 months, and the months need not be consecutive. The outcome-milestone method of payment permits an EN to receive payments for periods when the beneficiary meets certain employment and earnings requirements, referred to as milestones, and for periods when the beneficiary receives no SSI or SSDI benefits due to earnings, referred to as outcomes. The maximum that can be collected under the outcome-milestone system is 85 percent of the maximum for the outcome payment system.

The traditional VR reimbursement program, which has been in effect since 1981 and remains available to state VR agencies along with the reimbursement option, provides reimbursement from the Social Security Administration (SSA) to the state VR agency for beneficiaries who are referred to the VR agency by the state Disability Determination Service or who self-refer and who achieve substantial gainful activity (SGA) for nine consecutive months. Table 5 shows that between 6,000 and 11,000 individuals are rehabilitated each year, with an average cost of about \$12,000. The VR system serves many people with disabilities whose rehabilitation plans require a number of years to complete. The Council of State Administrators of Vocational Rehabilitation indicates that VR serves about 1.5 million clients per year, with 217,800 finding work each year.²⁸ Because payments under the traditional VR program are tied to earnings rather than cessation of benefits, the traditional program is less risky. Payments under the traditional program are limited to the cost of services, but under TiW it is possible for an EN to receive payments that greatly exceed the cost of services. Because VR agencies are the only organizations that can choose either the traditional VR payment system or the TiW system, many individuals interviewed for this project stated that the VR agencies have a significant advantage for participating in the TiW program over other ENs.

Barriers to Participating in the Ticket to Work Program. The Ticket to Work program has been phased in over several years. During the first phase of the program, which

²⁸ See www.rehabnetwork.org/investing_in_america.htm as of November 1, 2004.

began in February 2002, tickets were distributed in 13 states. In the second phase of the program, from November 2002 through September 2003, tickets were distributed in 20 states and the District of Columbia. In the third and final phase of the program, from November 2003 through September 2004, tickets were distributed in 17 states and five territories (Social Security Administration 2003).

Overall, the TiW program has gotten off to a slower start than had been hoped. As of August 2004, 9.5 million tickets had been issued to beneficiaries, but only 5,400 tickets have been assigned to ENs (Social Security Administration undated). In comparison, we estimated that about 2,400 exiters from WIA in 2002 may have been SSI beneficiaries.

Another aspect of the program that has been somewhat disappointing is that the hoped for competition among potential providers has not occurred. By the end of 2003, 1,004 ENs enrolled, but only 386 ENs were serving beneficiaries (Social Security Administration 2004). In addition, most of the tickets have been assigned to state VR agencies—the Ticket to Work and Work Incentives Advisory Panel reports that over 90 percent of the beneficiaries have deposited their tickets with state VR agencies.

Several organizations have analyzed the implementation of TiW, and they have identified a number of barriers that have resulted in low levels of participation as ENs by organizations that are not state VR agencies. Many of the barriers are financial in nature—the payments that ENs can receive for successfully serving beneficiaries are neither great enough nor certain enough to justify participation—but other barriers exist as well.

Table 5: Reimbursement to State Vocational Rehabilitation Agencies and Alternate Providers

Fiscal Year*	Number of Claims Allowed	Amount of Dollars Allowed	Average Cost Per Claim
FY 03	6,760	\$84,599,189.87	\$12,514
FY 02	10,527	\$131,062,205.10	\$12,450
FY 01	8,208	\$103,892,717.86	\$12,657
FY 00	10,220	\$117,024,222.20	\$11,451
FY 99	11,126	\$119,934,831.23	\$10,780
FY 98	9,950	\$103,037,127.54	\$10,355
FY 97	8,337	\$89,200,347.05	\$10,699
FY 96	6,024	\$65,480,627.30	\$10,870
FY 95	6,238	\$72,733,912.87	\$11,660

Source: <http://www.ssa.gov/work/ServiceProviders/claimsprocessing.html>, August 22, 2004.

In the preliminary evaluation of TtW implementation, Livermore et al. (2003) noted “A concern raised repeatedly by ENs was that the lack of any up-front funding for TtW limited their ability to participate in TtW. Many interviewees pointed out that they cannot afford to provide expensive screening and employment preparation services without any up-front financial support” (Livermore et al. 2003). The ENs also indicated that they would like to receive more information about the beneficiaries to improve their decisionmaking and reduce their costs in deciding whether to accept a ticket and that they believed that beneficiaries should receive better information about the TtW program to increase their participation.

The initial evaluation of TtW has reached similar conclusions (Thornton et al. 2004). The Mathematica Policy Research analysts interviewed eight ENs and concluded:

Fundamentally, to be successful, ENs must cover their costs. But all eight of the case study ENs despite their diversity on numerous characteristics, had one thing in common: they all were losing money on their TtW operations. It would be difficult to overestimate the seriousness of this matter for the future participation of these ENs—and possibly many others—in the TtW program. At the time of the fall 2003 interviews, 12 to 18 months after they started operating under TtW, the ENs’ situation looked rather bleak. (p. 106)

Financial problems described by the ENs most commonly related to the payment process, but concerns were also expressed about the payment structure for TtW. The payment process was viewed as overly burdensome and slow, and some ENs expressed concern about not being

able to recover any money unless the beneficiaries were able to earn sufficient wages to eliminate payments in a month. Other concerns expressed by the ENs in the study are similar to what was found in the Lewin Group study. ENs would like better information provided to both the beneficiaries and themselves, and they would like to see increased communication between the ENs and the TtW program manager and among the various ENs.

The Ticket to Work Advisory Panel has also concluded that there are major barriers to participating in TtW as an EN. The panel echoes the concerns expressed in the Mathematica Policy Research evaluation and conclude: “The most significant problem contributing to low EN participation is the payment system. We see this as the most urgent issue requiring attention” (Social Security Administration 2004). The Panel has recommended that Congress amend the payment schedule to increase potential payments, increase the size of payments, and accelerate the payment schedule.

The Panel also expressed some concerns with the policies and behavior of the Social Security Administration and the Rehabilitation Services Administration. Regarding the Social Security Administration, the Panel (2004, p. 8) states, “SSA has failed to market the Ticket Program to beneficiaries, most of whom remain confused about what a ticket is and why they might want to use it. The panel also believes that SSA has failed to engage enough ENs for the Ticket Program and has failed to support the ones that have enrolled.”

Regarding the state VR agencies, the Panel (2004, p. 17) concludes, “On balance, there has not been a productive integration or melding of the rehabilitative expertise of [state VR agencies] with the flexibility and community-based support services of ENs.” Specific concerns include the failure of VR agencies in some states to provide initial services to beneficiaries and the interpretation of the Vocational Rehabilitation Providers Handbook that permits states to assume under some circumstances that the beneficiary has selected the state VR agency as his or her EN without specifically selecting the VR agency as the EN.

Our interviews with a number of researchers, federal and state government staff, and interest groups confirm that all these concerns apply to state and local WIBs and One-Stop Career Centers. Some WIA organizations have been certified as ENS, and at least one state WIA agency is planning to become an EN, but overall, the WIA community has expressed the same concerns as the general EN community, particularly regarding issues on the payment system. In addition, some WIBs and One-Stop Career Centers have indicated that their charters do not permit them to assume the risks associated with the TtW contingent payments. Another

important factor, discussed below, is that the states and local WIBs are subject to performance standards, and the standards do not reflect the increased difficulties of serving customers with disabilities.

The National Center on Workforce and Disability (NCWD) has identified a number of options that One-Stop Career Centers and other WIA-related organizations can pursue in getting involved with the TTW program (Silverstein 2002).

- The One-Stop Career Center can become an employment network on its own.
- The local Workforce Investment Board can become an employment network.
- A One-Stop Career Center can become an employment network in partnership with other entities (e.g., state VR agency, state agency serving mentally retarded and developmentally disabled individuals, community organizations serving people with disabilities.)
- The One-Stop Career Center can partner with employment networks, and subcontract as a referral source or for other services.

VI. Conclusion

The Workforce Investment Act of 1998 was designed to provide a streamlined system of employment assistance that integrated many employment and training programs through a One-Stop delivery system for employers and job seekers, including job seekers with disabilities. As such, the One-Stop system offers the promise of providing people with disabilities a new source of employment and training assistance. Based on available WIA data, it appears that while people with disabilities are in fact making use of WIA services, such individuals comprise a small proportion (less than 10 percent) of the customers served and that the number of SSI and SSDI beneficiaries served is even less (under 2 percent).

The decentralized nature of the WIA system and the rich variation that characterizes One-Stop Career Centers make it risky to generalize about the extent to which One-Stop Career Centers across the country are responsive to the employment needs of people with disabilities or the extent to which lack of capacity and other barriers have prevented people with disabilities from making use of One-Stop services. Overall, it is recognized that the generic service delivery structure of the One-Stop system, existing WIA performance standards, insufficient access and accommodations, general lack of staff awareness and disability expertise, and lack of effective collaboration between One-Stop Centers and other disability-serving organizations can create

barriers to participation in the One-Stop system by people with disabilities. In addition, One-Stops have largely chosen not to become ENs under the Ticket to Work program.

To varying degrees, One-Stop Career Centers have made progress in addressing these barriers and improving the overall capacity of One-Stops to serve people with disabilities. Efforts to make One-Stop service delivery more accessible and responsive to the needs of people with disabilities is by no means limited just to One-Stop Career Centers that have benefited from the DOL and DOL-SSA specialized grant initiatives highlighted in the paper. At the same time, available studies on these initiatives plus discussions with state and federal government officials indicate that these targeted grants play an important role in building the capacity of grantees to better serve people with disabilities. In particular, the “disability navigator” offers a promising model for general capacity-building purposes, although it is not clear how well it can be replicated in the absence of funding dedicated to support such a position. The customized employment grants offer services that are typically beyond what the One-Stop Career Centers can provide with their WIA funds, so they give the One-Stops an important opportunity to augment their service mix.

A better understanding of the extent to which One-Stop Career Centers currently provide services to SSI and SSDI beneficiaries is severely hindered by data limitations associated with the current WIA reporting system. The ability to track services to SSI and SSDI beneficiaries in WIA programs would be greatly enhanced if the Department of Labor modified its reporting system to specifically note if individuals served are beneficiaries. Under the current reporting system, WIASRD, enrollment in neither program is specifically monitored, although SSI status is recorded along with several other welfare programs. The proposed reporting system, EMILE, currently records participation in both programs, but only for customers receiving intensive services or training; thus, people with disabilities who only receive core services would not be tracked under the Department of Labor’s current plan.

Four broader issues have important implications for the extent to which people with disabilities, particularly SSI and SSDI beneficiaries, will be served by One-Stop Career Centers. First, it is important to recognize that as currently structured, the potential for the One-Stop system to help those with the most significant barriers to work is through building strong partnerships with the VR system and other disability-serving organizations, such as the mental health agencies. With the exception of customized employment initiatives, most of the strategies discussed in this paper to improve one-stop service delivery to people with disabilities focus

more on ways in which capacity can be strengthened to better serve those with less severe disabilities.

Second, several aspects of the current WIA performance standards create a strong disincentive to serve those with disabilities, and especially those with more severe disabilities. If the WIA system is to be truly accessible to all customers who can benefit from services, performance standards need to be modified so that states and local WIBs are not penalized for serving people with disabilities.

Third, the Ticket to Work program, as currently configured, is unlikely to become a major source of expansion of services by One-Stop Career Centers to beneficiaries. For the most part this result is due to problems with the structure of the TtW program that discourage most potential providers from serving as ENs in the TtW program.

Finally, the emphasis on One-Stop Career Centers capacity to serve people with disabilities as well as efforts made by One-Stops across the country toward this end may in large part be eclipsed by larger disincentives experienced by SSI and SSDI beneficiaries to seek employment assistance and engage in employment due to fear of losing their program eligibility, Medicaid coverage, and other benefits.

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Appendix A

Selected List of Individuals Contacted for Background Information

U.S. Department of Labor, Office of Disability Employment Policy and Employment (ODEP) and Employment and Training Administration (ETA)

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Jim Downing, Policy Specialist, Division of Disability and Workforce Programs, ETA
Nathan Ainspan, Research Analyst, ODEP
Alicia Epstein, Youth Leadership Forum Program Manager, ODEP
Richard Horne, Supervisory Research Analyst, Office of Policy and Research, ODEP
Lisa Lahtman, Supervisory Program Specialist, Office of Operations, ODEP

U.S. Department of Education, Rehabilitation Services Administration

Jerry Elliott, Vocational Rehabilitation Program Specialist,
Charles Sadler, Vocational Rehabilitation Program Specialist

Social Security Administration, Office of Employment Support Programs

Jack Baumel, Deputy Office Director
Carol H. Brenner, Designated Federal Official for TtW Advisory Panel

State-level representatives

Jim Dorsey, E&T Grant Project Administrator, Vermont State Lead, Disability Program Navigator Initiative, Department of Employment and Training
Glenn Olsen, High Risk Population Specialist, Wisconsin Department of Workforce Excellence
Lisa Matrondola, Program Director of Disability Grants and Services, Massachusetts Department of Labor and Workforce Development
Doug Keast, Program Coordinator, Iowa Workforce Development
Dr. Robert Stensrud, Drake Rehabilitation Institute, Iowa
Barb McClannahan, Project Coordinator, Iowa Division of Vocational Rehabilitation
Norma Hohlfeld, Coordinator, Iowa Division of Vocational Rehabilitation
Becky Harker, Director, Iowa Governor's Developmental Disabilities Council
John TenPas, Department of Persons with Disabilities, Iowa Department of Human Rights

Academy of Educational Development

Larry Searcy, National Collaborative for Workforce and Disability/Youth,

Commission for Accreditation of Rehabilitation Facilities (CARF)

Paul Andrews, Director of Employment and Community Service programs
Renee Bibbee, Marketing and Research Coordinator

Cornell University Institute for Policy Research

David Stapleton, Director

Virginia Commonwealth University

Beth Bader, Research Associate, Rehabilitation Research and Training Center on Workplace Supports

Institute for Community Inclusion, University of Massachusetts Boston

Sheila Fesko, Project Coordinator, National Center on Workforce and Disability/Adult,
Allison Cohen, Research Associate, National Center on Workforce and Disability/Adult

National Disability Institute

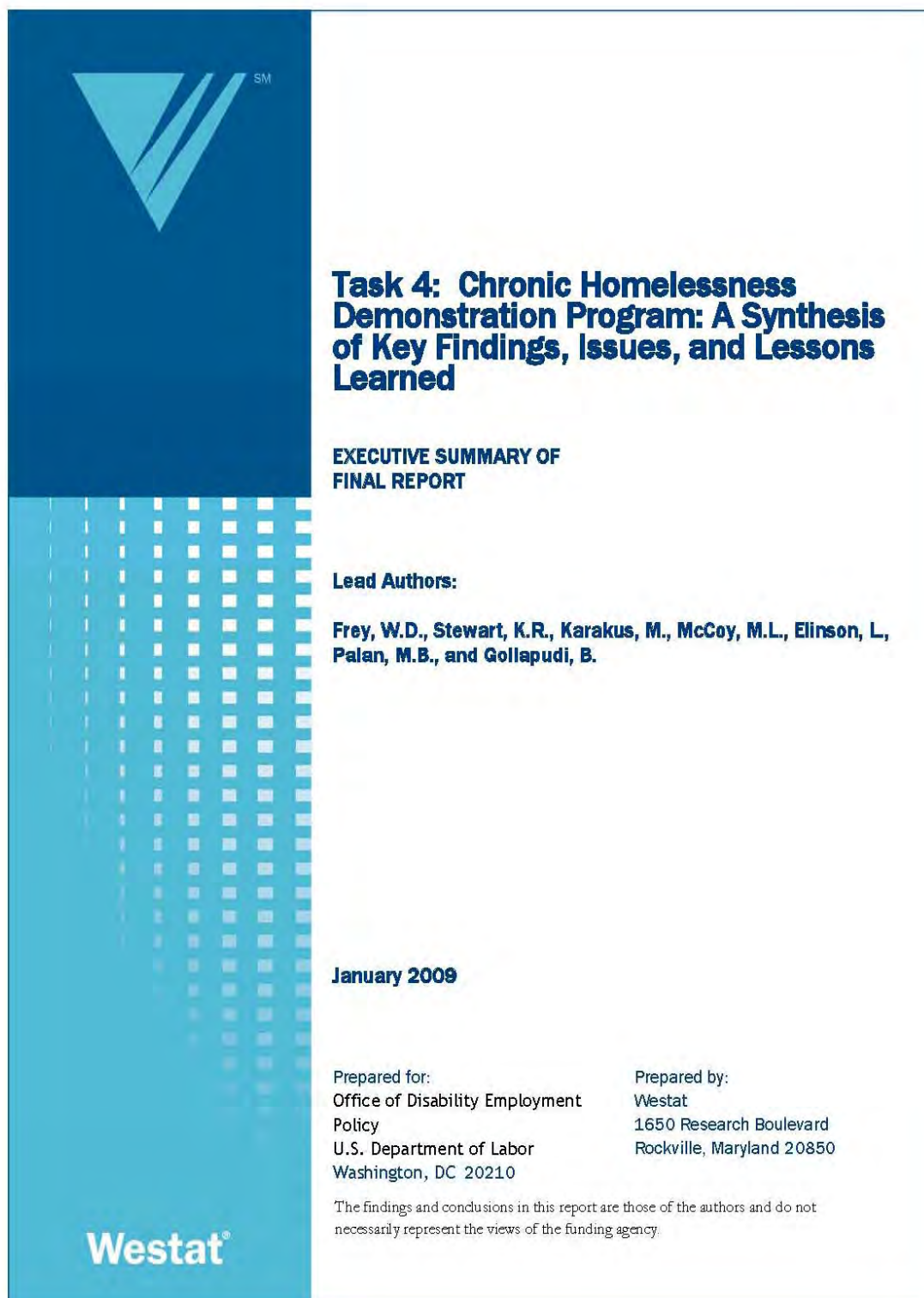
Michael Morris, Director

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Appendix K

Chronic Homelessness Executive Summary



Executive Summary

Background

In a concerted effort to address the problem of homelessness in the United States, the Interagency Council on Homelessness (ICH) was established by Congress in 1987 through the Stewart B. McKinney Homeless Assistance Act (Interagency Council on Homelessness, 2008). The Council is responsible for providing Federal leadership for activities to assist homeless families and individuals. The major activities of the Council include: (1) planning and coordinating the Federal government's activities and programs to assist homeless people, and making or recommending policy changes to improve such assistance; (2) monitoring and evaluating assistance to homeless persons provided by all levels of government and the private sector; (3) ensuring that technical assistance is provided to help community and other organizations effectively assist homeless persons; and (4) disseminating information on Federal resources available to assist the homeless population.

In Fiscal Year 2003, two U.S. Federal department members of the ICH, the Departments of Labor (DOL) and Housing and Urban Development (HUD), issued a Solicitation for Grant Applications (SGAs) for "Ending Chronic Homelessness Through Employment and Housing."¹ The purpose of this program (referred to as the Chronic Homelessness Demonstration Program) was to:

bring together the respective expertise and capabilities of both the local workforce development system (One-Stop Career Centers and their partners) and the local permanent housing service organizations, to develop and document the increased employment outcomes anticipated when these organizations combine their efforts to respond to the employment and housing needs of persons who are chronically homeless (U.S. Department of Labor and U.S. Department of Housing and Urban Development, 2003).

In addition to housing and the workforce development system, demonstration projects also needed to include mental health and other community services in the complex array of supports and services needed to facilitate the reintegration of the chronically homeless population into the workforce and community life.

¹ Three organizations within the Department of Labor contributed to this initiative: the Office of Disability Employment Policy (ODEP), the Veterans' Employment and Training Service (VETS), and the Employment and Training Administration (ETA).

The Chronic Homelessness Demonstration Program was also part of an important effort in the DOL to provide people with disabilities with universal access to employment services. The Workforce Investment Act (WIA) of 1998 established a national workforce preparation and employment system to meet the needs of businesses, job seekers, and those who want to further their careers through one-stop single-entry access to employment services, job training, and education. In order to increase the capacity of the One-Stop system to provide coordinated, seamless service delivery to people with disabilities, the Office of Disability and Employment Policy (ODEP) in the DOL initiated a demonstration program consisting of grants and cooperative agreements to implement and evaluate methods for building the capacity of the workforce development system. ODEP contracted with Westat, a private research company, to conduct an independent evaluation of the ODEP Demonstration Program.

The ODEP Demonstration Program consisted of both adult and youth programs within nine program priority areas.² Although all focused on the achievement of sustainable systems change to improve employment and/or educational outcomes among people with disabilities, each had a unique emphasis and specific target audience. This report focuses on one program priority area—Ending Chronic Homelessness Through Employment and Housing—and the technical assistance initiative, Chronic Homelessness Employment Technical Assistance (CHETA), that provided technical assistance to the Chronic Homelessness demonstration projects and policy advice to ODEP.

As part of the evaluation of the Chronic Homelessness Demonstration Program, Westat conducted initial and multiple followup site visits to all Chronic Homelessness projects. This report represents a synthesis of data collected during those site visits, as well as data extracted from Quarterly Reports and materials provided to Westat by all sites. We also incorporate findings from the evaluation's Chronic Homelessness database, which consists of detailed information on program customers collected from each of the five demonstration project sites. Finally, we include an analysis of the findings from site visits to CHETA and other CHETA materials.

² The nine program priority areas are Customized Employment, WorkFORCE, Chronic Homelessness, Innovative Youth Grants, State Intermediary (Youth), High School/High Tech State Grants, High School/High Tech State Implementation and Development, Faith-Based Mentoring, and Technical Assistance.

Chronic Homelessness Demonstration Program

The Chronic Homelessness Demonstration Program had certain features that made it unique compared to other ODEP demonstration programs. The Chronic Homelessness Demonstration Program was the only one of ODEP's demonstration programs that partnered with another U.S. department. Thus, it was governed by the sometimes conflicting policies, procedures, and expectations of two Federal agencies. Chronic Homelessness program customers were also a particularly hard-to-serve group of individuals. Most were dually diagnosed and required considerable coordination of several types of service and support organizations, including mental health and substance abuse. In addition, although a large number had graduated from high school and some had received post-secondary education, most had an unstable and often undocumented work history.

In Fiscal Year 2003, ODEP and its DOL partners, the Veterans' Employment and Training Service (VETS) and the Employment and Training Administration (ETA), in cooperation with HUD, funded demonstration projects in cities throughout the United States (Boston, Indianapolis, Los Angeles, Portland, and San Francisco). These demonstration projects provided three types of services to program customers – employment, housing, and mental health and other services. Using customized employment approaches (described below) that were also part of other adult demonstration programs funded by ODEP, the objectives of the Chronic Homelessness Demonstration Program were to increase and improve employment outcomes for people who were chronically homeless;³ bring together the respective expertise and capabilities of both the local workforce development system (i.e., One-Stop Career Centers and their partners) and the local permanent housing service organizations; and develop and document the increased employment outcomes anticipated when these organizations combine their efforts to respond to the employment and housing needs of people who are chronically homeless (U.S. Department of Labor and Department of Housing and Urban Development, 2003).

³ Chronically homeless is defined by the U.S. Department of Housing and Urban Development as an unaccompanied homeless individual with a disabling condition who has either been continuously homeless for a year or more, OR has had at least four episodes of homelessness in the past 3 years. In order to be considered chronically homeless, a person must have been sleeping in a place not meant for human habitation (e.g., living on the streets) and/or in an emergency homeless shelter. A disabling condition is defined as a diagnosable substance use disorder, serious mental illness, developmental disability, or chronic physical illness or disability including the co-occurrence of two or more of these conditions. A disabling condition limits an individual's ability to work or perform one or more activities of daily living.

Housing and Urban Development Continuum of Care Housing Programs

In addition to receiving employment services under the Chronic Homelessness Demonstration Program, the demonstration program enabled program customers to receive permanent housing and support. When seeking funding under the Chronic Homelessness Demonstration Program, projects could apply for one of two types of Continuum of Care⁴ permanent housing support authorized by the McKinney-Vento Homeless Assistance Act of 1987 – Shelter Plus Care and Supported Housing. The Shelter Plus Care Program is administered by HUD and provides rental assistance for hard-to-serve homeless people with disabilities in connection with supportive services funded from sources outside the program (U.S. Department of Housing and Urban Development, 2008). Shelter Plus Care is designed to provide housing and supportive services on a long-term basis for homeless individuals with disabilities (primarily those with serious mental illness, chronic problems with alcohol and/or drugs, and acquired immunodeficiency syndrome [AIDS] or related diseases) and their families who are living in places not intended for human habitation (e.g., streets) or in emergency shelters. The supportive services may be funded by other Federal, state, or local sources, as well as private sources. The Supportive Housing program is also administered by HUD and is designed to promote the development of supportive housing and supportive services to assist homeless individuals in the transition from homelessness and to enable them to live as independently as possible (U.S. Department of Housing and Urban Development, 2008).

Customized Employment

In conjunction with the housing programs provided by HUD (i.e., Supportive Housing and Shelter Plus Care Programs), the Chronic Homelessness Demonstration Program was intended to begin or expand the delivery and implementation of competitive, customized employment opportunities for chronically homeless people so that they would be able to live, work, and fully participate in the community. Customized employment seeks to individualize the relationship between job seekers and employers to meet the needs of both parties (U.S. Department of Labor, 2008). Customized employment opportunities are built on four key elements: (1) meeting a job seeker's individual needs and interests (individualization); (2) using a personal representative (e.g., a counselor, job developer, advocate, employment specialist) to assist and potentially represent the individual (representation);

⁴ A continuum of care system is designed to address homelessness through a coordinated community-based process of identifying needs and building a system to address those needs. The approach is predicated on the understanding that homelessness is not caused merely by a lack of shelter, but involves a variety of underlying, unmet needs - physical, economic, and social (U.S. Housing and Urban Development, 2008).

(3) negotiation with employers so that both employer and job seeker needs are met (negotiation); and (4) building a support system (e.g., benefits counseling, personal assistance, coordination of transportation, obtaining adaptive equipment, ongoing supports).

The focus of the Chronic Homelessness Demonstration Program was to implement customized employment approaches as part of the delivery of employment services in conjunction with the provision of housing, housing services, and mental health and other services.

Chronic Homelessness Employment Technical Assistance (CHETA) Initiative

In Fiscal Year 2004, ODEP awarded a cooperative agreement for the Chronic Homelessness Employment Technical Assistance (CHETA) initiative. The primary goals of CHETA were to provide the Chronic Homelessness demonstration projects with training and technical assistance in order to successfully implement the Chronic Homeless Demonstration Program and to provide ODEP with analysis on homelessness and employment related policy. Five objectives were described in the CHETA SGA: (1) Provide proactive, intensive, and ongoing technical support to the five Chronic Homelessness demonstration projects; (2) Develop a repository of knowledge and materials on promising practices and resources related to the delivery of customized employment services to individuals who are chronically homeless; (3) Provide technical assistance to other U.S. DOL and HUD grantees involved in related initiatives; (4) Process and provide feedback on policy information related to combining employment-related services with permanent housing services; and (5) Develop linkages and collaborate with other national initiatives providing services to the individuals with disabilities who are chronically homeless. The CHETA initiative was awarded to the Corporation for Supportive Housing (CSH), who partnered with Advocates for Human Potential (AHP) in order to implement the technical assistance initiative.

The Independent Evaluation

The evaluation of the Chronic Homelessness Demonstration Program is one component of the independent evaluation put into place by ODEP. Like the evaluation of other program priority areas supported by ODEP, the independent evaluation of the Chronic Homelessness Demonstration Program was intended to provide ODEP with data and information that could be used to assist policy development, decisions, and recommendations; track the success of ODEP's goals under the

Government Performance Results Act (GPRA); and ensure that public monies were being used to meet the objectives for which they were intended.

The evaluation framework developed by Westat was supported by the Open Systems Model which provided the general structure within which to describe ODEP demonstration programs, focus data collection efforts, and assess program efficiency and effectiveness (Westat, 2003a; Westat 2003b). The components affecting efficiency and effectiveness are generally described as program inputs, processes, outputs, and outcomes. *Inputs* are those resources that are needed to set processes in motion and keep them running. *Processes* are event sequences and arrangements of staff, services, and resources needed to achieve the intended result(s). *Outputs*, often referred to as “products,” are the “units” produced by processes supported by given inputs (e.g., the number of staff trained to use particular strategies targeted at meeting the employment needs of people with disabilities). *Outcomes* refer to the intended results of creating certain outputs or products. ODEP’s primary focus for the Chronic Homelessness Demonstration Program was on systems change (e.g., capacity building, coordination of services, customization, and sustainability).

The evaluation used a repeated-measures design known as a “one-group pretest-posttest design” (Campbell and Stanley, 1966). This design allowed for the assessment of change in the outcome of interest (e.g., systems change; changes in employment, employment retention, or educational goals) from before the implementation of the “intervention” (in this case, the presence of the ODEP-funded Chronic Homelessness Demonstration Program) to after it was implemented. The evaluation design was made operational by conducting initial site visits at program initiation and then one followup and one final site visit.

Data summarized in this report come from interviews, using semistructured interview protocol guides, with key informants at site visits to each Chronic Homelessness demonstration project and CHETA, telephone interviews and emails with site staff, quantitative and qualitative data from Quarterly Reports, products and materials provided to Westat at site visits, the original grant application, and data from the Chronic Homelessness Database. Protocol instruments were designed to collect information about project inputs, processes, and outputs, as well as systems change outcomes.

Program Successes

Although not achieved in equal amounts or at every demonstration project, Westat found several successful aspects to the Chronic Homelessness Demonstration Program as a whole. In this section we summarize the successes of the program with regard to improved capacity, coordination, quality of services for the chronically homeless population, successes in employment outcomes, and sustainability.

Improved Capacity. Capacity building took place at all five demonstration projects and resulted in increased knowledge, changed attitudes and, ultimately, behavior change. Despite major differences in philosophy and approach, projects reported that partners participating in the Chronic Homelessness Demonstration Program increased their awareness about disability and their knowledge about the chronically homeless population and the barriers they face in housing and employment. Project planning by project advisory committees, consisting of a variety of community organizations and agencies, enabled partners to learn about one another's services and to operate jointly to provide services to program customers.

Of particular note was the shift in beliefs and attitudes that took place among many program partners. Whereas going into the program, many partners were doubtful about the ability of this population to obtain and retain jobs, such assumptions were completely overturned once it was seen that program customers could find and retain competitive jobs.

Another shift at a number of project sites concerned the role of employment in the recovery process. Advisory Committee members at the Indianapolis demonstration project, Threshold, reported that project partners and staff had largely embraced the concept of employment as a component of recovery efforts for people with psychiatric disabilities and homeless histories. LA's HOPE created new communities of practice⁵ across partner staff that had neither worked together nor served this population before. Such collaboration helped shift perceptions about the role of employment in recovery for Department of Mental Health managers involved with the project. One-Stop Career Center staff in the LA's HOPE project also appeared to change their perceptions about the employment prospects for people who had been chronically homeless and living with psychiatric and/or drug and alcohol use disorders.

⁵ Groups of people who share a concern or a passion for something they do and learn how to do it better as they interact regularly (<http://www.ewenger.com/theory/index.htm>). Those in communities of practice engage in a process of collective learning in a shared domain of human endeavor.

Portland project staff and partners also reported how employment helped to facilitate recovery and mental illness self-management efforts for people with psychiatric and addiction disorders, and key informants reported that earlier doubts about whether people who were chronically homeless could be engaged in competitive employment were assuaged.

The LEGACY Diversity Training in Los Angeles, another WIA-funded program which was a product of the EmployABILITY project, was a source of training that further improved the capacity of LA's HOPE staff and partners to provide services to the chronically homeless population. Training on case management, customized employment, psychiatric disabilities, and accessing resources for people with disabilities was another way of improving capacity to serve this population.

Increased Coordination. As a result of improved coordination, resulting in increased access to needed supports and services, not only did project partners have a better awareness and understanding of the target population, the services they needed, and the services that were available in the community, but they also worked together to provide these supports and services for customers. Most projects used a team approach to develop and implement an employment plan for program customers. With teams consisting of representatives from a variety of agencies and organizations (e.g., One-Stop Career Centers, mental health and substance abuse centers, vocational rehabilitation [VR], and housing), supports and services were immediately available to the program customer, as needed. Team members also were able to provide the followup services as necessary and, if relapse occurred, one or more of the partners was able to step in to provide or arrange substance abuse services. In Boston, having the housing partner as part of the team also assisted in maintaining housing for program customers who needed to take a break from the program to attend a rehabilitation program.

Improvements in coordination were also seen at the Indianapolis site (where the workforce development and VR connection was strengthened) and at LA's HOPE, whose partners worked together to streamline the HUD housing application.

Improved Quality of Services. In addition to improved access to services through better coordination, the Chronic Homelessness Demonstration Program afforded projects the opportunity to improve the quality of services for program customers who had been chronically homeless. Projects used Social Security Administration (SSA) benefits planners and flexible funding arrangements such as paid job tryouts and internships. As a result of collaboration among a variety

of partners, some projects were able to utilize multiple sources of funding for program customers. Many program customers were linked to VR through One-Stop Career Centers, opening the door to more services, supports, and funding.

Boston was the only project that enrolled all program customers in the WIA system at the One-Stop Career Center. Doing so provided its customers with additional opportunities for intensive services and training. Even if not enrolled in WIA, however, program customers at other sites were introduced to the One-Stop Career Center and the core services it provides. At LA's HOPE and at Threshold in Indianapolis, WIA services were provided offsite to program customers in locations that were convenient and less threatening to them.

Although results were mixed in the provision of all four components of customized employment services, all projects provided customer-centered services. Project teams were used at all projects and assisted program customers in developing and implementing an employment plan that was based on their interests, strengths, and employment goals. Thus, the first component of customized employment – individualization – was realized at all sites. At several sites, project staff represented program customers by driving and accompanying them to job interviews or other meetings. Although job carving was rare, project sites often assisted in negotiating scheduled work hours and specific job tasks. Moreover, followup services and supports (e.g., counseling, helping individuals find suitable work clothing) were available at all demonstration projects.

Sites were also able to implement unique approaches that made sense for the chronically homeless population. Peer staff (people who had been previously homeless or had experienced similar mental health or substance abuse problems) were able to motivate and engage program customers at LA's HOPE. Moreover, career and resource mapping at the Portland site identified key contacts at different organizations and agencies and made the process of obtaining resources more straightforward and seamless.

Successes in Employment Outcomes. Although all program customers were chronically homeless and most had a psychiatric/emotional impairment and/or substance abuse problem, there was considerable variation in their history and circumstances. All met the HUD definition of chronic homelessness, but they met it in different ways. About 37 percent of the analytical sample⁶ had been homeless for 1 to 3 years, another 18 percent had been homeless for 3 to 5 years and 20 percent, had been for 5 to 10 years. More than 82 percent of the analytical sample was receiving at least one

⁶ Participants who received housing and stayed with the program for more than 90 days.

cash benefit at enrollment, and their education level varied, with 30 percent having less than a high school education, 40 percent with a high school education or GED, and 21.3 percent with more than high school.

The services provided to this population also varied. All members of the analytical sample received both housing and mental health services, but services varied within those categories, with 56 percent receiving assistance in obtaining benefits, 54 percent getting help in searching for a rental property, and 27 percent receiving temporary shelter. Among those with a psychiatric/emotional primary disability, 87.3 percent received mental health services. Those who relapsed received alcohol or substance abuse services. Almost 15 percent spent at least 1 day in jail. Some experienced symptoms of serious health conditions, while others obtained training and further education.

Despite a circuitous and diverse route to employment, employment outcomes were impressive. Chronic Homelessness program customers obtained a variety of jobs – part-time, full-time, temporary, or permanent – as a security guard, artist, manual laborer, computer lab assistant, housekeeper, groundskeeper, or truck driver. Overall, 43.9 percent obtained at least one competitive job (Table 1). The mean wage was \$9.70 an hour among competitive jobs, and 52.1 percent of program customers worked 35 or more hours per week. The six month retention rate was 63.5 percent, and 40 percent retained their job for 12 or more months.

Table 1. Employment outcomes

Indicator	Measure
Percent of customers who obtained at least one competitive employment position	43.9
Percent of customers who obtained only protected jobs and/or self employment*	14.7
Percent of customers who obtained at least one type of employment (protected job, competitive job, or self-employment)**	58.6
Average (standard deviation) wage per hour (\$)***	\$9.70 (2.50)
Median wage per hour (\$)***	\$9.50
Average (standard deviation) hours/week***	30.5 (10.9) hours/week
Median hours/week***	36.0 hours/week
Average (standard deviation) number of months until first competitive employment	5.5 (6.5) months
Program customers who worked 20 or fewer hours/week (%)	31.3
Program customers who worked 21-34 hours/week (%)	16.7
Program customers who worked 35 or more hours/week (%)	52.1
6-month retention (%)	63.5
12+ month retention (%)	40.0

* This figure also includes nine employed individuals for whom the type of employment was not clear.

** Program customers obtained more than one type of employment.

***Applies to competitive jobs with the maximum wage rate, maximum hours per week, and longest duration of employment for each customer who obtained competitive employment (N=200).

Finally, it was shown that the program itself was strongly related to obtaining competitive employment (Table 2). After adjusting for all other factors in a multivariate analysis, it was found that the odds of obtaining competitive employment for a program customer who always or most of the time participated in program services was 3.0 times greater than the odds of obtaining competitive employment for a program customer who sometimes or never participated. Those who participated in the program for more than 24 months were also likelier to obtain competitive employment compared to those who participated for fewer months.

Table 2. Factors related to competitive employment in multivariate analysis

Factors	Odds ratio*	95% confidence intervals	p-value
Gender (Male=1)	1.49	0.93, 2.37	0.10
Age 18-30 yrs old	1.73	0.81, 3.67	0.16
Age 31-40 yrs old	1.87	1.04, 3.37	0.04
Age 41-50 yrs old	1.45	0.87, 2.40	0.15
Age > 50	1.00		
Less than high school	0.62	0.38, 0.98	0.04
African-American	1.69	1.01, 2.84	0.05
Primary disability: Drug/Alcohol Abuse/Dependence	1.33	0.79, 2.26	0.29
Homeless more than 3 years	0.65	0.37, 1.13	0.12
Length of participation in program greater than 24 months	1.30	1.14, 2.83	0.01
Level of participation in services (Always/Most of the time =1)	2.95	1.81, 4.80	<0.001
SITE 1	6.73	2.49, 18.17	<0.001
SITE 2	5.00	2.36, 10.60	<0.001
SITE 3	2.97	1.43, 6.17	0.004
SITE 4	3.23	1.41, 7.36	0.005
SITE 5	1.00		
Pseudo R-squared**		0.1428	

*The odds ratio (Hosmer and Lemeshow, 1989) shows how much more (or less) likely it is for an outcome to be present (in this case, obtaining competitive employment) among those with and without a particular characteristic (e.g., participating in program services all or most of the time). An odds ratio of approximately 1.0 implies that the outcome is equally likely whether or not the characteristic is present. An odds ratio greater than 1.0 implies that the outcome is more likely if the characteristic is present. An odds ratio of less than 1.0 implies that the outcome is less likely if the characteristic is present.

**In multivariate analysis, the r-squared statistic is typically used to determine the goodness-of-fit of the model. Because logistic regression does not have an equivalent goodness-of-fit statistic a pseudo R-squared is used. A pseudo r-squared of about 0.14 implies that the variables contained in both the full and reduced model reasonably explain the relationship between competitive employment and the combination of these variables. However, it also implies that other factors, not contained in the Chronic Homelessness database, may provide further explanation.

Inroads to Sustainability. Although sustainability was not as extensive as anticipated, Chronic Homelessness demonstration projects were able to make important inroads. With several program

partners realizing that this population can and did work and that employment is an important component of recovery, it is expected that such changed knowledge and attitudes will lead to improved services for individuals experiencing chronic homelessness in the five cities with large homeless problems – Boston, Indianapolis, Los Angeles, Portland, and San Francisco. Moreover, with the addition of new partners and the strengthening of relationships among old ones, the increased capacity through training and collaborative efforts is expected to be sustained.

All projects were also able to sustain the housing vouchers they obtained through the program (with Boston increasing the number of vouchers it had available from 20 to 47 by the end of the program). Partnerships that had been strengthened as a result of the program (e.g., the workforce development system and mental health in Boston and the workforce development system and homeless organizations and mental health providers in Los Angeles) were expected to be sustained and to flourish.

Examples of Employment Outcomes – Qualitative Data

In addition to quantitative data on employment outcomes, successful employment outcomes were illustrated with qualitative data. The stories sketched out in this report both reflect employment outcomes and illustrate some of the wide-ranging issues that participants and project staff and partners confronted as participants sought to leave homelessness, establish residency in and adapt to supported housing, and find paid work in their local communities. Their narratives reflect the personal struggles to manage both mental illness and substance use disorders in their intersection with some of the unique aspects of the local urban setting.

One example is Tony⁷ who was 63 years of age at the time of his interview. Tony had been chronically homeless for 20 years and had spent some time in mental hospitals, in-patient addiction treatment centers, and jail or prison for non-violent crimes. Tony had also held a series of competitive jobs, one in which he operated printers and organized printouts and copies for a popular magazine for 4 years. He worked full-time on 12 hour shifts, 7 days a week with no time off. However, he stopped attending Alcoholics Anonymous meetings and relapsed and returned to “drinking, drugging and living on the streets” for 2 ½ years.

⁷ To protect the confidences of our informants, only first names of interviewees are used.

A homeless friend suggested that Tony contact a mental health-substance abuse treatment provider, which happened to be a Chronic Homelessness partner. The agency offered Tony transitional housing which he accepted. An employment specialist from the demonstration project told Tony about the Chronic Homelessness program, and he enrolled in the program shortly thereafter.

Tony received two transitional housing placements, spanning a 14-month period, before he was approved for a Shelter Plus Care voucher. He found his own apartment from the approved housing list and moved inside. He was counseled by project staff to apply for Supplemental Security Income (SSI), but he declined to do so. He worked steadily with his employment and support team from the project and kept looking for work. Employment team members kept in regular contact with Tony and provided job leads and motivational counseling. Tony was eventually hired by his former substance abuse treatment provider as a counselor. At the time of our interview, he had worked full-time, 5 days a week, for \$10 an hour for more than a year and received paid sick time and health insurance coverage. He was enrolled in General Educational Developmental (GED) classes, and also wanted to return to school for more classes at a community college in the near future.

Mark, another program participant told us he had been “street homeless” for over 15 years and had spent some of that time working in full-time jobs. He told us that he had been diagnosed with bipolar mental illness and struggled with addiction to drugs and alcohol. While living outside, a homeless friend told him about the Chronic Homelessness Demonstration Program. He applied for entry into the program and was housed in a hotel for 30 days as his application for a housing voucher was processed.

Mark received services from a team of staff members from a primary housing, mental health, and employment partner in the inner city. He reported that he had difficulty adapting to living in an apartment, and he worked on these issues with his employment team members. After 1 year he was able to relinquish his grocery cart, which he had been keeping in his apartment “just in case.” During this period, he also worked closely with an employment specialist to secure his first competitive position. The employment plan he had created with his project team reflected his interest in non-traditional employment that would provide time for social interactions and give him variety in his work day (“no desk jobs!”). The first position he found was as a hotel doorman for a large chain hotel in the city. He was paid above minimum wage and was given a uniform that he wore to work. He liked the job and started working full-time.

Mark had a “manic break and went back to using” [drugs and alcohol] after working as a doorman for 2 or 3 months. With the assistance of his project team, he was referred for and received inpatient

treatment. Because he was absent from his apartment for less than 90 days, the project was able to “freeze” his voucher so that he could resume living there after his discharge from the hospital.

When he returned to supported housing, Mark and his employment specialist explored what would be required for him to be able to become a self-employed glass artist (one of his long-time interests). His employment specialist received advice from VR staff about developing a business plan and applying to VR for funding support. In addition, members of Mark’s support team identified a private grant foundation to which Mark applied with the team’s assistance. He received a \$3,000 award to cover work-related expenses (e.g., protective glasses, raw materials, glass cutters). A portion of those funds has also been applied to the lease for a small art glass studio.

At the time of the interview, Mark had retained his housing for nearly 2 years and described himself as a “self-employed glass artist.” He was also working on marketing plans to expand his business with his support team from the project.

Lessons Learned

The expressed purposes of the Chronic Homelessness Demonstration Program were to bring together expertise in the U.S. workforce development and housing support service systems (i.e., DOL and HUD) to increase employment and sustained housing among the chronically homeless population in local communities and to document both the process and the success of funded efforts. The findings presented in this report clearly and forcefully document the success of the five funded projects in achieving high rates of competitive employment and stable housing among the chronically homeless program participants in five communities. While each of the projects (in Boston, Indianapolis, Los Angeles, Portland, and San Francisco) achieved positive outcomes, they did so with varying levels of success, and that success was achieved later rather than sooner for some projects during the 5 years of funding.

The overall success of the Chronic Homelessness Demonstration Program begs for an explanation of why and how the five projects were able to achieve the positive results they did. Through a comprehensive review of both the quantitative and qualitative data and information collected during the 5 years, including interviews with program customers, Westat staff has assembled what we believe to be the lessons learned from this important program. We begin by setting the context for the program with an overview of the general accomplishments at the Federal, state, and local levels.

We then present seven lessons that we believe comprise the core of what were the key ingredients to achieving successful employment and housing outcomes.

Overview of Program Impact at Federal, State, and Local Level. In the final analysis, it is evident that the successes of the Chronic Homelessness Demonstration Program extend well beyond the local projects. At the Federal level, the DOL and HUD agencies collaborated to fund and support this effort. The Congressional appropriations allocated to this effort revealed that there was a collective political will to confront and redress the continuing phenomena of chronic homelessness. Not incidentally, government funding of the program facilitated a flow of information from the local projects to the Federal government. Thus, by collecting local information on the processes used to house and employ people experiencing chronic homelessness and the outcomes they achieved, the store of knowledge that Federal agencies have to further inform the development of employment, housing, and mental health policy was greatly increased. Without funding for this program, the flow of information about such issues would never have taken place.

In addition to the Federal partnership, it became clear early in project implementation that additional state-level agencies were needed as partners to achieve employment and housing success with the chronically homeless population. State departments of mental health in Massachusetts, Indiana, California, and Oregon were included in the collaborative mix represented in the five projects. Like their Federal agency counterparts, state departments of mental health similarly developed new ways of communicating and working together with representatives from the workforce development system, VR agencies, public housing authorities, local Veterans Affairs agencies, and nongovernmental community rehabilitation providers. A critical consequence of these developments was that the representatives of these agencies, as well as nonprofit organizations, increased their awareness of, and knowledge about, issues surrounding chronic homelessness. The representatives also saw the role that their agency or organization could, or did, assume in confronting chronic homelessness in their state.

At the community level, efforts to resolve and redress chronic homelessness led project management staff, advisory or steering committees, and other significant stakeholders (e.g., families, advocacy organizations) to identify resources and solicit commitments to use them in both traditional and non-traditional ways. The necessary focus on practical considerations (e.g., what was needed to house, employ, and support people who were chronically homeless) ushered in a new discourse about chronic homelessness at the community level. New players sat together at planning sessions, and new direct service staff co-managed or co-coordinated resource use for customers in the projects. The need to conceptually understand and accept the ideas on which customized

employment and other important concepts were founded emerged at all sites. New ways of embodying the concepts and, equally important, of embodying the expectations in practice—that an employment goal was realistic and attainable for people who were chronically homeless—led to bending old policies and procedures and developing new ones.

The Chronic Homelessness Employment Technical Assistance center provided practical advice and guidance to grantees which helped facilitate the “buy-in” around the customized employment concept in project localities. On a practical level, CHETA also helped disseminate information about best practices in housing, developing or delivering customized employment services, and working with people with disabilities, mental health challenges, and substance abuse histories.

Conclusions. The seven conclusions below represent the core lessons learned from Westat’s evaluation of the Chronic Homelessness Demonstration Program.

1. Cultivating and nurturing partnerships among Federal, state, and local agencies and non-profit organizations were critical to successful outcomes for program customers who previously were chronically homeless.

Program findings affirm that strong and productive partnerships among Federal, state, and local agencies, as well as nonprofit organizations, boded well for program customers. In addition, project partnerships with the highest likelihood of sustainability beyond ODEP funding were those that also dedicated time and energy to building and maintaining strong relationships among program partners. These strong partnerships helped to develop and maintain common goals and operational definitions that were developed, shared, and applied across various organizational settings and practice. Just two examples of the results of such collaborative efforts are the intake form created by partners in Boston and jointly-developed employment plans for program customers at all sites. When project management understood the mission and knew the resources available across the partners, traditional policies and procedures could become more flexible to conform to individual needs when required. Organizations that previously had rejected the notion of employment for people with alcohol issues found that the support offered by other partners made them less risk-adverse. As successful housing and employment outcomes for people were observed by partners, the reluctance to take risks with new operations receded.

The projects were mandated to work with partners operating in different direct service systems (i.e., the workforce development system, housing systems, social service and assistance systems, and mental health, medical care, and addiction treatment systems). Partners had specific expertise in the operations of their respective systems, but no single partner, on its own, could meet the complex

needs of program customers. By functioning together on behalf of each customer, the likelihood of success increased exponentially.

2. Targeted staff development facilitated customer access to appropriate services and sustained engagement.

Evaluation findings affirmed the need for professional development among management and direct service staff in order to implement the project as intended. Partner staff needed strategies to recruit, engage, and establish relationships with chronically homeless people who were deemed the “hardest-to-serve.” In some cases, direct service staff came to the project with expertise in several “best practices” such as motivational interviewing and “stages of change” approaches. Others needed additional training to develop these skills.

Because customer teams were comprised of cross-agency staff, it was a novel experience for many mental health staff to be on a team focused on the customer’s employment goals. Similarly, staff from the workforce development system that heretofore focused on customers’ employment issues were now working on a team that also needed to address housing issues or support service needs.

Both management and direct service staff required a conceptual understanding of customized employment to increase the likelihood of “buy-in” to the customized employment approach and the need for new, cross-agency practices. New assumptions about the target population (e.g., employability, recovery potential) were actively being linked to new practices and innovative ways of working with other community agencies. In all, a wide variety of training needs were identified for direct staff at partner organizations and for those who were managing, advising, or evaluating the impact and outcomes of the project. Staff in One-Stop Career Centers or community development departments often needed basic training to learn more about serving people with multiple barriers to employment. Staff in housing and mental health agencies needed information about customized employment approaches; and project advisory committee members often needed information about the concept of customized employment and how its use could benefit both customers and employers.

The overall lesson learned from observing these staff development processes highlights the continuing need during demonstration programs—especially when serving new clientele or when serving customers in new ways—to be able to develop and deliver information about all aspects of the programs, from conceptualization through implementation. Process and outcome analyses show that the Chronic Homelessness demonstration projects that offered a wide array of training and

ensured that informational needs of stakeholders in diverse settings were addressed were associated with low rates of staff turnover at partner agencies and with strong rates of competitively employed program customers.

3. Building reliable and supportive relationships with chronically homeless customers requires time and patience from direct service providers but ultimately drives housing and employment success.

Reliable and supportive relationships between direct service staff and program customers took time and patience to develop and maintain. Findings from the evaluation demonstrated over and over that developing and maintaining such relationships was well worth the effort.

Staff members who built rapport and constructed supportive relationships with program customers helped them become and remain engaged and motivated to find work. Such engagement (i.e., both strong and long program participation) was found to have one of the most robust associations with obtaining competitive employment. Our statistical analysis found that, after considering other factors, the odds of obtaining competitive employment for a program customer who frequently participated in program services was 3.0 times greater than the odds of obtaining competitive employment for a program customer who participated less frequently. Additionally, after considering other factors, the odds of obtaining competitive employment for a program customer who had participated in the program for more than 2 years was 1.30 times greater than the odds for all others.

Staff members familiar with this population fared well in building rapport and trust. Others needed some training in “best practices” (e.g., motivational interviewing and stages of change techniques). Staff members who were hired by projects specifically because they were “in recovery” and had, themselves, experienced homelessness and/or had lived with mental illness or addictions, were particularly adept at engaging people still on the street or living in shelters. These peer staff members were also reported to be especially effective when re-engagement was needed for participants facing relapses of psychiatric illnesses or a return to use of drugs or alcohol. During site visit interviews, customers reported that their most valued relationships were formed with staff who knew that the issues the customers faced were very complex and painful to confront. Customers noted that they drew strength particularly from relationships formed with peer staff, who embodied what was possible to achieve (“if they can do it, so can I”).

Meeting the multiple needs of the chronically homeless population required not only the implementation of best practices, but also empathy, patience, and time. In practice, it often took

repeated contacts over several months before people who had been street homeless for years—or decades—would talk to staff or engage in a discussion about the project. From the descriptions offered by outreach workers and shelter staff, the process of building relationships with participants also required staff sensitivity and tenacity. Findings suggest that having a repertoire of best practices to draw upon when staff reached out to prospective enrollees was a necessary, but not a sufficient, condition for working with this population.

Much can also be said about the importance of reliable relationships between program customers and project staff. Time and again program customers reported on the constancy and dependability of program staff in helping them get through rough times. When staff turnover disrupted these relationships, participants reported difficulty in connecting with needed resources and in maintaining their confidence and momentum in achieving personal goals.

4. Project partners that were able to put aside past assumptions and organizational priorities were better suited to achieving the joint goals of the program – competitive employment and stable housing.

We found that the most successful projects were those in which all partners worked together to achieve common goals – competitive employment and stable housing for program customers. Partners and stakeholders that made the greatest investment of time and energy in project activities appeared to have accepted the key assumptions of the project – that people who are chronically homeless and have barriers to employment can be housed and can work competitively when supportive services are appropriate and accessible. Moreover, accepting and promoting the idea of employment as an integral feature of recovery also seemed to be an important marker for success.

Projects that made the least progress were those that attempted to partner with agencies or organizations that could not overcome their basic assumptions about the chronically homeless population or were unable to set aside their organization's mission to work on behalf of program customers in achieving both employment and housing goals. We noted that some demonstration projects and their associated partners were often stymied in their implementation efforts by agencies or organizations that were reluctant to overcome certain assumptions and ways of working.

Some of the most difficult assumptions to overcome had to do with “work readiness,” and the traditional approach to securing employment by pursuing pre-employment activities prior to accepting community-based, competitive employment. Other assumptions had to do with the mission of partner organizations and agencies. When projects could not overcome their bias toward the particular mission of their organization (e.g., housing first or a requirement for sobriety), true

collaborative partnering was rare. Conversely, when partners were able to embrace new ideas about the target population, excellent outcomes and sustainability were notable consequences. Sites in which decisionmakers communicated these new ideas to their staff were especially successful in achieving strong rates of competitive employment and retention.

5. Partners were able to collaborate when staff were made available to participate.

The ODEP funding for implementation of the Chronic Homelessness Demonstration Program initiated a trajectory that began with formal partnerships and moved, in many cases, to “buy in” to a common set of goals, commitment of staff time and energies, and the attainment of common goals. These factors, in turn, led to sustainability of key program components at some projects.

ODEP’s Chronic Homelessness grants created leverage to influence the operations of systems so that partners within the systems could take risks and embrace new practices. The various systems involved with the grantees included the workforce development system, the subsidized housing system, the mental health and substance abuse treatment systems, low-income assistance systems, and the criminal justice system.

Some of the leverage associated with ODEP awards was related to funding direct service staff member time to engage program customers and implement best practices for obtaining and retaining housing and employment. Other leverage bought the time of middle management and decisionmakers. When meeting time was paid for, more staff from more organizations were able to participate. When more stakeholders were represented in planning meetings, strategic plans were broadly conceived and involved more collaborators.

Beyond these effects, it was found that the sites where partners expressed high levels of commitment to continuing the ideas and activities of the Chronic Homelessness Demonstration Program were also able to advance systems change. Two of the five sites (Indianapolis and Los Angeles) were able to include people who were chronically homeless as a priority population for services from One-Stop Career Centers. LA’s HOPE also developed and launched satellite employment portals which were developed in areas frequented by people who were homeless.

Prior to these changes, WIA performance measures largely operated as a disincentive for the One-Stop Career Centers to serve people with multiple barriers to employment, including people who had been chronically homeless. In this nexus of influence and change, the lesson learned is that the

leverage and influence allowed by ODEP funding may also operate to reduce the disincentives within the workforce development system to serve people with multiple employment barriers.

6. Customized employment as implemented by participating organizations focused on the employment service provider-customer relationship rather than on the employer-employee relationship and lacked support for employer-employee negotiation.

Programs applied the customized employment approach to the relationship of employment service provider and customer rather than to employer and employee. In customizing the employment services relationship, some components of customized employment process were used more than others. Project staff and partners appeared to feel comfortable in customizing the early stages of interaction with program customers, particularly as they related to discovery and development of an employment plan. They also developed and implemented processes for representing program customers and obtaining ongoing supports and services for job retention. They used customized employment approaches and strategies listed in the SGA as a menu and not as requirements of a protocol. Program staff was committed to a process that centered on the needs and preferences of the individual and applied components of customized employment that were appropriate to the person's needs. They allowed the job seeker to drive the planning process.

The positive outcomes achieved by these programs cannot be attributed to a customized employment approach that relies on a voluntary negotiation of a personalized employment relationship between a specific individual and employer. As noted, the data reveal that most sites did very little negotiating with employers or job carving. The success of these programs was due to the strategic application of the customized employment approach to the delivery of employment services.

It should be recognized that customized employment principles including customization to meet individual needs, customer-driven planning, flexibility, and dismissal of work readiness activities that delay the employment task at hand can be, and have been, successfully applied to the employment service delivery process. Employer negotiation and job carving should be considered strategies that are appropriate for customers who are willing to disclose their disability to a potential employer and who agree to the process, but these should not be defining indicators of a customized employment process.

The Chronic Homelessness demonstration projects rarely made communication and negotiation with employers a priority. Few of the jobs obtained by program customers were negotiated with an employer by project staff. Reluctance to disclose seemed to drive this dynamic. It was also observed

that project staff reported little time devoted to developing relationships with employers that would have facilitated understanding of their discrete needs.

In interviewing staff we heard no evidence of support or incentives from management to set a higher priority on employer relations. If ODEP wants to see a higher percentage of positions resulting from a voluntary negotiation between employer and employee, it will require additional resources in terms of training and staff time, as well as higher priority from the agency for employer engagement.

7. The technical assistance provided to Chronic Homelessness demonstration projects was both needed and appreciated.

The Chronic Homelessness Demonstration Program began in Fiscal Year 2003 by identifying five Chronic Homelessness demonstration project sites and implementing startup activities immediately. Until a technical assistance initiative could be identified 1 year later, ODEP filled the technical assistance role, and the other adult technical assistance centers (Training and Technical Assistance for Providers [T-TAP] and National Center on Workforce and Disability/Adults [NCWD/A]) also contributed their expertise. The other technical assistance initiatives knew a lot about customized employment, but they did not have specific expertise on housing policy, HUD requirements, and homelessness. Thus, early on demonstration projects were left to fend for themselves on issues of finding and working with a housing partner, documenting chronic homelessness in a way that was acceptable to HUD, and ironing out housing-related issues such as background checks required by landlords. To their credit, the problems that Westat saw at the initial site visits (Elinson et al., 2005b) appeared to be resolved by the time we returned for followup and final visits, but not without considerable frustration and angst.

The technical assistance initiative designed specifically for the Chronic Homelessness Demonstration Program, known as CHETA, did not begin operations until Fiscal Year 2004. Not only did it take time for CHETA to learn about the Chronic Homelessness Demonstration Program, but CHETA staff (who were particularly knowledgeable about homelessness and housing programs) also needed to school themselves on customized employment. The CHETA staff managed to become knowledgeable about customized employment, but their particular usefulness in this regard may have been in organizing conferences that covered customized employment-related topics as well as topics on homelessness. These conferences were well received by demonstration project partners and staff and served to build capacity among local service providers and decisionmakers.

Grantee conferences also provided a valued forum for the exchange of ideas and practices across the five demonstration project sites.

The CHETA initiative appeared to make its greatest contributions by providing technical assistance on housing and housing policy issues, particularly as these issues related specifically to the local environment. Project directors of Chronic Homelessness demonstration projects reported that they liked bouncing ideas off CHETA staff and benefited from certain suggestions on tenant leadership programs and substance abuse policies. Across the five sites, case management and customer service issues were the most-requested CHETA training topics, followed by requests for training about customized employment.

Recommendations

Evaluation of all ODEP demonstration programs, including this one, demonstrates that vulnerable and high-risk populations can obtain and retain competitive employment and that using customized employment strategies and other customized approaches can help them to do it. What worked best for the chronically homeless population to achieve these positive outcomes and what continues to cause this population's biggest problems form the basis of the recommendations we propose to ODEP.

Recommendation 1: Provide avenues for local partners to pool resources and work together toward common goals.

A significant finding in this evaluation was that productive partnering is needed to achieve common goals on behalf of the chronically homeless population. Not only does this make sense from the perspective of trying to do more with less, but it also seems to work if productive partnerships can be formed to collectively work toward the goals of obtaining and retaining employment, housing, mental health services, and other service and support needs of the chronically homeless. ODEP has a role to play in making that happen throughout the cities of the United States where homelessness is a particular problem.

The first step, we believe, is to form partnerships at the Federal level to pave the way for coordinated services at the local and state level. Although the U.S. Department of Labor partnered with the U.S. Department of Housing and Urban Development in the Chronic Homelessness Demonstration Program, preliminary steps at the Federal level were never taken to pave the way for

sustained policy and practice change at local levels. We recommend that steps be taken at the Federal level to promote coordination of services for people who are chronically homeless and for others who might benefit from a wide array of supports and services funded or supported by more than one Federal organization.

Coordination at the Federal level is not enough, however. One demonstration project was able to show that besides a grouping of appropriate partners, what was critical was each partner's willingness to work outside its narrow mission and philosophy to ensure that the larger goals of the demonstration program (and of program customers) were being met. Achieving such a state did not come easily and required considerable planning and patience.

Westat recommends that ODEP support, in concert with its Federal partners, the development of a series of papers and technical assistance materials to assist local organizations and agencies in building collaborations and relationships that assist in planning and implementing customized services for individuals who are chronically homeless.

Recommendation 2: Promote a customized employment approach to employment services so that staff have the flexibility to “customize” the approach for the individual circumstances of job seekers, rather than having to work through a linear chain of services.

Although all Chronic Homelessness demonstration projects offered a customized blend of services to meet the housing and employment needs of program customers, their efforts did not necessarily fit the template carved out by ODEP on customized employment. As we have noted before in this and previous reports (Palan et al., 2007; Stewart et al., 2008), customized employment is a set of principles, not a set of services. Therefore, in Westat's opinion, customized employment may be more useful if presented as separate components rather than as a single unit of services that are dependent upon one another.

The principles common to both customized and supported employment – customization to meet individual needs, flexibility, and disdain for work readiness activities that delay the employment task at hand – is where ODEP should focus its attention, and not so much on the particular strategies of customized employment. As a result, Westat recommends that ODEP promote a customized employment approach to employment services so that project staff have the flexibility to “customize” the approach for the individual circumstances of job seekers, rather than having to work through a linear chain of services.

Recommendation 3: Expand the definition of customized employment (noted in the SGA) to include the application of customized employment principles and strategies to the employment service process. Acknowledge that negotiation with employers about job duties or employee expectations is a strategy that can be used when appropriate, but is not a defining principle of customized employment.

The SGA defined customized employment as “individualizing the employment relationship between employees and employers in ways that meet the needs of both. It is based on an individualized determination of strengths, needs and interests of the person with a disability and simultaneously employing strategies designed to meet the specific needs of the employer.” Sites followed this definition and applied customized employment as a flexible blend of strategies, services, and supports. However, the individualized employment relationship was not restricted to the employer-employee relationship. The positive outcomes of the programs resulted from application of the customized employment principles to the relationship between the service provider and customer.

Westat recommends that ODEP acknowledge the importance of applying customized employment principles to the relationship between employment service provider and customer. We also recommend that ODEP accept as customized employment, practices that blend strategies, services, and supports designed to increase employment options for the chronically homeless. These practices meet the unique needs of both the employee and the employer even if they do not include the voluntary negotiations and/or job carving between employer and employee. Job negotiation and job carving should be considered strategies appropriate for some customers but should not be required for customers who choose not to disclose their disability.

Recommendation 4: Strengthen employer engagement in the employment process by providing employment service providers with specialized training and incentives to engage employers more frequently in their work with customers.

Most efforts observed during site visits were focused on the customers, not employers. Some specialists spoke of relationships with employers that they used to identify positions, but they did not report much time or other resources being spent on that aspect of the customized employment process. We recommend that employment service providers, including employment staff that focus on job development and placement, receive training focused on engaging and negotiating with employers. Activities to understand the unique needs of employers and to engage employers at a macro level in the employment process should be included in the training. Employer engagement should be established as a priority with resources, including staff time and training dollars, allocated

to strengthening this component of customized employment. However, this aspect of customizing employment opportunities with and for customers should be seen as one of many tools available to employment specialists.

Recommendation 5: Work with other Federal agencies to incorporate customized strategies into policy and practice.

This study showed that the individualized strategies associated with customized employment were particularly helpful for the chronically homeless population. Although ODEP-funded demonstration projects under this program may have had a different understanding of and approach to the implementation of customized employment, it is clear that planning, representation, negotiation, and followup support services that are oriented toward the personal circumstances of a person with complex problems and barriers to employment can be very powerful.

Work is still needed to determine the best circumstances in which to use the various elements of customized employment, how customized employment stacks up against other types of customization, whether certain elements of customized employment are more meaningful for one type of disability compared to another, and what the benefits are of customized employment in relationship to the long-term outcomes it helps to achieve. Nevertheless, the evaluation of the Chronic Homelessness Demonstration Program shows that a customized approach for people who have been chronically homeless achieves results. What is less clear is how to best incorporate customized employment approaches into already existing systems so that these approaches can be implemented and funded for the people who need them the most.

Westat has noted in a previous report (Stewart et al., 2008) that ODEP has some natural partners in the Federal government that are already testing customized approaches to delivery of services for people with mental illness and other disabilities (e.g., Department of Labor-Veterans' and Employment and Training Service, the Social Security Administration, the Substance Abuse and Mental Health Administration, and the U.S. Department of Veterans Affairs). These agencies are developing policies to improve work opportunities, employment services, and ongoing supports and services for people with mental illness and other types of disabilities. We recommend that ODEP work jointly with these agencies to incorporate the notion of individualized employment services (including customized employment) into their policies and funded practices.

Description of Report

This report begins with an introduction (Chapter 1) and is followed by some background and context about the Chronic Homelessness Demonstration Program, the Chronic Homelessness Database, and CHETA (Chapter 2). Chapter 2 also describes some of the unique issues specific to each demonstration project and the barriers faced by the chronically homeless population. In Chapter 3, we describe the ways in which the demonstration projects funded under the Chronic Homelessness Demonstration Program overcame some of the barriers program customers faced, including a description of services drawn from both quantitative and qualitative findings from the Chronic Homelessness site visits, the Chronic Homelessness Database, and technical assistance from CHETA. In Chapter 4, we summarize the outcomes achieved – both systems change outcomes and employment outcomes. In Chapter 5, we present lessons learned. Finally, in Chapter 6, we make recommendations to ODEP. The design and methodology of this evaluation are described in Appendix A. Appendix B contains a description of program customers, including recruitment, enrollment, and characteristics. Additional appendices include interview protocols used at site visits and other background documents. A Glossary is contained in Appendix J.

All Westat reports are based on Westat's impressions of site visits written up at the completion of the visit, detailed summaries of site visits based on notes and tape transcriptions, and clarification of information with followup emails and telephone calls to project sites, as well as analysis of quantitative data from both Quarterly Reports and databases. Anything identified as "findings" in the report is Westat's own description of statements made by key informants at site visits, on telephone interviews, or extracted from another source of data for the evaluation (e.g., Quarterly Reports and databases). The contents of the discussion, lessons learned, policy implications, and recommendations are based on Westat's review of all data and have not been revised to meet ODEP's expectations.

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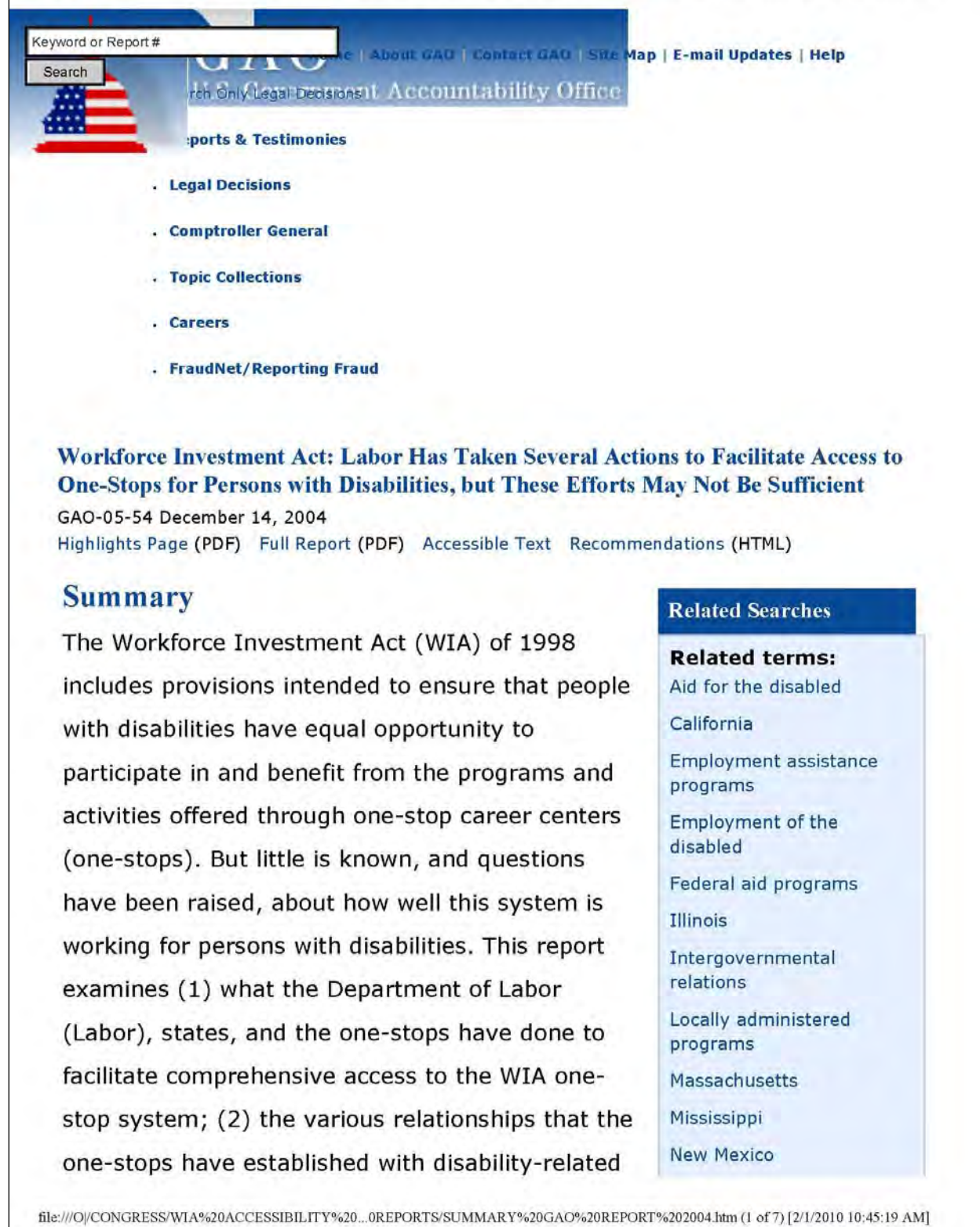
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Appendix L

Summary GAO Report 2004

U.S. GAO - Workforce Investment Act: Labor Has Taken Several Actions to Facilitate Access to One-Stops for Persons with Disabilities, but These Efforts May Not Be Sufficient



The screenshot shows the GAO website interface. At the top, there is a navigation bar with links: Home, About GAO, Contact GAO, Site Map, E-mail Updates, and Help. Below this is a search bar with the text 'Keyword or Report #' and a 'Search' button. To the left of the search bar is a graphic of the American flag. Below the search bar, there is a list of links: Legal Decisions, Comptroller General, Topic Collections, Careers, and FraudNet/Reporting Fraud. The main content area features the title of the report, 'Workforce Investment Act: Labor Has Taken Several Actions to Facilitate Access to One-Stops for Persons with Disabilities, but These Efforts May Not Be Sufficient', followed by the report number 'GAO-05-54' and the date 'December 14, 2004'. Below this, there are links for 'Highlights Page (PDF)', 'Full Report (PDF)', 'Accessible Text', and 'Recommendations (HTML)'. A 'Summary' section begins with the text: 'The Workforce Investment Act (WIA) of 1998 includes provisions intended to ensure that people with disabilities have equal opportunity to participate in and benefit from the programs and activities offered through one-stop career centers (one-stops). But little is known, and questions have been raised, about how well this system is working for persons with disabilities. This report examines (1) what the Department of Labor (Labor), states, and the one-stops have done to facilitate comprehensive access to the WIA one-stop system; (2) the various relationships that the one-stops have established with disability-related'. To the right of the summary, there is a 'Related Searches' section with a list of related terms: Aid for the disabled, California, Employment assistance programs, Employment of the disabled, Federal aid programs, Illinois, Intergovernmental relations, Locally administered programs, Massachusetts, Mississippi, and New Mexico. At the bottom of the page, there is a file path: file:///O:/CONGRESS/WIA%20ACCESSIBILITY%20...0REPORTS/SUMMARY%20GAO%20REPORT%202004.htm (1 of 7) [2/1/2010 10:45:19 AM].

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Workforce Investment Act: Labor Has Taken Several Actions to Facilitate Access to One-Stops for Persons with Disabilities, but These Efforts May Not Be Sufficient

GAO-05-54 December 14, 2004

[Highlights Page \(PDF\)](#) [Full Report \(PDF\)](#) [Accessible Text](#) [Recommendations \(HTML\)](#)

Summary

The Workforce Investment Act (WIA) of 1998 includes provisions intended to ensure that people with disabilities have equal opportunity to participate in and benefit from the programs and activities offered through one-stop career centers (one-stops). But little is known, and questions have been raised, about how well this system is working for persons with disabilities. This report examines (1) what the Department of Labor (Labor), states, and the one-stops have done to facilitate comprehensive access to the WIA one-stop system; (2) the various relationships that the one-stops have established with disability-related

Related Searches

Related terms:

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- Federal aid programs
- Illinois
- Intergovernmental relations
- Locally administered programs
- Massachusetts
- Mississippi
- New Mexico

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U.S. GAO - Workforce Investment Act: Labor Has Taken Several Actions to Ensure Access for Persons with Disabilities, but These Efforts May Not Be Sufficient

agencies to provide services to persons with disabilities; (3) what Labor has done to ensure that the one-stops are meeting the comprehensive access requirements, and the factors that have affected efforts to ensure compliance; and (4) what is known about the employment outcomes of persons with disabilities who use the one-stop system.

Noncompliance
Performance measures
Persons with disabilities
Program evaluation
State-administered programs
Tennessee
Workfare

Labor has awarded grants to facilitate comprehensive access, which is defined in this report as providing people with disabilities the equal opportunity to participate in and benefit from the programs, activities, and/or employment offered by the WIA one-stop system. States and local areas have used these grants for a range of efforts, including increasing staff capacity to provide services to persons with disabilities. During our site visits to 18 local areas and one-stops, we found that officials at most sites were working to implement architectural access requirements. Moreover, local areas and one-stops varied in the degree to which they had addressed other areas of comprehensive access. For example, a few sites had only begun to acquire assistive technology devices; other sites had assistive technology and had trained some or

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U.S. GAO - Workforce Investment Act: Labor Has Taken Several Actions to Ensure Access for Persons with Disabilities, but These Efforts May Not Be Sufficient

all of their staff in how to use it. One-stops have established various relationships to provide services to persons with disabilities. The structure of the one-stops' relationships with state vocational rehabilitation (VR) programs varied, as did the extent to which they have formed relationships with disability-related service providers other than VR. A few local areas and one-stops primarily formed relationships with VR, while others had also formed relationships with community-based disability organizations. Although Labor has taken several actions to ensure comprehensive access to one-stops, these efforts may not be sufficient. Labor's Employment and Training Administration (ETA), Civil Rights Center (CRC), and Office of Disability Employment Policy (ODEP) have issued guidance and assistance on the regulatory requirements. CRC also has conducted on-site reviews at local areas and one-stops in two large metropolitan areas in two states. In both areas, CRC identified instances of noncompliance with these requirements. Reviews in two other states will be completed during fiscal year 2005, but Labor has not developed a long-range plan for how it will carry out its oversight and enforcement responsibilities beyond 2005. To date, CRC's monitoring and

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enforcement efforts account for less than 2 percent of the total number of local areas and one-stops nationwide. The CRC Director stated that she had not yet determined whether CRC would conduct additional on-site reviews. The information that Labor publishes on employment outcomes for people with disabilities is limited for a variety of reasons. Disclosure about disability status is voluntary, thus the information about employment outcomes may be misleading. The collection of information on the employment outcomes of WIA participants is limited to those who are registered for services, and one-stops are not required to register customers who participate in self-service or informational activities. The performance measurement system may result in customers being denied services because local areas may be reluctant to provide WIA-funded services to job seekers who may be less likely to find employment.

Recommendations

Our recommendations from this work are listed below with a Contact for more information. Status will change from "In process" to "Open," "Closed - implemented," or "Closed - not implemented"

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based on our follow up work.

Director:	No director on
Team:	record
Phone:	No team on record
	No phone on record

Recommendations for Executive Action

Recommendation: To improve comprehensive access for persons with disabilities to the one-stop system, Labor should develop and implement a long-term plan for ensuring that the one-stop system complies with the comprehensive access requirements for people with disabilities. Moreover, in this era of constrained resources, Labor should utilize the expertise of CRC, ETA, and ODEP staff in developing such a plan.

Agency Affected: Department of Labor

Status: Closed - implemented

Comments: The Department of Labor (DOL) formed a workgroup to develop and implement a long-term plan for ensuring that one-stop career centers comply with comprehensive access requirements. In addition to involving DOL's Employment and Training Administration (ETA), Office of Disability Employment Policy (ODEP) and Office of the Assistant Secretary of Administration and Management's (OASAM) Civil Rights Center (CRC), as recommended, DOL also involved its Veterans' Employment and Training Services (VETS), the Department of Education's (DOE) Rehabilitative Services Administration (RSA), and the Social Security Administration (SSA). The workgroup acknowledged a need to coordinate many activities to promote quality services for people with disabilities, in addition

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U.S. GAO - Workforce Investment Act: Labor Has Taken Several Actions to Help People with Disabilities, but These Efforts May Not Be Sufficient

to activities to ensure compliance with the recommendation, and agreed to coordinate additional policies and activities. The workgroup developed a framework, finalized and approved by the former ETA Assistant Secretary and shared with ODEP and OASAM, which sets forth the ideal goals that DOL seeks to accomplish to promote excellence in service delivery for people with disabilities in the One-Stop Career Center system. The intent of the framework was to develop a comprehensive interagency work plan that would require a long term commitment and collaboration with federal partners to leverage resources in order to maximize the federal government's ability to help the One-Stop Career Center system serve this population. DOL notes that it may be necessary to prioritize and/or modify these goals, contingent upon available resources. Furthermore, DOL reported that its FY10 budget proposal requested an increase of \$10 million for ODEP, which will support a new initiative that focuses on working with employers, the One-Stop system, and other stakeholders to vigorously promote the hiring, job placement and retention of individuals with disabilities, particularly youth, in integrated employment, apprenticeship and pre-apprenticeship programs, and community service activities. Finally, ETA, ODEP and CRC have undertaken a number of joint activities since the issuance of this report, including presenting jointly at stakeholder conferences, participating in work groups to address mental health issues, and jointly developing and holding a web seminar focused on facilitating connecting people with disabilities with quality employment.

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Appendix M

2005 Four-State Study – National Overview Report



**Law, Health Policy & Disability Center
University of Iowa College of Law**

**University of Colorado at Denver
and Health Sciences Center
Colorado WIN Partners**

**Disability Program Navigator Project
Prospects for Systems Change - 2005**

**2005 Four-State Study:
National Overview Report
December 2006**

**Written by:
Judith Emery, M.A.
Mary Colleen Bryan, M.P.A**

Acknowledgements

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**Disability Program Navigator
Project Evaluation
2005 Four-State Study**

National Overview Report

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**Disability Program Navigator (DPN) Initiative
Prospects for Systems Change
2005 Four-State Study**

**Executive Summary
National Overview Report
November 2006**

.....
Respondents describe One-Stop Centers as having undergone culture change with regard to serving job seekers with disabilities. They describe One-Stop staff with better tools and resources who are more competent and willing to work with people with disabilities.

Between February and July 2005, evaluators interviewed 117 people in four states about their experiences of the implementation phase of the disability program navigator initiative. The respondents included navigators and supervisors, internal One-Stop staff and external staff from other community agencies, and customers with disabilities.

Navigator Impacts on One-Stops and Systems

33% of respondents credit the DPN initiative with making the One-Stop Centers more accessible.

Respondents describe One-Stop Centers as having undergone culture change with regard to serving job seekers with disabilities. They describe One-Stop staff with better tools and resources who are more competent and willing to work with people with disabilities.

45% of respondents speak of improved communication and collaboration within the workforce network, more appropriate referrals, and better knowledge and use of community agencies.

Customer Perceptions of the Navigator Initiative

Customers are well satisfied with the DPN and describe a wide range of support from the position. One of the most frequent recommendations that customers make about improving the DPN implementation pertains to increased marketing and outreach.

Respondents in all states note that more people with disabilities are seeking services through One-Stop Centers as result of the DPN initiative.

Respondents feel that people with disabilities are more aware of services and accommodations through the One-Stop Centers. Respondents also feel that One-Stop Centers are serving more people with multiple and more severe disabilities.

Interview Participants Summarize the Effect of Navigators

The interviews inspire a theoretical construct of a DPN implementation model. Factors which emerge as pivotal for gauging the maturity of a DPN implementation are:

- The degree and distribution of *disability expertise related to employment*,
- The *accessibility* of the One-Stop Career Center,
- The level of *problem solving* in which the DPN is primarily engaged, and
- The *sphere of influence* through which the navigator is engaged to effect change.

DPN initiatives within and among states are at various phases of maturity along a continuum. The value of the disability program navigator to employment of people with disabilities increases as DPN initiatives mature. The model is described in this report. The following comments taken from the interviews describe the experience which fed development of the model.

Prior to the navigator coming to the One-Stop, the counselor at the One-Stop knew about individuals with disabilities, but never how to address their needs. The navigator brings resources and information into the Center to educate staff on how we can address the needs of consumers with all different types of disabilities. (FLA)

.....
Navigators have a handle on how the system works as a whole, and how all the components and resources function interactively. They know which agencies perform which roles, and which agencies or organizations to contact for solutions to different situations. (WI)

Initially, the workforce center staff would run to the navigator for aid whenever they had a customer with disabilities. However; through the education efforts of the navigators, they now feel better equipped and more comfortable to work directly with the customer and only alert the navigator if they feel she needs to be involved. (CO)

Navigators have a handle on how the system works as a whole, and how all the components and resources function interactively. They know which agencies perform which roles, and which agencies or organizations to contact for solutions to different situations. As a result, consumers have one central person who can provide them with the best information for their individual situations and who can make sure they are moving in the right direction. The navigator makes sure no one falls through the cracks. (WI)

Having a navigator in a workforce center is like giving the public a fish. But having a navigator train an entire workforce center about disability issues is like teaching everybody how to fish. (CO)

Customers with disabilities are now viewed by One-Stop staff as regular customers for services, to be served just like any other customer who comes into the One-Stop, in all programs and services, not just core services. The Centers no longer automatically refer customers with disabilities to VR. (FLA)

Prior to this connection, we automatically referred customers with disabilities to VR. Center staff felt useless in our inability to serve these customers. We were sending customers out the door. The connection to the navigator in the workforce center offered an alternative to customers who might otherwise fall through the cracks. (CO)

Through the efforts of the navigator, One-Stop staff now has tools and resources to appropriately serve all customers. Customers with disabilities are now viewed by One-Stop staff as regular customers for services, to be served just like any other customer who comes into the One-Stop, in all programs and services, not just core services. The Centers no longer automatically refer customers with disabilities to VR. (FLA)

The Center underwent a critical review of its whole process and the quality of its customer service. This was an indirect result of the attention that the DPN initiative brought to the accessibility of the Career Center's process and its service of people with disabilities. The Center developed a set of core services that are applied and delivered to all customers, representing a major cultural shift. Staff is more customer-centered as a result of eliminating program barriers in general. For example, procedures for all clients were streamlined in the process of trying to revise and recreate them to better accommodate people with disabilities. The customer service level for all customers of the Career Center improved. (MA)

One-Stop Centers are now more accessible, staff is knowledgeable and able to serve persons with disabilities, and those customers are coming to the Centers to receive services. Now the connections to the business community need to be increased to get this customer group placed into employment. (FLA)

Disability Program Navigator Initiative: Background

The Disability Program Navigator (DPN) Initiative is a two-year demonstration project initiated in 2003. The DPN initiative seeks to increase self-sufficiency of persons with disabilities by providing seamless and comprehensive access to One-Stop Career Centers, facilitating programs and services, and establishing linkages to the employer community.

The DPN Project is jointly funded by the U.S. Department of Labor's Employment and Training Administration (DOL), and by the Social Security Administration's Office of Program Development and Research (SSA). In 2003, the first year of demonstration pilot, the project staged 131 navigators in 17 states at a cost of \$6 million. In the second year, the agencies contributed \$12 million to train existing navigators and fund additional navigators and state programs. By June 2005, 227 DPN Navigators deployed across 17 states. The Law, Health Policy and Disability Center of the University of Iowa College of Law Training subcontracts with the U.S. Department of Labor to conduct technical assistance and evaluation.

The four states selected for qualitative study are Colorado, Florida, Massachusetts, and Wisconsin. These states have 27% of all navigators across the country at the time of the site visits, but are not assumed to have a representative sample of navigators. The sites selected for the interviews exemplify diverse approaches to implementation from different regions of the country. Within each state, evaluators visited at least one rural and one urban site and a statewide DPN administrative office. Evaluators interviewed both internal and external network participants and customers to gain a 360-degree view of each program site.

.....
The four states selected for qualitative study are Colorado, Florida, Massachusetts, and Wisconsin. The sites selected for the interviews exemplify diverse approaches to implementation from different regions of the country.

The site visits took place within the four states between February and July 2005. State-level reports describe the structure of each state's DPN project, the challenges and barriers they encountered, their accomplishments, and considerations for future inquiry. More information about study methodology is described in the Appendix at the end of this report.

National Overview Report

This national overview report summarizes learning from across the four states that participated in the DPN site visits and seeks to generalize learning about the impacts of the navigator program on One-Stop Career Centers, on the systems that interact with the One-Stops within the workforce network, and on the experience of the workforce customer with

The Disability Program Navigator (DPN) initiative was designed for maximum flexibility so that it could “plug and play” into the myriad state/local political and institutional constructs that comprise workforce networks across the country. Its adaptable nature is key to its usefulness.

disabilities. The report does not seek to compare one state’s performance to another’s. Such comparison is not meaningful since states began at different points in time, at different degrees of readiness, with different DPN resources, and not all states are represented in the sample. But evaluators have gleaned from early experience a framework that others may use to assess the maturity and effectiveness of other DPN initiatives.

DPN Implementation Maturity Model

From several respondents in each site visit, evaluators heard “It takes time...” for the disability program navigator model envisioned by federal funding agencies to mature. How much time depends both on the baseline from which the program is initiated, and also on the point which is recognized as full maturity of an effective implementation.

The Disability Program Navigator (DPN) initiative was designed for maximum flexibility so that it could “plug and play” into the myriad state/local political and institutional constructs that comprise workforce networks across the country. Its adaptable nature is key to its usefulness. Nonetheless, the sheer variability among states’ environments can confuse the analyst’s assessment of implementation.

A model which isolates the attributes of implementation along a continuum and describes more fully the implementation cycle can help the reader determine the maturity of any state’s DPN initiative at a given time. It can help states plan the progression for growing their state program. It can help future evaluators assess the effectiveness of various implementation efforts. And it makes explicit the factors and criteria used in this evaluation to draw conclusions about what we saw.

In reviewing the data from the four site visits, four pivotal factors emerge to gauge the maturity of DPN implementation:

- The degree and distribution of *disability expertise related to employment*,
- The *accessibility* of the One-Stop Career Center,
- The level of *problem solving* in which the DPN is primarily engaged, and
- The *sphere of influence* through which the navigator is engaged to effect change.

In assessing the first factor, the evaluator looks at whether *disability expertise* exists, where it exists, and how expertise is refreshed and

In reviewing the data from the four site visits, four pivotal factors emerge to gauge the maturity of DPN implementation:

- The degree and distribution of *disability expertise related to employment*,
- The *accessibility* of the One-Stop Career Center,
- The level of *problem solving* in which the DPN is primarily engaged, and
- The *sphere of influence* through which the navigator is engaged to effect change.

distributed. Where is the locus of expertise relative to disability and employment of people with disability? Does it exist at all? Is most of this expertise held by the state level navigator? Is it concentrated in the person of the local navigator or workforce center disability specialist? Is it distributed across the workforce center staff so that a jobseeker with a disability does not have to be referred to the “disability silo” to get service? Is disability/employment expertise shared among the workforce center and its community partners? Is it packaged for easy transmission so that it can be/is disseminated to a core group of employers?

Another aspect of disability expertise is the mechanism whereby new learning or new developments related to disability employment can be shared among members of the workforce network. A fully distributed network model in which updated information on disability and employment is quickly and easily shared in a targeted way with all affected parties is considered a mature implementation relative to this factor.

Regardless of how great the information and relationships are relative to disability employment within the One-Stop Career Center, people with disabilities can only benefit to the degree they can access those resources. Therefore, *accessibility* is a key factor in determining the maturity of a DPN implementation. In considering this factor, evaluators ask: How accessible is the One-Stop Career Center in terms of physical entry and navigation, physical access to equipment and resources, and adaptive and assistive technology? To what degree do programmatic and attitudinal barriers hamper full access? Is access fully distributed throughout the center, or must the person with disabilities navigate a more narrowly isolated corridor that highlights his disability (i.e., designated accessible workstations) in order to access resources?

A fully mature DPN implementation on this factor is a workforce center that offers a fully accessible building, systems, processes, programs, information, technology, services and opportunities. It permits staff with disabilities to work among currently able-bodied staff to help job seekers. It allows people with disabilities to pursue job seeking and job preparation activities without being funneled into “disability queues”.

The third factor for assessing the maturity of a DPN initiative is the *level of problem-solving* in which a navigator is primarily engaged. In all settings, navigators are asked to help individuals with particularly difficult problems. This is desirable both from a perspective of responsive customer service and from a perspective of the navigator maintaining relevant and current knowledge of her customer base. But when individual case-level problem-solving predominates, the pace of systems change slows. The presence of segregated disability silos persists. And

.....
 DPN functions in this mature phase would evolve to keeping current on emerging technology and research, dispersing this information through the local networks, facilitating network collaboration, and responding to systems breakdowns as needed for ongoing maintenance.

the quality of employment leads for which people with disabilities are prepared or referred declines.

This all puts off the goal of accommodating and integrating job seekers with disabilities in the workforce network. Therefore, it is useful to assess the level of problems with which the navigator is primarily engaged, and to determine whether these activities primarily support individuals, subgroups of disabled job seekers or the larger population of job seekers with disabilities.

A mature DPN implementation with regard to this factor addresses the bulk of problem-solving resources to systems-change that assures full service within the workforce network and full access to high quality employment opportunities to the broader population of people with disabilities.

The fourth factor we consider in assessing the maturity of DPN implementation is the navigator's *sphere of influence*. Many significant barriers to full and meaningful employment of people with disabilities exist outside the One-Stop Career Center. Barriers such as accessible or affordable transportation, housing, and medical care, lack of employment skills or employer attitudes about disability can stop a person from securing and keeping a job. Effective advocacy requires the navigator to collaborate with people in those tangential networks, to effect change on behalf of employment for people with disabilities. A mature DPN implementation has a navigator identifying these tangential obstacles to employment, and partnering with other agencies, the disability community, and the broader community to address them.

The value of a disability program navigator to the workforce system and to the goal of full and meaningful employment for persons with disabilities increases as the implementation moves to more mature phases across these four factors. There was conflicting opinion in the interviews about whether the DPN function needs to be permanent or might become superfluous over time. As implementation matures, the function of addressing the issues of employment for persons with disabilities is fully integrated into the workforce development network, encompassing the One-Stop Centers, community partners, persons with disabilities, and employers. DPN functions in this mature phase would evolve to keeping current on emerging technology and research, dispersing this information through the local networks, facilitating network collaboration, and responding to systems breakdowns as needed for ongoing maintenance. The DPN implementation maturity model is shown in the Table attached to this report.

Navigator Impact on One-Stop Career Centers

+++++
Largely because of these changes, respondents speak of centers that are more accommodating and better equipped, more fully integrating services and training that are accessible to everyone, providing seamless service to persons with disabilities and helping to realize the goal of universal access.

Accessibility: Thirty-three of 101 respondents (or 33%) credit the DPN initiative with making the One-Stop Centers more accessible. These comments speak of expedited removal of physical and programmatic barriers, increased access to information technology, and introduction of adaptive equipment and assistive technology and training. Increased accessibility was most often cited in Massachusetts, where it was noted by every site and subset (and by 16 of 30, or 53% of respondents). These comments were common in Colorado (11 of 24, or 46% of respondents), heard less frequently in Wisconsin (5 of 25, or 20% of respondents), but not much mentioned in Florida (1 of 22, or 5% of respondents). Largely because of these changes, respondents speak of centers that are more accommodating and better equipped, more fully integrating services and training that are accessible to everyone, providing seamless service to persons with disabilities and helping to realize the goal of universal access.

Culture Change: Respondents describe One-Stop Career Centers that are better able to serve people with disabilities. Culture change is described by 43% of Massachusetts respondents (13 of 30), 25% of Colorado respondents (6 of 24), 20% of Florida respondents (6 of 30), and 12% of the responses from Wisconsin (3 of 25). The specific changes they describe are:

- Improved coordination and collaboration, with business staff beginning to function as a team, and One-Stop staff who have more tools, resources and knowledge to work with different subgroups of people with disabilities;
- DPNs who model appropriate expectations and approaches toward working with people with disabilities, resulting in One-Stop staff who are more aware and competent and better able to serve disabled clients directly as result of education/training by DPN.
- Center staff who are beginning to work with people whose disabilities are more limiting and who need more support and accommodation.
- Centers that have more services to offer people with disabilities.

Location: Three of the four states in the survey posit that the DPN's location makes an important difference in the success of the initiative. The states tried locating navigators in One-Stop Centers,

co-locating them with Vocational Rehabilitation in One-Stop Centers, and out stationing them with Centers for Independent Living. In general, the navigator's home agency always feels an increased capability to work with the employment issues of people with disabilities. It is somewhat more difficult for remote or circuit-rider (part-time) navigators to influence the operations of a One-Stop Center, and these constructs may cause further confusion among external users. There is some suggestion that the optimal location of the DPN might shift as the implementation matures – for instance, some respondents argue that stationing the DPN remote from the workforce center and in an agency that was already dedicated to disability issues gave the initiative a jump-start and buy-in at the outset. But sites also describe the importance of locating the DPN in the One-Stop Center as the focus turns to changing One-Stop procedures, policies, and physical and programmatic access to the One-Stop Center.

The DPN brings all the various agency partners together for trainings and meetings. That has everyone sharing and learning about the others' roles, limitations and abilities.

Impact on Systems

.....
 Respondents frame their comments in terms of improved quality of referrals, less turf-protecting behavior and better leveraging of resources, increased awareness and more appropriate referrals between One-Stops and other community agencies, and a greater connectivity in the workforce system, bridging gaps between agencies to coordinate services to clients.

One of the goals of the DPN initiative was to better enable the larger workforce network (including the One-Stop Center as well as other community agencies, programs and services that engage people with disabilities; employers; etc.) to help job seekers with disabilities secure and maintain full and meaningful employment. Evaluators looked at the impact of the DPN implementation on these larger systems.

Forty-six of 101 respondents (45%) speak to improved communication and collaboration within the workforce network. Respondents frame their comments in terms of improved quality of referrals, less turf-protecting behavior and better leveraging of resources, increased awareness and more appropriate referrals between One-Stops and other community agencies, and a greater connectivity in the workforce system, bridging gaps between agencies to coordinate services to clients.

In every state, the referral protocol prior to the DPN initiative was to refer every person with a disability to Vocational Rehabilitation. Each state touted one effect of the DPN as making the One-Stop Center better able to serve these customers on-site, increasing the knowledge and use of

community agencies and resources, and improving the appropriateness of referrals to VR.

The partnerships, both within the Workforce Center and with the community agencies, are as seamless and as natural as they come. In a rural area, all of the different entities understand limited funding and resources and realize the value of working together collaboratively. The relationship between the Workforce Center and Vocational Rehabilitation may be the most natural partnership witnessed during any of our site visits.

Customer Perceptions

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The customers came with employment histories in ballet dancing, retail management, computer work, truck driving, warehouse work, horse training, technical writing, grocery, business management, and agency collections. The jobs they found through the One-Stop Centers were in childcare, clerical fields, customer representatives, messenger/guard, home healthcare, riding instruction, health club marketing, and ski lift operations.

The characteristics of the customers interviewed during the four-state site visits are interesting to note, even though the respondents do not comprise a representative sample and not all customers provide full responses. Sixteen customers are interviewed in the four states; their numbers are concentrated in two. Nine of the responding customers have no previous experience of the One-Stop Center prior to the DPN. Only four of the customers are Ticket Holders, and four have used the services of the benefits counselor. Half of the customers (8 of 16) are not receiving public assistance benefits; seven (44%) are not and have not been SSDI beneficiaries.

The customers came with employment histories in ballet dancing, retail management, computer work, truck driving, warehouse work, horse training, technical writing, grocery, business management, and agency collections. The jobs they found through the One-Stop Centers were in childcare, clerical fields, customer representatives, messenger/guard, home healthcare, riding instruction, health club marketing, and ski lift operations.

Of the eight customers who are working (50% of customers interviewed,) only two report working 40 or more hours per week. No one reports moving off of public assistance due to employment gained through the DPN or the One-Stop Center at the time of the interviews. Two customers report that their most recent employment has accompanying health benefits, and one has other benefits as well. The seven customers who report income each earn less than \$20,000/year. Three customers report using accommodations on their jobs.

Most respondents do not report discrimination in a workplace. Seven (44%) of responding clients report that they have experienced workplace discrimination related to their disabilities, and four (60% of those) have addressed the discrimination with a navigator. The accounts of discrimination include:

- Multiple reports of discrimination in school systems, including difficulty getting school districts to deliver accommodations even when specified in an IEP
- The issue of how, when, and how much information to disclose about one's disability came up repeatedly as a cause of concern. Customers report incidents of being released from work soon after disclosing a disability; not hired when prospective employers look at a disability and assume the customers cannot do the job; and employers limiting job opportunities/assignments due to disability rather than following up with accommodations.
- Employers discriminating against deafness
- An employer removing previous supports and sabotaging success with the job concurrent with company restructuring
- An employer telling an employee with a disability that she would have to seek assistance on her own for accommodations in testing for a key professional licensing exam. Since the customer didn't know how to follow-up, she repeatedly failed the exam and could not sustain employment.
- People with hidden disabilities report supervisors misperceiving the cause of behavior even when forewarned that a disability exists. For instance, one customer who periodically has anxiety attacks reports a supervisor screaming at him that he needed to "grow up".

The navigator takes the time to really address my needs and explain things in a way that is understandable. Through the Center, I am finding program support, direction, and guidance to help me get back into employment.

Since the navigators' role is primarily to work on systems change with One-Stop Center staff, many customers with disabilities may never encounter the DPN directly. But where they have, customers seem very

satisfied with the DPN. In describing the kinds of support the navigator provides, the customers cite:

- Help to access the services of the workforce center (7 responses, or 44%)
- Help with a variety of job preparation and readiness activities, including help to gather old school records of learning disabilities and arrange for updated records and accommodations, help to accommodate disabilities for professional licensure exams, workshops on resume building, linking to job coaches, and arranging informational interviews. (4 responses or 25%)
- Help to access and appropriately use the services of Vocational Rehabilitation (4 responses or 25%)
- Better information or referrals re: rights and benefits, including Ticket to Work, youth services, benefits specialists, public benefits, community services, civil rights protections (5 responses or 31%)
- Specific help to approach employers, including help to complete an online application, recommendations about employers appropriate to a customer's personal interests and experience, help to recognize personal strengths and frame recently acquired disability in a way that employers can see the customer in the job, referral to specific employers that have successfully hired people with the same disability, and specific coaching on in-place accommodations that makes the employment work (3 responses or 19%)
- Introduction to a current job (3 responses or 19%)
- Encouraging the acquisition of independent living skills and job skills through community partner agencies. (1 response or 6%)

One job seeker came to the One-Stop following an acute and disabling illness. He had visited the Center four times previously and worked with several different staff members, but each time the client left feeling that maybe he really wasn't capable of working anymore. He let extended periods of time pass between One-Stop visits and hadn't much incentive or energy to aggressively pursue job preparation or employment. The navigator changed all that. According to the customer, she brought a "can-do" attitude and motivation, and created a sense that the customer has a team working to support his efforts to find work. Now the customer reports that he is coming to the One-Stop regularly, making more aggressive use of the services at the Center and VR, and feeling more hopeful of finding employment again.

When asked to articulate changes to the DPN initiative or the One-Stop Center that would increase meaningful participation in the workforce system, customers offer the following suggestions:

- Locate centers and satellites in more accessible and more centralized public places such as malls, with heightened visibility and signage.
- Better marketing and outreach within the community that the DPN resource and One-Stop services even exist. Suggested targets for outreach include youth with disabilities, other public agencies (Medicaid, social services, SSA), school system, consumers at groups like the National Federation of Blind. In addition to targeted marketing, customers suggest that centers improve Internet search results on One-Stop system, provide more information on state websites about One-Stops, and offer strategically-placed, more complete and more accurate information so that people can learn who to contact and where to obtain basic information, including basic information about the work of the navigators.
- Institute a greeter position at crowded One-Stop Centers (like at Wal-Mart) to meet people as they come in the door and direct them appropriately
- DPNs should communicate directly with consumers to determine their needs in the Career Centers. Navigators should provide more guidance and support around disclosing disability, and offer tests to help customers identify the type of employment their interests and skills are best suited to do.

Outcomes

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Many of the improvements and changes resulting from the DPN initiative take awhile to affect outcomes.

- Have staff available at One-Stop Centers to accommodate the needs of the Deaf.
- Across community programs, incorporate services, resources, and advocacy for customers who are deaf.
- Memorialize the connections made by the DPN and the information that the DPN has made to prevent its loss in the event that the DPN position is eliminated. The network and education provided by the DPN is invaluable.

Many of the improvements and changes resulting from the DPN initiative take awhile to affect outcomes. None of the initial outcomes reports are quantified, and future efforts to measure outcomes should examine hard data in addition to subjective interviews. Further, certain trends are most notable to people in certain positions (i.e., changes in the composition of One-Stop clientele may be most notable to internal respondents or administrators.) Respondents report the following outcomes starting to emerge from the implementation phase of the DPN project.

- Some respondents in every state note that more people with disabilities are seeking services through the One-Stop Career Centers. (15% of 101 respondents)
- The internal and external workforce network respondents express a strong belief that people with disabilities are more aware of services and accommodations available through the One-Stop Centers, are more comfortable and confident in the centers' ability to serve them, and feel freer to ask for what they need. (11% of 101 respondents)
- People with disabilities from various subgroups (i.e., youth in transition, mental health issues, hidden disabilities) and people with multiple and more severe disabilities are accessing the centers in greater numbers. (14% of 101 respondents)

Thirty-five of 101 respondents (35%) volunteer the above comments in response to open-ended questions about the impact of the navigator. In addition, specific states are seeing positive outcomes that are expected to further meaningful employment of persons with disabilities.

- Florida reports that businesses are making better use of both navigators and One-Stop Centers, and a larger employer pool is willing to hire job seekers with disabilities as the employers become more comfortable and knowledgeable about hiring people with disabilities.
- In Massachusetts, employment of a navigator who can sign opened communication channels with the Deaf community and speeds service to persons who are deaf.
- In Wisconsin, the presence of more adaptive equipment and assistive technology makes employment possible. And employment of a navigator with disabilities is felt to provide a higher level of understanding and service to job seekers with disabilities, while modeling ability in a different guise to One-Stop workers.
- The contributions of Colorado's DPN initiative won the program a 2005 Employee Recognition Award from the state Department of Labor & Employment and a nomination for a Governor's State Top Achievement Recognition (STAR) Award.

Intervening Changes

In the nature of a dynamic and responsive implementation environment, many of the observations that percolated through the interviews have since been addressed. The national training contractors with the Law, Health Policy & Disability Center at the University of Iowa College of Law initiated changes and produced tools in the wake of the 2005 site visits that speak to many of the issues raised by the respondents. Training and technical assistance was offered in the form of national trainings, audio conferences, a workforce innovations conference, FAQs, working groups, etc. Topics included:

- improved connections with LWIBs, ways to counter One-Stop staff feeling 'monitored' by the DPN, improved linkages and role clarification between navigators and benefits planners, and relationships between One-Stops & Vocational Rehabilitation;
- case management, one-on-one time with customers with disabilities, and ways that One-Stops can effectively serve deaf people when there is shortage of interpreters;
- interagency collaboration; and
- stronger marketing, outreach, and linkages to employers.

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The Center recognizes that future training and technical assistance will continue to be valuable.

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 But on the whole, across every state and in many different ways, respondents expressed their perception that the Disability Program Navigator Initiative is a successful example of the Federal government providing funds, structure, the tools and training needed to make an important initiative work. As a One-Stop administrator notes: "It made things much easier on our end. In this region, the DPN Initiative has proven its point."

It will be useful for follow-up evaluation to review the degree to which the technical assistance and training that has been delivered on these issues reduces the incidence of comment in these regards.

The Center recognizes that future training and technical assistance will continue to be valuable. Topics that surface from the site visits as promising targets for future training include:

- tips on effectively collaborating with agencies that serve people with developmental disabilities, youth in transition, mentally ill persons, and people with hidden disabilities;
- tips on effectively engaging Medicaid program partners;
- further illuminating the effective resource tools that local navigators have created such as desktop guides, multi-agency maps to community resources, and web pages focused on disability;
- follow-up on the degree to which products and information from the employer working group has been disseminated to local navigators.

More guidance is needed from the US Department of Labor on how much DPNs may work jointly with One-Stop staff to help customers with disabilities find jobs. This issue surfaced strongly during interviews in three of the four states we visited. Guidance that describes how much DPN assistance is too much in terms of working with One-Stop staff at a case level would be useful. For example, determining whether the DPN can do some of the actual job development, or should only be involved with helping from 'behind the scenes' on issues like disclosure, accommodations, transportation, etc.

There is widespread concern with WIA performance measures and testing that creates a disincentive for workers to draw on training services, workshops and learning labs for people with disabilities; similarly, with WIA success criteria (i.e., 40-hour work week) that are often unreasonable and unreachable for workers with significant disabilities. Both Colorado and Florida respondents felt that improved awareness and coordination of services among Federal & State agencies (i.e. SSA, VA, Medicaid, public assistance) could help the local navigators and One-Stop staff be more efficient in leveraging needed resources for job seekers with disabilities.

But on the whole, across every state and in many different ways, respondents expressed their perception that the Disability Program Navigator Initiative is a successful example of the Federal government providing funds, structure, the tools and training needed to make an important initiative work. As a One-Stop administrator notes: "It made things much easier on our end. In this region, the DPN Initiative has proven its point."

Appendix: Study Methodology

The project evaluation plan includes four components: a 14-state evaluation (incorporating a telephone survey), a navigator quarterly report evaluation, a four-state study of effective DPN programs based on face-to-face interviews, and an evaluation of individual outcome data. This summary pertains to the four-state study portion of the overall DPN evaluation.

The Four-State Study seeks to identify best practices and short-term outcomes related to system change and to summarize them in state-level reports. The Four-State Study is designed to address three evaluation questions:

- What short-term system change outcomes associate with the presence of a navigator?
- What practices or activities show promise to improve the employment or economic sustainability for individuals with disabilities?
- How satisfied are persons with disabilities with a navigator intervention strategy?

The four states selected for study are Colorado, Florida, Massachusetts, and Wisconsin. These states represent 27% of all navigators across the country at the time of the site visits, but are not assumed to have a representative sample of navigators. The sites selected for the interviews exemplify diverse approaches to implementation from different regions of the country. Within each state, evaluators visited at least one rural and one urban site and a statewide DPN administrative office. Evaluators interviewed both internal and external participants to gain a 360-degree view of each program site. The study design has a recognized positive bias in terms of site and respondent selection. The objective for evaluating the implementation phase is to identify promising practices and opportunities for future success.

Internal and external participants responded to a standard set of questions:

- In what ways have you interacted with the DPN in the past year?
- What changes in the workforce system do you attribute to the DPN?
- What changes do you hope that the DPN can accomplish in the next year in the workforce system?
- How satisfied are you with the DPN program?
- What changes would you like to see in the program?

Across the four states in the study, evaluators interviewed a total of 101 agency representatives: 42 internal respondents, 55 external respondents and 4 administrators.

A second aspect of the four-state study is face-to-face interviews with One-Stop customers. Evaluators spoke to a total of 16 customers across the four states in the study. Customers were asked questions about:

- Current employment, earnings, and employee benefits as well as past jobs;
- Their introduction to and pre-navigator experience of the One-Stop Career Center;
- The point at which they encountered the navigator;
- The services they received;
- What difference the navigator made to their One-Stop experience or employment;
- Their status on public assistance, SSI/SSDI, medical assistance or Ticket to Work;
- Whether they had experienced discrimination in response to their disabilities; and
- Suggestions for improving access and encouraging more effective and meaningful participation in the workforce system.

The site visits took place within the four states between February and July 2005. The responses within each state are subjected to qualitative data analysis. State reports describe the structure of each state's DPN project, the challenges and barriers they encountered, their accomplishments, findings and considerations for future inquiry. This national overview report looks across the four state reports to identify the factors that influence success of a DPN initiative, to assess the impacts of the pilot on the One-Stop Centers and the larger workforce system. These reports will inform a second round of data collection in the winter of 2006/07.

Table
PHASES OF DPN IMPLEMENTATION MATURITY

Phase	Expertise	Accessibility	Problem-Solving	Sphere of Influence
0	No expertise specific to employment issues of people with disabilities exists within the one-stop center.	One-stop center has physical, programmatic, and attitudinal barriers to access by people with disabilities	One-stop center has no institutional supports for dealing with people with disabilities, who are sent to directly to Vocational Rehabilitation.	One-stop center has few contacts with other community agencies or employers, none directed specifically toward the needs of people with disabilities. Staff may give a customer with disability a list of other resources but little follow-up.
I	One-stop center is developing a reservoir of expertise and information relevant to employment of people with disabilities in the person of a disability program navigator.	One-stop center audits its needs relative to full access by people with disabilities and the physical, programmatic, technology changes and training to address them	DPN focuses on developing solutions for individuals with disabilities.	Navigator intermittently engages resources across the community around disability issues, but with few examples of collaboration around long-term systems change.
II	Navigator provides or facilitates orientation and training of one-stop center staff, periodically exposes them to resources. Training pertains to subjects like disability awareness, etiquette, dispelling myths.	One-stop center begins to address accessibility issues. Assistive technology and adaptive equipment is purchased and housed in the one-stop center. Center staff are trained in use of equipment.	Navigator is mentoring one-stop staff on working with case level disability and employment issues. One-stop staff are becoming familiar w/ types of disabilities, questions to ask to identify people with disabilities, resources for various types of disabilities and employment issues.	Navigator emphasizes outreach to community organizations and to advocacy and disability groups to secure and stabilize employment of people with disabilities. One-stop staff and Navigator work to make these groups aware of the workforce center and to help them see the One-Stop as a resource.
III	Navigator is working to broaden the disability expertise across the one-stop center by training, developing a library of information for use by the one-stop staff, developing fingertip resources (web sites, resource directories, resource maps, desk aids, etc.).	One-stop center is fully physically accessible with adequate signage. Programmatic and attitudinal barriers are being actively addressed. Staff are familiar with the assistive and adaptive technology/equipment. One-stop services are being marketed as being available specifically to customers with disabilities. Policies and procedures are in place to address access, screening, accommodations, etc.	DPN focuses on problem-solving for groups, not individuals. Navigator focuses on system-wide change. DPN activities focus on developing tools rather than case-level consultation. Addresses issues such as developing integrated case plans to braid funding streams or developing tools to address the needs of employers relative to hiring persons with disabilities.	Internal One-stop staff are familiar with community advocacy and disability and service groups, and have established a point of contact with them. Navigator emphasizes outreach to people with disabilities, employers, and community organizations that serve people with disabilities. Multi-agency and multi-disciplinary collaborations seek to secure and stabilize employment of people with disabilities.

Phase	Expertise	Accessibility	Problem-Solving	Sphere of Influence
IV	One-stop center has resources relevant to people with disabilities. These are institutionalized in processes, constantly updated, and accessible by staff across the agency through resource tool kits, screening guidelines, ongoing training, etc	One-stop center is fully accessible. Physical, programmatic and attitudinal barriers have been removed. People with disabilities feel welcome at the one-stop center and confident that their needs will be served by the staff they encounter, not just the navigator. Seamless service delivery to people with disabilities as to other customers.	Navigator focuses on system-wide change. DPN activities focus on groups, not individuals, and on developing tools rather than case-level consultation. Addresses issues such as developing integrated case plans to braid funding streams, developing tools to address needs of employers. Center uses routine periodic mechanisms to survey satisfaction and needs of customers, staff and network partners. Survey results are shared with network participants and input to continuous process improvement.	Internal One-stop staff are familiar with community advocacy and disability and service groups, and have established a point of contact and working relationships with them. Navigator emphasizes outreach to people with disabilities, employers, and community organizations that serve people with disabilities. Multi-agency and multi-disciplinary collaborations seek to secure and stabilize employment of people with disabilities. DPN meets w. collaborative groups external to but including staff from the one-stop center (i.e., business leadership teams, disability advisory committees, regional transportation planning teams, etc.) that convene regularly and independently, actively leading the community to address the dynamic employment needs of people with disabilities.

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Appendix N

Westat Briefing Report

Evaluation of Disability Employment Policy
Demonstration Programs

A Preliminary Synthesis of Findings from
the Independent Evaluation of the ODEP
Demonstration Program

The findings and conclusions in this report are those of the authors
and do not necessarily represent the views of the funding agency.

July 2007

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1. Accomplishments

Accomplishments of ODEP demonstration programs were far-ranging. All programs were able to build the capacity of the workforce development system to better provide services and supports to people with disabilities. Moreover, programs were able to set up efficient and productive systems, many of which had clear potential for sustainability.

1.1 Capacity Building

One of the most important objectives of the evaluation was to provide information to ODEP on the effectiveness of demonstration programs in building the capacity of the workforce development system. ODEP has learned from the evaluation that all demonstration programs have achieved successes in their capacity building efforts. For example,

- Adult demonstration projects improved both physical and programmatic accessibility of their One-Stop Career Centers. As a result, people with disabilities are able to access services through new “disability-friendly” orientations, assistive technology and adaptive equipment, and informed staff. Many One-Stop Career Centers have also hired a Disability Navigator and have used the Workforce Incentive Grants to blend and leverage funding to improve accessibility in their facilities. Previously, people with disabilities were referred elsewhere, away from the One-Stop Center. Today, this no longer happens in many One-Stops.

In Indianapolis (Fiscal Year 2002), a Workforce Incentive Grant (WIG) was a precursor to the Customized Employment (CE) demonstration project and laid the groundwork for accessibility. Under the WIG the One-Stop Career Centers made improvements in accessibility by adding equipment, better signage and more resources to the resource room. Accessibility improvement continued under the CE demonstration grant. There is now a staff member at the One-Stop Career Center who can use American Sign Language to communicate with individuals with hearing impairments and get them started with One-Stop services before a certified sign interpreter becomes available.

In Napa, the CE Fiscal Year 2001 grantee did not receive a Workforce Incentive Grant (WIG) but was able to make physical and programmatic improvements to the One-Stop Career Centers through the work of the Universal Access Group. The Universal Access Group was composed of the Marin Center for Independent Living, Marin Conservation Corps, Integrated Community Services, Public Authority, Buckelew Vocational Services, Guide Dogs for the Blind, the Employment Development Department - Employment and Training Network, a WIA staff member from the One-Stop Career Center and two individuals with disabilities. During the course of the project, this group met quarterly to discuss and address access needs at the One-Stop Career Centers associated with the project and most of the accessibility changes made to the three One-Stop Career Centers (Marin, Napa, Sonoma)

can be attributed to the group. The members of the group assessed the aspects of the One-Stops that created barriers to participation for people with disabilities and tried continually to improve accessibility and usability, particularly of the core services. All three One-Stops were reconfigured for universal access (i.e. access for people with all types of disabilities). The project's prioritization of universal access led to the institution of an annual accessibility audit of the One-Stop Career Centers by the Department of Rehabilitation.

The Napa grantee also moved beyond physical accessibility to address programmatic accessibility. The project created the "Counsel of the Day" position that rotates among all One-Stop Career Center staff. The person assigned to that position was expected to be available to assist people with disabilities access the services available in the One-Stop Career Center. Whereas once the One-Stop Career Center staff would have automatically referred a person with disabilities to the Department of Rehabilitation, One-Stop Career Center staff members now coordinate those services themselves.

- *Demonstration project sites also instituted training programs (including formal training and technical assistance) for their staff, partners and collaborators. One of the greatest deterrents to serving people with disabilities is the lack of knowledge and understanding of One-Stop Career Center staff about how to assist these individuals. Some innovative and exemplary practices, curricula, and competency requirements have been developed through the demonstration programs.*

Several of the CE grantees used outside consultants and other subcontractors to provide staff with targeted training and technical assistance. For example, the Fiscal Year 2001 grantee in Marietta hired Cary-Griffin Associates to provide training. Staff received technical assistance and advice on how to deal with specific cases and individual customers. Technical assistance was provided on specific issues, as well as general project-related issues. Technical assistance was used more as a teaching tool using real case studies. In Detroit (Fiscal Year 2002), the project contracted with the United Cerebral Palsy Foundation (UCP) and Goodwill Industries to deliver training. The grantee made the decision to provide training on customized employment to all One-Stop Career Center staff, including managers. In addition, all One-Stop staff received training in disability awareness and etiquette. Project staff in Detroit also received training on using assistive technology, and some were trained in using American Sign Language. According to interviewees, this training was helpful in conducting outreach to recruit customers with disabilities.

In Helena (CE Fiscal Year 2003), the project arranged multiple trainings for various community agencies. The SSA provided trainings on the development of PASS (Plan for Achieving Self-Support) plans and Ticket-to-Work eligibility and protocols. These trainings were available to project staff, formal and informal partners, and the Disability Navigators in the community. A representative from Medicaid conducted training on preserving Medicaid health benefits when employed. In addition, a private subcontractor from University of Montana, Rural Institute on Disabilities

provided professional development and training to project staff with an emphasis on working with individuals with disabilities in rural areas. In Richmond (Fiscal Year 2002), the grantee arranged to have several trainings provided for various groups in the workforce development system, including employers. VCU's Rehabilitation Research and Training Center (RRTC) provided training on using supported employment methods in rural areas. Employers received training on accommodating disabilities in the workplace, work incentives offered to those who employ and accommodate people with disabilities, accessing local employment networks that include people with disabilities looking for employment, developing a business leadership network, and disability etiquette for employers.

- New HS/HT programs were developed, existing programs were strengthened and recently defunded programs were revived. All states achieved some measure of success in covering a significant portion of the state in establishing new High School/High Tech programs.
- Through the dissemination of information and creation of stronger partnerships among educational, workforce, and youth-serving agencies, youth demonstration projects have greatly heightened the overall awareness of the needs of youth with disabilities in each state. This awareness has led to concrete improvements in services for youth with disabilities.

For example, in Vermont the State Intermediary demonstration project's coordination and collaboration with the Vermont Vocational Rehabilitation Department to support the School to Career Transition Project as a best practices model has led to expansion of transition staffing by Vermont Vocational Rehabilitation. Several demonstration sites have reported that One-Stop Career Centers and WIA service providers are now requiring that contractors serve all youth including youth with disabilities and are creating additional staff positions within their agencies to support and coordinate services for youth with disabilities.

1.2 Implementation

Having developed strategic planning and implementation teams that consist of a variety of service provider partners, demonstration projects awarded in Fiscal Years 2001-2004 developed and implemented processes that achieve greater efficiency through increased collaboration with WIA mandated and non-mandated agencies and organizations, increased coordination, person-centered planning, and customized employment services.

- Services are more efficiently (and effectively) delivered through coordinated efforts and leveraging of resources among partners and collaborators.

In Detroit (CE Fiscal Year 2002), several of the partner agencies had a history of working together successfully on previous grants and other projects. Consequently, the project did not report any difficulties in obtaining

commitment and cooperation from partners. Key partners to the project included the Michigan Department of Career Development Rehabilitation Services (MDCDRS) (Vocational Rehabilitation co-located at the One-Stop Career Centers), Goodwill Industries (to provide services), United Cerebral Palsy Association (provided training), and the Greater Lakes Center for Independent Living. Despite previously working together, collaboration with MDCDRS resulted in an even greater awareness among One-Stop Career Center staff about the services available through MDCDRS. The grantee experienced some initial difficulty trying to collaborate with the Detroit Public Schools (DPS) but once DPS participated in one of the project-sponsored planning forums and saw the number of agencies committed to involvement, the schools became involved. At the time of the site visit, Detroit had a memorandum of understanding (MOU) in place with the DPS. One-Stop Career Center staff were participating in the DPS transition-to-work teams, and DPS had asked the One-Stop Career Center staff to expand its role on the team by assisting youth with additional services. In addition, One-Stop Career Center staff agreed to work with the ODEP High School/High Tech program that was being implemented by DPS in Michigan.

At the Tennessee WorkFORCE site, partners from the local hub sites universally described improved collaboration, blended funding, and referrals resulting from the interactions. This optimistic view was also expressed by state-wide partners with most convinced that the collaboration model could be easily used with other populations.

- Customized employment services are now available at many sites due to improved coordination with workforce development system partners, enhanced One-Stop Center capacity, and new expertise that was needed to broaden their service capabilities.

In Indianapolis (CE Fiscal Year 2002), the project partnered with Goodwill Industries and Easter Seals Crossroads to provide services to customers in the One-Stop Career Centers. Both organizations had staff co-located in the One-Stop Career Center for approximately 2 days a week to provide services to the demonstration program customers. In Napa (CE Fiscal Year 2001), three partner agencies either co-located on a part-time basis or increased their presence if they were already co-locating at the One-Stop Career Center. The three agencies (Buckelew Vocational Programs, Goodwill Industries of Redwood Empire, and Dream Catchers) provided services such as a job club, work experience, work placement, and welfare-to-work services. In Fairfax (CE Fiscal Year 2001), the demonstration project partnered with PRS (formerly known as Psychiatric Rehabilitation Services) to provide customized employment services for some project customers. As a result of the partnership, PRS staff are currently co-located at the One-Stop Career Center where they provide services for program customers as well as PRS customers. Unique to the One-Stop Career Center in Fairfax is that the co-located partners are not asked to pay for the office space used. This arrangement allowed the One-Stop Career Center and the project to partner with organizations and agencies that were not just looking for office space but instead could augment the services already offered through the One-Stop Career Center and promote the use of customized employment.

The WorkFORCE Jobs For All project in Athens, GA experimented with a wide variety of employment strategies, and provided many customers with successful and meaningful work opportunities. In addition to working with employers on job development, the site also offered self employment, micro-enterprises, and "resource ownership" opportunities. Two customers, for example, each began their own small arcade business by purchasing arcade machines and setting them up in places such as Boys and Girls Clubs and car washes. Customers who found employment through "resource ownership" included a woman who brought two computers with her to a pre-school and worked at the school part-time teaching the children how to use the computers. Another program customer bought a Clipper Vac system, a hydraulic table, and several dog cages and has gone to work at a dog grooming salon.

- Many promising practices have been identified at demonstration project sites – in the areas of strategic planning, needs assessment, customized employment and micro-enterprises, self-advocacy approaches for youth with disabilities, use of mentoring, and establishment and maintenance of high program standards.

The Fairfax, VA (CE Fiscal Year 2001) project identified a technique called "mystery shopper" as a best practice. The grantee used this method to obtain direct feedback from people with disabilities by implementing a "mystery shopper" program. The "mystery shopper" program was adapted from the retail industry where companies identify customer service issues by sending a "mystery shopper" into the store to perform the usual shopping functions of any customer. At the Fairfax grantee, five people with disabilities visited One-Stop Career Centers in search of services. After the One-Stop Career Center visits, they provided feedback on their experiences by completing a survey instrument on physical accessibility of the facility, access to services, work areas and equipment, materials and written information, obtaining services, and employment service delivery.

The Utica, NY (Fiscal Year 2003) grantee identified three best practices that emerged from project implementation. The Screening Tool and the Services Referral Guide ("Cheat Sheet") developed for One-Stop Career Centers allowed customers to indicate what services they need (disclosing disability was an option), and the Services Referral Guide provided the staff with information on agencies that can provide each of the services indicated. Also, the electronic referral system appeared to be an effective tool for tracking and coordinating services. Finally, co-location, at least part-time, of service providers in One-Stop Career Center increased the customers' access to services and increased the One-Stop Career Center staff's comfort level in making direct referrals to those services without going through VR.

The Frederick, MD WorkFORCE project cites its Wellness Recovery Action Plan (WRAP) as a promising practice. WRAP provides a comprehensive wellness approach to customers. WRAP is a self-management and recovery

system developed by a group of people who had mental health difficulties and who were struggling to incorporate wellness tools and strategies into their lives. WRAP is designed to: Decrease and prevent intrusive or troubling feelings and behaviors, increase personal empowerment, improve quality of life, and, assist people in achieving their own life goals and dreams.

Another example of innovative thinking was at the Vancouver, WA WorkFORCE site. This project addressed the local shortage of certified nursing assistants (CNAs) to do home health care. While performance of medical tasks, such as, changing dressing or assuring proper administration of medication, is an important part of this work a portion of the time at the home was spent doing simple housekeeping tasks. The Business Services Unit has proposed and is now working at pairing the available CNAs with a partner with a developmental disability. The CNA would perform the required medical tasks while the other person completes the household care tasks under her supervision. This strategy is expected to successfully expand the capacity to make the needed home visits with the number of available CNAs and still provide employment opportunities for people with disabilities.

- A number of demonstration programs in rural areas focused on providing outreach to rural populations.

In the Vancouver, WA WorkFORCE project, outreach to the more rural areas of the Workforce Development Council was one of the goals of this grant. Wahkiakum County, WA is a very rural area, and the mental health center covering that area has a co-op organized for its clients seeking self-employment. The coop runs a store called the Made in Wahkiakum Store for clients to display and sell their goods. The grant provided \$8,000 in funding to promote self-employment ventures for people with disabilities in this rural area.

- Providing hard evidence of program effectiveness was an important ODEP goal achieved by many demonstration projects.

The Vancouver, Washington WorkFORCE site small business consultant was able to present a cost savings analysis of hiring people with disabilities for jobs at her small business. This presentation was a beneficial method for presenting this information, beyond anecdotal reports of successes.

- Mentoring programs that had a strong connection to the schools seemed to do well. Schools are a fertile recruiting ground for both mentees and mentors (both adult and peer), provide safe and accessible locations for mentees and mentors to meet, and can facilitate the incorporation of career exploration activities into for-credit or other school-based curriculum and programs, leading to further program sustainability. Transportation can be a very big problem for youth with disabilities, especially in more rural communities, and school-based mentoring programs remove some of the transportation problems. In general "site-based" mentoring programs vs. community-based mentoring programs seemed to be more stable and successful.

1.3 Sustainability

ODEP's ultimate goal for the adult demonstration programs is systems change in the form of successful and sustainable policies, procedures and practices that are put in place to improve access to high quality services for people with disabilities. For the youth demonstration programs, sustainability will be achieved when WIA Youth Councils and the provider community recognize the complex needs of youth with disabilities and address these needs with changes to planning, policies, procedures, and services.

Sustainability was demonstrated in new and stronger partnerships among service providers, integrated training curricula in state or local school systems, and greater attention to physical and program accessibility at One-Stop Career Centers for people with disability.

- *Findings from the Detroit (CE Fiscal Year 2002) site visit suggest that many elements of the demonstration project will be sustained beyond the life of the grant. Grant monies were not used to fund direct services to customers. Instead, customer services were funded by the partner agencies involved in the project, and grant monies were used for building workforce development capacity to serve people with disabilities. When project staff realized that customized approaches to services could be implemented using existing agency funds (i.e. not using ODEP grant monies), they started providing the services to customers outside of the demonstration project. In addition, the operator of the One-Stop Career Center reported being committed to sustaining the project within the center and was in the process of identifying additional resources from other agencies to help fund the services. Finally, all demonstration program customers were slated to be transferred to Goodwill Industry's WIA Special Populations Customized Employment Project to ensure a seamless continuation of services.*
- *In Juneau (Fiscal Year 2002), one of the project partners, whose staff had attended customized employment training, has started providing customized employment services to people with disabilities. The Department of Public Assistance (DPA) is co-located with the project staff in the job centers. DPA had a 60-month welfare-to-work requirement and saw that customized employment was working and wanted to apply customized employment services to some welfare recipients. The DPA launched a pilot study called Family Centered Services (FCS) using the same customized employment approach as that used in the ODEP-funded CE program. Fifteen individuals received customized employment and 15 (the control group) received usual DPA services. Thus far, the pilot has shown better employment outcomes in the customized employment group (statistically significant). As a result, the project was given \$850,000 in state funding to expand services. In addition, the Department of Vocational Rehabilitation adopted some elements of*

customized employment (e.g., the discovery process) into its manual of services. They have also developed cross-agency training materials for a statewide training program that includes customized employment principles. The training includes consumer choice and the use of strength-based principles when conducting discovery with customers (i.e., focusing on strengths and not limitations). Finally, the Steering Committee for the Juneau project will be sustained. When DPA launched the FCS pilot study, it established its own Steering Committee with many of the same members as the CE project. Eventually, the two projects integrated the Steering Committees into one group (Job Center Service Integration Committee) that will continue beyond the ODEP demonstration program.

- The alignment of goals, a targeted population, and models of service delivery between HS/HT and Departments of Education facilitated sustainability in the HS/HT program.

The Fiscal Year 2004 sites in Oklahoma and Maryland were able to achieve success in meeting goals because they were building on preexisting programs, and the grantees were part of the educational system. In Maryland the grantee was the Department of Rehabilitative Services located in the State Department of Education. In Oklahoma the grantee was the Bethany School system and Director of Special Education for the State Board of Education was responsible for the HS/HT administration and oversight. The Oklahoma key activity was the implementation of a single technology based curriculum implemented in all participating HS/HT schools. The strategy implemented to build toward a statewide HS/HT program in Maryland included a broad focus at the level of the State Department of Education. The design features/guideposts were used as the framework for a intra-agency cooperative transition planning agreement for secondary students with disabilities signed by Division of Rehabilitative Services, Special Education/Early Intervention Services, Career Technology and Adult learning and Student and School Services. A major activity was the provision of a statewide web site for HS/HT that would be accessed locally. Although these sites were initially funded for only one year, they were able to strengthen the HS/HT system in their states.

- The HS/HT manual, which delineated design features/guideposts, proved to be a flexible and effective tool for many different types of HS/HT programs. The design features/guideposts were useful in school-based programs, after school programs, weekend clubs, and in-school curricula. It was also noted that the design features/guideposts worked well for students without disabilities.
- Demonstration projects under the Youth State Intermediary program were required to conduct resource mapping to assess their youth service delivery infrastructure in light of evidence-based operating principles on transition. The resource mapping process helped each project to determine the nature and extent of all available assets and services available at the state and local level for the purpose of assisting youth with disabilities in achieving

educational and employment outcomes. In addition, the process has led to sustainable activities for some sites.

For example the Minnesota site created an interactive web-based resource mapping public site called C3MN. C3MN was launched in year 3 and as of the spring 2007 had 185,543 hits; 111,698 page views; and 4,722 visits (site usage of 4 minutes or longer). The site has received both state and national attention as an innovative tool that connects youth with disabilities to comprehensive services in their own communities. C3MN is being noted as a best practice both nationally and internationally.

State agencies in Minnesot have seen the value in resource mapping as an information dissemination and community planning tool, and have set aside funding to expand the scope in Minnesota. Minnesota's Department of Education, Department of Human Services Pathways to Employment Grant and the Department of Employment and Economic Development have provided resources for the expansion of resource mapping in the existing pilot sites and to three additional regions in the state which will provide resource access to 87% of the state's population.

- Of particular importance is the fact that the ODEP Youth State Intermediary demonstration projects have brought together two major systems – the education system and the One-Stop/WIA system – to better serve youth with disabilities.

On the state level, for example, the Vermont Department of Education was approved for funds for a State Program Improvement Grant for Children with Disabilities. ODEP demonstration project staff members worked with the Department of Education to identify ways in which to use these funds to support transition activities, including those for youth with disabilities. In Colorado, the activities and priorities of the demonstration project state 5-year plan have been blended into the WIA 2-year state plan. On the local level, examples of sustainability through coordination include Boulder, Colorado where the One-Stop Career Center is now working with the local high schools to provide internships for youth with disabilities.

1.4 Program Outcomes

In addition to program outcomes related to systems change, ODEP demonstration programs were able to recruit and serve thousands of adults and youth with disabilities and assist them in obtaining and retaining competitive employment.

- As of September 29, 2006, 6,555 adults with disabilities (from CE, WorkFORCE, and Chronic Homelessness programs) and 6,601 youth with disabilities (from the High School/High Tech, Mentoring and Youth State Intermediary programs) were recruited and served.

Many of these individuals were from hard to serve populations with little job experience, minimal levels of education, and disabilities that required complex and ongoing support services.

- Among the adults served in ODEP demonstration programs, more than 21 percent had less than a high school education, 13 percent had never worked, and 35 percent were SSI recipients. More than 25 percent were receiving mental health services.
- Among the youth with disabilities served in ODEP demonstration programs, more than 40 percent had a learning disability or cognitive impairment. More than 37 percent were covered by IDEA.

Despite barriers to obtaining and retaining employment, all demonstration programs were successful in obtaining positive employment outcomes.

- Among program participants served by ODEP adult demonstration programs, 44.8 percent were placed in some form of employment.
- The average number of hours worked was 27.2 per week.
- The average hourly wage was \$8.70.

Westat also conducted an Outcome Analysis Project (OAP) in which adult demonstration programs were asked to sample those program customers who had obtained competitive employment. Findings from the third round of the OAP (in which 609 program customers were sampled) showed that:

- More than 95 percent earned higher than minimum wage (\$5.15/hour), and 35 percent earned an hourly wage greater than \$8.15/hour.
- The average hourly wage was \$8.95/hour.
- More than 26 percent worked full-time.
- Twenty-five percent of program customers worked at jobs that provided fringe benefits (e.g., health insurance, paid sick time, paid vacation time, pension or retirement plan, or retirement).
- More than 58 percent worked at a job that had career advancement potential.
- Almost 74 percent of those who were followed up had retained their job for 12 or more months.

2. What was learned

2.1 Physical and Program Accessibility

- CE projects, which were held by local Workforce Investment Boards or their representatives, were the most successful in improving accessibility at One-Stop Career Centers.
- Success in improving accessibility at the One-Stop Career Center may be related to the funded project's relationship to the WIA system. That is, youth projects and some WorkFORCE projects outside the WIA system had little influence on the accessibility of their One-Stop Centers, while those projects that were part of the WIA system (e.g., CE projects) were able to have more influence.

2.2 Information, Training, and Technical Assistance

- Despite having developed many exemplary training programs, the quality of training sessions was found to be variable. Some training sessions were solely informational and not associated with any particular competencies, training objectives, or hands-on experience. Others were more rigorous, involved assessments, written competencies, and resulted in certificates of completion. Those with written competencies were the most effective in building and sustaining capacity.
- Because there may be a large turnover in WIA service provider organizations and there is no guarantee that WIA service provider organizations whose staff was trained will have their contract renewed with the One-Stop Career Center, it is necessary to ensure that training programs are repeated and available after the demonstration program has ended. Sites attempted to overcome high turnover by developing training programs that include a wide variety of agency partnerships; posting training modules on the project web site; and making training a requirement of employment.

2.3 Financial Incentives

- Fear of losing benefits was a strong disincentive to full-time employment for people on Social Security benefits. At nearly all sites where customers were being served, it was noted that customers on SSI or SSDI did not want to obtain full-time employment for fear of losing their benefits (especially medical benefits).
- It was noted that providing program participants with the ability to control their own budget to purchase training, services and other resources reinforces independence and is a necessary condition for finding and retaining employment for some customers.

- Projects that provided financial analysis and planning also assisted program customers in making informed decisions about employment.

2.4 Coordination of Services and Resources

- Site visit data suggest that the level of involvement of the local WIB in many ways defined the strength of key project collaborations, which, in turn, appears to have had an impact on the projects' abilities to build the capacity of the workforce development system to provide employment related services to people with disabilities. Thus, projects that were awarded to a WIB but administered by another agency or organization often reported more difficulty developing relationships with One-Stop Career Centers.

2.5 WIA Performance Measures

- Almost universally – at site visits, in Quarterly Reports, or both – projects have reported that the current indicators of performance for workforce investment activities under WIA are a disincentive to serving customers with disabilities.
- Several project sites noted that state and federal policies, such as WIA performance measures, impede the One-Stop Career Center's ability to provide needed services to "harder-to-serve" populations.
- Not only were sites reluctant to enroll program participants in the WIA system, but members of the WIA system (e.g., local WIBs, One-Stop Career Centers) were sometimes reluctant to fully participate in projects for fear that their staff would be required to take on time-consuming responsibilities and be accountable for what they perceived would negatively affect their performance.
- Sites were either not enrolling any program participants in WIA or only enrolling those participants that they gauged would be successful in finding employment.
- As a result of evaluation findings, Westat recommended a thorough review of the logic and usefulness of using the WIA performance measures as an outcome measure for providing employment services to people with disabilities, with discussion and recommendations on alternative approaches. Until the incentive system changes, people with disabilities will continue to be denied the services they need from One-Stops.

2.6 Customized Employment Services

- The key elements of customized employment services are: individualization, representation, ongoing support, and negotiation. Westat encountered numerous examples of project sites implementing the key element of *individualization* (e.g., person-centered planning). There was also evidence

of *representation* and *ongoing support* at project sites. However, there was little evidence that projects had implemented *negotiation*.

- In fact, the employer side of the customized employment services equation appeared to be weaker than the person-centered side, and few adult demonstration projects had a strong employer involvement emphasis. Those that did appeared most successful in job negotiation.
- Most adult demonstration project grantees were not implementing job negotiation services. Although some job negotiation occurred, grantees mostly appeared to be offering job placement services rather than job negotiation services. For example, the San Diego grantee (Fiscal Year 2001) described the goal of its services as placement in a job. Project staff reported engaging the customer in some discovery services, but the product of the discovery did not appear to be used to shape the job search. Instead, customers were placed in job openings that fit their schedule and level of work experience. This apparent lack of negotiation can be attributed to the fact that some program customers need work experience and therefore need to take any placement available. In addition, some program customers are motivated to work in any situation and are willing to take any position that becomes available. On the other hand, the lack of negotiation can also be attributed to difficulty gaining access and buy-in from employers and project staff's limited experience with negotiation and lack of comfort with the process.
- Customized employment appeared to be a set of principles, not a set of services. Therefore, recommended that customized employment be presented as separate components rather than a single unit of services that are dependent upon one another. Westat also recommended that the customized employment approach to employment services be presented so that project staff have the flexibility to "customize" the approach to job seekers, rather than having to work through a linear chain of services.

2.7 Sustainability

- The collaborations formed as a result of the demonstration program were the most sustainable element of the program. Interviewees consistently reported that these relationships will continue, despite the fact that funding was ending.

