

**Improving Services for Persons with Disabilities under the Workforce  
Investment Act and Related Programs:  
Challenges, Opportunities, and a Way Forward**

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## Executive Summary

People with disabilities have been hit especially hard by the Great Recession. Their employment and earnings experiences do not reflect the same degree of recovery from this severe downturn as other underserved groups of jobseekers. Yet, the demands of the labor force will require participation by a greater number of persons with disabilities, and recent data demonstrates a significant increase in the expectations of individuals with disabilities who desire to work. In this report, we briefly review the programs that provide workforce development services to persons with disabilities and discuss the challenges and opportunities to serving this population through the Workforce Investment Act (WIA) and related programs. We also provide findings of a comprehensive search through the Employment and Training Administration (ETA) database of WIA waivers for programs related to people with disabilities.

While it might seem that utilizing waivers under WIA would be one of the first lines of attack, the fact that they have rarely if ever used to encourage or incentivize more and better services for persons with disabilities suggests otherwise. More research is called for to help understand why WIA waivers have been underutilized for this purpose for this population. Based on our research and analysis, major recommended strategies for improving services for persons with disabilities are as follows:

### **1. Improved, More Fully Integrated Data Collection and Reporting**

Data collection and reporting systems for persons with disabilities served by workforce development and various support systems need to be improved considerably. Accurate and timely reporting is the prerequisite to implementing other strategies. Model efforts are in place in states and localities across the country in which programs are linking WIA and American Job Center (AJC) data with information from Ticket-to-Work programs. The legacy of the Disability Program Navigators (DPN) effort has spurred USDOL/ETA's Disability Employment Initiative (DEI) sites to continue these efforts. Building on these experiences would be a productive path to take.

### **2. Employing Performance Adjustments and Incentives**

Performance adjustment is the key to lessening unintended disincentives for service providers that the WIA system generates. Adopting mechanisms for adjusting performance and providing cash and non-cash incentives have the potential to incentivize not only WIA service providers and AJCs, but other organizations across the workforce development system as well to better serve jobseekers with disabilities. These approaches become even more important because funding for training and related services is declining since program administrators tend to view serving individuals with disabilities as more costly. Performance adjustment and incentives

schemes can mitigate the perceived costs and may even induce AJC counselors to ask customers about their disability status, discretely and appropriately. This practice can help individuals with disabilities self-report their status to WIA's reporting and accountability systems.

### **3. Building Collaborative Service Networks**

Federal and state agencies also should embrace a concentrated effort to build a collaborative network of service partners that involves Vocational Rehabilitation (VR) and other systems that serve persons with disabilities in order to more fully leverage the available resources and funding. The Integrated Resource Teams being deployed in DEI serve as one example to follow. Credit for positive outcomes for those with disabilities should also be shared across the various workforce development and service support systems, not just claimed by one or the other.

### **4. Targeted Outreach**

Some states actively seek to determine their customers' disability status. In Maine, for example, Disability Program Navigators work with the state's Medicaid Infrastructure Grant to reach out to people with disabilities at job fairs. In Iowa, contrary to prior practice, AJC counselors are now encouraged to ask customers whether they have disabilities, resulting in considerably higher disability disclosure rates. The LEAD Center and the National Disability Institute (NDI) are currently developing a new approach to assessing and identifying customers with disabilities.

### **5. Improving Accessibility**

Jobseekers with limited basic skills face many more barriers to securing good-paying jobs with benefits. Some strategies for serving job seekers with limited basic skills could apply to the general population of jobseekers with disabilities, including:

- *Universal access*: taking steps to ensure that AJCs are welcoming, friendly, and accessible place in addition to meeting physical accessibility
- *Knowing your customers*: tracking and mapping the numbers of people who identify disabilities.
- *Using distance learning* to provide basic skills training to jobseekers that have mobility or transportation barriers.

### **6. Leveraging System Grants**

State and local workforce boards should be encouraged to utilize performance waivers or Work Incentive Grants (WIG) to develop strong partnerships with VR agencies and disability advocacy groups. Local boards can serve as intermediary organizations. Also, appointing a 'boundary spanner' can better facilitate information flow across agencies and strengthen partnerships among organizations in the collaboration.

## I. Introduction

Disadvantaged and hard-to-serve adults and youth, including persons with disabilities, have long been key target populations for education, training, and rehabilitation program services at the Federal and state level. Moreover, the recent recession, in combination with a demographic shift that will eventually thin the ranks of the workforce, are likely to increase demands on the workforce investment system to improve services provided to these populations. In this paper, we consider the challenges that prospective workers with disabilities face in accessing and receiving services under the Workforce Investment Act (WIA) and other workforce development programs. We also identify opportunities that policymakers and administrators can use to improve their access and the quality of services they receive.

People with disabilities are one of the groups that have been hit hard by the Great Recession. Kaye (2010) found that from 2007 to 2009, the number of people with disabilities as a share of all workers had declined by nine percentage points. For workers with disabilities who have lost their jobs, unemployment presents a special challenge because they often have greater difficulty reconnecting to the labor market. Heidkamp and Mabe (2011) point out that more dislocated workers will tend to have disabilities in the future as they tend to be older workers who have a higher chance of becoming disabled. Few public programs are specifically targeted to serve older workers with disabilities. Older workers benefit from fewer public training programs than younger workers, and they participate less in part because they are reluctant to disclose hearing and vision problems, or literacy and learning disabilities that may interfere with training (O’Leary and Eberts, 2007; Heidkamp, Mabe and DeGraaf, 2012). Moreover, recent demographic trends suggest that predicted shortages in labor supply and skills will require strategies to better incorporate people with disabilities into the workforce, including providing education and training services.

This paper concludes that employment support programs will benefit substantially from using performance standard adjustments and service incentives. These instruments will lessen unintended disincentives for service providers that the WIA system generates. In addition, data collection is often limited to self-reporting of disabilities, making it difficult to clarify the mix of services that should be provided. Similarly, tracking and reporting systems must be modified considerably. Accurate and timely reporting on population trends is the prerequisite to implementing other strategies to improve services. Lastly, there should be a concentrated effort to build a collaborative network of partners that involve not only state VR programs, but other organizations that are tasked with serving individuals with disabilities as well. For example, potential engaged partners should

include employers as well as other major social and human service systems: Medicaid, Social Security, Mental Health, Developmental Disabilities, Housing, and Transportation. Both the current Disability Employment Initiative (DEI) of the U.S. Department of Labor and its predecessor, the Disability Program Navigator (DPN), featured more integrated data collection strategies, linking AJC and Ticket-to-Work data. Such approaches will increase the chances that regions and states can fully leverage the resources and funding available to better serve persons with disabilities and make changes in the systems serving them. Improved services within WIA and related workforce programs should be seen as a first step in changing the perceptions among individuals with disabilities and program administrators alike on how the WIA system can help them achieve their career goals. Further educating disability related programs about the WIA services and operations can also lead to better understanding, enabling them to identify potential disconnects and possible solutions for them. Clearly such education works both ways and would be beneficial to both systems. Although WIA waivers have been utilized by every state to improve public workforce services, a recent review found that none used this policy lever specifically to address the needs of jobseekers with disabilities (see Roe, Berk and Ziegler, 2012). This suggests that there is a real opportunity to consider and make use of the strategies discussed in this paper to serve individuals with disabilities more effectively.

## II. Issue in Brief: Overview of Federal Workforce Development Programs

### WIA Overview

The **Workforce Investment Act** (WIA) was enacted in 1998 and became fully effective nationwide in July 2000. It transformed the workforce development system, replacing similar programs that had operated under the Job Training Partnership Act (JTPA) since 1983 in response to growing concerns that a wide array of employment programs was operating without efficient coordination. Apart from programs operated under WIA, other Federally-funded programs provide workforce development services spanning a dozen or so Federal agencies. These include: work programs serving welfare recipients under the Temporary Assistance for Needy Families (TANF); work programs serving recipients of Supplemental Nutrition Assistance Program (SNAP); Adult Education and Literacy programs (funded under WIA Title II); Vocational Rehabilitation; Trade Adjustment Assistance; the Employment Service, which provides labor exchange services (e.g., job-matching, job referral and labor market information) for all jobseekers under the Wagner-Peyser Act; and the Social Security Administration's Ticket to Work



program, which offers incentives for disability beneficiaries to transition from receipt of Social Security Disability Insurance (SSDI) benefits to long-term employment.<sup>1</sup>

The WIA system of services is based on the America's Job Center (AJC)<sup>2</sup> delivery infrastructure, which is designed to meet the needs of both employers and jobseekers, WIA's "dual customers." AJCs provide jobseekers access to information and services in a single location, as well as online. It also gives employers a single point-of-contact to inform the workforce investment system about the skills that they require of workers and to advertise available jobs and training programs. The structure of WIA and the larger workforce system, which encompasses the longer list of programs referenced above, actually varies considerably from state to state (for example, see: Barnow and King, 2005). Some states (e.g., Utah, Texas) have created more comprehensive state workforce investment agencies that include many of these programs within a single entity and provided for similar structures at the local level, while others feature more traditional fragmented (or 'siloed') approaches with workforce development services spread across numerous departments or agencies at the state and local levels. Accessing services that address more complex needs such as those for persons with disabilities is arguably easier and may be more effective under more comprehensive, integrated systems.

WIA provides all adults age 18 and older access to its core services. The system mandates universal access, but also strives to achieve efficiency by creating a hierarchy of three service tiers – core, intensive, and training – in which more expensive and higher level services are set aside for those who are deemed to need the most (D'Amico and Salzman, 2004). Core services include assistance with job search, placement in employment and information. When customers enter an AJC, computers and printed material on workshops and job postings are made available. Customers generally are expected to use these resources, self-directed services, on their own. Core services can also include moderate staff involvement such as career counseling, workshops, and job clubs. Intensive services involve more customized guidance on developing employment plans, basic training on job readiness such as interviewing and communication skills, and training referrals. Training services include a wide variety of training such as occupational, on-the-job, skill upgrading, entrepreneurial, and job readiness. Participants, except for those receiving customized and on-the-job training for certain hard-to-serve groups, may be required to receive core and intensive services before becoming eligible for training. Additionally, in line with the underlying market-

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<sup>1</sup> More information on these programs can be found in Goodman and Stapleton (2007). In Appendix D, the authors provide a list of programs that were Federally funded in FY 2012 and served working-age people in education, training, and employment readiness.

<sup>2</sup> America's Job Centers is the term now used by the U.S. Department of Labor to refer to what were originally known as One-Stop Career Centers.

oriented philosophy of WIA, training tends to be viewed as the “service-of-last resort,” reserved for individuals who could only find suitable work with improved skills (King, 2006).<sup>3</sup> It is important to note that persons with disabilities are one of the designated hard-to-serve population groups, which can more readily be provided with training services without having to first progress through the sequence of services.<sup>4</sup>

One of the more distinctive and significant differences between WIA as it currently operates and many if not most disability related programs is its underlying philosophy that participants should take responsibility for seeking out and securing services on their own. The concept of universal services, one of WIA’s guiding principles from the early days of program implementation, could hardly be addressed without such an approach. WIA, in many ways, represented a real break from earlier workforce development systems in the nation (e.g., JTPA, CETA) precisely for its deemphasis on staff assistance, whether it was job counseling, case management, selection of training programs and providers, or other things. In fact, given this approach, staff are quite likely to assume that jobseekers entering AJCs prefer to explore the available resources on their own before seeking more information or direct staff assistance. Disability systems have long adhered to very successful case management approaches for its participants. The advent of career or workforce navigators in WIA might be seen as a concerted effort to counter the weaknesses of an overly self-directed system, especially in the case of severely disadvantaged populations and individuals with disabilities.

Another of WIA’s key features is its emphasis on market-based accountability (see King and Barnow, 2011). WIA utilizes individual training accounts (ITA) to empower adult and dislocated workers to choose training programs and providers and to improve system accountability overall. ITAs, which are essentially limited training vouchers, were created to maximize customer choice by inducing competition among local training providers. AJCs provide customers with a list of “eligible training providers,” which are certified by state and local areas, along with information on how effective each provider has been in terms of labor market outcomes with prior cohorts of trainees. WIA requires potential training providers who wish to provide training with WIA funds to report labor market and related performance to the state.

WIA also established seventeen statutory indicators of performance: 15 Adult, Dislocated Worker, Youth program measures and 2 customer satisfaction measures. Figure 1 lists both the statutory and more recent “common” performance measures for

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<sup>3</sup> Strict interpretation of and adherence to the “sequence-of-services” provision was more common in the early years of WIA implementation than at present.

<sup>4</sup> USDOL/ETA staff have pointed out that its push, jointly with the US Department of Education, toward sectoral-based, core competency models may inadvertently create further barriers to good training opportunities for persons with disabilities, a trend that merits further scrutiny.

adults, dislocated workers, and youth.<sup>5</sup> As required since Program Year 2007, all states must continue to collect and report common performance measures for both older (age 19-21 years) and younger youth (age 14-18 years). The state can negotiate with ETA Regional Offices in May through June before the Program Year begins in July. The negotiation process between the ETA and the state, in turn, involves establishing agreed-upon levels of performance for each of the twenty (20) measures.

States elect to submit **WIA waivers** as part of their strategic plans in order to relax regulatory requirements with the goal of meeting localized workforce needs. They may also be submitted separately. In a study of WIA waivers, Roe, Berk and Ziegler found that between 2008 and 2010, DOL approved 750 such waivers but that knowledge was limited as to how they were used and how they actually affected service delivery and performance.

We searched the ETA database in order to determine the extent to which waivers were used specifically for serving jobseekers with disabilities. In addition, we examined select state WIA plans for states that were known to host and operate high-quality workforce development services. We searched the database for the terms ‘people with disabilities,’ ‘jobseekers with disabilities,’ ‘disabilities,’ and ‘disability.’ The search revealed no results for any of these terms. While it is clear that individuals with disabilities can benefit from waivers not directly aimed at addressing barriers specific to their situations and experiences – and from WIA in general – we found no instances of their being addressed through this process. The waiver process is a potential avenue for making use of some of the opportunities presented in this paper and in the workforce community, beginning with more information on waivers’ success in facilitating outcomes for target populations.

For example, the extent to which the process for requesting a waiver varies by locality and state. The majority of states in the most recent study of WIA waivers reported input at the local level as part of the waiver development process, but a wider study of local and state workforce administration would shed light on practices across the country (Roe, Berk and Ziegler, 2012). According to one county workforce administrator in Texas, it is generally a challenge for local workforce boards and partners in their area to be aware of opportunities on the federal level.<sup>6</sup>

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<sup>5</sup> Performance measure definitions and reporting specifications are documented in U.S. Department of Labor Training and Employment Guidance Letter (TEGL) No. 17-05.

<sup>6</sup> Jaehee Choi and Alejandra Cerna Rios. Interview with Lawrence Lyman, Travis County (TX) Health and Human Services Department on May 24, 2013.

People with disabilities generally have weaker labor market attachment than those without disabilities. The Great Recession dimmed the employment prospects further for persons with disabilities. Kaye (2010) analyzes 2008-2010 data from the Current Population Survey (CPS) and shows that the Great Recession has had a disproportionate effect on workers with disabilities: there was a nine-percentage point decrease in their share in the workforce over the period. He also shows that people with disabilities have more volatile rates of job acquisition and job exit than other groups, including racial and ethnic minorities.

Another study by Heidkamp and Mabe (2011) at Rutgers University's National Technical Assistance and Research (NTAR) Leadership Center, based on interviews conducted with Disability Program Navigators (DPNs) and Rapid Response Coordinators around the country, reported that:

- One-Stop Career Centers in several states have seen a rise in the number of customers who are older workers and older workers with disabilities.
- Many customers who had lost jobs after working for a long period in the same field tend to have disabilities, especially learning disabilities, that they are either reluctant to share or do not know they have.<sup>7</sup> A workforce development meeting hosted by the Federal Reserve Board of Atlanta in 2012 also noted that the failure to self-disclose disabilities remains a problem for persons with disabilities because it precludes them from receiving the services and support they need (Board of Governors of the Federal Reserve System, 2012).
- One-Stops also are serving greater numbers of customers who have mental and behavioral health problems.

### **Figure 1. WIA Performance Measures**

#### ***Adults and dislocated workers: statutory and common***

*Entered Employment Rate*  
*Employment Retention Rate at Six Months*  
*Average Earnings Change in Six Months*  
*Employment and Credential Rate*

#### ***Older Youth (age 19-21 years): statutory and common***

*Entered Employment Rate*  
*Employment Retention Rate at Six Months*

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<sup>7</sup> One seasoned navigator pointed out that individuals with impairments who have been employed for long periods of time but find themselves unemployed may not think of their impairments as disabilities at all.

*Average Earnings Change in Six Months  
Credential Rate*

***Youth (14-21) Common Performance Measures***

*Placement in Employment or Education  
Attainment of a Degree or Certificate  
Literacy and Numeracy Gains*

***Younger Youth (age 14-18 years): statutory and common***

*Skill Attainment Rate  
Diploma or Equivalent Attainment  
Retention Rate*

***Youth (14-21) Common Performance Measures***

*Placement in Employment or Education  
Attainment of a Degree or Certificate  
Literacy and Numeracy Gains*

***Customer satisfaction***

*Employer customer satisfaction  
Participant customer satisfaction*

*Sources: Workforce Investment Act Annual Report: General Reporting Instructions and ETA Form 9091, Revised 2010 available at:  
<http://www.doleta.gov/performance/guidance/WIA/WIAAnnualReportSpecification.s.pdf>*

*In TEGL NO. 17-05, a participant is defined as: “an individual who is determined eligible to participate in the program and receives a service funded by the program in either a physical location (One-Stop Career Center or affiliate site) or remotely through electronic technologies.”*

## **Other Federally-funded Workforce Development Programs for Jobseekers with Disabilities**

People with disabilities seeking labor market attachment can try to access and utilize the services under generic workforce development programs. However, several Federally-funded programs are specifically targeted towards people with disabilities. Among these targeted programs are:

The Rehabilitation Services Administration’s **Vocational Rehabilitation** (VR) program allocates money through formula and discretionary grants for states to provide services that assist people with disabilities to seek and maintain employment. VR is a mandated

partner in most state workforce investment systems.<sup>8</sup> The universal design elements of the Title I WIA program offers jobseekers with and without disabilities a range of service options to advance employment goals and valued outcomes. After nearly fourteen years of WIA operations, states and local communities are challenged to find the right balance of services delivered by VR and WIA in an efficient, coordinated way. A study in 2008 by the University of Massachusetts Boston shows that VR-WIA partnerships vary widely by state in the structure and scope of their collaboration due to the discretion in local and state agreements and differences in service delivery as well as performance goals. Researchers identified four collaboration models distinguished primarily by the intensity of VR presence at AJCs as well as the nature of VR involvement in service delivery and quality control improvement at the centers (Timmons et al, 2009). Questions of integrated service delivery and funder of last resort requirements remain an area for further consideration. Another issue noted by navigators is staff turnover, in particular retirements: many knowledgeable VR staff have (or will have soon) reached retirement age. When seasoned staff with long institutional memories retire, it can present further barriers to smart collaboration for service delivery.

The **Ticket-to-Work** program was launched under the Social Security Administration in 2002 as a program that offers new service options for individuals receiving SSI and/or SSDI benefits. The performance-based structure of the program allows SSDI beneficiaries to take their “ticket” to an approved list of service providers, which are reimbursed for their services when certain milestones are met along the path to long-term employment. Since its implementation, program rules have been modified to allow for adjusted performance milestones.<sup>9</sup> In addition, ODEP staff report continuing expansion of AJCs and state workforce investment agencies that are opting to become Employment Networks under the Ticket-to-Work program.

**Disabled Veterans Outreach Program (DVOP):** The DVOP, funded through DOL’s Veterans’ Employment and Training Service (VETS), provides dedicated staff to meet the employment needs of veterans, while giving priority to veterans with disabilities. DVOP staff members can be located at One Stop centers or other local employment service delivery points such as labor or veterans agencies. The program also acts as an intermediary to develop employer contacts and technical assistance to grantees that

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<sup>8</sup> Some states (e.g., Florida, Texas, Utah) had established relatively comprehensive, integrated workforce systems prior to WIA’s 1998 passage and were “grandfathered” from adhering to certain provisions of the law. Among these was designating VR as a voluntary rather than a mandatory partner. Such states may experience reduced commitment to collaboration as a result.

<sup>9</sup> For more information about Ticket-to-Work programs and their effectiveness, see Livermore et al (2012) and the Social Security archive of Ticket-to-Work Evaluation Reports at: [http://www.ssa.gov/disabilityresearch/twe\\_reports.htm](http://www.ssa.gov/disabilityresearch/twe_reports.htm)

offer such services. The formula grant from DVET requires reporting on how many veterans entered case management and their employment and earnings, entry and exits from the program, and outreach efforts to identify and enroll new veterans. There have not been impact evaluation studies conducted to determine the performance of this this program (USGAO, 2012).

In 2002, USDOL/ETA partnered with SSA in the **Disability Program Navigators (DPNs)** contributing \$125 million to SSA's \$12 million, to create a demonstration program to help jobseekers with disabilities better navigate training rehabilitation, benefits, and related services in One-Stop Centers. This initiative was developed as part of the Federal government's ongoing effort to 'braid' resources across different systems and funding streams in order to maximize the use of the taxpayers' dollars and increase service effectiveness. DOL trained DPNs on both SSA work support programs and its own One-Stop programs so that DPNs could bring together the multiple partners and better serve persons with disabilities to help them obtain long-term employment.<sup>10</sup> Those involved with DPN programs have suggested that positive impacts from the initiative continue and that navigators are recognized as a valuable resource to the system. One of the challenges the DPN program faced was an innate tension involved with maintaining a system resource, i.e., navigator staff, who were not directly tied to service provision nor directly tied to measurable program outcomes. Program success might have to be counted in other system measures, not direct program performance indicators.

The DPN initiative concluded at the end of 2009. Building on the achievements of this project, in 2010 USDOL funded the **Disability Employment Initiative (DEI)** in order to identify and diffuse good practices developed from DPN and other projects that enhance the workforce system for people with disabilities. Since September 2010, the Initiative has funded four rounds of grants totaling more than \$81M in 26 states to implement best practices for serving persons with disabilities in workforce development systems.<sup>11</sup>

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<sup>10</sup> For a history of the DPN program, see *Programs that Improve the Lives of People with Disabilities: Disability Program Navigator Initiative Final Report*, July 2003-July 2010.

<sup>11</sup> DEI grant awards were as follows: \$21M in Round 1 (10/29/10) to Alaska, Arkansas, Delaware, Illinois, Kansas, Maine, New Jersey, New York, and Virginia; \$21M in Round 2 (9/27/11) to California, Hawaii, Ohio, South Dakota, Tennessee, Wisconsin, and Washington; \$20.7M in Round 3 (9/20/12) to Florida, Iowa, Indiana, Massachusetts, Minnesota, Louisiana, and Rhode Island; and \$18.6M in Round 4 (9/26/13) to Alabama, Alaska, Connecticut, Idaho, Maine, New York, and Virginia. Award details are available on USDOL's Office of Disability Employment Programs website at [www.dol.gov/odep/topics/grants/htm](http://www.dol.gov/odep/topics/grants/htm). Accessed on January 27, 2014.

In addition, many Federal programs provide non-specific funding for populations with disabilities. For example, TANF work-related programs provide funds to create workforce programs for welfare recipients. Similarly, SNAP work programs use funds to provide employment training, much of which is very short-term. Adult Education and Literacy programs are formula allocated to states based on the number of residents who have not attained a high school diploma. Trade Adjustment Assistance is available to workers who are affected by trade policies. And, the Employment Service provides labor exchange services for all jobseekers under the Wagner-Peyser Act.<sup>12</sup> None of these programs was specifically designed to assist persons with disabilities. Rather, their aim is to provide effective, quality services for all customers.

Moreover, there are many federal employment support programs that specifically target persons with disabilities. A recent GAO report (NO. 12-677) identified 45 programs across 9 departments that supported employment for people with disabilities in FY 2010. The report addresses concerns for potential inefficiencies that arise from operating multiple programs that serve similar populations even if individual eligibility requirements differ across the programs.<sup>13</sup>

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<sup>12</sup> Other programs or provisions could be discussed here as well, including Community Service Employment Programs under Title V of the Older Americans Act of 1965, as well as Medicaid waivers and state plan options that invest in employment supports.

<sup>13</sup> Appendix III and IV of the GAO report lists federal programs that support employment-related services for people with disabilities.



### III. Challenges to Serving Persons with Disabilities

A review of state WIA/Wagner-Peyser plans reveals that few specifically discuss disability employment issues.<sup>14</sup> WIA plans reflect the universal mandate to serve the widest range of possible job seekers and therefore do not enter into discussion of specific populations. Furthermore, there is no evidence that states that incorporate descriptions of ongoing efforts to increase employment and outcomes related to the employment of people with disabilities perform any better in delivering these services than those that do not. Several states include a discussion of improvements they have made in this area, however, including examples of how AJCs arrange partnerships and financing, structure their program operations, and customer flow to better serve persons with disabilities. Incorporating information on activities related to employment for people with disabilities can create a mechanism for accountability, particularly when plans are shared with advocates in the disability community.

#### Accessibility<sup>15</sup>

Persons with limited basic skills have significant education and training needs, yet are the less likely to approach AJCs because they may not feel comfortable speaking to staff about their situation (Heidkamp and Mabe, 2011). Service providers may sometimes feel uncomfortable or may be unaccustomed to working with customers with disabilities. In most workforce systems, the Vocational Rehabilitation agency is considered the primary or presumptive provider of education, training and related services for this population, leaving AJC staff at a disadvantage in experience and reputation for responding to the needs of customers with disabilities. Without customer self-disclosure, AJC counselors may not even be aware of the disability status of customers and fail to direct them to the VR agency or other providers of services and training. Moreover, for years, AJC staff were directed not to ask about jobseeker's disability status for fear of asking inappropriate questions about it. Iowa does well in countering this problem by encouraging their AJC counselors to ask customers whether they would like to discuss any disabilities. One study reports that in some cases, AJC staffs were not trained to use supportive services, such as transportation and assistive equipment or technology (Fesko et al., 2003). In addition, literacy deficiencies and learning disabilities among dislocated workers may preclude some jobseekers from pursuing training, posing significant challenges to serving them.

#### Clarifying Numbers

Published unemployment rates for people with disabilities do not fully reflect their labor market experience, both because the population is difficult to identify and because

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<sup>14</sup> State workforce plans can be accessed at [www.doleta.gov/performance/results/AnnualReports/annual\\_report.cfm](http://www.doleta.gov/performance/results/AnnualReports/annual_report.cfm).

<sup>15</sup> This section draws upon Fesko et al. (2003) and experience and observations by the authors.

policies that discourage employment among people with disabilities tend to mask the true number of job seekers who could be served. In a recent Federal Reserve report on barriers to jobseekers with disabilities, non-profit organizations cited inaccurate unemployment reporting and stigma as key reasons people with disabilities do not seek workforce services (Board of Governors of the Federal Reserve System, 2012).

### Limitations with WIASRD

The disclosure of disability status by jobseekers at AJCs is completely voluntary. This makes it is hard to determine exactly how many people with disabilities are actually participating in WIA programs, as well as how performance measures reflect—and could be adjusted for—their participation. In addition, AJC staffs have indicated that co-enrollments in WIA and related programs are not always reported (Holcomb and Barnow, 2004). This gap is reflected in the Workforce Investment Act Standardized Record Data (WIASRD) system data. In Table II-18 of the *2011 Data Book*, only 6.8 percent of persons with disabilities were reported to be co-enrolled in other partner programs (e.g., VR) in the 4th quarter of 2011. These numbers would be expected to be higher given the large role other partner agencies play in referring customers to AJCs.

In TEGL NO. 23-09, Attachment VI, USDOL/ETA in 2009 produced simple bivariate regression estimates of disability status and WIA performance outcomes using WIASRD data in order to show how a state might adjust its performance goals. A participant is defined as disabled if the customer indicates a disability such as a physical or mental impairment that substantially limits one or more of the person's life activities as defined in the Americans with Disabilities Act of 1990. The analysis is based on WIA exiters using recent information from the national-level WIASRD.

Table 1 below shows the relationship between performance outcomes and disability status. The table indicates that a one percentage-point increase in the share of adults with disabilities served reduced the national entered employment rate by 0.1 percentage points for example. To give another example, a one percentage-point increase in the share of adults with disabilities served decreased the six-month earnings nationally by just \$14.

**Table 1: Adjustment Factors for Persons with Disabilities**

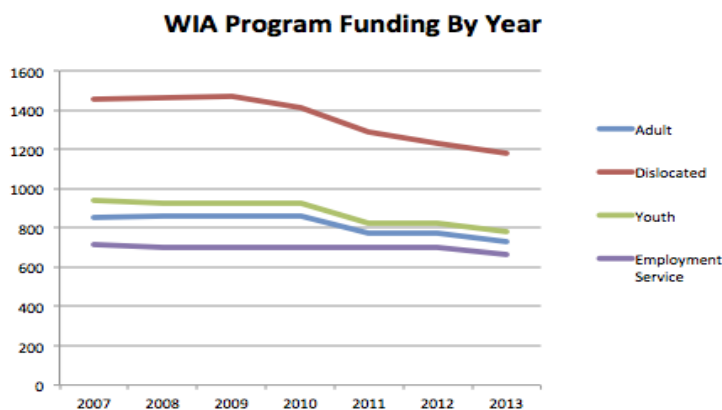
Outcome measures	Effects on Performance of a One Percentage Point Increase in:				
	Adult	Dislocated workers	Older Youth	Younger Youth	Youth Common
<b>Entered Employment Rate</b>	-0.102	-0.053	-0.089	N/A	N/A
<b>Employment Retention Rate</b>	-0.034	-0.027	0	N/A	N/A
<b>Employment and Credential Rate</b>	-0.039	-0.02	-0.012	N/A	N/A
<b>Average Six months Earnings</b>	-14	-15	-13	N/A	N/A
<b>Skill Attainment Rate</b>	N/A	N/A	N/A	0.011	N/A
<b>Diploma or Equivalent Rate</b>	N/A	N/A	N/A	0.031	N/A
<b>Retention Rate</b>	N/A	N/A	N/A	-0.059	N/A
<b>Placement in Employment or Education</b>	N/A	N/A	N/A	N/A	-0.052
<b>Attainment or Degree of Certificate</b>	N/A	N/A	N/A	N/A	0
<b>Literacy and Numeracy Gains</b>	N/A	N/A	N/A	N/	0

Source: Attachment VI, TEGL NO. 23-09.

These numbers are quite small in general, which means that only very large changes in proportion of persons with a disability status will have a substantial effect on their outcomes.<sup>16</sup> Given that persons with disability are in general reluctant to disclose their status, there is good reason to believe that these adjustment factors are not completely accurate and may even underestimate the actual relationships between disability status and performance. Having accurate information upon which to set performance goals is critical in improving services for any customer group, but even more so for persons with disabilities. Performance standards must be appropriately adjusted for this target group.

### Limited and Declining Funding

When funding is scarce, it becomes even more difficult for providers to serve hard-to-serve populations without appropriate performance adjustments. WIA Title I funding has steadily declined since 2001. In 2012, overall funding was 30% lower than in 2001 (National Skills Coalition, 2011). Aside from a major infusion of funds from the American Recovery and Reinvestment Act (ARRA) in 2009-2010, formula funding has been shrinking for years, severely constraining service provisions in all three program areas as the following chart demonstrates:



Source: Federal Register, 2008-2012.

Funding for WIA Adult, Dislocated Worker and Youth programs, as well as the Employment Service, has been steadily declining over the last five years and even longer.<sup>17</sup> Furthermore, the Great Recession and the weak recovery have substantially increased the numbers of jobseekers accessing services through WIA-funded programs.

<sup>16</sup> It is also the case that states serving shares of persons with disabilities close to the national average would not expect large adjustments as a result. This is simply the way regression model adjustments work.

<sup>17</sup> King and Heinrich (2011) show that U.S. spending on workforce and education services in real dollars has declined substantially since the late 1970s and the decline is even more pronounced when measured on a per-capita (labor-force-member) basis.

These two trends have constrained resources available for all potential beneficiaries of WIA programs.

The May 2013 *Employment and Training Reporter* reported that PY 2013 WIA allotments for Adult and Dislocated Worker programs are likely to be much smaller than was previously projected primarily due to the effects of the sequester. For example, the federal government is expected to allocate only \$118.2 million in funding for Adult programs, down by almost 5 percentage points compared to the prior year. Almost every state will see a substantial squeeze in Wagner-Peyser funding this year; moreover, Wagner-Peyser funding levels nationally have been at approximately the same level in nominal terms for the more than three decades, even as the labor market jobseekers are facing has become far more volatile.

At the same time, funding for state VR programs has risen slightly in every program year from 2005-2010, as shown in the following chart:<sup>18</sup>

<b>Year</b>	<b>Actual Budget (billions)</b>
2005	2.64
2006	2.72
2007	2.84
2008	2.87
2009	2.97
2010	3.08

Source: Rehabilitative Services Administration

Funding increases for state VR agencies are modest, while the numbers of people approaching the VR for assistance can be expected to rise substantially given major demographic trends in the workforce (e.g., aging).

### **Service Disincentives**

The WIA system mandates universal access in its AJC model and its hierarchy of three service tiers to achieve efficiency. However, requiring customers to complete multiple courses of basic services in order to receive intensive services or substantial training

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<sup>18</sup> Note that 2010 is the last year for which data are publicly available.

may threaten sustained engagement from persons with disabilities. Holcomb and Barnow (2004) describe this problem as the tension between WIA's philosophy and its practices: the generic AJC model was simply not designed to meet the specialized needs of persons with disabilities to obtain employment. In the early stages of WIA implementation, administrators at VR agencies were concerned that the quality of specialized services for persons with disabilities might be compromised in the AJC system (Fesko et al., 2003).

This innate tension creates structural barriers or disincentives to serving persons with disabilities in the workforce investment system generally. Since the system was not designed specifically to meet the needs of persons with disabilities, program administrators are unintentionally incentivized to admit individuals who are more likely to evidence the most benefit from participation as measured by near-term program outcomes, a phenomenon known as 'creaming'.<sup>19</sup> King (2006) argues that applying a performance standard that does not incorporate performance adjustments based on disability status creates a disincentive to serving this population. Workforce service providers in the Austin area also noted that in serving the most difficult to employ customers, performance adjustments provided an important lever to clarify the impact of the organization's work in producing significant outcomes among populations overcoming multiple barriers to employment.<sup>20</sup>

### **Lack of partnership among systems**

WIA was designed to accommodate every individual seeking employment but not specifically to provide customized services to persons with disabilities. To optimize WIA services for this group, it is necessary to leverage *all* of the resources potentially available, especially from organizations that have traditionally served people with disabilities, such as the VR and other systems. However, previous research documents concerns about the difficulty of building cooperative relationships between these organizations and the AJC system: Holcomb and Barnow (2004) report that establishing the role of the VR within the AJC system has posed a formidable challenge. They point out several structural differences, including differences in cultures, values, funding streams, performance requirements, and the underlying philosophies between AJCs and VR agencies. The quality of these relationships may have changed in recent years, as state WIA plans have required the inclusion of the VR as a planning partner. These

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<sup>19</sup> Which is not the same as saying that these would be the participants most likely to experience the greatest *impacts* from services. Unfortunately, program administrators operate in a gross outcomes, rather than a net impacts, world: they can only observe what happens after participants are served, not the added value resulting from the services over and above what would have happened in their absence.

<sup>20</sup> Interview conducted with Tamara Atkinson, Deputy Director, Workforce Solutions-Capital Area, by Alejandra Cerna Rios and Jaehee Choi on May 29, 2013.

relationships should be reexamined, particularly in light of state-by-state differences in policy. However, beyond organizational differences, overarching efforts to induce all organizations with a charge to serve persons with disabilities to efficiently braid all the resources available have been lacking. From each individual organization's point of view, collaboration across agencies is expensive and risky yet may provide an opportunity to overcome the limitations described here. In testimony on WIA reauthorization to the U.S. Department of Labor, Maria Heidkamp of the John J. Heldrich Center for Workforce Development at Rutgers University, recommended strengthened or required interagency collaboration, specifically with accountability measures and incentives that reward creative collaboration in serving persons with disabilities (Heidkamp, 2009). Mechanisms to incentivize AJCs to work together with other agencies on a substantial level must be crafted to lessen the costs.

In many cases, jobseekers with disabilities at their entry at an AJC are referred to VR agencies rather than being served directly with the WIA funding. In a 2002 survey, staffs at organizations that serve persons with disabilities were asked whether the centers refer most jobseekers with disabilities to VR agencies rather than serving them with WIA funding. The results indicated that 80% of the respondents agreed that this practice occurs (Holcomb and Barnow 2004). In recent interviews with Austin area workforce administrators, we were told that this type of referral remains standard practice.<sup>21</sup> One local administrator pointed out that having to take additional steps in order to enroll in the workforce system can be particularly discouraging for persons with disabilities. For example, because this group is more likely to have difficulty using the public transportation system, the extra steps may pose a barrier to enrolling in or engaging effectively with WIA.

#### **IV. Opportunities for Serving Persons with Disabilities**

One of the key tenets of WIA is improved accountability. In general, accountability is viewed as beneficial for all stakeholders, yet performance measures and standards can create unintended disincentives for administrators and service providers. In seeking to meet common or negotiated benchmarks, they may focus less on serving persons with disabilities if they are perceived as having less potential to secure employment for them and increase their earnings or view them as in need of longer training time or more resources. Performance adjustments can take into account characteristics that adversely affect outcomes and clarify the gains made in serving more difficult-to-serve populations. Incorporating disability status into the performance measures can mitigate

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<sup>21</sup> Interview conducted with the staff of Workforce Solutions-Capital Area (Austin, TX) by Alejandra Cerna Rios and Jaehee Choi on May 7, 2013.

the incentive to focus services on more traditionally successful populations. Ultimately, performance adjustments are instrumental in enhancing WIA's ability to serve a wider set of customers.

King (2006) recommended adopting mechanisms for adjusting performance and providing incentives to improve service to hard-to-serve populations including individuals with disabilities, with variations as necessary and appropriate depending on the nature of the program and its associated structures, traditions, and participants or students. Among the mechanisms he recommended are the following:

- **Statistical Modeling/Adjustments.** Statistical models can account for key performance variations; for example, the Value-added Performance Improvement System (VAPIS), which was developed by researchers at the Upjohn Institute and implemented in Michigan for several years (see Bartik et al., 2009). In addition, ETA in 2010 announced a pilot project to test a regression-based method for state and local performance target-setting in the workforce system (TEN NO. 49-09). Nine states participated in the project in Program Year 2010. These regression-based approaches allow state and/or local boards to make adjustments for the factors that are outside their control and to be more responsive by making their own forecasts since there are usually lags in data collection.

These performance adjustment models can be utilized separately or in combination with various performance strategies, such as up-front rewards models, back-end models, and non-cash rewards, including:

- **Cash rewards.** In the front-end model, bonus points can be awarded in the formula allocation process if programs serve a higher share of hard-to-serve populations, including persons with disabilities.<sup>22</sup> Moreover, serving individuals with multiple barriers can carry added points. Special demonstration project grants using Governor's discretionary funds of various types are a variation of this approach. The back-end incentive approach awards cash bonuses to programs that have exceeded expectations in serving target hard-to-serve populations.
- **Non-cash rewards.** As the name suggests, non-cash efforts offer rewards such as widespread recognition or added program discretion to programs meeting

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<sup>22</sup> Such approaches were widely used under the JTPA program that preceded WIA implementation in July 2000. It is unclear whether these approaches were continued under WIA. A research project to obtain information on the practice would be useful.



established service or performance criteria. Implementation of this approach is relatively easier and possibly less controversial than some of the other methods.<sup>23</sup>

- **Data collection and reporting.** The market-based system of accountability that WIA emphasizes cannot be sustained without timely, consistent, accurate, and user-friendly information. Approaches to measuring and adjusting performance, as well as creating incentives for encouraging enhanced services for persons with disabilities in these programs should strive for complete transparency. In addition, data collection is often limited to self-reporting of disabilities, which are often invisible, but people with disabilities refrain from reporting their disability status due to the stigma associated with it. One way to tackle this issue is to outreach to the customers through multiple channels. WorkSource Florida provides a good example. With data<sup>24</sup> acquired from another organization that administers TTW, WorkSource Florida identifies eligible TTW recipients among AJC participants and informs them via mail about a special menu of services designed to serve people with disabilities. Additionally, WorkSource Florida partners with community organizations and utilizes social media to actively market its programs and recruit potential TTW participants.

### Foster partnership across agencies

Hill and Lynn (2005) discuss why agencies collaborate despite the fact that it is typically costly to them to do so. They view collaboration as a “joint production strategy” of human capital and argue that collaboration has to be governed because modifying an individual organization’s production process may be more costly—from society’s point of view. Therefore, a collective action problem will inevitably arise.

By encouraging state and local areas to utilize performance waivers or Work Incentive Grants (WIGs), the AJC, VR agency, major social and human service systems, and disability advocacy groups can design collaborative services for persons with disabilities and develop initiatives from the bottom up. One feasible scenario might be that a local Workforce Investment Board (WIB)<sup>25</sup> or a disability-serving nonprofit<sup>26</sup> takes the role of

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<sup>23</sup> It is also unknown the extent to which states and local WIBs are using non-cash rewards as part of their accountability systems. Research on the topic would be helpful.

<sup>24</sup> To protect privacy of the potential customers, WorkSource Florida destroys the disk provided by Maximus once the mails are sent out.

<sup>25</sup> The WorkPlace, Inc., the regional WIB for Bridgeport, CT is a good example of a WIB functioning as a workforce intermediary (WI). One of the board’s Job Centers was among the first in the nation to become a Ticket-to-Work site in 2003. Also, the board started financing its own disability navigator in 2006 after a DOL grant expired.

an intermediary and overseer that facilitates the partnering agencies in setting shared performance goals and establishing reinforcing service strategies. For example, a navigator based at Workforce Solutions-Lower Rio Grande Workforce Board convened a meeting with community organizations and agencies to encourage an area-wide response to a grant opportunity, recognizing that the board was going to be the primary provider of services. The board's executive director supported the effort as part of the board's role in the community. VR had been the lead service provider, but had never had such a grant before. The navigator continued as the area-wide convener/coordinator for the collaborative, which included VR, two postsecondary institutions, other service providers, and the board's own individual and business services.<sup>27</sup> Inter-organizational communications and reinforcement activities are critical for this approach to be effective.

The Navigator was designed to serve as a facilitator of inter-/intra-agency partnership. In addition, the concept of Integrated Resource Team (IRT) was introduced to provide an added level of service in coordination and communication. An IRT may consist of members from the AJC, VR agency, major social and human service systems, and disability advocacy groups. Also, it prepares AJC career counselors to focus on the customer's capacities rather than on his/her challenges to employment. The overall goal is to provide a more customized effort and concentrate on the specific needs of individual jobseekers.

According to a DEI webinar, Oregon's workforce investment system was able to provide a targeted service: Jobseekers who participated in navigator-sponsored activities including IRTs were enrolled in WIA intensive services at a substantially higher rate than those who did not participate in such programs. This is in contrast with the widespread practice of referring individuals with disabilities at their entry to VR agencies (Holcomb and Barnow 2004).

Based on their longitudinal case studies on collaborative relationships between VR and Job Centers, Timmons et al. (2009) also recommend that policy makers provide incentives for collaborative partnership at the local and state levels. In addition, for such partnerships to be effective, the authors argue that regulations that limit collaboration have to be identified and changed. For example, different eligibility requirements across systems naturally inhibit collaborative efforts. Unifying these requirements would also involve operating a joint funding stream obligated to serving persons with disabilities.

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<sup>26</sup> Ryan (2004) notes that nonprofits relatively free from limitations of large bureaucracies have comparative advantage in bringing about innovation over government agencies. However he also points out that outsourcing service is not necessarily easier than providing direct service.

<sup>27</sup> This example was provided by Janice Ferguson of the Texas Workforce Commission in a November 7, 2013 email to the authors.

The partnership should consider establishing shared definitions such as for participants and outcomes as well as specific performance measures. Each Federal or state workforce development program typically has its own definitions of participants and key outcomes, many of which are embedded in legislation. For example, King (2006) points out that the concept of “exit” has various meanings across workforce programs. This gets even more complicated for programs in which participants tend to be enrolled intermittently. The partnership could consider piloting a cohort-based measurement approach alongside current exiter-based ones, complete with performance adjustments and incentives.

### Potential Alternative Sources of Financing

In a volume edited by Prince (2007), contributors discuss several alternative strategies for financing workforce intermediary services. WIA is 100 percent Federally-funded, but local boards may be able to utilize some of these schemes to gain access to added resources needed to serve persons with disabilities especially when partnering with other workforce programs or systems. Alternative financing options may include:

- *Bond Financing*: At least three states—Iowa, Kansas and Missouri—have attempted to address the workforce funding shortage (specifically for training services) through the sale of general obligation bonds. The proceeds from the bond sales are used to finance training programs and, in some cases, their administrative costs. Bonds are retired through diversion of state payroll taxes associated with the newly trained workers. Alternatively, in those states without a state income tax, diversion of a share of local sales tax or of Unemployment Insurance can be utilized to retire training bonds. Once the bonds are retired, funds are returned to the state general fund.
- *Tax Increment Financing (TIF)*: This tool offers to capture anticipated gains from increases in property tax payments that development projects generate. Chicago is one of the municipalities that support TIF. Since 1977, the City of Chicago has used what they call TIFWorks and claims that they have created 6,000 jobs and spends about \$3.26 million per year on training generated by TIF financing.
- *SNAP Employment and Training*: Supplemental Nutrition Assistance Program: Employment and Training (SNAP E&T) activities and support services provide training services for eligible individuals who are not TANF recipients. A key provision for the program allows the U.S. Department of Agriculture to provide 50 percent matching funds for every non-Federal state and local dollar spent on training participants, without apparent limits. States must provide for its use in their state SNAP plans. This provision has been used very little to date.

- *Cost Sharing Strategies:* Jobseekers with disabilities represent a diversity of personal, education, and employment experiences; serving their needs require more resources and services than a single system can provide. Braiding resources refers to the practice of pooling resources from a variety of partner organizations to address large social issues that defy a single-sector approach. *Braiding* is a strategy that “taps into existing categorical funding streams and uses them to support unified initiatives in as flexible and integrated a manner as possible (National Collaborative on Workforce and Disability, 2006).” Several administrative conditions facilitate an effective collaboration with braided funding:
  - well-developed contracts and memoranda of understanding (MOU);
  - an intermediary organization that can identify areas of affinity and bring in employers; and
  - data collection and tracking that assures service provision and payments are maintained.

The Project SEARCH model, which has been replicated in over 100 cities, provides a good example of a collaboration using braided funding.

In addition, WorkSource Florida has generated \$150,000-\$200,000 to date by outreaching to TTW holders. In addition, its AJC also uses other sources of funding to serve its TTW participants, including TANF, SNAP, and WIA funds.<sup>28</sup> Revenues generated through TTW have not yet allowed making reinvestment beyond staff support, but the organization believes these revenues will increase as TTW participation continues to rise. One advantage of braiding resources through TTW and generating its own revenue stream is having an increased capacity to sustain services even when Federal WIA and other state funding decreases. Having uninterrupted services for people with disabilities is particularly important in times of an economic downturn since the demand for WIA services rises sharply. WorkSource Florida indicated that TTW and the Navigator Program were critical in building better program infrastructures.

### **State Leader Innovation Institute**

In the *State Leader Innovation Institute*, a demonstration project run by Rutgers University’s NTAR Leadership Center, high-level, cross-agency teams bridged workforce, disability and economic development agencies in order to better serve people with disabilities. The project found that interagency relationships and collaborations were critical to meeting the needs of people with disabilities. They

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<sup>28</sup> Telephone interview with Bryan Stone of WorkSource Florida conducted by Jaehee Choi on October 30, 2013.

recommended that Federal programs be aligned in order to promote employment among people with disabilities “along with clear direction and incentives within federal programs to eliminate barriers experienced by people with disabilities.” And create a policy environment that “comprehensively expects and provides opportunities for full inclusion in the labor market, addressing the constraints of separate funding streams and fragmented programs” (Heidkamp, 2009).

In its Final Report, the Institute shared lessons learned from its three partner states: Connecticut, Maryland, and Minnesota. They cited the following as critical components of the collaboration:

- *Use of MOUs* (Memoranda of Understanding) to initiate more intense coordination between vocational rehab, economic development and workforce, including clarifying roles and funding responsibilities for their initiatives. Let to integrating questions about hiring of people with disabilities to employers and collecting data into their databases. The use of MOUs also led to the creation of a website for employers on hiring people with disabilities.
- *Overcoming communication barriers* to distinct agencies, saying: “For each of the states, one challenge was simply getting the workforce development, vocational rehabilitation, economic development, human services, education and other partners to understand each other.”

As mentioned earlier, the Integrated Resources Team (IRT) is a bottom-up practice to bring together the expertise and resources that exist across systems. The function of IRT is to better coordination and communication among distinct agencies. While USDOL/ETA does not appear to expect every Navigator to build the Integrated Resource Team process, promoting the IRT model to local WIBs may encourage multiple agencies and community partners to engage in the collaborative activities. In addition, another top-down approach would be for the managers of some of the agencies involved to meet in order to create more of a shared accountability system at the state and/or local level.

## **V. Recommended Strategies: A Way Forward**

Based on the challenges and opportunities identified in this report, we outline a series of recommendations for enhancing workforce development and related services for persons with disabilities below. While it might seem that utilizing waivers under WIA would be one of the first lines of attack, the fact that they have rarely if ever used to encourage or incentivize more and better services for persons with disabilities suggests otherwise (Rowe, Berk and Ziegler, 2012). Explanations for underutilizing WIA waivers for this purpose for this population are not apparent. More research on this issue is called for. Based on our research and analysis, major recommended strategies for improving services for persons with disabilities are as follows:

### **1. Improved, More Fully Integrated Data Collection and Reporting**

Data collection and reporting systems for persons with disabilities served by workforce development and various support systems need to be improved considerably. Accurate and timely reporting is the prerequisite to implementing other strategies. As described in the report, model efforts are in place in states and localities across the country in which programs are linking WIA and AJC data with information from Ticket-to-Work programs. The legacy of DPN programs has spurred USDOL/ETA's Disability Employment Initiative sites to continue these efforts. Building on these experiences would be a productive path to take.

### **2. Employing Performance Adjustments and Incentives**

Next, performance adjustment is the key to lessening unintended disincentives for service providers that the WIA system generates. Adopting mechanisms for adjusting performance and providing cash and non-cash incentives have the potential to incentivize not only WIA service providers and AJCs, but other organizations across the workforce development system as well to better serve jobseekers with disabilities. These approaches become even more important because funding for training and related services is declining since program administrators tend to view serving individuals with disabilities as more costly. Performance adjustment and incentives schemes can mitigate the perceived costs and may even induce AJC counselors to ask customers about their disability status, discretely and appropriately. This practice can help individuals with disabilities self-report their status to WIA's reporting and accountability systems.

### **3. Building Collaborative Service Networks**

Federal and state agencies should embrace a concentrated effort to build a collaborative network of service partners that involves VR and other systems that serve persons with disabilities in order to more fully leverage the available resources and funding. The Integrated Resource Teams being deployed in DEI serve as one example to follow along these lines (Disability Employment Initiative, 2013). Credit for positive

outcomes for those with disabilities should also be shared across the various workforce development and service support systems, not just claimed by one or the other. Improved services will eventually change the perceptions of individuals with disabilities by the WIA system and encourage its programs to serve more people with disabilities.

Additional strategies and best practices from the field include the following:

#### **4. Targeted Outreach**

Some states actively seek to determine their customers' disability status. Heidkamp and Mabe (2011) report that in Maine, for example, Disability Program Navigators work with the state's Medicaid Infrastructure Grant to reach out to people with disabilities at job fairs. Also, in Iowa, contrary to prior practice, AJC counselors are now encouraged to ask customers whether they have disabilities. This has resulted in a higher disclosure rate from 2% to 11%. The LEAD Center and the National Disability Institute (NDI) are currently developing a new approach to assessing and identifying customers with disabilities (Morris and Krepcio, 2013).

#### **5. Improving Accessibility**

Jobseekers with limited basic skills face many more barriers to securing good-paying jobs with benefits. Some strategies for serving job seekers with limited basic skills could apply to the general population of jobseekers with disabilities (Heldrich Center, 2004), including:

- *Universal access*: taking steps to ensure that AJCs are welcoming, friendly, and accessible place in addition to meeting physical accessibility
- *Knowing your customers*: tracking and mapping the numbers of people who identify disabilities.
- *Using distance learning* to provide basic skills training to jobseekers that have mobility or transportation barriers.

#### **6. Leveraging System Grants**

State and local workforce boards should be encouraged to utilize performance waivers or Work Incentive Grants (WIG) to develop strong partnerships with VR agencies and disability advocacy groups. Local boards can serve as intermediary organizations. Also, appointing a 'boundary spanner' can better facilitate the information flow across agencies and strengthen partnerships among organizations in the collaboration.

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