



**LEAD CENTER**

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## **LEAD Center Reviews Unified and Combined WIOA State Plans**

LEAD Center staff reviewed state plans for Iowa, California, Florida, Georgia, Illinois, North Carolina, Ohio, Texas, Washington, and Tennessee, utilizing a guide we developed that identifies key areas for plan design and implementation to advance effective and meaningful participation of youth and adults with disabilities in the workforce development system. LEAD Center staff analyzed both Title I and Title IV requirements with particular attention to new roles and responsibilities based on changes in the Workforce Innovation Opportunity Act, [www.doleta.gov/wioa/](http://www.doleta.gov/wioa/).

Across all ten plans, there is an expressed commitment to a) serve people across the spectrum of disabilities, including individuals with significant disabilities; b) cross-system collaboration where customers of the system are served by staff organized by function rather than program or funding source; c) program and physical accessibility with the new requirement of monitoring and review of American Job Centers annually based on state criteria defined by Section 188 of WIOA to promote universal access and equal opportunity; and d) Employment First and expanded VR partnerships with students with disabilities while they are still in high school with pre-employment transition services, a new WIOA requirement.

The following chart identifies examples of state strategies that recognize the benefit of a) Employment First State Leadership Mentor Program (EFSLMP); b) training and technical assistance from the LEAD Center; c) the Disability Employment Initiative (DEI) and Disability Resource Coordinators (DRC); and d) the Section 188 Disability Reference Guide.

## Iowa

### Employment First State Leadership Mentor Program (EFSLMP)

“IVRS is making changes in the alignment and collaboration of service rates through **participating the past four years in an Employment First Grant through the Office of Disability and Employment Policy**” (p. 202).

“Iowa VR has been the lead agency in the Employment First initiative and worked with 30-plus community providers in receiving direct subject matter expertise with community integrated employment strategies” (p. 202).

“**The adoption of EF has involved changes in both policy and service provision in Iowa.** Specific focus was on changing the employment culture of Iowa with an emphasis on community integrated employment” (p. 255).

“The following table represents some of the results of the **Employment First State Leadership Mentoring Program: there was an increase in number of jobs obtained and number of jobs that were customized** (p. 255).

### Customized Employment

“Competitive Integrated Employment – it was recommended and agreed to by IVRS that the policy related to competitive integrated employment demonstrate a strong emphasis on progressive employment and creating **customized employment opportunities for the most significantly disabled youth**” (p. 191).

“These efforts of provider transformation, along with **Community of Practice webinars during the past two years, positively impacted customized employment service delivery** as well as increased numbers of individuals with the most significant disabilities, accessing competitive, community integrated employment” (p. 202).

“IVRS is the lead agency with the Employment First Initiative and staff as well as partners **have access to a myriad of customized employment training webinars**” (p. 216).

“In 2011-13, the State of Iowa received a grant to focus on Employment First initiatives, customized employment strategies and alignment of service delivery systems, and funding for those services across state systems” (p. 255).

### Braiding/Blending Resources

“Iowa operates under an Integrated Service Delivery model to ensure all customers are afforded a comprehensive blend of services designed to jointly place them into full-time, non-seasonal employment or upgraded agricultural employment” (p. 162).

“**Efforts to blend and braid funds, as well as establish uniform payment systems among state partners continues to be viewed as IVRS priority areas going forward**” (p. 240).



## Section 188/Section 188 Guide

**“The Section 188 Disability Reference Guide created in partnership between the LEAD Technical Assistance Center, the Civil Rights Center and DOL, ETA is being used as a foundation for system design** in regard to ensuring ALL Iowans have equally and supported access to services throughout Iowa. The One-Stop Operations and System Design Group is developing effective policies, plans and procedures that will be incorporated into the One-Stop Center operations” (p. 123 – 124).

## DEI/Disability Resource Coordinators

**“The Disability and Employment Initiative through IWD/DOL has also been a key collaborator** and partner in increasing employment outcomes. The DEI project has enhanced communication and awareness through their local projects with an **Integrated Resource Team, financial literacy strategies and benefits planning**” (p. 258).

## California

### Employment First State Leadership Mentor Program (EFSLMP)

“AB 287 (2009) established the Employment First Policy, which led to a standing Employment First Committee formed by the State Council on Developmental Disabilities. The bill expands employment opportunities for people with intellectual and developmental disabilities, and identifies best practices and incentives for increasing integrated employment and gainful employment opportunities for people with intellectual and developmental disabilities. The Employment First policy requires Regional Centers to develop Individual Program Plans to ensure individuals with intellectual and developmental disabilities beginning at age 14 are provided options, competitive integrated employment, and post-secondary education to enable the consumer to transition from school to work. CDOR is an active participant in the Employment First Committee to help with transition planning” (p. 27 – 28).

### Customized Employment

“Efforts are taking place to update the CRP Vendorization and Certification Guidelines with information on PETS and **Customized Employment WIOA services**” (p. 26).

### Braiding/Blending Resources

“Local Boards have a lot of experience braiding resources and integrating service delivery through the One-Stop system” (p. 45).

**“In California, resources will be braided and services integrated and aligned through the creation of ‘value-added’ partnerships at the state, regional, and local levels”** (p. 70 – 71).

“Recommended relevant best practices may include... braiding resources from WIOA Title I Adult and Youth programs with WIOA Title II programs to provide supportive services to those attending basic education and skills programs so as to facilitate both course and program completion” (p. 104).



## Section 188/Section 188 Guide

“The State Board, in consultation with chief elected officials and Local Boards, will establish objective criteria and procedures to evaluate the AJCCs and delivery system for effectiveness. The evaluation must also include criteria evaluating how well the centers and local delivery systems take actions to comply with the disability-related regulations implementing WIOA section 188, set forth in 29 CFR part 37” (p. 148).

## DEI/Disability Resource Coordinators

N/A

## Florida

### Employment First State Leadership Mentor Program (EFSLMP)

“VR is currently a partner with other state agencies and organizations in implementing Employment First, a national effort to assure individuals with disabilities are offered employment on a preferred basis in planning their lives. **Employment First is consistent with VR’s belief that individuals with disabilities, even the most significant disabilities, can achieve meaningful employment when provided with appropriate supports**” (p. 26).

### Customized Employment

“VR has expanded the use of Discovery and Customized Employment statewide, and is now focusing on increasing provider capacity to provide these services” (p. 42).

### Braiding/Blending Resources

“Collaborations such as High School High Tech (HSHT), Project SEARCH, and Postsecondary Education programs engage youth in experiences that blend academics with career and technical education. They also provide hands-on career exploration and preparation activities where learned skills, attitudes, and behaviors can be applied” (p. 19).

## Section 188/Section 188 Guide

N/A

## DEI/Disability Resource Coordinators

N/A



## Georgia

### Employment First State Leadership Mentor Program (EFSLMP)

N/A

### Customized Employment

“VR continues to identify current information from research, rehabilitation trends, and professional resources. This information is provided to agency staff through a variety of methods, including training at the State, quadrant, and local level. **Most recently, this training has been focused on Customized Employment**” (p. 165).

### Braiding/Blending Resources

Georgia’s one-stop system engages youth in customized career pathways and SES through collaborative partnerships between VR and other core partner programs in the one-stop system. Georgia recently developed a strategic initiative to expand and improve VR services for youth with disabilities who are either in-school or out-of-school. The purpose of this initiative is to braid existing and new resources to offer a robust, comprehensive array of VR services to all schools” (p. 64).

### Section 188/Section 188 Guide

“Georgia’s One-Stop delivery system is focused on ensuring universal access across its workforce system. The State and its local partners maintain compliance with the provisions of WIOA Section 188 which require programmatic and physical accessibility. Through monitoring performed at both the state and local level, Georgia ensures that all One-Stops are in compliance with Section 188 of WIOA, the ADA, and other applicable regulations. Individuals who seek to utilize Georgia’s workforce system can expect facilities, whether physical or virtual, to meet federally-mandated accessibility standards. In addition, the State maintains a Methods of Administration which details how compliance with WIOA Section 188 will be maintained” (p. 89).

“Each of the State’s core program administrators monitor for compliance independently. WFD, acting as the administrator of Title I-B, monitors for WIOA Section 188 compliance across Georgia’s 19 LWDA’s” (p. 90).

“Per federal law, each LWDA must appoint a local Equal Opportunity Officer who is responsible for ensuring local WIOA Section 188 compliance” (p. 90).

### DEI/Disability Resource Coordinators

N/A



## Illinois

### Employment First State Leadership Mentor Program (EFSLMP)

N/A

### Customized Employment

N/A

### Braiding/Blending Resources

“Aligning WIOA Title I services with efforts that currently address justice-involved youth. Illinois is **exploring a range of career pathway models seen nationally and statewide as best practices, and examining ways to braid and blend funding for maximum impact**” (p. 40).

“The focus will be to expand access and success in these **sector-based bridge programs across all WIOA partners, as a way to braid funding to ensure an integrated approach to service**” (p. 50).

### Section 188/Section 188 Guide

“Illinois is committed to ensuring both programmatic and physical accessibility to the One-Stop delivery system by maintaining compliance with WIOA Section 188, the Americans with Disabilities Act of 1990 (ADA) and all other applicable statutory and regulatory requirements” (p. 62).

“The State of Illinois has taken the appropriate action to comply with WIOA, Section 188, as applicable, including but not limited to compliance with applicable provisions of the United States Civil Rights Act, Section 504 of the Federal Rehabilitation Act, the Americans with Disabilities Act, Illinois Department of Human Rights Act, Illinois Accessibility Code and all other applicable federal and state acts and rules” (p. 64).

### DEI/Disability Resource Coordinators

“The promotion of the models and best practice will be built on lessons learned from... **Disability Employment Initiative (DEI) pilot projects for individuals with disabilities**. These career pathway initiatives will be supported by core and required partners” (p. 39).

“Vocational Rehabilitation has worked effectively with Commerce around its DEI projects throughout the state” (p. 52).

## North Carolina

### Employment First State Leadership Mentor Program (EFSLMP)

“Most recently, NCDVRS has partnered with DMHDDSA and DMA on a workgroup **through the Employment First Leadership State Mentoring Program with the**



**mission of developing ways to infuse integrated employment into Medicaid Waivers and State Plan Medicaid Options” (p. 264).**

### **Customized Employment**

N/A

### **Braiding/Blending Resources**

N/A

### **Section 188/Section 188 Guide**

“The physical accessibility of facilities is systematically addressed across the state. The State maintains a Methods of Administration which details how compliance with WIOA Section 188 will be maintained” (p. 158).

“Per federal law, each local workforce board must appoint a local Equal Opportunity Officer who is responsible for ensuring local WIOA Section 188 compliance” (p. 159).

“The State has taken the appropriate action to be in compliance with WIOA section 188, as applicable” (p. 161).

### **DEI/Disability Resource Coordinators**

N/A

## **Ohio**

### **Employment First State Leadership Mentor Program (EFSLMP)**

“In FFY 2013, OOD, in partnership with the Ohio Department of Developmental Disabilities (DODD), established a dual certification program as part of the **Employment First Partnership Agreement. This dual certification program is designed to ensure continuity of services and allow for more successful transition from time-limited to long-term supports**” (p. 104).

“Ohio is an Employment First state with an active taskforce of state agency representatives, including OOD. The taskforce meets regularly to align policies, funding and planning for services and supports that prioritize competitive, integrated employment for Ohioans with developmental (and other) disabilities” (p. 125).

“As part of the Employment First Initiative, OOD and DODD have established an Interagency Agreement to expand supported employment services for working-age adults with developmental disabilities” (p. 125).

### **Customized Employment**

“Disability resource coordinator staff in OhioMeansJobs centers implemented Ohio’s strategic components, which included deploying integrated resource teams, leveraging



partner funds and resources, **customized employment, and asset development**" (p. 245).

### **Braiding/Blending Resources**

N/A

### **Section 188/Section 188 Guide**

"Ohio has a strong history of addressing WIOA Section 188 in a number of ways. Most recently, collaboration was formed between ODJFS, the Opportunities for Ohioans with Disabilities (OOD), the state vocational rehabilitation agency, and the Office of Workforce Transformation (OWT) over the last year to address the specific issue of improving service and emphasis for those individuals with disabilities" (p. 65).

"Ohio's standards for OhioMeansJobs center certification also will include requirements to not only comply with the ADA, but also Sec 188 of WIOA" (p. 37).

"Ohio has taken appropriate action to be in compliance with WIOA section 188" (p. 68).

### **DEI/Disability Resource Coordinators**

"In 2011, the Ohio Department of Job and Family Services (ODJFS) received a **three-year Disability Employment Initiative (DEI) demonstration grant project to improve the education, training, and employment opportunities and outcomes for adults who are unemployed, underemployed, and/or receiving Social Security disability benefits**" (p. 245).

## **Texas**

### **Employment First State Leadership Mentor Program (EFSLMP)**

N/A

### **Customized Employment**

N/A

### **Braiding/Blending Resources**

N/A

### **Section 188/Section 188 Guide**

"The TWC Equal Opportunity (EO) Unit functions within the Subrecipient and Equal Opportunity Monitoring Department. The EO Unit monitors recipients of WIOA Title I financial assistance to determine compliance with the nondiscrimination and equal opportunity provisions of WIOA §188. **Both programmatic and physical accessibility are addressed during an EO compliance review**" (p. 99).



## DEI/Disability Resource Coordinators

N/A

## Washington

### Employment First State Leadership Mentor Program (EFSLMP)

N/A

### Customized Employment

“2015 Priority: Collaborate with disability and employment partners to sponsor events that focus on disability recruitment, hiring and retention issues such as mentoring, disability awareness, reasonable accommodation, **customized employment, transportation, independent living, benefits issues, etc.**” (p. 307).

### Braiding/Blending Resources

“Evidence shows that I-BEST education, pioneered by Washington’s community and technical college system, improves and accelerates the attainment of important learning outcomes and meaningful work credentials. This model, which blends basic skills training with high-demand occupational training, has been replicated and expanded in numerous states” (p. 18).

### Section 188/Section 188 Guide

“WIOA allows local area boards to establish standing committees to work on issues specifically faced by individuals with disabilities, including Section 188 and ADA compliance” (p. 45).

### DEI/Disability Resource Coordinators

“In accordance with section 8(b) in the Wagner-Peyser Act, local comprehensive centers and affiliates have assigned disability specialists. The ES staff serving in this role receive training on serving individuals with disabilities and on accessible computer work stations. Also, they are often involved in local efforts to enhance employment and training access for individuals with disabilities. When there are special grants, **such as the Disability Employment Initiative (DEI), core program staff will be equipped to direct referrals for assessment and program services**” (p. 67).

## Tennessee

### Employment First State Leadership Mentor Program (EFSLMP)

“Tennessee is an Employment First State and has an established Employment First Task Force” (p. 142).



## Customized Employment

“The [Vocational Rehabilitation] Division has interagency arrangements and coordination with the following entities for the provision of supported employment services and extended services... [including] Tennessee Department of Labor and Workforce Development, **to provide customized employment services through their system of Career Centers** on behalf of VR clients and business and industry” (p. 139).

## Braiding/Blending Resources

“In keeping with the Governor’s conservative Fiscal Goal, the Tennessee Department of Labor and Workforce development has encouraged its local Workforce Investment Areas **to maximize resources and braid WIOA funds** with other Federal and state discretionary funds and with local entities which have a vested interest in the development of the local workforce” (p. 31).

## Section 188/Section 188 Guide

“The [certification] policy will assess the effectiveness, physical and programmatic accessibility in accordance with section 188 and the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) and continuous improvement of one-stop centers” (p. 61).

## DEI/Disability Resource Coordinators

**“The Disability Program Navigator (DPN), and the Disability Employment Initiative (DEI), grants received by the Tennessee Department of Labor and Workforce Development (TDLWD), are national focused grants which have served to put in place collaborative and sustained services to disability populations”** (p. 14).

“TDLWD uses the DEI Grant in conjunction with the Work Opportunities Tax Credit (WOTC) Program and the WIOA program funds to assist two of its customers (individuals with disabilities and employers who hire them)” (p. 70).

“With broadened collaborative partnerships with DEI, TDLWD expects to see heightened use of the Career Centers by jobseekers with disabilities” (p. 71).

## Action Steps to be considered in your state include the following:

1. Read and comment on your State Plan. Please visit [www.leadcenter.org](http://www.leadcenter.org) for tools to help you identify critical plan elements to support youth and adults with disabilities and to gain a greater understanding of WIOA from a disability perspective.
2. Consider some of the identified promising strategies from the ten states.
3. Remember that all states are continuing to explore new expanded collaboration opportunities across state systems, strengthened relationships between VR and state and local education agencies to provide pre-employment transition services, and capacity building training for staff in American Job Centers to be responsive to the needs of job seekers with disabilities. Pay close attention to the mandate for program accessibility, defined as “policies, practices, and



procedures providing effective and meaningful opportunity for persons with disabilities to participate in or benefit from aid, benefit, service and training” (29 CFR 38). Propose changes in structure, access to technology, other reasonable accommodations that can be made to customize career services and pathways for individuals with disabilities.

4. Review the Notice of Proposed Rulemaking (NPRM) for Section 188 to learn more about state responsibilities to implement policies and monitor practices that afford equal opportunity and effective and meaningful participation of youth and adults with disabilities in the workforce development system (<https://www.federalregister.gov/articles/2016/01/26/2016-01213/implementation-of-the-nondiscrimination-and-equal-opportunity-provisions-of-the-workforce-innovation>).
5. Review your State Plan to identify strategies that are being proposed to focus on financial literacy for youth and adults with and without disabilities. Section 129 (c)(2) includes financial literacy education as one of 15 elements that youth programs shall provide to support career readiness. Adult career services (Section 134 (c)(2)) include financial literacy as one of 11 specific services that should be provided if determined “to be appropriate in order for an individual to obtain or retain employment.”

## State Plan Links

- **Iowa:**  
<https://www.iowaworkforcedevelopment.gov/sites/search.iowaworkforcedevelopment.gov/files/Iowa%20Unified%20State%20Plan%20Draft%202.pdf>
- **California:**  
[http://www.cwdb.ca.gov/WIOA\\_Unified\\_Strategic\\_Workforce\\_Development%20\\_Plan.htm](http://www.cwdb.ca.gov/WIOA_Unified_Strategic_Workforce_Development%20_Plan.htm)
- **Florida:** <http://www.rehabworks.org/docs/2017-20VRUnifiedStatePlanDraft.pdf>
- **Georgia:** <http://www.georgia.org/wp-content/uploads/2015/11/2016-State-Plan.pdf>
- **Illinois:** <http://www.ides.illinois.gov/SitePages/NewsArticleDisplay.aspx?NewsID=299>
- **North Carolina:**  
[https://www.nccommerce.com/Portals/11/Documents/NCWorks%20Commission/WIOA%20Implementation/NorthCarolina\\_WIOA\\_UnifiedStatePlan\\_Master\\_01\\_11\\_16.pdf](https://www.nccommerce.com/Portals/11/Documents/NCWorks%20Commission/WIOA%20Implementation/NorthCarolina_WIOA_UnifiedStatePlan_Master_01_11_16.pdf)
- **Ohio:** [http://workforce.ohio.gov/Portals/0/UnifiedStatePlan\\_Complete.pdf](http://workforce.ohio.gov/Portals/0/UnifiedStatePlan_Complete.pdf)
- **Texas:** <http://www.twc.state.tx.us/partners/workforce-innovation-opportunity-act-wioa>
- **Washington:**  
<http://www.wtb.wa.gov/Documents/TAPPlanStrategicandOperational2016.pdf>
- **Tennessee:**  
[https://tn.gov/assets/entities/labor/attachments/TN\\_WIOA\\_Combined\\_State\\_Plan.pdf](https://tn.gov/assets/entities/labor/attachments/TN_WIOA_Combined_State_Plan.pdf)

