



April 9, 2021

The Honorable Patty Murray, Chair  
Senate HELP Committee  
United States Senate  
Washington, DC 20510

The Honorable Richard Burr, Ranking Member  
Senate HELP Committee  
United States Senate  
Washington, DC 20510

Dear Chair Patty Murray and Ranking Member Richard Burr,

Thank you for your request for comments on workforce innovation to address lost jobs in the COVID-19 pandemic. In your letter, you asked for the following information in pursuit of bipartisan solutions:

- how to enhance or improve workforce training in direct relation to the COVID-19 pandemic and economic recovery, including ways to address workforce needs of the health care and public health sectors;
- reforms to programs authorized under the Workforce Innovation and Opportunity Act;
- ways to develop, modernize, and diversify the national apprenticeship system, including innovative approaches such as youth apprenticeship and pre-apprenticeship; and
- strategies to encourage innovation to address worker and industry needs.

CCD is the largest coalition of national organizations working together to advocate for Federal public policy that ensures the self-determination, independence, empowerment, integration, and inclusion of children and adults with disabilities in all aspects of society. CCD is committed to ensuring that students with disabilities have every opportunity to succeed and that the educators who serve them are equipped with the resources and skills necessary. The CCD Education Task Force is comprised of CCD member organizations dedicated to improving educational opportunity for children, youth and young adults with disabilities.

The impacts of the pandemic and the economic fallout have been widespread, but are particularly prevalent among people with disabilities. This is especially so when disability intersects with Black, Latino, Indigenous, and immigrant households ([see CBPP](#)). The employment rate for people with disabilities was low before the pandemic due, in part, to structural barriers and stigma. The pandemic has harshly exacerbated these inequities.

According to the [Department of Labor](#), the unemployment rate for people with a disability more than doubled from 7.8 percent in January 2020 to 18.9 percent in April 2020. For people with disabilities working in congregate settings, many of these jobs have been completely shut down and may never return.

First and foremost, the CCD Education Task Force strongly urges Congress NOT to reauthorize the Workforce Innovation and Opportunity Act (WIOA). Congress conducted a comprehensive bipartisan reauthorization of WIOA in 2014. WIOA of 2014 provided significant improvements for people with disabilities. For example, the reauthorized law created the following improvements:

- American Jobs Centers (AJC) must provide physical and programmatic accessibility to employment and training services for individuals with disabilities.
- Students with disabilities will receive pre-employment transition services so they can successfully obtain competitive integrated employment.
- State Vocational Rehabilitation agencies will set aside at least 15% of their Federal award to provide pre-employment transition services to students with disabilities.
- The law authorized a committee to advise the Secretary of Labor on strategies to increase competitive integrated employment for individuals with disabilities (see [final report](#)).
- State Vocational Rehabilitation agencies must engage employers to improve participant employment outcomes.

These improvements are still being implemented and their success has not been fully evaluated.

While we believe the WIOA of 2014 should not be reauthorized, we do believe there are ways to increase opportunities for career training experiences, transition support, skill building opportunities and, ultimately, employment without a full reauthorization of the law. The following opportunities exist for Congress to invest in educational opportunities that lead to competitive integrated employment for youth and young adults with disabilities:

1. Ensure that recent COVID relief funds are used to provide school leaders and educators with resources to provide educational services to students served under IDEA.
2. Support efforts to authorize a glidepath to full funding for IDEA, such as proposed in the recently introduced the Keep Our Promise to America's Children and Teachers (PACT) Act (S.72 & H.R. 764).
3. Ensure full implementation of the Every Student Succeeds Act (ESSA) through appropriate funding, enforcement, and monitoring of all provisions.
4. Ensure greater accessibility and availability of pre-apprenticeship and apprenticeship programs for people with disabilities.
5. Support the Save Education Jobs Act, which would stabilize the education workforce and mitigate the impact of student learning loss. The bill would provide up to \$261 billion to preserve teaching and other school jobs over a 10-year period. America has one million fewer teachers than a year ago and many more could be lost in the coming months.
6. Reauthorize the Higher Education Act, as proposed in the 116th Congress through the Aim Higher Act which included key provisions supporting access to higher education for all students with disabilities, including through access to accommodations, open educational resources and a continuation of the expansion of postsecondary education programs for students with intellectual disabilities which significantly increases the likelihood of students finding employment.
7. Strengthen and expand investments in the Carl D. Perkins Act Career and Technical Education (CTE) Act (Perkins V) to ensure students with disabilities are robustly included in secondary and post-secondary settings and educators are provided tools to assure accessible educational materials, assistive technology and more. With its focus on skill development in specific career sectors, including STEM, programs under Perkins V can create great opportunities for young

people with disabilities as they explore career opportunities through experiential internships, CTE training, and work-based learning experiences so they can begin to enter the workforce.

8. Provide funding to address the expanding teacher shortage through the Teacher Quality Partnership (TQP) Grants in Title II of the Higher Education Act. The TQP program is a partnership between higher education and PK-12 schools to prepare new teachers in shortage areas for high need schools and to provide mentoring and induction for new teachers.
9. Increase funding for state vocational rehabilitation (VR) programs above the required Consumer Price Index (CPI) level to ensure investment in transition to postsecondary opportunities, supported employment, customized employment, and workforce development programs that help people with disabilities find and keep jobs and have more career options.
10. Help states build their infrastructure and to transform their systems to increase competitive integrated employment, such as supporting the Transformation to Competitive Integrated Employment Act, just introduced in the House of Representatives.
11. Create tax and other incentives for employers that expand apprenticeship, STEM internships and other work opportunities for individuals with disabilities in partnership with CTE, WIOA, VR or other programs currently authorized. .
12. Ensure that state VR programs have trained personnel available that know how to assist people with disabilities using customized employment models.

While the Education Task Force is mostly concerned with students with disabilities and their ability to access programs that prepare them to work through the school setting, we know that the WIOA authorized a bipartisan committee to identify a comprehensive set of recommendations to increase opportunities for competitive integrated employment opportunities. These recommendations that include innovative strategies are included in the [final report](#) delivered to the Secretary in September of 2016. We encourage Congress to create an interagency task force dedicated to implementing these comprehensive recommendations.

Thank you again for reaching out to stakeholders for input on how to get people back to work safely. We know that our colleagues on the CCD Employment Task Force will also be providing ideas. We are eager to work with you to advance legislation that will improve access to career and employment training for youth and young adults with disabilities.

Sincerely,

American Association on Intellectual and Developmental Disabilities (AAIDD)  
American Music Therapy Association  
American Therapeutic Recreation Association  
Association of People Supporting Employment First (APSE)  
Association of University Centers on Disabilities (AUCD)  
Autism Society of America  
Autistic Self Advocacy Network  
Bazelon Center for Mental Health Law  
Center for Learner Equity  
Center for Public Representation  
CommunicationFIRST  
Council for Learning Disabilities  
Council of Administrators of Special Education

Council of Parent Attorneys and Advocates  
Easterseals  
Higher Education Consortium for Special Education (HECSE)  
Learning Disabilities Association of America  
National Association of Councils on Developmental Disabilities  
National Association of State Directors of Special Education (NASDSE)  
National Center for Learning Disabilities  
National Center for Parent Leadership, Advocacy, and Community Empowerment (National PLACE)  
National Disability Rights Network (NDRN)  
National Down Syndrome Congress  
RespectAbility  
School Social Work Association of America  
Teacher Education Division (TED) of the Council for Exceptional Children  
The Advocacy Institute

CCD Education Task Force Co-Chairs:

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Kim Musheno, Autism Society of America  
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*The Consortium for Citizens with Disabilities (CCD) is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society. The Education Task Force of CCD monitors federal legislation and regulations that address the educational needs of children and youth with disabilities and their families, including regulatory efforts under federal law such as the Individuals with Disabilities Education Act (IDEA), the Every Student Succeeds Act (ESSA), Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act (ADA). The Education Task Force advocates for high expectations for children with disabilities under these and other laws.*

[www.c-c-d.org](http://www.c-c-d.org)