



June 17, 2011

The Honorable Tom Harkin  
Chairman, Senate Committee on Health, Education, Labor, and Pensions  
Washington, D.C. 20510

The Honorable Michael Enzi  
Ranking Member, Senate Committee on Health, Education, Labor, and Pensions  
Washington, D.C. 20510

The Honorable Patty Murray  
Chairman, Subcommittee on Employment and Workplace Safety  
Senate Committee on Health, Education, Labor, and Pensions  
Washington, D.C. 20510

The Honorable Johnny Isakson  
Ranking Member, Subcommittee on Employment and Workplace Safety  
Senate Committee on Health, Education, Labor, and Pensions  
Washington, D.C. 20510

Dear Chairman Harkin, Ranking Member Enzi, Chairman Murray, and Ranking Member Isakson:

The Consortium for Citizens with Disabilities (CCD) Veterans Task Force is writing to convey our comments concerning the discussion drafts of Titles I-IV of the proposed Workforce Investment Act (WIA) reauthorization.

The reauthorization of WIA, including the Rehabilitation Act, provides a tremendous opportunity to ensure that our nation's veterans with significant disabilities are adequately integrated into the nation's workforce strategy. The task force believes that it is important to remember that veterans with disabilities are also eligible for and may be able to benefit from programs targeted more towards members of the general population with disabilities.

Overall, it appears that the drafts of Titles I-IV make few changes to the specific veterans' components of WIA. The task force noted two main changes to the Veterans' Workforce Investment Programs (VWIP), Section 268. We believe that the addition of language in (a)(3)(A) will help to ensure that services provided by one-stop operators and one-stop partners are a focus of programs authorized under VWIP and believe it is important to list these services as required

activities of programs supported under VWIP. In addition, we support the inclusion of performance accountability measures in (b)(3) to ensure that VWIP programs are meeting the needs of veterans with the most significant disabilities.

The task force recently testified before the House Veterans' Affairs Committee regarding the need to improve employment opportunities for veterans with significant disabilities. At that time, we testified regarding a promising practice published in 2009 by the Department of Labor which highlighted coordination efforts between Disability Program Navigators and the Disabled Veteran Outreach Program (DVOP) and Local Veterans Employment Representative (LVER) staff at Idaho One Stop Career Centers. As a result of their partnership, DVOPs and LVERs added to their knowledge of public and private agency services for people with disabilities and the DPNs obtained valuable information about veteran's resources that could be used to assist future clients.

In Title II, Section 234, we believe that (d)(1)(A)(iii) recognizes the importance of providing customer support to veterans with disabilities who are eligible for multiple programs due to their status as veterans and people with disabilities to ensure that these individuals receive the full level of support for which they are eligible. The task force commends this recognition. We believe that to address the employment needs of our nation's most significantly disabled veterans this spirit must be replicated throughout the nation's workforce system.

Thank you for the opportunity to submit comments. The CCD Veterans Task Force is willing to assist the Committee in any way to serve veterans with disabilities. If you have any questions, please contact Heather Ansley, CCD Veterans Task Force Co-Chair, at (202) 556-2076, ext. 7702 or by e-mail at [hansley@vetsfirst.org](mailto:hansley@vetsfirst.org).

Sincerely,

Heather Ansley, VetsFirst, a program of United Spinal Association  
Co-Chair

Bill Jefferson, NISH  
Co-Chair

Susan Prokop, Paralyzed Veterans of America  
Co-Chair

Leonard Selfon, Paralyzed Veterans of America  
Co-Chair

## Stakeholder Comment Form

### Senate discussion draft of the Workforce Investment Act of 2011

This form should accompany your organization's comment letter. Please send both documents (as attachments to a single email) to [ews@help.senate.gov](mailto:ews@help.senate.gov) no later than Friday, June 17<sup>th</sup> at 8:00pm.

Organization: CCD Veterans Task Force

One contact person: Heather Ansley

Contact email: hansley@vetsfirst.org

Contact phone number: 202-556-2076 Ext 7702

In order of priority, please provide a full description of each item highlighted in your organization's comment letter, including specific legislative references (e.g., Sec.

111(a)(1)(A)...), along with legislative language. Use additional pages as necessary.

1) Title I: Section 101(36)—The draft definition fails to include individuals who receive VA pension for low income aged or disabled non-service-connected veterans and family members covered under 38 U.S.C. Sections 1501-1543.

2) Title I: Section 101(51)—The draft definition fails to address recognized Department of Defense certifications.

3) Title I: Section 112(b)—The operational planning elements section (b)(2)(C)(ix) addresses how states will implement priority of service for veterans. However, veterans are not included as a strategic planning element within the unified state plan. We propose adding (b)(1)(G) or as appropriate, “a description of the state’s strategic vision and goals for complying with, enforcing, and monitoring veterans’ priority of service, in particular as this applies to veterans with disabilities.”

4) Title I: Section 131—In (b)(2)(A), state performance accountability measures are set out for workforce systems programs but not those authorized under Title 38, Chapter 41. Veterans must be included in accountability measures, in addition to those included in Title II, Section 268, to ensure that state and local performance reports include veteran specific information.

5) Title I: Section 131—In (j), system wide measures to test the effectiveness of the workforce system are addressed but we are concerned about the lack of indicators for veterans, particularly in light of the need stated in (j)(2) to address “the collective effectiveness of the workforce development system . . . in providing transitions between the programs . . . .” Thus, we propose adding (j)(3)(K) or as appropriate, “number and percentage of veterans referred and served under priority of service, including number and percentage of veterans with disabilities referred and served under priority of service.”

6) Title IV: Section 409—In (e), the legislation would create a Workforce Information Advisory Council to evaluate the nationwide workforce and labor system. We believe that the council's membership as laid out in (d)(2)(B) could benefit from the inclusion of consumers of the system, including veterans with disabilities. Thus, we propose adding (d)(2)(B)(ix) or as appropriate, to address this need.