



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

To: The Hon. Robert C. “Bobby” Scott, Chairman, House Committee on Education and Labor

From: The Co-Chairs of the CCD Employment and Training Task Force

Re: Initial Reaction to proposed Workforce Innovation and Opportunity Act of 2022

Suggested Additions:

- Add language on "SUPPORTIVE SERVICES" to specifically include job coaches or other direct support professionals who specifically support people with the most significant disabilities to participate in the workforce.
- Require the definition of "career pathway" to ensure individuals are given all their career options.
- Likewise, DSPs, including job coaches and job developers, need to be included as a recognized category in the coding of the Bureau of Labor Statistics Standard Occupational Classification (SOC) system.
- Add language explicitly incorporating the terms of the Jobs For Veterans Act that involve not only priority of service but again reiterate the monitoring and oversight of both the job service as well as WIOA.
- Direct WIBs to draft workforce integration plans with specifics on how Disabled Veterans Outreach Personnel and Local Veterans Employment Reps are to be integrated into providing WIOA services to disabled veterans,

Clarifying Questions:

- Given the scope of unmet disability needs among returning citizens, is there a place for explicit language on disability services or supports within the expansion to reentry programs?
- How will the inclusion of state VR agencies on workforce boards and the push for greater diversity of representation on state/local boards be enforced?
- How would appropriations work if the legislation does not include authorization of appropriations for programs under Title IV? Can this be handled outside of WIOA reauthorization through appropriations for the Dept of Education?
- How will the federal government work with states if disparities are found as a result of disclosures in the proposed State equity reports? What's the follow through/change process for the states?

General Comments:

- Full funding for the workforce development system! Outstanding long-term commitment and good measurable goals on serving more Americans!
- Very glad to see that the definition of ‘supportive services’ includes services such as transportation, child care, dependent care, housing, food and nutrition services, mental health care supports, substance use disorder treatment, access to the internet, assistive technology, and needs-related payments, that are necessary to enable an individual to participate in workforce development activities.
- Very glad to see the strong focus on equity, disparities, and barriers to employment.

We deeply appreciate the opportunity to contribute to the development and advancement of this important piece of legislation. That said, we do have further questions regarding the process for advancing this forward. With a proposed law such as this one, there is a serious need to engage with stakeholders in a thoughtful process. We really appreciate your outreach and we are honored to partner with you on this, however we are concerned that the short turnaround time on this initial draft left little room for more thoughtful or more detailed feedback. Likewise, a proposal such as this one, which includes many important policy changes with serious fiscal impacts, needs to be coordinated with the external partners and internal champions.

That said, we really look forward to seeing where this goes and where we can be most helpful. Thank you so much for what you are doing.

Sincerely, CCD Employment and Training Task Force Co-Chairs:

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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 Employment and Training Task Force monitors federal legislation and regulations relevant to the employment of people with disabilities, particularly issues related to the programs and projects funded under the Rehabilitation Act of 1973, as amended.