



Commemorating 40 Years
Of Disability Advocacy
1973-2013

September 30, 2013

The Honorable Thomas E. Perez
Secretary
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

Dear Secretary Perez:

These comments are submitted by the co-chairs of the Consortium for Citizens with Disabilities' (CCD) Veterans and Military Families Task Force in response to your request for feedback on the draft fiscal year (FY) 2014-2018 Strategic Plan for the U.S. Department of Labor (DOL).

CCD is a coalition of national consumer, service provider, and professional organizations which advocates on behalf of people with disabilities and chronic conditions and their families. The CCD Veterans and Military Families Task Force advocates for policies and follows issues of concern to veterans with disabilities and military family members with disabilities. Our comments are influenced by the Task Force's interest in ensuring veterans with disabilities and military family members with disabilities have access to DOL employment services and supports and are granted the full rights and protections as provided under law.

The CCD Veterans and Military Families Task Force fully supports all five DOL strategic goals. However, our comments are focused on Strategic Goals 1, 3 and 5 and the Strategic Objectives identified under DOL's Veterans' Employment and Training Service (VETS), Office of Federal Contract Compliance Programs (OFCCP), Office of Disability Employment Policy (ODEP), Employment and Training Administration (ETA), Women's Bureau, and the Bureau of Labor Statistics (BLS).

Strategic Goal 1 – Prepare workers for better jobs and ensure fair compensation

We fully support this FY 2014-2018 DOL strategic goal. During your swearing-in ceremony, you spoke about how DOL was the department of opportunity and described DOL's important role in providing the foundation for economic self-sufficiency and upward mobility. Preparing workers for better jobs must continue to be the highest priority for the Department of Labor. DOL VETS and ETA are critical to the success of this goal and we are pleased these agencies have identified strong objectives and strategies to achieve this important goal.

- Strategic Objective 1.1: Advance employment opportunities for U.S. workers:

- **VETS** has identified two strategies to help achieve this objective: developing an effective interactive transition assistance employment workshop and providing focused and intensive services to veterans. The Transition Assistance Program (TAP) helps service members, including those with service-connected disabilities, make the transition from military service to the civilian labor force. The CCD Veterans and Military Families Task Force supported the provisions in the VOW to Hire Heroes Act that made TAP mandatory and more relevant for transitioning service members. We support VETS' plans to develop a virtual curriculum and to design a single portal of employment resources. In addition, DOL VETS manages and funds the Disabled Veterans' Outreach Program (DVOP) and the Local Veterans' Employment Representative (LVER) program. DVOP specialists are crucial in providing intensive employment services to address the employment barriers of veterans with service-connected disabilities. The VOW to Hire Heroes Act mandated that the DVOP specialists focus exclusively on eligible veterans and not perform non veteran-related duties.
 - **Recommendation:** We urge DOL VETS to make education of employment services and rights for transitioning service members with service-connected disabilities a prominent part of the TAP workshop and virtual curriculum. This important information must be shared in-person and reinforced through the online materials.
 - **Recommendation:** We urge DOL VETS to fully fund the Jobs for Veterans State Grants (JVSG) program that supports DVOP specialists across the country. We urge VETS to monitor the Disabled Veterans' Outreach Program to ensure it complies with the intent of the VOW to Hire Heroes act of ensuring priority of service for veterans with service-connected disabilities.
- **ETA** identified a strategic priority of helping job seekers of all ages compete in today's labor market through credential attainment. We support ETA's effort to promote tailored training, improve education and employment outcomes in training programs and to strengthen partnerships with businesses to ensure training focuses on in-demand skills and jobs.

Strategic Goal 3 – Promote fair and high-quality work environments

Americans with disabilities, which includes veterans with disabilities, face double-digit unemployment and other barriers to employment. We are pleased DOL has identified this important goal and we support the priorities and strategies identified by OFCCP, ODEP and the Women's Bureau to help promote fair work environments for all Americans, particularly our wounded warriors.

- Strategic Objective 3.1: Break down barriers to fair and diverse workplaces and narrow wage and income inequality:
 - **OFCCP** has identified priorities and strategies to implement regulatory reform and to strengthen enforcement. The CCD Veterans and Military Families Task Force commends DOL for releasing the final rules for Section 503 of the Rehabilitation Act and the Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA) that require federal contractors and subcontractors to set hiring goals and benchmarks, respectively, for individuals with disabilities and protected veterans. Veterans with disabilities are protected within both Section 503 and VEVRAA. The

rules provide, for the first time ever, a quantifiable metric to measure contractors' success in recruiting these important populations.

- **Recommendation:** As part of DOL's commitment to implement and enforce these new rules, we urge OFFCP to partner with veteran service organizations and community employment providers to help educate contractors and subcontractors about successful outreach, recruitment and retention strategies and best practices that could help them achieve the new utilization benchmark goals.
- **ODEP** will promote the adoption and implementation of policy strategies and effective practices to help DOL achieve Objective 3.1. ODEP provides key leadership in developing and promoting policy and initiatives that help to eliminate barriers to the training and employment of people with disabilities. We are particularly pleased ODEP plans to focus on improving access to training, education and transition services, fostering high expectations, highlighting the benefits of hiring people with disabilities, supporting the collection, use and dissemination of credible, reliable disability employment data and enhancing public workforce system capacity to meet employment-related needs of people with disabilities.
 - **Recommendation:** We urge ODEP to make veterans with disabilities a focus of each of its priorities and strategies in achieving this objective, whether the push to increase access to services or the drive to collect, analyze and distribute disability statistics.
- **Women's Bureau** identified three priorities and strategies to achieve this objective, including conducting research and analyses, providing technical assistance and using evaluations and test models to foster policies and programs that promote women's participation, advancement and retention in the workforce.
 - **Recommendation:** We recommend that the Women's Bureau include women veterans with disabilities within the research, analysis and evaluations to compare their workforce participation and advancement rates to their non-veteran, non-disabled counterparts. This information and analysis are critical in ensuring that this population receives fair access to employment training and supports and ultimately finding success in the workplace.

Strategic Goal 5 – Produce timely and accurate data on the economic conditions of workers and their families

We fully support this strategic goal. Accurate and comprehensive data are critical in our ability to advocate for existing and advance new initiatives, policies and resources aimed at veterans with disabilities and military family members with disabilities.

- Strategic Objective 5.1: Provide sound and impartial information:
 - **BLS** is the lead federal agency responsible for collecting and measuring labor market activity and other economic data. Among its strategies toward achieving this goal, BLS will continue to

produce objective data and analyses, to improve and develop relevant and accurate materials and to increase availability of data to various stakeholders.

- **Recommendation:** We urge BLS to improve and expand the data collection and products related to veterans with disabilities and military family members with disabilities who are in the workplace to help inform policymakers and the public about the challenges and opportunities related to employment of these underserved populations.

If you have any questions, please contact any of the co-chairs of the CCD Veterans and Military Families Task Force: Heather Ansley (202-556-2076, Ext. 7702; hansley@vetsfirst.org); Maynard Friesz (202-403-8345; mfriesz@easterseals.com); or Susan Prokop (202-416-7707; susanp@pva.org).

Thank you for the opportunity to share with you our feedback on your draft strategic plan.

Sincerely,

Heather Ansley
VetsFirst
Co-Chair

Maynard Friesz
Easter Seals
Co-Chair

Susan Prokop
Paralyzed Veterans of America
Co-Chair