December 1, 2017

Office of Policy Development and Research
Employment and Training Administration
US Department of Labor
200 Constitution Ave. NW Room N-5641
Washington, DC 20210

On behalf of the Consortium for Citizens with Disabilities Employment and Training Task Force, we want to congratulate the members of the new [Task Force on Apprenticeship Expansion](https://www.dol.gov/). CCD is a coalition of national disability rights, advocacy, consumer and provider organizations and self-advocates representing the 57 million Americans with disabilities. This task force concerns itself with issues affecting employment opportunities for those Americans.

For many Americans, apprenticeships offer a potential first step for joining the workforce. Hands-on experience combined with professional oversight provides a smooth introduction to a diverse range of careers. Earning while learning also gives the apprentice more economic freedom than the average internship. That freedom allows for more work opportunities as well as a chance to enjoy life outside of the apprenticeship.

We congratulate the members of the Task Force for the leadership and commitment to expanding opportunities in the workforce for more Americans. Apprenticeships have, for decades, been a valuable tool in helping individuals learn “the practical and theoretical aspects of a highly skilled occupation.” While apprenticeship programs are traditionally associated with the construction and manufacturing industries, emerging high-growth industries such as health care, information technology, and energy offer additional opportunities for high paying jobs with solid benefits.

As the members work to increase the number of apprenticeships, we urge you to include a special focus on those who would benefit most from apprenticeships: people with disabilities and, even more so, people of color with disabilities. Both groups have been too often overlooked in workforce initiatives. These are the folks who with proper training and a few accommodations can enter the workforce, earn an income, and learn a profession.
In looking at apprenticeships, we want the Task Force to know that two things. First, people with disabilities want to work. Second, people with disabilities, especially youth, can benefit from apprenticeship programs.

People with disabilities want to work. A 2015 Kessler Foundation survey decisively showed that seventy percent of working age people with disabilities want to work. However, people with disabilities face various barriers to enter the workforce. While this letter cannot document every barrier that keeps people with disabilities from having jobs, we do argue that apprenticeship offers one tool, among many, to overcome those barriers. As the Task Force moves to expand apprenticeship as a model and increase the number of opportunities for Americans to become apprentices, we ask the members to look specifically where apprenticeships can have a lasting impact on jobs for people with disabilities and people of color with disabilities.

The critical connection between educational attainment and employment preparation is obvious and only growing in importance. According to the Georgetown University Center on Education and the Workforce, 65 percent of all jobs in the economy will require postsecondary education and training beyond high school. Failure to obtain a high school degree is a key problem faced by thousands of students with disabilities. Apprenticeship can offer those young Americans hope for a better future. Here’s how.

Each year, nearly 400,000 students with disabilities leave school, almost 40% without a high school degree. This severely limits their potential to find a job. Those educational outcomes are even worse when you look beyond the national average and look closely at the experiences of students of color with disabilities. According to the Department of Education, while fully 70% of white students with disabilities graduated high school, barely 57% of African American students with disabilities and 59% percent of Latino students with disabilities graduated high school. In other terms, it means that the American economy is losing the tremendous talents of 100,000 youth with disabilities each year.

According to the Bureau of Labor Statistics, there are over 6 million job openings right now. At the same time, there are 22 million working age people with disabilities eager to work, earn an income, and become independent. Yet thousands of those people with disabilities slip through the cracks and never enter the labor force because there is misalignment between educational systems and employment opportunities. Apprenticeships can change that.

By connecting apprenticeship opportunities to schools, students can have a goal and a place to go after graduation. The first few months after graduation are crucial for youth with disabilities, because any support or structure provided by the school is suddenly gone. Without skills training and credentials to enter a competitive labor force, youth with disabilities may be left in a post-school limbo.

Giving special attention to apprenticeships is a productive step forward to empower young people and promote economic freedom across our nation. However, young people with disabilities, especially those of color, need a fair chance at such opportunities as well.
So we urge the members of the new Task Force on Apprenticeship Expansion to think intentionally about people with disabilities.

Thank you for your attention to our comments. Our Task Force welcomes the opportunity to work with the Department in furthering this crucial work. If you have any questions, please contact Kelly Buckland at NCIL (kelly@ncil.org, 202-207-0334 ext. 1104), Aaron Kaufman at the Jewish Federation of North America (Aaron.Kaufman@jewishfederations.org, 202-785-493), Alicia Epstein at SourceAmerica (aepstein@sourceamerica.org, 703-584-3987) or Philip Pauli at RespectAbility (philipp@respectabilityusa.org, 240-483-4134). Thank you for your consideration.