



Name: Alicia Epstein

Group (if applicable): The Consortium of Constituents 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 concerns itself with policies and programs affecting their ability to achieve economic self-sufficiency through competitive, integrated employment. Below comments is from on the behalf of the task force.

The task force is chaired by the following co-chairs: Julie Christensen, APSE; Bartholomew Devon, Eggleston Services; Alicia Epstein, SourceAmerica; Mike Nagel, The Arc; Rick Webster, National Industries for the Blind.

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Comments:

p. 277, Line 19 and p. 278, Line 1, Section 173 – Evaluations and Research

- Feedback #1: Study on Improving Workforce Services for Individuals with Disabilities, replace ‘may’ with ‘shall’ and replace “under titles I and II” with “under titles I, II, and III.”
- Brief context: The task force believes that the study must be mandated to ensure that the study is being carried out by the respective federal agencies to identify opportunities for improvement within the workforce services for individuals with disabilities who are on waiting list. In addition, people with disabilities are also eligible to receive services under Titles I-III not just Titles I-II.

p. 17, Line Number: 24, AND p. 18 Section 111- State Workforce Development Boards

- Feedback #2: Require that State Workforce Development Boards include individuals with disabilities or representatives of organizations that provide or support competitive integrated employment for individuals with disabilities
 - On Page 16, after line 24, insert the following and renumber accordingly:
 - “(A) redesignating subclauses (III) and (IV) of clause (ii) as subclauses (IV) and (V);
 - “(B) inserting after clause (ii)(II) the following:
 - “(III) shall include individuals with disabilities or representatives of organizations serving individuals with disabilities;”

- Brief context: The task force believes that representation matters, and it is critical that people with disabilities and organizations, including representatives from state vocational rehabilitation agencies, with the knowledge and experience are represented on the state workforce development board

Feedback #3: Add representative from the state vocational rehabilitation agency
On PAGE 18, Section 101 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3111)

Pg.18, insert between line 4 & 5.

- A representative from the State Vocational Rehabilitation Agency as a lead state official responsible for core programs,

p. 35, Line Number: 19, Section 116- Local Workforce Development Boards

- Feedback #4: Require that Local Workforce Development Boards include individuals with disabilities or representatives of organizations that provide or support competitive integrated employment for individuals with disabilities
 - On Page 35, after line 19, insert the following and renumber accordingly:
 - “(i) redesignate clauses (iii) and (iv) of subparagraph (B) as clauses (iv) and (v) respectively;
 - “(ii) inserting after subparagraph (B)(ii) the following:
 - (iii) shall include individuals with disabilities or representatives of organizations serving individuals with disabilities;”
- Brief context: See above for the same rationale for the State Workforce Development Board

Pgs. 18-19, 46, 170, 177, 178, 222, 420, 422 Section 143. USE OF FUNDS FOR EMPLOYMENT AND TRAINING ACTIVITIES.

Section 134(a) of the Workforce Innovation and Opportunity Act (42 U.S.C. 3174)

- Feedback #5: Maintain definition and use of term ‘universal design for learning’ (V) information on effective service delivery strategies to serve workers and job seekers, **including the principles for universal design for learning;**

“carrying out activities to facilitate remote access to services, including training services described in subsection (c)(3) **and may incorporate the principles of universal design for learning,** provided through a one-stop delivery system, including facilitating access through the use of technology;”

(II) in subclause (II)— (aa) in item (cc), by inserting “activities carried out **by comprehensive transition and postsecondary programs for students with intellectual disabilities** established under section 19 of the Higher Education Act of 1965 (20 U.S.C. 1140g),” after “developmental disabilities,”

Section 134(d) of the Workforce Innovation and Opportunity Act (42 U.S.C. 3174(d)) is amended— (related to permissible local employment and training activities)

(IV) to strengthen, through professional development activities, the knowledge and capacity of one-stop staff to use the latest digital technologies, tools, and strategies to deliver high-quality services

and outcomes for jobseekers, workers, and employers, **which may incorporate universal design for learning**

Brief context: The task force recommends incorporating universal design learning in employment and training activities. The addition of Universal Design for Learning (UDL) to the WIOA updates the law consistent with other federal employment and education laws and will promote rapid replication and expansion of work that is underway across the U.S. The flexible application of and use of the UDL framework is helping to advance and increase access to career training in apprenticeship programs, community colleges/universities and industries (e.g., manufacturing, biopharma, STEM etc.), and its application helps target federal investments to ensure any eligible participant can access the learning environment/classroom/curricula free of any learning barrier that may exist due to literacy/education level, language, and/or disability.

p. 178, Line 13 Section 143 – Use of Funds for Employment and Training Activities

- Feedback #6: Delete the word “model”
- Brief Context : “Model” comprehensive transition and postsecondary programs for students with intellectual disabilities (CTP) as defined in 20 USC 1140 refer only to the federal funded model CTP programs commonly known as TPSIDs (approximately 25 grants per year from the Department of Education). Deleting the word “model” in the section expands the coverage to mean all programs referred to as CTPs as it is defined by the HEOA in 20 USC 1140. [20 U.S.C. § 1140 - U.S. Code Title 20. Education § 1140 | FindLaw](#)

p. 11, before line 1, Section 102. Definitions

- Feedback #7: insert the following [into the definition of “recognized postsecondary credential”]:
“In paragraph (52) insert “a credential or certificate from a comprehensive transition and postsecondary program for students with intellectual disabilities (as such term is defined in section 5 of the Higher Education Act of 1965 (20 U.S.C. 1140))”
- Brief Context: The failure to include comprehensive transition programs for students with intellectual disabilities in the definition of a “recognized postsecondary credential” continues to be a barrier to students receiving support from Vocational Rehabilitation and other supports under WIOA.
- Feedback #8: Maintain the addition of 'assistive technology' to the definition of Supportive Services:
 - P. 11 – Definition of Supportive Services
- Brief Context: The addition of 'assistive technology' to the definition [and list of services] will help ensure that any participant requiring assistive technology can access the services authorized under WIOA.

p. 22, Line Number: 1, Section 112 – Unified State Plan

- Feedback #9: Delete the word “model”

- Brief Context: “Model” comprehensive transition and postsecondary programs for students with intellectual disabilities (CTP) as defined in 20 USC 1140 refer only to the federal funded model CTP programs commonly known as TPSIDs (approximately 25 grants per year from the Department of Education). Deleting the word “model” in the section expands the coverage to mean all programs referred to as CTPs as it is defined by the HEOA in 20 USC 1140. [20 U.S.C. § 1140 - U.S. Code Title 20. Education § 1140 | FindLaw](#)