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Why the visit to Walgreens in Anderson?

I've had the good fortune of more than 30 years of opportunities to study and learn about ways of promoting participation of people with disabilities within valued aspects of everyday life, including employment. Because of the nature of my work, people ask me from time to time, "What do you think about Walgreens?" Having studied from afar Walgreens' initiative to hire people with disabilities at its Anderson, S.C. Distribution Center, I know exactly what is being asked. So it was a privilege when I was offered the opportunity to visit Anderson with six other Kentuckians for the experience of a hands-on orientation, or Boot Camp, providing an overview of the history, values, practices, and people behind the initiative.

While I'm always interested in meeting others dedicated to the cause, another particular reason for my interest in this visit is the increasing adoption of Walgreens' ways by other corporations and human service organizations. This is my effort at recording things I saw as key issues during the August 21-23 visit. However, I certainly may have gotten some things entirely wrong. Feedback and corrections will be appreciated.

Most of all, I hope these observations and reflections can provide a way to continue the conversation with my Kentucky colleagues from the Boot Camp, as well as having something to share with others when they inquire, "What do you think about Walgreens?"

Why Walgreens' interest in doing things differently in Anderson?

About seven years ago, Randy Lewis, Walgreens senior vice president of supply chain and logistics, emerged as the catalyst for the idea of proactively recruiting and hiring people with disabilities at the proposed new Walgreens Distribution Center in Anderson. Mr. Lewis' interest was quite personal. His son has a disability. And likely Mr. Lewis was well aware of the limitations within society, community, and human services to address his son's need to belong and contribute. So even though the Anderson Distribution Center would not directly benefit his son (since they live in a northern state), he was committed to demonstrating that it was possible for people with and without disabilities to successfully work alongside one another as fellow employees.

What happened at Boot Camp?

The Boot Camp was organized by Walgreens Career Outreach Coordinator Angela Mackey and included presentations, discussions about general disability topics and specific Walgreens issues, question and answer sessions with panels of Walgreens managers and Anderson human services people, as well as time on the floor to observe and work. Most of our schedule was centered at the Anderson Distribution Center, which is the focus of this document. However, our team also visited the Pendergrass, Ga. Distribution Center. Our

Kentucky group included five people employed by entities involved with supported employment services, one human service board member, and the human resources manager for a major corporation that has a significant presence in Kentucky.

What are different paths for people with disabilities getting hired at Walgreens?

Approximately 40% of employees at the Anderson distribution center are known to have disabilities and there are various ways for people with disabilities to be hired. Of course, as in many businesses, it's likely there are employees with disabilities not counted in the 40% because they chose not to disclose, nor request an accommodation. For people that disclose their disabilities, these are the primary paths for becoming Walgreens team members (employees): 1) People with disabilities may apply through typical ways, having no involvement with a human service organization. These applicants will follow the usual 45 day probationary period, have a mentor for up to 45 days, and then if meeting the required production rate and safety requirements, become team members. 2) People may be referred by Vocational Rehabilitation (VR) for direct hiring, and then follow everything described in the previous example. 3) In each department, 30% of positions are reserved for those who've successfully gone through the training room and transitional work group (TWG), a process that will be described in a later section.

In this paper, I've devoted significant attention to option number 3, the training room and TWG, because this approach was given emphasis during our boot camp, and because my primary interest is in those replicating Walgreens. Even though 30% of departmental positions are reserved, I'm not certain about the training room/TWG prevalence in hiring people with disabilities when compared with the direct hiring options.

Positive Features

- Walgreens actively recruits job seekers with disabilities, including those often unemployed or underemployed, for jobs having favorable wages and benefits in Anderson (start \$11.30/hr., after two years \$15/hr., after 90 days health, dental, profit sharing, option to purchase stock, and retail discount).
- There's top down leadership and buy-in for the inclusion initiative -- determination to learn and make its inclusion initiative work.
- Walgreens uses universal design in technology in the Anderson DC (e.g., computer touch screens that work well for people who read and those who don't). Physical accessibility is excellent throughout.
- A positive workplace culture of mutual accountability and teamwork was observed in interactions and terminology such as "team members."
- Attention was given to the assimilation of external job coaches (not employed by Walgreens). Their attire, identification badges and relationships with all team members, those with and without disabilities, helped them blend in with the culture on the production floor, minimizing the possibility of stigma by association.

- The distribution center facility is a magnificent setting in form and function, making for a very positive and inviting tone. One member of our Kentucky team commented that it looks more like a corporate office than a distribution center. Even the production floor is climate controlled.
- There are clearly stated beliefs that people with disabilities have a lot to offer and should be included rather than kept apart and away.
- It was affirmed that people are all individuals; one person with a disability is not like another person having the same condition.
- Over time it was learned that there are *not* “disability jobs” or jobs predetermined to be good jobs for people with disabilities. Our team primarily saw people performing production work. However, we were told that people with disabilities work in all levels at Anderson including production, management, clerical, and maintenance.
- The company recognizes the transformational power of good employment including the positive impact on people’s material side of life and personal identity.
- The inverse of the previous point was also noted — consciousness regarding the perils of poorly implemented (supported) employment, including “place and pray,” “placement” without regard for job fit in low paying, high turnover, undesirable service industry jobs, etc.
- We heard positive personal stories from team members with and without disabilities, management, and human services people.
- Our teacher and organizer of the Boot Camp, Angela Mackey, displayed an obvious passion for her work, energy, leadership, and a sense of humor, along with a rich personal perspective having experienced *both* negative stereotypical disability assumptions *and* high expectations for success — through home, community, school, undergraduate and graduate school, and employment as a vocational rehabilitation counselor prior to her current work for Walgreens.

Key Issues for Analysis & Consideration

It would be great to have more businesses and corporations taking a proactive approach to seeking and including the contributions of people with disabilities and hiring with good wages and benefits. However, as I left Anderson for my drive back to Kentucky, I was restless about issues at Walgreens that I thought had been settled long ago as being inefficient and limiting. For instance, how did the idea about someone with a disability needing to prove his or her “job readiness” by doing simulated tasks, grouped with other people with disabilities in a special setting, return to the landscape of vocational options?

It certainly is Walgreens’ prerogative to recruit, prepare, screen, hire, and train people with disabilities just the way they’re doing it. Furthermore, Walgreens doesn’t claim to have all of the answers. It was suggested that visitors use and adapt what’s learned to fit unique circumstances and company cultures.

My concern is the unquestioning adoption of *all* of Walgreens' ways by others, including many businesses *and* supported employment professionals, without discerning which practices are progressive and which ones could lead us to (using what I see as a fitting Baptist term) "backsliding."

I. Job Readiness and the Training Room – Here's what I understand to be the history and design of the training room: Long before the steel shell of the distribution center was visible, Walgreens contacted the local Developmental Disabilities Special Needs Board (DDSN) about help recruiting Walgreens employees with disabilities. The DDSN suggested, and Walgreens agreed to, the development of a "training center" in an empty Anderson warehouse. South Carolina economic development funds were used to renovate the warehouse for this purpose. The idea behind the training center was that people with disabilities would go there to be involved in simulated work as a way of establishing their work readiness to perform essential job functions for Walgreens. In other words, they'd be ready to hit the ground running when the distribution center opened. Folks from the DDSN identified three production tasks to simulate in the training center, believing these to be suitable for their clientele (1-AKL order picking, 2-de-trash, and 3-case check-in). Later on, after the Anderson DC was operational, the training center was moved to the distribution center, in a self-contained room, away from the production floor. It became the "training room," continuing the process of readying and screening people with disabilities.

People with disabilities are referred to the training room by VR, DDSN or special education programs within area public schools. Those referred to the training room by DDSN or schools are not paid. The rationale for this, as I understand it, is that actual production is not being completed. Apparently items are sorted and resorted, unpackaged and repackaged for training purposes.

We were told people are in the training room for up to two years, although most stay less time. Two conditions for graduating from the training room are: 1) establishing one's readiness, *and* 2) job openings. During a lunch conversation, it was indicated that some people have trouble staying on task in the training room. So for some, the intensity and duration is significantly different from a production job on the floor — perhaps working an hour, taking a break, working another hour and then leaving.

Walgreens employees do not provide training for people in the training room. Rather, training is performed either by DDSN job coaches or teachers for public school special education students. Walgreens employees train the job coaches or teachers and they in turn teach people with disabilities in the training room. (The training room was not operational during our visit. Our Kentucky group was given a walk-through of the space, but there wasn't an opportunity to observe what happens.)

After the training room — Those determined ready to move on from the training room join a transitional work group (TWG) on the floor where they're paid for production as temporary workers. TWG workers get 45 days of instruction with a DDSN job coach and Walgreens mentor. If they meet 80% rate and 100% accuracy, then they move

onto the payroll. If they meet 100% production rate in another 45 days, then they become team members.

Concerns and suggestions about the training room (*especially for those wanting to replicate the Anderson DC*)

- The training room collides with other values and principles that were described as foundational to the initiative. It just doesn't fit.
- The very existence of the training room confirms, rather than refutes many popular negative stereotypes about people with disabilities, including that they are alike and fundamentally different from non-disabled people, all have the same needs, all learn the same way, want to be together, and should be together.
- Walgreens places a high premium on confidentiality and people not being identified (by Walgreens) as having a disability. However, a person's presence in the training room essentially "outs" him or her.
- Even though Walgreens has learned that people with disabilities can do far more than the three production jobs originally identified, the training room still has the three original simulated workstations (1-AKL order picking, 2-de-trash, and 3-case check-in). In other words, for people in the training room, there still are "disability jobs."
- Evaluating people's "job readiness" in congregated, segregated, simulated, low-paying work places has its own failed history in the disability human service field. I believe it was the 1954 Amendments to the Vocational Rehabilitation Act that introduced the notion of people with disabilities attending sheltered workshops to get ready for real jobs. Even with the best of intentions, it never worked as designed. Some people moved on, but most didn't make the grade or ever "get ready." Eventually, it was recognized that the best places to work are places where everyone works. And the best places for people to learn jobs are places where everyone learns. This realization was the spark for developing supported employment more than 30 years ago.
- The *good news* is that there's low employee turnover at the Anderson DC. This builds the potential for continuity of coworkers, authentic team work, and employment security. The *bad news* is about job availability. The training room can become a holding area, even for people determined ready to work. From the perspective of the job seeker who has completed the steps required, there's a clog in the opportunity pipeline.
- Whenever possible, learning tasks in the actual environment of performance is important, and this is probably one of the reasons that all workers without disabilities learn their Walgreens production jobs on the production floor. This educational principle is *especially* important for people whose impact of disability is such that it's difficult to learn tasks in one place and then generalize and transfer the skills to another place. Likely this very thing, skill generalization and transfer,

presents problems for many people in the training room. Yet by design, everything taught in the training room requires skill generalization and transfer.

- If people are going to be evaluated on anything, they want to be evaluated under the best possible conditions. Yet in the training room, two primary motivators for work performance (1- fitting tasks of interest, and 2- pay) are removed from the formula. Even though not intentionally designed this way, for many it's a recipe *not* to get ready. And to be honest about it, few reading this document would perform well, at least long-term, under such conditions.
- Imitation and modeling are primary ways of learning for all people. For new learners, it's important to be surrounded by skilled, experienced and competent workers, and this is *especially* true for those who have learning difficulties. But, in the training room, the model workers are primarily or entirely others striving for competence. Also, at least for some, intensity and demand are significantly different than real production.
- Likewise, to the fullest extent possible, it's important for new employees with disabilities to receive instruction from the people typically instructing all new employees. Then, only as needed, job coaches will support the typical mentor/instructor with supplemental instructional strategies. Benefits of this approach are: 1) It maintains the integrity of the business' culture/ways of doing things, and as a result 2) builds on worker commonalities rather than emphasizing differences, and therefore 3) provides experience and confidence with the business owning the impact of the person's disability, while 4) providing expert instruction by a person who knows and performs the tasks, and most important 5) sets the stage for the person with a disability to be accepted and authentically seen as a "trainee," "employee," "team member," or whatever would be the typical designation for a person in that particular level of training.

It's important to note that this kind of thing does happen to some degree for workers with disabilities who are direct hires or those in the Transitional Work Group (TWG). Walgreens mentor workers, the typical instructors, are paired with external job coaches, even though I left with the impression that roles are reversed from what I described above. That is, the job coaches are primary instructors and the Walgreens mentors secondary. (For those replicating Walgreens, I recommend support roles arranged as described in the previous paragraph.)

Nonetheless, those in the training room, people who by definition of the impact of their disabilities would need the *best* instruction, do *not* receive instruction from Walgreens mentors.

- If it takes up to 2 years to get ready under the conditions in the training room, it raises serious questions about either: 1) the suitability of the tasks for the job seeker, and/or 2) the quality of instruction provided to the job seeker.
- Heading to the Anderson production floor, it's impossible to miss the huge universal NO symbol painted in red on the wall, right on top of the word "them." (No "them!") However, despite their best intentions, and I'm convinced Walgreens is very sincere about this, there *is* a "them." And "they" are in the training room.

- For these many reasons, the training room is a practice I'd recommend *not* replicating. I predict that it's only a matter of time before the training room comes to be seen by Walgreens as a serious liability toward their goal of inclusion.

2. Essential Functions & Traditional Job Design – “Same pay. Same performance. Side by side.” Randy Lewis set the bar high, and for many this has worked well. “Job readiness” and “essential functions” were terms used deliberately and repeatedly during the boot camp. And these clearly are the benchmarks Walgreens uses to determine people who get hired and people who don't.

I'm almost certain that the brand of *job readiness* described and critiqued in the previous section was derived from dated human services practices that found their way into the Anderson Walgreens DC. The term *essential functions* has an entirely different root. It comes from a landmark piece of disability legislation, Title I of the Americans with Disabilities Act (ADA) of 1990, requiring that employers with 15 or more employees provide a level playing field for people with disabilities as long as they are “qualified applicants,” who can perform the “*essential functions*” of a job, with or without a “reasonable accommodation,” to be provided as long as the accommodation does not create an “undue hardship” for the business. That's the essence of Title I of the ADA, legislation that's had tremendous impact on raising American's consciousness to the contributions of people with disabilities in the workplace. Many doors formerly closed have been opened.

At the Anderson Walgreens DC, this position is taken regarding employment opportunities: For anyone with a disability for whom work in the DC is a good choice, then if he or she has the personal motivation, as well as high expectations and acceptance from others in the DC, and is provided good instruction, then he or she can learn the same standard of performance and receive the same pay. It fits Title I of the ADA to the letter.

Concerns and suggestions regarding the use of only ADA Title I job design (*especially for those wanting to replicate the Anderson DC*)

- Despite the positive results of the ADA including Title I, it's important to consider that employers had work to be done prior to 1990 that they defined differently. In many ways, the ADA resulted in formalizing ways of employment that used to be informal. I believe that the standard of meeting employer needs is just as important as is meeting the relatively new and narrower standard of “essential functions.”
- It's very true that many people with disabilities have been denied good work because they've not been provided high expectations, offered challenging jobs that are a good fit, provided good instruction, and given technological or other support to meet performance demands. However, the inverse doesn't apply — that *all* people with

disabilities can meet production demands in a performance task if provided with these same conditions.

- At Walgreens there seemed to be a sense of rescuing people with disabilities from the often-dysfunctional human service system that includes poorly provided supported employment services (“place and pray,” “placement” without regard for job fit, etc.). While I share in the frustration that some of what happens in the name of supported employment falls short of the mark, I’m also aware of high quality services that provide significant benefits to employers and job seekers with disabilities. It’s unfair to dismiss a valid approach based on examples of poor implementation.
- The principle of partial participation says that just because someone can’t do *all* of the tasks or steps, he or she should not be prevented from doing the parts that *are* possible. This way of thinking has potential to transcend the ADA and open new doors for employers and job seekers with disabilities.
- Much has been learned, especially over the last decade, about ways to discover personal gifts and talents previously unrecognized and then pursue fitting types of work formerly unconsidered.
- Additionally, much has been learned about the voluntary negotiation of jobs that pair employer needs *with* the discovered personal competence and contribution of people with disabilities. Often referred to as “customized employment,” this approach is very different than the notion of “job placement,” or arbitrarily putting people with disabilities in readily available jobs. The United States Department of Labor, through its Office of Disability Employment Policy, has been an active contributor in the refinement and growth of customized employment.
- These two previous points are consistent with an enduring belief that I hold along with many others, that everyone with a disability has something important to contribute whether or not they can perform the essential functions of a competitive job. The points also provide a translation of the “presumption of employability,” that’s been a part of the Amendments to the Rehabilitation Act for more than 15 years.
- Nationally in the field of supported employment, the over-reliance of competitive “placement” or solely seeking competitive work, has forced people with disabilities into the only jobs where they believe they can compete — high turnover, service industry jobs.
- Competitive jobs that meet the Title I definition of the ADA and customized jobs that voluntarily match employer needs with job seeker contribution are *equally valid approaches*. *One is not inherently superior to the other*. They’re not mutually exclusive, nor are they disability specific. I’d propose that employers consider using both approaches for people with and without disabilities.
- Beginning January 2013, Walgreens will introduce REDI (Retail Employees with Disabilities Initiative), proactively hiring people with disabilities in their retail stores in all fifty states. *This nationwide retail employment initiative presents an ideal opportunity for replicators interested in the lessons of Walgreens to think broadly about*

ways of employment. This is especially true for Kentucky companies that are similarly positioned with large distribution centers as well as retail operations. Offering managers *the option* (along with competitive hiring) of pairing their store needs with specific job seeker competencies, is one possibility for testing the waters of customized employment. Straightforward information about customized employment is readily available through the U.S. Department of Labor and elsewhere. These approaches will appeal to managers' common sense, and it's likely participating managers will find the process similar to current practices -- assigning employees to perform tasks where they're at their best.

- If Title I of the ADA is the *only* standard, then many of the people historically left behind, without opportunities to contribute, will remain on the sidelines.

3. Two Other Issues & Suggestions for Consideration - This is a combined section about two other issues I noticed during time on the floor and that were also topics of discussion with our group: imagery and inclusion. As with the other sections, it's hoped this will be useful for people interested in replication and learning from the experiences of Walgreens in the Anderson DC.

Imagery

- a. Something I observed on the production floor that I'd never seen before in an industrial setting were photographs used to differentiate departments and workstations within a department. For example, one of the departments had a theme of animals with different animals designating workstations. Even if this is something that's becoming part of the culture of production floors, it gave me pause — thinking that the photographs could impair the image of workers with disabilities. The photos seemed more like something typical in an elementary school rather than an industry. Not that any of this was intentional, but given the negative stereotypes that people with disabilities face, including adults being seen as eternal children or even like animals, I'd recommend that others wanting to replicate Walgreens find a different, more typical way within industry to code facility locations.
- b. Related to point "a." above, one of the things we worked on in our group was the development of "job aids," basically pictographs to remind workers of specific tasks, quality reminders, production needs, etc. We were told that all team members, those with or without disabilities might have these. When I raised the issue of risk that an image could unwittingly perpetuate a negative stereotype of team members with disabilities, I was told that no one had ever complained. Asking people if they are okay with images used in a job aid is important; however, it's not the only consideration. A photo or graphic could be harmful to a person's image without the person harmed being aware of this. For example one could ask a young man with Down syndrome, someone who's highly vulnerable to being seen as an eternal child, if he would mind having a cartoon character as a symbol in his job aid. Even if he agreed and said it was fine, the cartoon character would still be harmful to his

image, perpetuating the child role. For those replicating the use of job aids, I recommend careful consideration of the above issues.

- c. I appreciate the sentiment of the huge NO “THEM”! sign painted on the production room wall. However, somehow calling attention to the fact that some workers would be considered as “them” seemed to negate the intent. For those interested in replicating the idea of “no them,” I believe this could be a theme more appropriately covered in employee interviews around a company’s commitment to include workers with disabilities.

Inclusion

- a. Inclusion is intended to address the popular, unfortunate and limiting experience of congregation and segregation of people with disabilities in our society. With the exception of the training room, inclusion is a primary goal of the Anderson DC. Initially hiring people with intellectual disabilities was the focus, and later Walgreens moved to people having other disabilities. Currently about 40% of the workforce is people with disabilities. However, the high proportion of people with disabilities was not apparent during my time on the floor, likely because many people have disabilities that are “hidden.” And it’s important to say that another reason for the high proportion not being apparent is that people were competent in their work.
- b. In one of our group discussions, it was acknowledged that there would be some point when the percentage of workers with disabilities could become so high that the benefits of inclusion would be lost. However, there didn’t seem to be a lot of consideration given by Walgreens to indicators or conditions that could lead to this predicament of declining inclusion. Here are examples of issues that affect the inclusion of numerous people with disabilities working in the same business including: a) How obvious are people’s disabilities? b) What is the proximity of employees with disabilities to each other? c) How similar are the kinds of work tasks performed by an employee with a disability when compared to tasks performed by non-disabled coworkers? d) What are the demands or support needs of workers with disabilities? e) Are relevant supports and instruction provided in typical ways to the fullest extent possible? These kinds of things are important to consider intentionally and in advance, rather than being left to chance. The risk of not planning is that the business takes on the de facto identity of a corporate sheltered workshop.
- c. Some would propose that a natural proportion of people with disabilities provides the greatest likelihood of assimilation.
- d. A recommended approach to promote inclusion would be where a company: 1) has a clear commitment to consider hiring people with disabilities, quietly and deliberately, one person at a time, according to the job seeker’s specific contributions and interests, meeting a business’ needs, in either a competitive or customized arrangement, 2) pays attention to assimilation indicators listed in point b., and 3) encourages other businesses and corporations to do the same.

4. Conclusion - I don't claim to be an expert in business; however, I recall studying about "opportunity costs" in a business course taken at the University of Kentucky many years ago. Here's a homemade definition that I believe is pretty close: Part of determining the cost of a particular way of proceeding in business includes determining the cost of not doing an alternative. For example, if a business decides to develop a "training room" and then places people with disabilities in it hoping they'll get ready for actual work, then the time, resources and people devoted to developing the training room *or* "getting ready" in it, won't be available for other approaches. I think I've just written a paper about opportunity costs.

While Walgreens has "a way" and certain innovations in providing employment for people all too often left behind, it would be a mistake to characterize Walgreens' way as "the way." I found all Walgreens employees in Anderson to be gracious, sincere, and devoted to their work. Very impressive! And they were also entirely human. As it is with any human endeavor, there will always be room for analysis and improvement.

However, I didn't write this document thinking that Walgreens would want to change how they do business. Rather, I'm interested in ways we Kentuckians devote ourselves to critical thinking and honest debate about issues I've raised, as well as other dimensions of Walgreens I didn't include. Our work — our responsibility to job seekers with disabilities, companies and their shareholders — is too important to do otherwise.

Acknowledgments

Ideas offered in this paper are derived from things I've learned through the work of others, including Marc Gold, Mike Callahan, Wolf Wolfensberger, Darcy Elks, Lou Brown, and others too numerous to mention. Also, I'm not claiming this document to be representative of their work, nor that they would agree (would have agreed) with what I've presented in it.

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Addendum (11/26/12 • REDI update and critique)

Purpose of the addendum about REDI

REDI stands for the “Retail Employees with Disabilities Initiative,” referenced at the bottom of page 8. Following a pilot project in a limited number of states, Walgreens plans to launch REDI in all fifty states beginning January 2013. Service Clerk is the REDI job of focus. As more information emerges about the retail initiative to employ workers with disabilities, and as colleagues in my home state of Kentucky consider their options for involvement, an update including translation of principles from the original paper seems to be in order.

The addendum lists issues and recommendations that are targeted for two primary groups: 1) supported employment program personnel considering involvement with REDI and/or promoting its replication, and 2) businesses interested in replication. Some of the issues and recommendations are specific to REDI, while others closely follow items already named in prior pages related to the Walgreens Anderson Distribution Center. In these instances, page numbers will be noted. (In order to understand the issues raised in the addendum, it will be important to read the preceding eleven pages.)

As with the Walgreens Anderson Distribution Center, the intent of REDI is certainly positive (pages 2 and 3). Again, Randy Lewis, Walgreens senior vice president of supply chain and logistics, is the driving force (page 1).

Cautions about exclusion of workers with disabilities including unwittingly creating a second-class workforce

- I. Unpaid trainees (externs) with disabilities** - Walgreens identifies people with disabilities participating in REDI interchangeably as “trainees” or “externs.” Externs are not paid during their training, which is projected to have a duration of 4-6 weeks and 50-200 hours. The unpaid externships are permissible using a U.S. Department of Labor (DOL) provision that says adults with disabilities don’t have to be paid while training for work if certain criteria are met.

Some of these DOL requirements are spelled out in the agreement between Walgreens and participating supported employment programs that refer externs to REDI: “...the trainees will work under close personal supervision and are not displacing regular employees; Walgreens is receiving no immediate advantage from the training and, occasionally, Walgreens operation may be less efficient; the trainees are not entitled to a job at the conclusion of the training period...”

The Walgreens agreement also stipulates the need for the referring agency to provide insurance for externs because they aren’t covered by Walgreens workers’ compensation insurance.

Concerns and suggestions regarding unpaid trainees/externs (*especially for those considering REDI participation or replication*) - Because there is a learning curve for everyone studying new work, and because non-disabled people are typically paid during their training, I suggest that replicators *not* use the special DOL disability training provisions, thereby avoiding making predetermined distinctions about people

with disabilities regarding expectations, status and training practices. Essentially, it's a bad idea to make decisions about what, if anything, might be needed to accommodate a person with a disability regarding training or work prior to meeting the person.

Even if there are some similarities with REDI and unpaid experiential learning programs for non-disabled students, the fitting analog for the adults eligible for REDI is adults pursuing service clerk jobs. (In other words, how do adults typically try to obtain service clerk jobs?) The overarching problem with the REDI training arrangement is its inadvertent "us" and "them" hierarchy. Status-differentiating messages that are opposed to Walgreens' intentions (pages 2 and 3) are implicit in the special arrangement: "We" are paid during Walgreens service clerk training. "They" aren't. "We" are expected to demonstrate competence and contribution while we're learning. For "them" there's "no immediate advantage (to Walgreens) from the training and, occasionally, Walgreens operation may be less efficient." "They" even need to have a job coach from an outside agency or a Walgreens employee with them every minute. "We" were hired prior to receiving service clerk training. For "them" it's made clear that "trainees are not entitled to a job at the conclusion of the training period." A more efficient (page 11, "opportunity costs") and recommended way for replicators to avoid these unintended pitfalls is by taking a personalized approach rooted in job fit and available work. (Please see page 10, d. Also, see page 5, bullet 6 re "opportunity clog.")

In Kentucky, there *is* the possibility of a publicly funded third party paying externs a training stipend and covering insurance. While this is certainly preferable to no compensation during training, the negative "us" and "them" perceptions remain intact.

2. **Predetermining primary instruction to be provided by external job coaches** - With REDI, there's the assumption that people with disabilities will not benefit from the same kind of instruction that's provided to non-disabled people. From the REDI Training Document: "It's important to remember that during training, externs are not permitted in the store without a trained job coach." "It is the job coach's responsibility to make sure that candidates have experience in all areas of the curriculum." Also, from the related DOL rules: "Participation will be... under the general supervision of rehabilitation organization personnel."

Concerns and suggestions regarding emphasis on instruction by external job coaches (*especially for those considering REDI participation or replication*) - The emphasized job coach training approach was critiqued in issue #1 primarily from the perspective of image problems. Page 6, beginning with the third bullet, lists a rationale for using typical supports for optimal competency development, along with image enhancing benefits. Basically, it's always best to begin with the standard of what's typical and valued, only adapting when needed for individual circumstances.

3. **Rigidity in job design** - Within REDI, all three essential job functions of the service clerk position (customer service, register transactions and store appearance) must be mastered by externs. Reasons Walgreens provides for developing REDI include this: "Stores were often approached with candidates from agencies that could only do one or two of the primary duties of a service associate, but not all three needed by Walgreens." Then adding, "We realize that not all candidates will acquire all three of the skill sets that Walgreens requires for Service Clerk. Our hope is that those who do

not will gain some valuable retail skills that can be used in another retail environment where specialization of only one skill set is more marketable.”

Concerns and suggestions regarding job design rigidity (*especially for those considering REDI participation or replication*) - An entire section in the original paper was devoted to the issue of job design flexibility and potential benefits for employers and employees. (Please see Section 2 beginning on page 7.)

The [U.S. Department of Labor](#) has excellent resources on customized employment. Also, it's an area where the program I work for at the University of Kentucky teaches extensively, so I'll be pleased to provide information. While it's Walgreens prerogative to design jobs as they wish, I hope that others will consider looking more broadly at job definitions that fulfill the work to be done -- accomplishing work as well or better than is possible with strict adherence to Title I of the ADA. If all businesses follow Walgreens' example, then many people with disabilities having much to offer will be denied opportunities to contribute through valued employment.

4. Relationship discontinuity and need for skill generalization & transfer -

Walgreens' information about potential hiring locations for successful externs is as follows: “In general, we expect that the extern will not be hired at the training store; externs will hopefully be hired by a store in the immediate area, another store in the district or another Walgreens business unit, or by another business in the community.”

Concerns and suggestions regarding extern movement (*especially for those considering REDI participation or replication*) - It's fair to assume that service clerks are typically interviewed, hired, trained and employed in the same store. As described in the original paper, whenever possible it's important to learn tasks in the actual environment of performance, and this is especially important for many people with disabilities (page 5, last bullet). Also, continuity of co-workers and managers will be significant for many, especially those for whom forming relationships is difficult. Therefore, working in the same location where training is received is recommended.

Addendum Summary

As one who's been on the road of this movement for more than 30 years, making many mistakes but seeing positive possibilities along the way, I applaud the intent of Walgreens and would certainly like to see other businesses step up to the plate. At the same time, it seems unwise to leave 30 years of learning on the shelf, especially if this means reverting to practices that hinder advancement of employment opportunities. Given human nature, the significant positive public attention, and the sparsity of critique, it's possible that Walgreens has been elevated in the minds of many as demonstrating the best approaches in all areas. We need to continue constructive critique throughout our field, more conversations about people with disabilities assuming their rightful place in the world.

Acknowledgments & Contact Information

Please refer to information on page 11. Comments, corrections and questions are welcomed. ■ Milt Tyree, 11/26/12