VERMONT PYS 2020-2023

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I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

A. WIOA STATE PLAN TYPE

This is a combined plan

COMBINED PLAN PARTNER PROGRAM(S)

Trade Adjustment Assistance for Workers programs (activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))

Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)

II. STRATEGIC ELEMENTS

A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

1. ECONOMIC AND WORKFORCE ANALYSIS

Vermont is a small state both based on land size and population. It is predominately rural with a high concentration of forest land. Geographically, the state is bifurcated by a mountain range which can make east to west travel challenging depending on the season. The largest population base was established along Vermont's most prominent water way, Lake Champlain. This area in northwestern Vermont continues to have the highest levels of population density ultimately leading to the highest levels of economic activity in the state as well.

Overall, the Vermont economy is more balanced and diversified than the layperson may realize. Though known for farms and ski resorts, the business composition of Vermont shows a more diversified picture. Based on 2018 data and relative to the United States economy, Vermont has a higher concentration of industry employment in private education (NAICS 61), health care and social assistance (NAICS 62) and (NAICS 31-33). These three industries, plus the often-cited ones of agriculture and leisure and hospitality, offer a wide variety of employment opportunities across the state.

In addition to these private sector activities, government employment is also well represented in the Vermont economy. The combination of an international border (federal government) and dedicated support to public education (local government) add to the stability of the Vermont economy. This overall diversity of industry employment acts as a buffer against the typically wider swings of the United States economy. This is evident during the last economic downtown. During the depths of the last recession, the U.S. economy lost approximately 6 out of every 100 jobs. In Vermont, approximately 4 out of every 100 jobs were lost. This relative moderation is not just on the downside but also the upside as well. During the economic recovery, the U.S. economy's rate of employment growth exceeds Vermont's.

While the Vermont economy is not overly reliant on any one industry, there are sub-state areas where high concentrations of industry employment can be found. In 2018, using Career Technical Education (CTE) Center catchment areas, a report highlighting large industries by employment and relative concentration in these sub-state areas was created. Similar to statewide tools, this report was meant to steer discussions of support towards certain well-represented industries as well as identify opportunities by highlighting under-represented industries. From this work, several themes emerged.

Industries in Demand: Growing Industries

Health care and social assistance is a significant employer in many parts of the state. It is projected to grow which will create job openings requiring specialized skills. In addition to growth, many job opportunities will be created by current employees exiting their profession due to retirement or job churn. As such, health care and social assistance, including early care and learning and care for the elderly, are projected to require a large inflow of employees.

Another sector projected to have significant growth is professional and business services, including information technology (IT) and cybersecurity occupations. Though not heavily concentrated in the Vermont, this industry is the future of the American economy. It represents the newest level of specialization and allows individual firms to focus on their core capacities and partner with other firms to handle ancillary business functions. This is a competitive sector and requires talented individuals but once created, firms in this sector can generate significant economic activity by servicing customers around the globe.

Industries in Demand: Projected High Levels of Openings Due to Replacements

As discussed above, health care and social assistance is expected to be hiring due to growth as well as backfilling positions. As a job seeker, knowing where job openings are can be more important than understanding where job growth is. This section highlights industries which are expected to have above average demand for labor not due to growth but due to replacements.

Surprising to many, manufacturing is more highly concentrated in the Vermont economy than the U.S. economy. A traditional generator of wealth for individuals of all skill levels, is not what it used to be. Though still a productive and profitable sector, it no longer requires the employment base once needed. Through new technology, manufacturers are able to produce more products with less labor. The downward decline of employment in over the last 50+ years has led to the incorrect perception that there are not employment opportunities to be had within this industry. This is untrue. Currently in Vermont, employers of all sizes are reporting openings. These jobs require more technical skills than in past decades as the technology has changed. The majority of opportunities do not require four-year degrees. Many entry level positions require a high school education and some post-secondary training. Though the industry is not growing, there are projected to be many job openings in due to the current workforce retiring.

Similar to manufacturing, construction is not projected to be growing but will be hiring. Again, due to retirements and job churn from the existing workforce, construction will be looking to fill many positions in the next ten years. Training for these positions, which can include "green" occupations like solar installers and weatherization specialists, can be completed through Career Technical Education Centers or through an apprenticeship. In both options, participants are acquiring the necessary skills at little to no cost to themselves and preparing themselves for solid middle-income careers. construction is an integral part of any economy as it provides valuable services in the creation, remodeling or repairing of houses, buildings and infrastructure.

Regional Distribution

While not specific to any one region, these industry trends are important to the broader state conversation. Local knowledge is key to any discussion about a sub-state area. As eluded to at the beginning, the northwestern area of the state – whether defined as Chittenden County or more broadly as the Burlington-South Burlington Labor Market Area – is considered the 'economic hub' of Vermont. The county accounts for over 25% of the state's population and approximately one-third of all employment opportunities. The LMA (which is comprised of Chittenden County and much of Franklin County) includes one-third of the population and 40%

of the state's employment. Consistent with economic history, economic development follows the placement of natural resources and transportation corridors. As the modern economy has moved away from the reliance on natural resources for employment, the transportation corridors between housing stock and businesses has become more important. This in part explains the overspill of economic activity out of Chittenden County to the north and the southeast via Interstate 89.

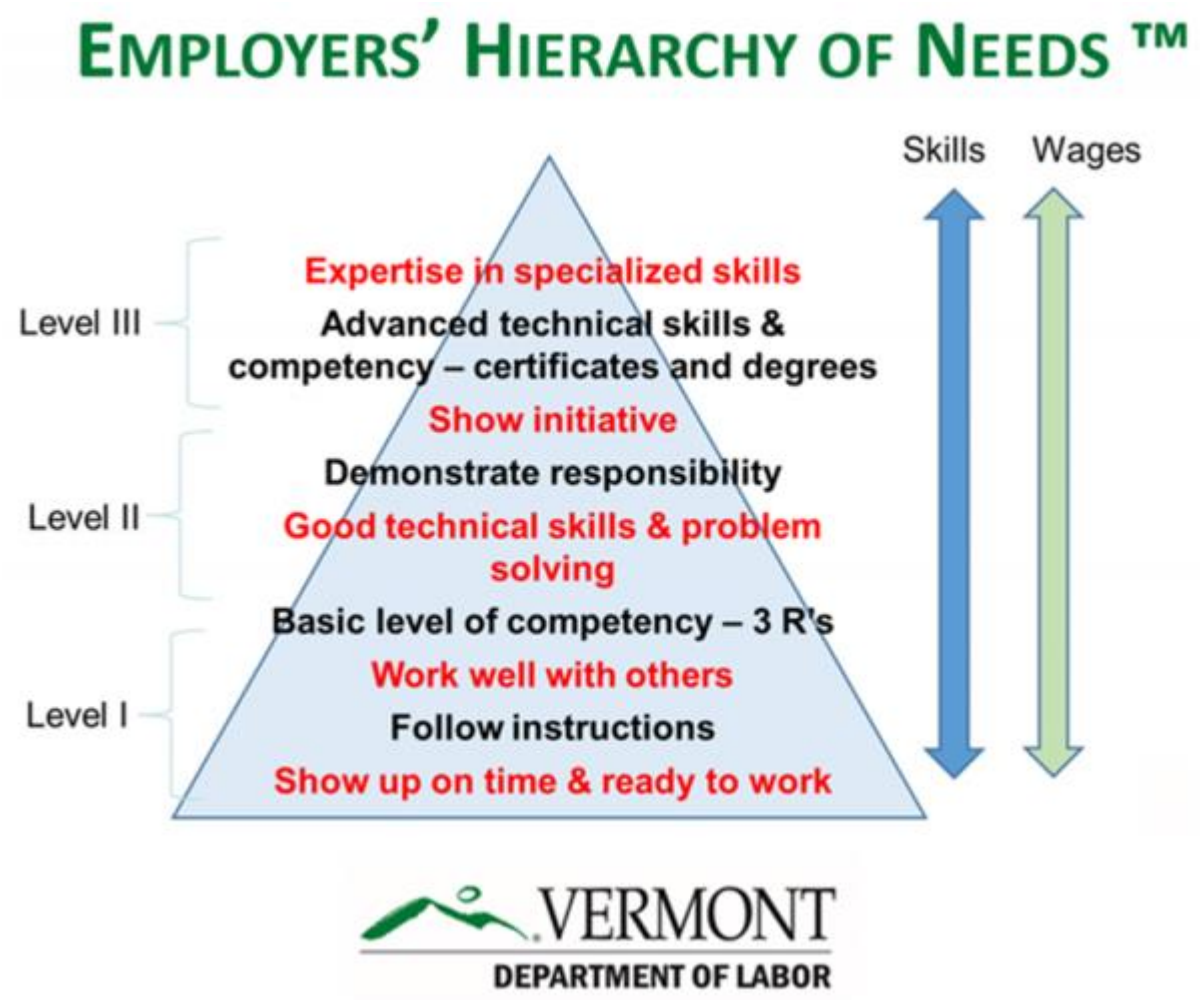
Over the last ten years, the '89 corridor' has been a consistent producer of economic activity in part due to or as the result of population recruitment and retention. The three-county area comprised of Chittenden, Franklin, and Lamoille have shown the largest population increases across the state. Washington County is the next county down the corridor and though it has not experienced similar population gains, it does host the state's capital and as such has produced similar economic gains as measured by employment. In total, these four counties account for 83.7% of the statewide employment gains realized between 2009 (trough of the recession) and 2018. This means over 15,000 of the nearly 18,000 jobs that have been added to the Vermont economy during the economic recovery/expansion occurred in this four-county region.

Conversely, seven counties (Bennington, Caledonia, Essex, Orange, Rutland, Windham, and Windsor) are yet to fully recover from the last economic downturn. Geographically, these counties represent the southern and the eastern part of the state. In the past 11 years (2007 to 2018), these areas are showing fewer jobs and fewer people - a vicious, self-reinforcing economic cycle. In total, 10 out of 14 counties in Vermont have shown population declines (includes the aforementioned seven counties plus Grand Isle, Orleans, and Washington Counties). As a small state, resources – particularly labor – can be scarce. The state has actively been promoting education and career awareness to all students and job seekers. These individuals represent the future of the Vermont workforce.

Employment Demand

In 2019, the Vermont economy faced tight labor market conditions with labor demand exceeding available labor supply. Nearly all occupations in the state are "in-demand" by some measure. The tension was created by contributing factors on each side of the equation. An ongoing national economic expansion drew down unemployment counts to historical lows as businesses hired job seekers. The continued health of the U.S. market has put upward pressure on labor demand. On the flip side, the demographic pressures created by the initial wave of retirements coming from the Baby Boomer generation is decreasing labor supply. Employers across the state, in all industries and of all sizes, are reporting job openings.

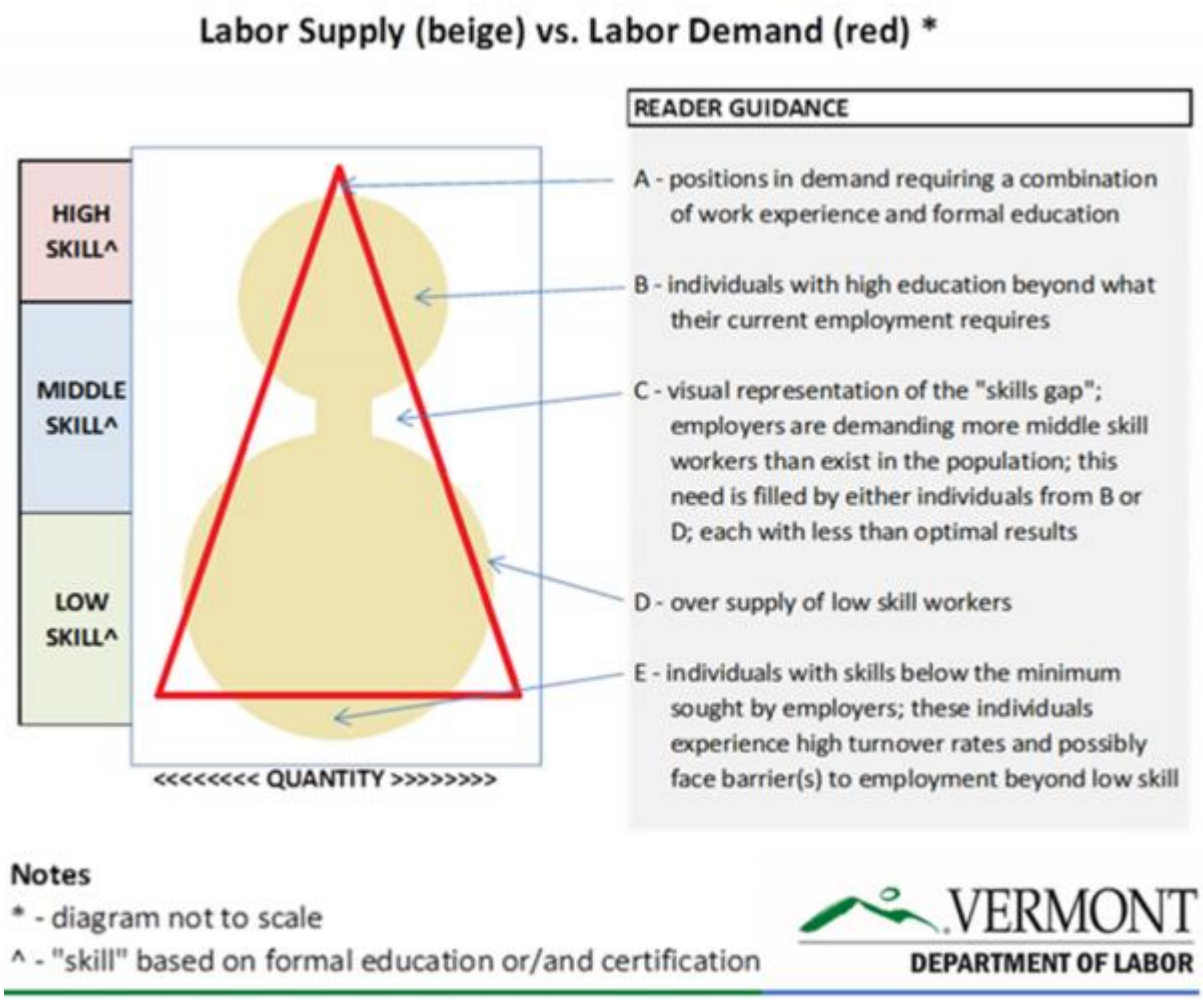
To better understand the available employment opportunities in the state, the Vermont Department of Labor contacted employers to ask about posted jobs and which skills were most difficult to recruit for. After thousands of calls, the compiled research showed that the three greatest skills in demand by employers were: show up on time, follow instructions, and work well with others. These soft skills may not yield high wages in all circumstances, but they are key elements of all jobs. As represented in the "Employers' Hierarchy of Needs" illustration, these three soft skills are in greatest demand (quantity). Employers need these the most to handle all aspects of their day to day operations. While specialized and technical skills (elements of quality of labor) are important and lead to higher wages, they are not required for all positions. By better understanding employer needs (labor demand), it was easier to understand the opportunities at the margin to improve individual outcomes (labor supply).



This understanding lead to the creation of the "cello diagram" which overlays labor supply and labor demand. The name "cello" comes from the perceived shape of labor supply. It details the employment outcomes of individuals across the economy. Through qualitative research and discussions with partner organization, it was determined that there was a large segment of the population with low skills who could benefit from upskill training thereby gaining them access to the middle skill job market. Apprenticeships, Career Technical Education, post-secondary programs with short-course formats are going underutilized though they are the pathway to economic independence.

It was also identified that there was a noticeable percentage of the population with less skills than would be necessary to be successful in any job. While these individuals may have one or more barriers to employment, the upshot is: in a workplace setting these individuals have difficulty consistently demonstrating the three key employment elements identified by employers --- show up on time, follow instructions, and/or work well with others.

Lastly, from a pure employment perspective, there was also a recognition that certain individuals had more education than was demanded by the labor market. Though education for education sakes is important, if the end goal of school is work then additional information needs to be consulted. This is how labor market information can be so valuable in the hands of those making education or career decisions. By not incurring unnecessary student costs and by targeting training which yields specific employment outcomes, students and job seekers reach the economic self-sufficiency quicker and more affordably.



Occupations in Demand

Now in its third iteration, the Vermont Department of Labor has maintained a partnership with the McClure Foundation to produce physical and online resources to assist students and job seekers in Vermont. The Pathways to Promising Careers brochure is distributed to schools, Vermont's American Job Centers (including regional Career Resource Centers), public libraries and other partner organizations that provide direct service. The brochure highlights a myriad of employment opportunities in the state as well as the educational attainment level necessary for each. Online resources allow someone to research the Vermont based education and training providers that offer the necessary course work to meet these educational attainment levels. The brochure highlights 62 occupations based on a wage threshold and ample number of projected openings.

For a comprehensive assessment of employment opportunities in demand, an online publication summarizing the statewide ten-year occupational projections is more helpful. By grouping occupations by education attainment levels and sorting them by both growth rates and projected openings, a job seeker can quickly understand low-barrier points of entry into the labor market as well as assist in informing long-term career goals. One take-aways from the long-term statewide projections is that there are many jobs which do not require four-year degrees. In fact, most employment opportunities require less. These jobs tend to pay less than jobs which require higher education. Examples of where this is not the case include Social Workers and Substance Abuse Counselors. In both cases, these occupations typically require an advanced degree, but the pay is less than other occupations requiring less training.

Another long-term trend in the Vermont economy is the large growth rates projected to STEM occupations. Though not a large part of the current economy, technical and scientific occupations are growing faster and will become increasingly important. These occupations require specialized skills and typically earn high wages. The advancement of the Vermont economy is going to depend on the ability of the Vermont labor force to create or leverage technology towards economic gains. The jobs requiring less education are in direct competition with technology. Increased computing power, predictive and scanning software, and user interfaces are just some of the ways employers are looking to technology to improve business performance. These "advancements" can come at the expense of certain occupations. Through training and education, individuals can acquire modern skills to best prepare for tomorrow's economy.

Unemployment Rates and Barriers to Employment

Also related to educational attainment are labor force participation and unemployment. Consistent with economic research and as evidenced by the outcomes in Vermont, the higher the educational attainment level of a population, the higher the labor force participation rate. Versus the U.S., Vermont's labor force participation rate is approximately 3 percentage points higher. Even with a high rate of participation, the outcomes are also better for Vermonters when considering unemployment rates. Unemployment is inversely related to education and Vermont is consistently in the top ten for lowest unemployment rate in the country. For much of 2019, Vermont had the lowest unemployment rate of any other state. This is not to say the employment outcomes of all Vermonters are positive. Many populations within the state experience significant barriers to employment.

Women – the economic progress of women in the U.S. economy has been robust over the past 50 years. Between 1950 and 2000, the labor force participation rate of women in the U.S. has nearly doubled. However, since this time, the rates have leveled and, in some states, declined. Some of this decline could be attributed to the increased participation of women in education. By most education metrics in Vermont, the educational attainment level of young women exceeds young men. Beyond labor force participation and schooling, the economic outcomes for women and men continue to be different.

Occupational segregation presents an ongoing challenge as traditional definitions of employment by sex persist. This can isolate women from the fast-growing and high-paying world of the Science, Technology, Engineering and Mathematics (STEM) fields. Another challenge is the division of labor when it comes to unpaid work in the household. Though women are more likely to be working or in school than decades ago, the time spent on household related activities continues to disproportionately fall to women. Home responsibilities can limit a women's ability to single-mindedly pursue economic advancement (promotions, trainings, working overtime, etc.). This potentially manifests in lower direct compensation in the short run but that is not all. The downstream impacts of breaks in employment can limit future professional advancement, impact qualifying earnings calculations for Social Security and lessen monetary contributions to personal retirement accounts.

Minorities – In Vermont, conversations on gender equity and racial equity are closely associated. Vermont is often considered a "white state" with over 94% of the population identified as "white alone" per the U.S. Census Bureau. Though a small part of population, non-white races and ethnicities are an increasing share of the state's people. This important and growing number of non-white Vermonters can face many barriers to employment as evidenced by the higher unemployment rates. Specifically, hispanic and black Vermonters that are in the labor force are two times more likely to be unemployed than their white counterparts.

Unpacking additional economic outcomes by race is difficult due to a lack of reliable data. It is the hope of the State of Vermont that the 2020 U.S. Census will provide better clarity on the total numbers. Many non-white Vermonters have come here in the last ten years via refugee status and are therefore New Americans.

Veterans – As a state, Vermont has consistently answered the call to serve the country. Vermont's ratio of Veterans to population (6.2%) exceeds the U.S. average (5.7%). As such, Vermont has a high concentration of veterans and supporting them is a priority. Overall, Gulf War Veterans (eras I and II) employment outcomes are positive with higher labor force participation and lower rates of unemployment. That said, Veterans from all eras can experience high rates of disability due to physical or mental health issues.

Mature Workers – With a high concentration of people over 55 years old, the mature worker is a key contributor to the Vermont economy. Bringing a wealth of personal and professional experiences, the mature worker is a valuable contributor to businesses in all industries. The leading edge of the Baby Boomer generation turned 65 in 2011. The tail of this generation won't turn 65 until 2029. Some mature workers can retire but choose to work. Others must keep working out of economic necessity. Either way, working with employers and training providers to promote the employment opportunities to this population is critical.

Vermont's Workforce

One common theme in Vermont and across the U.S. is the varying economic outcomes between urban and rural areas. The period of economic expansion which began in 2009 has largely been concentrated in urban areas with the U.S.'s metropolitan areas reaping most of the economic gains. This story is no different in Vermont where rural counties have higher rates of unemployment and lower rates of labor force participation. Living in a rural setting represents physical distance to employment centers which increases the need for reliable transportation. This can also complicate access to childcare. Rural communities may also be underserved with regards to internet access. Online job applications have become commonplace in today's job market. The ability to work from home or start your own business can also require a reliable internet connection.

Though magnified in a rural setting all the aforementioned barriers to employment – transportation, childcare, lack of internet – are real to many people in urban settings as well. And the barriers don't stop there. Substance abuse, criminal records, physical or mental health issues, secondary impacts of poverty – all of these situations can impact a person's ability to advance economically. In many cases, these situations disproportionately impact certain populations most notably women, minorities, veterans, and mature workers.

As a core determinant of traditional economic growth, population can be used as a key barometer of future economic outcomes. As previously alluded to, Vermont has a small population base with last estimate at approximately 624,000 in 2019. The population in the state has been hovering in the 620,000 range since 2005. Over this 14-year time period, the annual growth rate of the state's population falls between -0.1% and 0.1% depending on the year. For all intents and purposes, the population in Vermont is flat and there is little evidence that this will change soon.

As a state, Vermont's population is the third oldest in the U.S. as determined by median age. The two largest contributing factors to this are: Americans are living longer due to advances in health care and Vermont has had a low birth rate for several decades. Underlying both trends is the high level of educational attainment realized by Vermonters. Education is positively linked to life expectancy and negatively related to birth rates. Relative to the U.S., Vermonters have a

higher rate of high school completion and are more likely to have a bachelor's or advanced degree.

Education and Skill Levels of the Workforce.

Vermont school enrollment has been declining since 1997. In the 2015 - 2016 school year (SY), Vermont's high schools had a combined enrollment of 23,145, a decline of 114 students from 2014-15. SY 2015-2016 compared to SY 2017-2018 shows an additional drop in enrollment of 4.3% or 1,005 students. The statewide dropout rate for high school students decreased in a recent five-year period: SY 2013-2014 showed a rate of 9.6% as compared to 8.1% in SY 2017-2018.

Data collected as part of the AOE's education quality review indicates:

- Students are meeting most academic performance standards.
- Performance is lower in 2017-18 than it was in 2016-17.
- Achievement gaps persist between our Historically Marginalized Students and their historically privileged peers.

ELA and Math:

- There are large gaps in Performance for all Historically Marginalized Student groups.
- Gaps in Growth for Historically Marginalized Student groups are generally smaller.
- English Language Acquisition (ELA) performance is consistent across grade levels.
- Math performance declines steadily from grades 3-9.
    - This trend holds for all student groups, though it is the least pervasive for females.

Graduation Rates:

- Gaps in graduation rates are small for most Historically Marginalized Student groups when compared to gaps in ELA and Math performance.
- English learners have the lowest 4-year graduation rate of any student group.
- The gap in 6-year graduation rates is substantially lower for English learners.

Additional Links for inclusion:

http://www.vtlmi.info/pathways.pdf

http://www.vtlmi.info/projLT.pdf

2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

The State's Workforce Development Activities

In early 2017, Governor Scott launched a series of initiatives refocus its workforce development efforts to meet the more modern needs of Vermont's workers, employers, and service provider partners. The primary focus of this work was to increase the number and skill level of available workers in Vermont. As the designated workforce leader of the state, the Vermont Department of Labor (VDOL) has been tasked with strengthening partnerships among public and private

education, training, and service delivery providers and aligning federal and state workforce program services with one another to meet the needs of Vermont's employers.

Over the past two years, the state has intensified its efforts to serve Vermonters with the highest economic need and those facing barriers to employment, including people with disabilities, out-of-school young adults, new Americans, women in poverty, ex-offenders, and Vermonters in recovery. A stronger relationship and collaboration between VDOL and Vocational Rehabilitation (VR) has helped meet employers' needs faster and maximize the successful participation of customers in education and training programs that will result in employment or advancement in employment. Working together and with other workforce partners, regional leadership and staff have improved program referrals, co-enrollments, support service funding and delivery, and co-case management to support participant success. In several regional offices, VDOL and VR have physically co-located in order to provide more seamless service delivery.

The state has worked to expand the availability of occupational skills training programs in manufacturing, construction, and health care through apprenticeships, internships, class-based training, and other on-the-job learning opportunities. These are priority industry sectors with occupations in high-demand that pay strong wages. In partnership with the Agency of Education (AOE), Adult Education and Literacy (AEL) programs, and Adult Career and Technical Education (ACTE) providers, Vermont has helped ensure that under skilled youth and adults are connected to postsecondary training and education programs that result in a credential of value and lead to long-term, unsubsidized employment.

In 2019, VDOL, and AEL providers focused on increasing the labor participation rate of young adults in partnership with other local service providers. Demonstration projects like Real Careers at Rutland County, VT Youthworks, Vermont Barn Painting Initiative, and grants through the Vermont Internship Program helped many Vermonters access workplace readiness trainings, job coaching, on-the-job work experiences, and skill development needed to help them successfully land full-time employment. Vermont has greatly expanded apprenticeship program enrollment and opportunities over the two years – increasing the number by approximately 650 participants.

Vermont has also prioritized activities that retrain and retain older workers in the labor force after traditional retirement or temporary exit from the workforce. In December of 2018, the state launched a new Returnship Program that connects individuals who have work experience, but have been out of the labor force, with support and short-term work experiences to aid in successful re-employment. In its first year, this program has helped over 100 Vermonters and the network of employment service providers fine-tune the way that experienced workers are reconnected to the labor force. The Returnship Program is a unique partnership between Associates for Training and Development (A4TD, Vermont's Sr. Community Service Employment Program Provider), VDOL, and VR.

In partnership with the Department of Corrections (DOC), state and community workforce partners are working to strengthen relationships and understanding of program requirements between regional workforce staff, case managers, DOC leadership, and local probation and parole staff. DOC and VDOL have facilitated meetings for staff to learn about one another's work, provided training material and information to each other, participated in Regional Summits, and created a plan for extended communication and training between local service providers. In addition, VDOL, DOC, AOE, VR, Career and Technical Education (CTE) leaders, and Vermont State Colleges are working on an adult re-entry employment support system that will be the foundation for focused work over the coming years.

State and community workforce partners will be working increasing more with the Agency of Commerce and Community Development (ACCD) to create and promote strategies to convert visitors, tourists, out-of-state college students, and Vermonters living outside of the state to full-time residents and workers. In 2019, the VDOL began designing and implementing the Vermont Relocation Assistance Program (VRAP), a system to connect, support, and respond to prospective new Vermonters as they consider making Vermont their new home. In considering how the state supports successful employment placements for out-of-state jobseekers, there is opportunity to bolster and expand information about middle and higher-level jobs available that can be of value to Vermonters seeking career growth.

In 2018, using Career Technical Education (CTE) Center catchment areas, VDOL's workforce development division and labor market information division partnered to begin reporting local labor market information differently. Historically, labor market information had been presented by county or economic development subdivision. By shifting how information is presented to focus on CTE catchment areas, it's easier to see and act on opportunities to better align workforce needs with delivery education and occupational skill trainings. The reports highlighted large industries by employment and relative concentration in these sub-state areas. Similar to statewide tools, this report was meant to steer discussions of support towards certain well-represented industries as well as identify opportunities by highlighting under-represented industries. From this work, several localized opportunities to connect trainings with employers were developed.

With approximately 95% of Vermont's workforce development services provided through federally funded programs, the state departments and agencies implementing the programs are highly focused on finding ways to work collaboratively to meet the aims of the programs while working together to better support the specific needs of Vermont's workers and employers. What follows are descriptions of the specific One-Stop services provided by the core partners: VDOL (Title I & III), AOE (Title II), and VR & DBVI (Title IV).

Vermont Department of Labor (VDOL)

VDOL offers Vermont businesses, jobseekers, and workers several comprehensive services. Businesses work with staff to register jobs into our Vermont Job Link (VJL) system, search for and screen applicants, conduct hiring events and job fairs, access current labor market information, hire interns, apprentices and OJTs, access information about tax credits, find support to avoid layoffs, tap rapid response services, learn about grants for job training for new and incumbent workers, and gain assistance with employment and labor law questions. For job seekers, services include skill assessment, skill training, labor market information, career counseling, and job placement assistance. VDOL serves all Vermonters.

WIOA basic and career services are provided, with programs focusing on at-risk out-of-school youth, disadvantaged adults, and dislocated workers under Title I. The Wagner-Peyser Program under Title III provides all customers with employment services, labor market information, referrals to job opportunities, workshops and occupational skills development activities. Title I and III services are very often blended with information and resources related to registered apprenticeships, Jobs for Veterans Grant (JVSG) services and referrals, Trade Adjustment Assistance (TAA) registration and referrals, and, to a very high degree, SNAP and TANF employment and training programs.

All services are provided through the One-Stop American Job Center (AJC) Network which includes the state's only comprehensive center in Burlington, 11 One-Stop Career Centers

operated by the VDOL throughout the State, and dozens of other sites where WIOA partner programs deliver services.

The VDOL is the State's One-Stop Operator in addition to administering the following federal programs: WIOA Title I, and III, JVSG, TAA, Unemployment Insurance (UI) and Re-employment Services and Eligibility Assessment (RESEA), Foreign Labor Certification (FLC) support, Labor Market Information (LMI), Work Opportunity Tax Credit (WOTC), the Registered Apprentice (RA) program, Migrant and Seasonal Farmworker (MSFW) outreach, and the Mine Safety and Health Administration (MSHA) grants.

The VDOL is working to establish more comprehensive "business needs" programs, teaming up with employers, chambers, regional workforce development and investment boards, trade associations, training and education partners, state agencies, the Agency of Commerce and Community Development and others to support existing businesses. Assistance can range from providing technical assistance on programs, guiding them to resources, assisting with labor law explanation and compliance, helping with job development, advertising and recruitment for their vacancies, and assisting with specialized needs.

Agency of Education (AOE)

Adult Education and Literacy (AEL). AEL programs serve adults who are 16 years old or older and not enrolled in school, and who lack a high school diploma or an equivalent, or who are basic skills deficient; or who are English language learners. Instruction is provided from the lowest skill level in adult basic education to adult secondary education, as well as English to speakers of other languages in the basic skills of reading, writing, math, and speaking/listening. The purposes of the program are to assist individuals to increase their academic skills, to obtain a high school diploma or GED, to obtain employment, and to successfully enter post-secondary education or training. Services are funded by federal and state grants awarded to eligible agencies via open funding competitions.

Under WIOA, AEL providers are awarded through the competitive process to provide services in every county via full-service adult learning centers and additional satellite offices. AEL students develop and engage in a personalized learning plan, with career exploration included as a central component. Variable levels of instructional intensity are available to students, dependent on their skill level and specific educational needs. AEL instruction is offered in applied contexts and the programs are flexible to accommodate learners' barriers so that they can persist in their studies (e.g., evening hours, group and individual instruction). Grant-funded AEL providers will be required to develop and implement Integrated Education and Training programs in the program year beginning July 1, 2020.

Students are eligible to earn a regular high school diploma from their town of residence through the flexible and innovative Vermont High School Completion Program. Students who come to adult education with a 9th grade equivalent in skills (as determined by Federally-approved assessments) take, on average, ten months to earn their high school diploma. Alternatively, students have the option of preparing to earn a GED certificate, which has been revised to align with the College and Career Readiness Standards. The GED is a useful educational option for some adult learners, as completing a computer-based test requires that they have developed basic technology skills.

Vermont Division of Vocational Rehabilitation (DVR)

Vocational Rehabilitation (DVR) provides employment services for individuals with disabilities in order to offset barriers to their employment. DVR serves individuals with any disability, with

the exception of people with visual disabilities who are served by the Division for the Blind and Visually Impaired (DBVI). Services provided by DVR are highly individualized and can include a wide range of activities as long as they support an employment goal. After a determination of eligibility, DVR and the consumer develop an Individual Plan for Employment (IPE) which outlines the employment goal, the services to be provided, and the responsibilities of the consumer. A consumer is determined to have achieved an employment goal when they have been employed a minimum of 90 days and are stable on the job.

While all DVR services are highly individualized, DVR has developed some specific programs and initiatives to better meet workforce needs. DVR uses a dual customer approach that promotes meeting the needs of both employers and consumers. DVR's primary interface with the business community is through its business outreach program called Creative Workforce Solutions (CWS). CWS consists of 13 business account managers housed in twelve Agency of Human Services' districts, who coordinate with local employer outreach teams. DVR funds or partners with over 200 community non-profit staff who provide placement services for individuals with disabilities. Employer outreach by these providers is coordinated through the CWS business account managers.

In response to the WIOA Common Performance Measures, in 2017 DVR launched its Careers Initiative. The Careers Initiative is designed to shift DVR practice and services to achieve higher levels of career outcomes for DVR consumers. Prior to WIOA, DVR's federal measures were focused on quantity of employment outcomes. WIOA has shifted that focus to the quality of outcomes and promoting higher wage careers rather than entry level employment. DVR is a strong supporter of the WIOA Common Performance Measures. New measures support consumers in their career goals, promote higher wages and more sustainable employment. However, the WIOA measures are extremely lagging, meaning most of the desired outcomes occur well after services end. For example, the measure of median earnings occurs two full quarters after case closure. As a result, the measures are not very useful in guiding the work of frontline staff on a day-to-day basis. Therefore, DVR decided to establish leading measures of activities expected to improve the longer-term WIOA outcome measures. The section below outlines these lead measures and how they are expected to influence the lagging outcome measures.

- Leading Measure One: The
- Leading Measure Two: The involvement of other team members (employment placement staff, benefits counselors and others) strengthens consumer engagement in completing their employment goal
- Leading Measure Three: Career focused education and training leads to higher wages and higher quality employment.
- Leading Measure Four: VR counseling with an emphasis on career focused plans will lead to higher wages and higher quality employment.
- Leading Measure Five: Continued support and encouragement after job placement results in better job retention and career advancement.

DVR has formed a series of charter groups to support staff to align practice with the leading indicators. Each charter group has developed tools and practice guidance to help staff meet the new expectations. DVR has also created a dashboard that can provide staff and managers with real time data on how they are doing with each of the lead indicators. Over time, DVR will have high quality information on how practice impacts outcomes and will be able to make

adjustments based on solid data. DVR staff have embraced the new focus on careers and are fully engaged in the process. Frontline staff have participated in all the charter groups.

In addition to the core program, DVR operates a number of special programs to meet the unique needs of our customers. These include the following:

1. Pre-Employment Transition Services (Pre-ETS). In order to meet the requirements of Pre-ETS, DVR has established a cadre of fourteen VR counselors assigned to work exclusively with students in high school. Each counselor has an assigned Youth Employment Specialist to develop real work-based learning experiences. DVR has the capacity to provide PETS services for eligible students in all 57supervisory unions.

2. Supported Employment for Youth and Adults. DVR partners with the Division of Developmental Services and the Department of Mental Health to provide supported employment services for adults with developmental disabilities and youth with emotional behavioral disabilities.

3. Rehabilitation Services for the Deaf (RCD). DVR has four Rehabilitation Counselors for the Deaf to provide specialized employment services to adults and students who are deaf or have hearing impairments.

4. Work Incentive and Benefits Planning. Approximately 30% of individuals in the DVR caseload receive Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI). Individuals on SSDI or SSI often need assistance understanding and managing the effects of earned income on their benefits. DVR Benefits Counselors provide this guidance to beneficiaries and assist them in taking advantage of available work incentives.

5. Short Term Industry Recognized Training. DVR data has indicated that consumers who complete industry recognized short-term certification programs achieve higher wage employment outcomes. DVR therefore sets aside a portion of the overall case service budget for consumers interested in these training programs.

6. Progressive Employment. Progressive Employment allows individuals to make incremental steps towards employment through graduated experiences. These experiences range from job shadows and company tours to On the Job training agreements. DVR makes extensive use of work experiences in competitive settings to assist individuals in building their skills and gaining real work experience. Progressive Employment is also an excellent tool for employers to get to know potential employees before committing to a hire.

Vermont Division for the Blind and Visually Impaired (DBVI)

The Vermont Division for the Blind and Visually Impaired (DBVI) provides specialized services for people who are blind or visually impaired using a rehabilitation model that starts when the person experiences vision loss. DBVI offers an array of services specifically designed for people who have lost visual function and independence. Given appropriate adaptive skills training and assistive technology instruction, many limitations due to blindness can be overcome. Quality of life, employment, dignity, and full integration are the focus of the program. DBVI practices a rehabilitation model that takes a holistic approach to working with the individual at the time of vision loss.

The process begins with the individual and the DBVI counselor working together to develop an individualized plan for employment to achieve the highest level of independence and

employment possible. DBVI services help people reestablish control and ability to complete independent living tasks necessary to access employment and the community. The overall goal is to help individuals gain economic independence by obtaining satisfying, well-paying jobs. This is accomplished through specialized instruction to build adaptive skills related to blindness and by building employment skills through vocational training and higher education.

An individual has achieved an employment goal when they have been employed a minimum of 90 days and are stable on the job. The goal of DBVI's vocational rehabilitation services is to help people with vision loss to retain, return, or secure employment. Individual meet with a DBVI counselor to identify goals and develop a plan to reduce the limitations that result from a vision loss.

1. Transition Services. DBVI transition services provide high school students with opportunities for learning independent living and job skills. DBVI collaborates with several partners including the Division of Vocational Rehabilitation, Vermont Associates for the Blind and Visually Impaired (VABVI), Vermont Youth Conservation Corps, ReSource, and the Gibney Family Foundation. One specific transition program called LEAP (Learn, Earn, and Prosper) provides paid summer employment for youth in a residential setting. This program empowers students to take charge of their employment future by gaining early employment success that can be carried into future employment pursuits. The goal is for all graduates to enter college, obtain future training, or join the world of work. A new addition to the summer work experience is the requirement for students to secure internships in their local community. The goal of the internships is to make connections in the local community where jobs will eventually develop and to expand a summer experience into year-long career exploration. LEAP has completed its seventh successful year.

2. Technology. Maximizing the power of assistive technology is critical to people with vision loss. DBVI invests significant effort in staying current about new assistive technology, which will revolutionize employment access and eliminate other barriers caused by vision loss. Assistive technology plays a critical role in allowing an individual with a visual impairment to be connected with society, continue employment, and pursue a tremendous range of careers in mainstream society. In most situations, assistive technology is the key to opening the door for employment. Specialized software and hardware are often needed to access print, and specialized skills, including the use of specialized magnification and lighting, are needed to use the technology successfully. The combination of technology and the skills to use the technology helps individuals return to their jobs and community activities.

One-Stop delivery system partners provide services through the Burlington American Job Center (AJC) as follows: All of the required career services and programs and activities carried out by one- stop partners are available at the Burlington AJC through walk-in appointments, scheduled one-on- one appointments, group orientations, and self-service resources. Where appropriate, partners who provide the same career services deliver those services in a coordinated manner and involve the One-Stop Operator in the design of the process as needed. At least one VDOL staff person is physically present during regular business hours and customers have access to all programs, services, and activities described in this section. "Access" means that a program staff member or a staff member from a different program who is appropriately trained, is physically present at the Burlington AJC, or a direct connection via phone or real-time web-based communication is available at the Burlington AJC to connect a

customer with a program staff member who can provide information or services to the customer, within a reasonable time.

In addition, some programs are coordinating delivery of services both in and outside of the Burlington AJC. The following list provides some examples of inter-program service delivery collaboration:

- Local Adult Education Literacy (AEL) staff attend group orientations and other information sharing meetings with job seekers and other clients, as appropriate, to describe services available through adult education. AEL staff meets with individual clients at the AJC by appointment to facilitate access to services. Local adult education centers also make space available on at least a bi-weekly, half-day basis for partner staff to meet with co-enrolled clients.
- DBVI provides vocational rehabilitation services to individuals who are blind or visually impaired through Blind Services Counselors in four regional offices, available by referral and appointment.
- Participants in the Senior Community Service Employment Program (SCSEP) receive eligibility determination, supportive service referrals, and enrollment assistance at local Mature Worker Resource Centers (several of which are co-located with One-stop career centers in VT). "On-site" training services are received at nonprofit partner locations in the general community, and "off-site" training services are received either virtually or at the facilities local training providers (community colleges, local libraries, etc.).
- The Unemployment Insurance (UI) program offers virtual services through a direct connection to the VDOL UI Claims Center for initial claims and online access to file additional claims. RESEA services are offered directly through the Burlington AJC through a dedicated full-time staff member.
- Burlington AJC intake specialists are trained by CVOEO on their Micro-Business Program and Community Kitchen Academy. Staff can assist customers in connecting with these programs through a specially arranged referral system.
- The Vermont Educational Opportunity Center program is a Federal TRIO program at VSAC with full statewide reach for adults looking to improve their employability. Through individual counseling and group workshops in the Burlington AJC, other career resource centers, and other community locations, participants receive assistance through career exploration activities, financial aid and admission applications, and postsecondary enrollment. Staff are available at the Burlington AJC and co-located at many other career resource centers.
- Economic Services staff trains VDOL staff to screen for Reach Up/3SquaresVT eligibility and makes off-site Economic Services staff available to accommodate an immediate referral via Skype.
- One-Stop Career Center staff are oriented to the CCV and VTC brochures and degree/certificate program listings; websites; contact information for admissions personnel so that they may assist customers in appropriate outreach.
- A VR counselor is on-site in the Burlington AJC part time on a regular basis. When a counselor isn't present, referrals are made via Skype where customers are provided with an overview of services and given the date of the next orientation to VR services.

The Strengths and Weaknesses of Workforce Development Activities

Vermont sees the following as strengths to the workforce development system in the state:

Structural Familiarity. For the most part, core WIOA services are managed by staff at the state and local level who have collaborated closely for a long time and have experienced constriction and expansion of resources together. The smallness of the state and the tightness of communities helps to ensure that program and service delivery decisions are made with deep awareness of how customers and colleagues will be impacted.

Intimate, Individualized Services. Core partner programs are highly accessible to individuals and program participants would rarely encounter wait times in program centers across the state.

Program Accessibility. Many One-Stop partners are already collocated in accessible offices across the state. Over the past year, VR and VDOL have continued to collocate locally, and other WIOA partners have increased their service time in locations convenient to customers (local career centers, recovery centers, correctional institutions, educational institutions, etc.).

State Support. Three significant workforce system improvement bills have been passed by the Vermont General Assembly and signed by the Governor in the last three years. Stakeholders are united in focus around quality and ease of service delivery, expansion of the state's labor force, access to services for jobseekers and employers, responsiveness to employment demands, and building better supports for individuals with barriers to employment.

Education Opportunities. Vermont is ranked at or near the top for the quality of its education system. Not only has the State made significant investments in promoting flexibly pathways for pk-12 students, but it has ensured that Adult Education and Literacy programs are available free of charge to participants in every corner of the state. These programs provide career services, including access to core partner programs and Integrated Education and Training programs. Additionally, there are 20 colleges and universities in Vermont, including one research university, twelve conferring master's degrees, an art school, a culinary school, a law school, and 20 undergraduate colleges conferring associate's and bachelor's degrees. These colleges are considered national leaders and this has resulted in a net positive migration of college-age people into Vermont.

Strong Employer Partnerships. The state workforce programs have a strong emphasis on the employer as a customer. These business services are offered directly to employers, and promoted through intentional engagement with economic development partners, and community organizations and leaders. The state has taken active steps to better aligning its economic development and workforce development supports for businesses and is poised to make more progress in the next four years.

Plan alignment. Over the last four years, state partners and key stakeholders have worked intentionally to align required plans (e.g. Perkins V), strategies, priorities, and activities related to workforce development with one another and the WIOA state plan. The AOE, VDOL, VR, and DBVI have tailored policy initiatives (e.g. Act 189, Act 80) to promote coherence in areas of oversight and responsibility.

Vermont sees the following as weaknesses of the workforce development system in the state:

Declining Labor Force. As mentioned above, Vermont's population is aging and getting smaller. A labor force shortage stresses the state's workforce development system because the

resources and program services that are available, as a 95% federally-funded system, aren't always the ones that employers and jobseekers need in this market.

Rural Landscape. Although workforce services are highly accessible, some areas of the state still suffer from a lack of physical and technological infrastructure that makes serving customers in these areas more difficult. Additionally, outside of the larger municipalities, it can be difficult to amass populations with a common employment need or focus.

Communication. Communication can be very smooth when partners have longstanding working relationships. Staff turnover, however, can unveil substantial knowledge deserts that successors need time and technical assistance to remedy. Additionally, unequal access to technology infrastructure, database systems, and IT programs can make upscaling a successful collaboration much more challenging.

Scale. As a single-area state with formula funds set at the "small state minimum," the State must dedicate a disproportionally higher amount of funding to ensuring that activities like data collection and reporting, performance management, program and system monitoring, compliance and regulatory oversight, technical assistance, and specific outreach activities occur.

State Workforce Development Capacity

Vermont's workforce partners have consistently and effectively provided their services to Vermont's jobseekers and employers. Despite the individual successes of Vermont's WIOA partner programs, the state faces demographic shifts and ongoing funding constraints that challenge partners in further meeting the more specialized needs of Vermont businesses, employers, employees, and job seekers.

In the last three years, workforce partners have focused extensively on breaking down silos, building trust, finding areas of philosophical agreement, developing shared priorities, and piloting joint projects to work more efficiently and effectively together. Some areas of great success and laudable progress are in developing and expanding apprenticeships, jointly providing SNAP E&T services through the Individual Career Advancement Network (ICAN), developing and offering customized trainings for specific employers focusing on braiding core program services, expanding outreach and programing with the Department of Corrections and regional Career and Technical Education Centers, and piloting joint programs (Title I, II, and IV) serving disadvantaged young adults.

While the Vermont workforce development system still has silos, our small size and status as a single-area state has helped improve connections between the partner programs under WIOA.

We've expanded coordination and collaboration and are coming together to ensure every Vermonter has the support they need to participate in the state's labor force, and advance along a career pathway at their own pace.

The core partners would like to expand capacity to develop and implement innovative partnerships that better leverage the offerings of each program. As we mature into the operation of our one-stop centers and network, we expect to discover opportunities to do this. Program administrators are judicious in selecting the number and types of collaborations to pursue at one time, recognizing the ongoing demands of time, regulatory compliance, and continuous improvement activities.

B. STATE STRATEGIC VISION AND GOALS

Vision

Vermont's employment demands will be met through a statewide, coordinated, and integrated system of workforce education, training, and development where all Vermonters can connect to robust career pathways, advance along career ladders, and new Vermonters can quickly secure employment with a Vermont employer.

Goals

Goal 1: Connect Vermonters to the education, training, and supportive services needed to enter and advance along a career pathway that leads to greater financial independence.

Goal 2: Increase the number of women, veterans, minorities, people with disabilities, and other underrepresented people employed in the skilled trades, science, technology, engineering, and mathematics fields, advanced manufacturing, and other priority industry sectors in Vermont.

Goal 3: Increase the number of Vermonters with barriers to employment who complete high school, earn a post-secondary credential - including an industry-recognized certificate, registered apprenticeship, or post-secondary degree program - and become employed in occupations that align with the needs of Vermont's employers.

Goal 4: Improve Vermont's workforce development system by continuously aligning, adapting, and integrating workforce education and training programs and career and supportive services to meet the needs of all customers.

Goal 5: Expand Vermont's labor force by helping more Vermonters enter the labor market and assisting out-of-state workers in securing employment with Vermont employers and relocating to Vermont.

Performance Goals

See Appendix I

Assessment

The State will assess the overall effectiveness of the workforce development system in the following ways:

1. The six common performance measures reported by the core partners will indicate how many jobseekers and employers are being served, how well they are being served (short and long-term employment, wages, credential attainment, skill gain, repeat services, etc.), and whether our performance is aligned with our goals this program year and over time,
2. The common data elements collected on program participants and services will indicate whether target populations are experiencing positive impacts as expected,
3. The state's unemployment and labor market participation rates will indicate if employers' needs are being met,
4. The WIOA narrative report and VDOL's Annual Workforce Report will describe outcomes from specific initiatives, progress in supporting targeted populations, staff development, sector-based partnerships, etc.,
5. Customer satisfaction surveys administered by each program will reflect whether services are meeting the needs of customers,

6. The State Workforce Development Board's Policy Committee will review and assess the physical and programmatic accessibility of the Burlington AJC and One-Stop system in 2021.
7. The State Workforce Development Board's Policy Committee will be working to establish a common set of workforce system performance measures that public and private stakeholders can look to in evaluating how well Vermont is meeting its labor force education, training, and employment needs.

The State will use the results of the assessments and other feedback to make continuous and quality improvements, using the regular negotiation of the One-Stop MOU as the mechanism for initiating system-wide changes.

C. STATE STRATEGY

Vermont will be using the following strategies to advance the State's goals and meet the objectives highlighted in the questions above:

Strategy A: Publish and share information describing education, training, and skill development opportunities with the public and related service delivery providers in a customer-friendly format.

Strategy B: Collect and review labor market, education and training, and workforce service delivery data by gender, age, race, ethnicity, and disability status.

- Ensure that data supports ongoing analysis whether these strategies are addressing the employment and training needs of Vermonters with barriers to employment, including displaced homemakers, low-income individuals, minorities, individuals with disabilities, youth, older individuals, ex-offenders, homeless individuals, youth who have aged out of the fostercare system, individuals who are English language learners, individuals with low levels of literacy, farmworkers, single parents, veterans, long-term unemployed individuals, and New Americans.

Strategy C: Develop common intake, communication, and referral processes to increase co-enrollment in and alignment of workforce service and support programs.

- Expand physical colocation of WIOA partner programs and service providers.
- Develop and conduct semi-annual opportunities for communication, service coordination, and cross-training of workforce service delivery providers at the regional and state level.
- Share information about available support services, eligibility information, and referral protocols among workforce service providers.
- Provide virtual workshops for partner staff and service providers to facilitate greater alignment and integration of JVSG, TAA, RESEA, SNAP, and TANF programs into the one-stop system.

Strategy D: Develop and coordinate shared professional development opportunities, best practices, and approaches to counseling individuals in entering and advancing along career pathways.

- Increase awareness among secondary school and career and technical education (CTE) counselors about the variety and availability of employment opportunities available to

ensure that students' personalized learning plans are informed by broad exposure to careers, including non-traditional careers for women, minorities, and individuals with disabilities.

Strategy E: Increase outreach and delivery of workforce services to at-risk youth, ex-offenders, women, veterans, minorities, individuals in recovery, New Americans, individuals with disabilities, and mature workers to support their initial, continuing, and extended participation in the labor market.

- Increase access to employment services by providing them in places more convenient to the customer.
- Promote the coordination of and expansion of publicly availably transportation options for working Vermonters.
- Improve physical and programmatic accessibility of all WIOA partner program services and spaces.
- Promote program and community-partner collaboration to develop cohort specific programs serving at-risk youth.
- Explore opportunities to jointly pursue Second Chance Act grants to support re-entry of former inmates into successful, long-term employment.

Strategy F: Expand the use of progressive employment practices.

- Expand coordination and availability of transition support for individuals moving from secondary to post-secondary education and training to enable successful entry into future employment in a career pathway with opportunities for advancement.
- Offer additional support to employers who hire individuals overcoming barriers to employment.

Strategy G: Prioritize participant enrollment in education and training programs that result in measurable skill gain and attainment of a high school diploma or post-secondary credential.

- Maximize the use of work-based learning and training to help jobseekers build and master skills.
- Increase the number of registered apprenticeship opportunities in the State
- Establish a pre-apprenticeship registration program that outlines how credits and hours earned will be recognized when enrolled in subsequent registered apprenticeship program.

Strategy H: Support sector partnerships that inform the development and expansion of career pathways and alignment of education, training, and recruitment activities.

- Support partnerships among primary, secondary, and post-secondary education and training providers, including career and technical education centers and adult education providers to establish and expand career pathways, especially for in-demand and higher-wage industries and occupations.
- Expand development of career pathways, pipelines, and ladders that extend from introductory and entry-level to middle-management.

- Expand partnerships with employers and industry and economic development leaders to develop training programs that meet the employment needs of local businesses.
- Prioritize career pathway development in the manufacturing, health care, human services, construction, business services, information technology, and hospitality sectors with development of new registered apprenticeship and pre-apprenticeship programs by 2023.

Strategy I: Assist employers in accessing and retaining qualified workers.

- Increase the coordination and availability of services offered to employers.
- Adopt a "no wrong door" approach with the business community to reduce redundancy, confustion, and streamline service and funding access.
- Encourage and assist employers in providing information about available employment opportunities in publicly accessible spaces.
- Develop common, easily accessed tools and resources to assist employers in receiving workforce services.
- Provide relocation information and employment assistance to in- and out-of-state jobseekers to connect them with available jobs.
- Expand efforts to effectively serve employers through Creative Workforce Solutions (CWS)
- Increase outreach and explore best practices for enhancing and systematizing Rapid Response, Layoff Aversion and Trade Adjustment Assistance activity.

III. OPERATIONAL PLANNING ELEMENTS

A. STATE STRATEGY IMPLEMENTATION

1. STATE BOARD FUNCTIONS

The Vermont State Workforce Development Board (SWDB) is a majority-business board, appointed by the Governor, with members representing all sectors of the economy and all geographic regions of the State. In addition, board membership includes top officials from State agencies and education and training institutions, representatives of labor and special populations, and members of the Vermont legislature. The Chair of the SWDB is appointed by the Governor from among the business membership. The SWDB advises the Governor on the development and implementation of a comprehensive, coordinated, and responsive workforce education and training system. Vermont is designated as a Single State Local Area and the SWDB is designated as the State and Local Workforce Development Board under the federal Workforce Innovation and Opportunity Act (WIOA). Under Section 101(d) of the WIOA, the SWDB assists the Governor in the following functions:

- The development, implementation, and modification of the State Plan. The SWDB plays an active role in coordinating completion of the State Plan, drafting components specific to the SWDB, participating in the development of the vision and goals, and soliciting public comment.
- Review of statewide policies, statewide programs, and recommendations on actions to align workforce development programs to support a comprehensive and streamlined

workforce development system, including the review and provision of comments on the State Plan, if any, for programs and activities of One-Stop partners that are not WIOA core programs.

- The development and continuous improvement of the workforce development system, including:
    - Identification of barriers and means for removing barriers to better coordinate, align, and avoid duplication among the programs and activities carried out within the system.
    - Development of strategies to support the use of career pathways for the purpose of providing individuals, including low skilled adults, youth, and individuals with barriers to employment (including individuals with disabilities), with workforce investment activities, education, and supportive services to enter or retain employment.
    - Development of strategies for providing effective outreach to and improve access for individuals and employers who could benefit from services provided through the system.
    - Development and expansion of strategies to meet the needs of employers, workers, and job seekers, particularly through industry or sector partnerships related to in demand industry sectors and occupations.
    - Development and continuous improvement of the One-Stop Center delivery system, including assistance to the One-Stop operator, partners, and providers through planning and delivery services (including training and supportive services) to support effective service delivery to workers, job seekers, and employers.
    - Development of strategies to support staff training and awareness across programs supported by the system.
- Development and updating of comprehensive state performance accountability measures, including state adjusted levels of performance, to assess the effectiveness of the state's core programs. The Policy Committee of the SWDB continues to engage with the Core Partners in identifying key performance metrics and necessary data collection.
- Identification and dissemination of information on best practices, including best practices for:
    - Effective operation of One-Stop Centers, including business outreach, partnerships, and service delivery strategies, including strategies for serving individuals with barriers to employment.
    - Effective training programs that respond to real-time labor market analysis and make effective use of direct assessment and prior learning assessment to measure an individual's prior knowledge, skills, competencies, and experiences and evaluate such skills and competencies for adaptability to support efficient placement into employment or career pathways.
- Development and review of statewide policies affecting the coordinated provision of services through the state's One-Stop delivery system, including the development of:

- Objective criteria and procedures for use in assessing the effectiveness and continuous improvement of One-Stop Centers.
- Guidance for the allocation of One-Stop Center infrastructure funds.
- Policies relating to the appropriate roles and contributions of entities administering One-Stop partner programs within the One-Stop Delivery System, including approaches to facilitating equitable and efficient cost allocation in the system.

The SWDB has established such criteria and procedures for certifying Vermont's One-Stop Center(s), most recently recertifying in June 2019 for a period of two years with a status report and formal review in the interim. In these periodic certifications, the SWDB has identified several areas for improvement in service delivery including enhanced accessibility and colocation of services and providers, comprehensive cross training among staff of One-Stop partners, improved mechanisms for client feedback, and more.

- Development of strategies for technological improvements to increase facilities access and the quality of services and activities provided through the One-Stop delivery system, including such improvements to:
  - Enhance digital literacy skills.
  - Accelerate acquisition of skills and recognized post-secondary credentials.
  - Strengthen the professional development of providers and workforce professionals.

Ensure such technology is accessible to individuals with disabilities and individuals residing in remote areas.

- Development of strategies for aligning technology and data systems across One-Stop partner programs to enhance service delivery and improve efficiencies in reporting on performance accountability measures, including the design and implementation of common intake, data collection, case management information, performance accountability measurement and reporting processes, and the incorporation of local input into such design and implementation to improve coordination of services across One-Stop partner programs.
- Preparation of required annual reports.
- Development of the statewide workforce and labor market information system.
- Development of other policies that may promote statewide objectives for, and enhance the performance of, the workforce development system.

In addition to the functions required under section 101(d) of the WIOA, the SWDB is tasked with the following duties:

- Conduct an ongoing public engagement process throughout the state that brings together employers and potential employees, including students, the unemployed, and incumbent employees seeking further training, to provide feedback and information concerning their workforce education and training needs; and
- Maintain familiarity with the federal Comprehensive Economic Development Strategy (CEDS) and other economic development planning processes, and coordinate workforce

and education activities in the state, including the development and implementation of the State Plan required under the Workforce Investment Act of 1998, with economic development planning processes occurring in the state, as appropriate.

2. IMPLEMENTATION OF STATE STRATEGY

A. CORE PROGRAM ACTIVITIES TO IMPLEMENT THE STATE'S STRATEGY

Vermont's workforce development system serves jobseekers, workers, and employers more effectively and efficiently as service providers, employers, educators, and community partners operate more as an integrated system. As partners understand and respect one another's areas of expertise and program oversight, they avoid replication of services and staff time, overcoming the weaknesses (described earlier) that come with operating on a small scale and expanding their ability to provide more and higher-quality services. As progress is made in unifying and aligning programs, work plans, and timetables and infrastructure, an even stronger workforce development service system emerges.

Strategy A: Publish and share information describing education, training, and skill development opportunities with the public and related service delivery providers in a customer-friendly format.

Representatives from VDOL, AOE, and VR are all participating as a cohort Vermont's credential attainment team along with ten other states, supported by the ETA, OCTEA, and OSERS. As processes for defining, recognizing, and coordinating credential attainment materialize, VDOL anticipates including this information along with eligible training provider (ETP) and registered apprenticeship (RA) information through its online systems. It's likely that there will be small progress made by other community partners in culminating and organizing the information around trainings and apprenticeship opportunities before all the information will be located in one place in a customer-friendly format.

VDOL is in a ten-state consortium called American's Job Link Alliance (AJLA) to develop and maintain cost-effective workforce technology to support the delivery of VDOL workforce programs. The consortium is currently supporting an extensive update of the system – which includes its job board, ETP, and RA functionalities. The VDOL expects this project (Rapid Storm) to be complete by the fall of 2020. The updated product will make a marked improvement for users and customers (both job seekers and employers) in locating accessing and understanding workforce services and opportunities. Further, the VDOL is completing Phase 1 of a three-phase procurement process (required by the state) to competitively bid our information management systems in 2021 and 2022 to meet short- and long-term needs. The VDOL plans to involve other departments, agencies, and public and private workforce partners in developing the RFIs and RFPs that will be part of this procurement.

Strategy B: Collect and review labor market, education and training, and workforce service delivery data by gender, age, race, ethnicity, and disability status.

The state workforce board and core partners will be working together in program year 2021 and 2022 to identify which data points serve as the more effective indicators of outreach and success in making services more inclusive and helping more underrepresented people participate in Vermont's labor force. As the state begins to implement Perkins V, core partners will consult with the AOE and secondary and post-secondary providers to align data collection and review efforts serving similar purposes. Additionally, VR has done extensive work in establishing internal "leading" measures to guide approaches to service delivery that most likely

result in positive outcomes. Similar approaches will be considered in deciding what data to collect and review.

Strategy C: Develop common intake, communication, and referral processes to increase co-enrollment in workforce service and support programs.

A "one-stop" or "no wrong door" service model is the aim of Vermont's workforce system. To help more customers access employment services, training, and support to advance in along their career pathway, the core partners will develop a common intake process that will include gathering and sharing relevant information, making effective referrals, and following-up with one another to support customers. A key step in this development will be the creation of a process map, and subsequent trainings to use tools developed, including the possibility of a common form or online information sharing mechanism. Core partners expect to complete this during PY 2021. The second phase of this work will be to expand the process map and resources to other one-stop partners, including economic services, youth services, and training providers, refining systems of information sharing and referrals at each step.

Vermont's Jobs for Independence (JFI) pilot, conducted several years ago, coordinated SNAP E & T services across many One-stop partners. It's newest iteration, Individual Career Advancement Network (ICAN) continues this work. Evidence from this work shows that there are greater instances of service co-enrollment, stronger "teaming" in case management, and better outcomes for customers in regions where partner programs are collocated. VDOL and VR plan to expand physical colocation of their staff, programs, and services in local offices throughout the state. They expect to focus on one office annually.

One-stop partners participated in twelve regional workforce summits in the fall of 2019. Designed to start the continued practice of regular regional convenings of workforce partners, the core partners plan to develop and host t semi-annual opportunities for communication, service coordination, and cross-training of workforce service delivery providers at the regional and state level.

Strategy D: Develop and coordinate shared professional development opportunities, best practices, and approaches to counseling individuals in entering and advancing along career pathways.

Career counseling occurs at local schools, post-secondary education institutions, through WIOA programs – including VR, VDOL, and AEL – and through many other state and local organizations. Over the next four program years, Vermont intends to convene career counselors at different levels and serving different populations throughout the state. Through a series of meetings, partners hope to gain insight into best practices, learn more about how and where counseling can be accessed, and develop a plan for coordinating information and high-quality counseling better.

System improvements might include: creating resource directories, streamlining service delivery models, sharing best practices, identifying common professional development opportunities, and developing shared principles or approaches to providing career advice. In addition to the core partners, AOE's secondary school career services providers, the Vermont Student Assistance Corporation (VSAC), the Community College of Vermont (CCV), VDOL's labor market information specialists, and key community organizations will be invited to help develop and participate in a shared plan for improving career development and guidance.

An intentional focus of work under this strategy will be to Increase awareness among secondary school and career and technical education (CTE) counselors about the variety and availability of

employment opportunities available to ensure that students' personalized learning plans are informed by broad exposure to careers, including non-traditional careers for women, minorities, and individuals with disabilities. VDOL and VR will support this work, particularly as it applies to connecting guidance systems and opportunities that help individuals' transition from secondary education into post-secondary education, training, or a career.

Strategy E: Increase outreach and delivery of workforce services to at-risk youth, ex-offenders, women, minorities, individuals in recovery, New Americans, individuals with disabilities, and mature workers to support their initial, continuing, and extended participation in the labor market.

VDOL is exploring ways to increase access to employment services by providing them in places more convenient to the customer. This includes coordinating more with community partners like recovery facilities, CTE centers, health care providers, rotaries, retail and other establishments, restorative justice centers, and more to bring employment services to places that people already are.

VR organized the Governor's Summit on the Employment of People with Disabilities in 2019 in partnership with Vermont's Agency of Transportation. Focusing on the issue of non-existent or inconsistent access to transportation for many Vermonters, the day successfully brought together workforce partners and transportation stakeholders to begin developing ways to make improvements at the local and state levels. With a number of projects now in design stage, core partners plan to prioritize and promote the coordination of and expansion of publicly availably transportation options for working Vermonters.

In partnership with the Department of Corrections (DOC), state and community workforce partners are working to strengthen relationships and understanding of program requirements between regional workforce staff, case managers, DOC leadership, and local probation and parole staff. With better relationships, understanding, and methods of referral and communication, more ex-offenders will be referred to WIOA services and better supports can be offered to help them return to the labor force. In addition, VDOL, DOC, AOE, VR, Career and Technical Education (CTE) leaders, and Vermont State Colleges are working on an adult re-entry employment support system that will be the foundation for focused work over the coming years – including a proposal for a Second Chance Act grant to support re-entry of former inmates into successful, long-term employment.

In 2019, VDOL was directed by the Vermont Legislature to design and begin implementing the Vermont Youth Employment Program (VYEP). The aim of VYEP is to establish a comprehensive system of delivering employment services and support to any Vermonter ages 15-24. Current federal and state funding streams and programs are incorporated into the umbrella design of VYEP so that Vermont's youth and young adults will no longer have to navigate siloed programs and eligibility requirements. VDOL staff will work with VR, AEL, employers, training providers, and state and community partners to develop, oversee, and support employment projects that are customized to meet employer needs and, when possible, involve community service, improvement, or beautification. The continued development of VYEP, with its key focus on partnerships and braiding of existing funds and programs, will be one way the State aims to support at-risk youth successfully entering a career pathway.

Strategy F: Expand the use of progressive employment practices.

Vermont will expand coordination and availability of transition support for individuals moving from secondary to post-secondary education and training to enable successful entry into future employment in a career pathway with opportunities for advancement. Additionally, core

partners and employer partners will continue to pursue how additional support to employers who hire individuals overcoming barriers to employment can be expanded and funded with existing or new funds.

Strategy G: Prioritize participant enrollment in education and training programs that result in measurable skill gain and attainment of a high school diploma or post-secondary credential.

As described under Strategy A, Vermont is involved in better defining, recognizing, and promoting credential attainment. This work aligns with the common performance goals of WIOA's core partners, and Vermont's recently adopted public policy aim of helping 70% of Vermonters to attain post-secondary credential by 2025. The State Workforce Development Board (SWDB) has established a committee tasked with work related to approving training providers and recognizing credentials. In program year 2021, VDOL, AOE, and VR will take the work of the credentialing cohort and work with the SWDB create a system for evaluating and promoting high-quality workforce training programs that result in a credential.

As this system work continues, Vermont is also working to maximize the use of work-based learning and training to help jobseekers build and master skills and earn credentials. VDOL is working to double the number of registered apprentices and registered apprenticeship programs by the end of 2023. Additionally, VDOL, AOE, CTE centers, and the state colleges will be working to establish a pre-apprenticeship registration program that outlines how credits and hours earned will be recognized when enrolled in subsequent registered apprenticeship program. This work will help more Vermonters increase their skills and earn a credential while meeting real-time needs of the state's labor market.

Strategy H: Support sector partnerships that inform the development and expansion of career pathways and alignment of education, training, and recruitment activities.

Active collaboration with educational partners, industry leaders, economic development and VDOL will form a comprehensive workforce development system. Vermont will continue to support partnerships among primary, secondary, and post-secondary education and training providers, including career and technical education centers and adult education providers to establish and expand career pathways, especially for in-demand and higher-wage industries and occupations. Title II and Perkins V providers will be key participants in this work.

Vermont will expand partnerships with employers and economic development leaders to develop training programs that meet the employment needs of local businesses. Customized trainings that are developed with groups of local employers and supported by CTE and post-secondary education providers will be a shared focus of the core partners.

Additionally, VDOL and AOE will be working with CTE providers and the Vermont state colleges to develop a comprehensive, multi-year initiative to bolster, integrate, and align the state's workforce and training programs to provides Vermonters throughout the State with high quality programs that are standardized, replicable, and offered with regularity and consistency. A recent, legislatively mandated initiative requires the design of a fully integrated adult postsecondary CTE system will meet the following aims:

- Provide Vermonters throughout the State with high quality programs that are standardized, replicable, and offered with regularity and consistency;
- Coordinate, or integrate where appropriate, the many programs and providers of adult training and education to maximize the efficient use of workforce education and training resources;

- Feature a governance structure that provides consistency across the system whenever appropriate, but also provides the flexibility necessary to respond to local and regional workforce demands;
- Outline statutory or administrative barriers to implement the redesigned system;
- Delineate funding and cost implications that could arise when implementing the redesigned system; and
- Identify data and information sharing systems that would need to be developed to support effective integration.

Vermont will also expand the development of career pathways, pipelines, and ladders that extend from introductory and entry-level to middle-management in key sectors of growth including health care, social services, manufacturing and information technology. Increasing the number and variety of registered apprenticeship programs in partnership with industry groups, specific employers and local training providers will help meet this aim. With the creation of a formal pre-apprenticeship recognition system, sector partners will be organized more intentionally around pathways and pipelines into occupations that are in-demand throughout the state.

Strategy I: Assist employers in accessing and retaining qualified workers.

Vermont will increase the coordination and availability of services offered to employers. Applying the "one-stop" or "no wrong door" approach with the business community will reduce redundancy, clarify roles and streamline service and funding access. VDOL and the Agency of Commerce and Community Development (ACCD) are planning systematic changes in the way they jointly assist employers, including combined visits, development of common resource tools, serving as advisors on one another's granting processes, and shared professional development. An area of focus will be to increase outreach and explore best practices for enhancing and systematizing Rapid Response, Layoff Aversion and Trade Adjustment Assistance activity. Additionally, workforce partners are exploring opportunities to partner more with Creative Workforce Solutions (CWS), a non-profit organization that currently works with employers to place individuals served by VR and TANF, and JVSG's local Veteran's employment representatives (LVERs).

In each region of the state, Regional Development Corporations (RDCs) work with the Department of Economic Development (DED) to support economic development. In recent years, many of the RDCs have become more intimately involved in workforce development activities, as labor force shortages have mounted pressure on businesses and caused barriers for growth. Core partners will build on relationships fostered through the 2019 regional workforce summits and pursue recommendations about state and local collaboration in support of meeting employers' workforce needs.

Vermont is known to have a "shadow" job market – where employment needs of employers at middle and high-skill levels aren't always written and publicized. In the coming years, Vermont aims to work with employers to encourage and assist them in providing information about available employment opportunities in more publicly accessible spaces. This will also support the state's interest in helping new Vermonters find work in the state. Vermont is developing relocation and employment information to assist both in- and out-of-state jobseekers in connecting with available jobs. Helping to surface more information about employer needs is a key first step in meeting them.

Many organizations are working to develop common, easily accessed tools and resources to assist employers in receiving workforce services. Core partners will work with industry groups, employer organizations, and other advocates to support the development of common tools for businesses to access in meeting their employment needs. This will include best practices for recruiting, employing and retaining specific populations, information about tax incentives and resources for hiring, and other points of contact for services available locally and statewide within the workforce development system.

B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

The strategies outlined in this plan were developed with the input and consideration of other required and voluntary One-stop partners through a half-year process. As a small state, it is important to include these partners in the delivery of workforce services. As the strategies indicate, career and technical education, registered apprenticeship, and vulnerable populations generally served by Vermont's Agency of Human Services are a key focus in planning to meet the State's workforce goals.

One of the mechanisms for developing the goals and strategies included in this plan was the convening of twelve regional workforce summits across the state this fall. These day long events were held in partnership with regional (economic and business) development partners and were designed to consider mechanisms for better aligning and coordinating all workforce partner activities. In Strategy C, the State plans to continue regional and state level meetings of service providers to further develop ways to align and coordinate the activities taking place across the state.

Further description of coordination and alignment of activities that resulted from the regional summits and other planning activities – including development of the state's Perkin's V plan - is outlined above in III. a. 2. A discussion of how the state's strategies will be implemented.

C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

Vermont is very focused on coordinating and aligning the delivery of services to individuals with barriers to employments. Not only are the core partners engaged in strategic planning related to coordination, including the development of resource and process maps, but are they are teamed together to coordinate workforce services for SNAP & TANF recipients (VDOL, VR, AEL, Community Action Agencies (CAA), Vermont Technical College, SNAP, TANF), working together with mental health and substance abuse treatment providers to provide employment services at recovery centers (VR, VDOL), participating as part of the network of providers for the support of New Americans in communities and the workplace (VDOL, VR, AEL), and piloting ex-offender re-entry skills development and employment supports (VDOL, VR, AEL, DOC).

As discussed in earlier sections of the plan, workforce service providers are unifying around the challenges that inadequate or unaffordable transportation options present in helping individuals access career services and training and education options – in addition to permanent employment. Vermont's Agency of Transportation (VTRANS) has become a much more involved partner in local and state efforts to review, revise, and pilot initiatives aimed at

reducing the tremendous barrier that lack of reliable and affordable transportation places on many members of Vermont's current and future labor force.

In 2019, VDOL (including WIOA, Wagner-Peyser, Registered Apprenticeship, JVSG, and TAA staff), AOE, VR, CCV, DOC, TANF, SEP, AEL providers, local employers, regional development corporations, and other local workforce development stakeholder participated in 12 regional workforce summits designed to:

1. Facilitate cross-training among workforce training providers;
2. Provide employers with state and local tools and information about how and where to access resources to help them meet their labor force needs;
3. Generate regional feedback on pre-determined questions that would be used to inform aspects of planning a 2020 Workforce Summit and the development of the 2020 WIOA State Plan; and
4. Create a directory of local workforce education, training, and support providers, programs, and relevant resources.

The Regional Workforce Summits built upon past collaborations among the RDCs, employers, and state and regional service providers and educators. The summits were meant to establish a process where state action reflects local realities, increasing information flow and improving transparency across a statewide workforce development system, providing both a source of knowledge and a means of advancing the conversation while avoiding duplication of past efforts.

The Regional Workforce Summit series generated a significant amount of information that included statewide and and regional strategies. The statewide strategies were considered and incorporated, when agreed to, in the development of the state's strategies outlined in this plan. The timeline for completion is consistent with the timeline of this plan. Regional strategies will be considered on a region-by-region basis. VDOL intends to work with the RDCs to ensure that regional convenings of employers and workforce development service providers convene at least annually and that consideration and work on the regional strategies be part of the ongoing work of those groups.

D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

The coordination and alignment of service delivery has been of tremendous interest among workforce and economic development partners in the last eighteen months. Several important leadership changes have occurred that have helped elevate the level of planning and system restructuring. First, the former Commissioner of Labor was appointed to Secretary of Commerce and Community Development, overseeing the state's Department of Economic Development – a key partner in employer engagement. Her deep knowledge of WIOA and the VDOLs workforce system have helped surface opportunities to communicate and partner more around delivering employer services under Title I and III, as well as TAA, JVSG, Rapid Response, WOTC, and Registered Apprenticeship. Senior staff at VDOL and ACCD plan to continue meetings to identify areas where coordination can better serve the needs of Vermont's employers.

VDOL recently welcomed the Employment Services Manager from VR into a new Assistant Director position. With two decades of experience working directly with employers to meet their workforce needs, this individual helps connect VDOL and VR's employer services efforts, identifying and facilitating more opportunities for improving quality and communication. The

VDOL also created a new manager position specifically to oversee employer services – bridging TAA, Rapid Response, layoff aversion and registered apprenticeship outreach services through state policy changes, training enhancements, and participating in interagency and community efforts to support employers.

In 2019, Governor Scott appointed a new chair of the State Workforce Development Board upon the retirement of the former chair. The current chair also serves as the executive director of one of Vermont's Regional Development Corporations (RDC) and as the chair of the RDC association. In these roles, he is able to identify and facilitate opportunities for stronger collaboration at the state and local level. These connections are already fostering better service delivery as local RDCs and core partners, and other one-stop partners participated in a dozen regional workforce summits this fall – learning more about the demand and supply sides of local workforce challenges, building relationships, and identifying areas for greater focus and collaboration. Many of the ideas that were generated during these summits informed the development of the goals and strategies for this plan.

The risk of overwhelming employers with contacts from multiple "helpful" one-stop partners necessitates the need for coordination with local regional core partners in offering services to employers and in identifying job placement opportunities for students. VDOL and AEL providers participate in local Creative Workforce Solutions (CWS) groups hosted by VR. These groups share information about employers who are hiring and what skills are needed. The connections established and information disseminated through these regular meetings with local One-stop partners benefits all customers. Partners intend to continue these local team meetings in pursuit of better service delivery for both jobseekers and employers.

Over the next few years, the state plans to: explore procurement and shared use of a common (business) customer information management system, expand the variety of services offered to employers by workforce partners – including trade assistance, layoff aversion, and registered apprenticeship program development support, explore co-delivery of employer outreach and services among core partners, develop state and local versions of employer services resource directories, and strengthen sector partnerships in the development of career pathways, pipelines, and on-the-job learning and training opportunities.

E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS

The State's community college (CCV) and technical college (VTC) are voluntary, active partners in Vermont's One-Stop system. Both have representation on the SWDB, are part of the State Apprenticeship Team, and participated in development of the state's vision, goals, and strategies in this plan.

In his 2020 budget address, Governor Scott directed VDOL "to work with the Vermont State Colleges and tech centers throughout the state to double the number of apprentices by 2023. To further increase training, [he] also asked DOL and the Agency of Education to work with the State Colleges to align our Adult Education and Adult CTE system with CCV, VTC, our tech centers and regional stakeholders. This will create a seamless pathway from school to training to work. It brings together those who need new skills to get a good job and businesses looking for employees. It will also help State Colleges expand their reach into our communities."

As noted earlier, VDOL, AOE, the State Colleges (including CCV and VTC), the state's regional CTE centers, and AEL providers will participate in an information gathering and system redesign process over the next year that will provide one or more models for delivering a more integrated, available, and responsive post-secondary education and training system. Perkins V implementation will also leverage a comprehensive local needs assessment as the start of a

process of local reflection on program effectiveness and alignment. As local needs assessment system develops, workforce partners will be supporting and prioritizing alignment of career paths and post-secondary opportunities to meet local and statewide employment needs.

Finally, as VDOL reshapes its process, outreach, and publication of the Eligible Training Provider List (ETPL) it will work with CCV, the state colleges, other accredited post-secondary training providers, and CTE centers to support a more inclusive list of offerings. Many partners rely of the state non-degree grants (advancement grants) to help offset costs of participant tuition. But VDOL also uses WIOA, RA, and TAA funds to help fund enrolment in ETP approved courses.

F. PARTNER ENGAGEMENT WITH OTHER EDUCATION AND TRAINING PROVIDERS

Vermont's small population limits the number of workforce and training providers available that aren't already part of the one-stop system. Other education and training providers might include private colleges or universities, specialized training providers, like those who provide commercial drivers license (CDL) instruction, some industry-specific training programs, and a handful of others. The state will work to include and consider these training providers as much as possible. If Vermont's ETPL data collection waiver is approved, as requested later in this plan, VDOL will include greater outreach to training providers to apply for inclusion on the ETPL.

G. LEVERAGING RESOURCES TO INCREASE EDUCATIONAL ACCESS

Vermont is committed to increasing access to education to all Vermonters and using every available resource to do so. State and community partners leverage WIOA, TAA, VR, Pell Grants, public and private grants – including Vermont's Advancement Grants (non-degree grants), and other resources to assist participants in their educational goals. Additionally, the core partners coordinate with the Vermont Students Assistance Corporation, which provides grants, loans, scholarships, career and education planning, and general information for those seeking educational opportunities in Vermont. Vermont funds a Vermont High School Completion Program that provides a flexible pathway to a high school diploma or equivalent to all Vermonters aged 16 and older, which is accessed through AEL providers as part of their grant agreement with the state.

H. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

In 2013, Vermont passed a law requiring flexible pathways toward college and career readiness for all Vermont public students. Several components of this legislation are directly relevant to improving access to post-secondary credentials for Vermonters. As of November 2015, all seventh and ninth grade students have a personalized learning plan in place. A core component of these learning plans, typically crafted with school advisee-advisor periods, is the identification of relevant workforce opportunities for students along with educational pathways that are necessary to obtain such opportunities. The core partners will work together to ensure that relevant employment information, including the findings from the workforce assessment work, are made available to middle and high school educators so they may use this information to better inform students. Ensuring that graduating students have a clearer sense of exactly what type of post-high school educational credentials or high-quality certifications are necessary for specific jobs is critical to ensuring workforce success statewide.

Vermont also offers a robust, state-funded dual enrollment system to all high school students. Students are eligible to take two courses for college credit while they are still enrolled in high school, using these experiences to get a jump start, both experientially and financially, on their post-secondary endeavors. Some students leverage these dual enrollment opportunities with

work-based learning in apprenticeships and industry shadowing opportunities to develop quite sophisticated personalized learning plans that have them on their way to college completion and workforce success upon high school graduation. In recent years, Vermont has also expanded its funding and opportunities related to early college, where high school seniors can unenroll from secondary school and enroll at select state colleges and universities during their senior year.

In Act 80 of 2019, Vermont also set a goal that 70% of working-age Vermonters will hold a credential of value by 2025. It adopted a policy to "promote awareness of career pathways and the value of postsecondary education and training; expand access to postsecondary education and training to students of all ages; increase completion of postsecondary education and training programs by ensuring that Vermonters have the supports they need to succeed; and maximize partnerships across and within sectors to achieve State workforce development and education goals." The core partners are working together, and as a state cohort receiving technical assistance from ETA, OCTAE, and OSERS on ways to define, develop, and promote more training opportunities that result in a credential. Further, the state's aim to double the number of registered apprentices by 2023 and establish a system for approving pre-apprenticeship programs will help to bridge learning opportunities and increase the postsecondary credential attainment rate of Vermonters.

The state's Perkins V plan similarly tracks Vermont's goal of prioritizing trainings that result in portable and stackable credentials that align with the state's employment demands. WIOA partners and secondary and post-secondary CTE providers are working closely together to support the development of non-duplicative sequences of secondary and postsecondary courses within a CTE program of study to ensure that students transition to postsecondary education without duplicating classes or requiring remedial coursework. They are also developing clear, easy to understand systems of stackable credentials for secondary and adult students to reference as they work toward their career goals.

I. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES

At the State level, the Agency of Commerce and Community Development (ACCD) is represented on the State Workforce Development Board through the membership and participation of the Secretary of ACCD and Commissioner of Economic Development (ED). This ensures that policies and decisions regarding the State's workforce development system are taking into account the strategies and expertise of the Agency. In Vermont, the current Secretary of ACCD is also the recent past Commissioner of VDOL and has extensive knowledge of VDOL services and the One-Stop system.

Coordination with economic development strategies and partners is a key piece of Strategy I: Assist employers in accessing and retaining qualified workers. Details regarding this strategy implementation are outlined above.

B. STATE OPERATING SYSTEMS AND POLICIES

The VDOL, the AOE, and the DVR, each use different operating and data systems for their respective programs. These systems do not have the capacity to exchange real-time data. However, data sharing MOUs are under development that address co-enrollment, case related data collection, and reporting on employer satisfaction measures.

In order to bring their operating systems into alignment with the purposes of WIOA, and to support the implementation of the State's strategies to improve service for individuals, the core partner programs will continue discussions to identify cost-effective approaches to connecting

their data systems. The long-term goal is to facilitate interconnection and alignment between the data systems involved in case-management, job banks, performance reporting, and labor market information, among others, so that the information is shared in real time.

AOE tracks the skill gains and secondary school graduation rates of participants through a web-based, relational database. The database houses each AEL participant's engagement in postsecondary education and employment outcomes obtained through data matches with service provider partners. Using the database, the AOE also tracks adult education and literacy provider training and activities. Providers are responsible for real-time data entry and are able to pull a range of reports to support program monitoring and improvement efforts. The database is aligned to the reporting parameters of the National Reporting System of the U.S. Department of Education and meets its assurances for data quality. The AOE has an electronic communication system in place with the AEL field in the form of an e-mail distribution list. Similarly, distribution lists of principals, superintendents, and other key stakeholders are maintained by the AOE.

VR and DBVI track all consumer services through Aware case tracking system. This system collects demographic, service, expenditure, and participant-level data. The system is used for all required federal reporting for both the DVR and DBVI programs. The system is managed by the DVR Program Evaluation Unit. This Unit matches data to other administrative data sources such as the State Unemployment Insurance Wage Reporting System and the SWIS to report and evaluate services across programs.

Communication at the state level includes core partner program representation on the SWDB and its Operating Committee, and regular strategic meetings between the heads of the core partner programs. In order to advance the specific discussions around operating systems and policies, the core partner programs have identified key priorities, and instated monthly subgroup meetings to work on those priority issues. The meeting participants include staff and directors from the VDOL, the AOE, the DVR, and as appropriate. The meetings focus notably on issues of cross training, colocation and common intake, data sharing, and common performance measures.

The VDOL's Economic and Labor Market Information (LMI) Division provides labor market information through a variety of avenues. VDOL staff are available to provide labor market information presentations, workshops, products, and other services to the SWDB, one-stop centers, core partners, one-stop partners, community partners, and employers. Labor market information is available online on Vermont Job Link (VJL) through the American Job Link Alliance, and on the website www.vtlmi.info. This website is Vermont's online resource for labor market information as supported by the Employment and Training Administration (ETA). All core partners have real-time access to this information, and receive technical assistance regarding the optimal use of the website. Core partners are also all members of Vermont's Economic and Labor Market Information Division data listserv, which circulates news and other updates, in particular regarding new labor market information data products.

Labor Exchange System. Both labor exchange and workforce development programs are managed using VJL as a case management system. VJL is the VDOL's primary data collection and information exchange system. VJL provides client tracking, case management support, and federal reporting services. The system operates through a Citrix interface that provides the user with the flexibility to conduct job searches and receive referrals to open positions. Program participants including UI, WIOA, Wagner-Peyser, TAA, RESEA, and ICAN are all required to register on VJL in order to receive services. VDOL employees can access the system through any VDOL office or while on the road through a secure portal. VJL collects and tracks data for the

following programs: WIOA Title I youth, adult, and dislocated worker programs, including Vermont's Rapid Response activities; Trade Adjustment activities; Jobs for Veterans Program; Migrant Seasonal Farmworker activities; and employment assistance services such as RESEA. VDOL's Apprenticeship program currently uses a portion of our legacy system (IDEM) in anticipation of moving to a new system, along with VJL to track and register apprenticeships. VJL will be used more extensively in the next year in managing Registered Apprenticeship data, the Eligible Training provider list, ICAN (SNAP E & T), and processing Work Opportunity Tax Credit (WOTC) applications.

1. THE STATE OPERATING SYSTEMS THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES. THIS MUST INCLUDE A DESCRIPTION OF–

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Currently, the three core partners operate using different operating and data systems for their respective programs.

VDOL's data collection system is Vermont JobLink (VJL). VJL is used to track and report on:

- All self-service and staff-assisted jobseeker activities and outcomes through Wagner-Peyser.
- All staff-assisted activities and outcomes for the WIOA Adult, Dislocated Worker, and Youth Programs.
- Trade Adjustment Assistance (TAA).
- Two UI programs - Reemployment Services and Reemployment Services and Eligibility Assessments.
- Jobs for Veterans State Grant (JVSG).
- National Dislocated Worker Grants (NDWG).

Through VJL, VDOL can produce and share data within the programs listed above. Each individual programmatic Participant Individual Record Layout (PIRL) includes co-enrollment data indicating services provided as well as outcome information. VJL is also the system in which common data elements will be shared between the Vocational Rehabilitation and Education partners.

VJL provides the quarterly ETA 9128 and 9048 for the UI programs, as well as the ETA 9173 for WIOA Adult, DLW, Youth, NDWG, WP, JVSG and TAA. The ETA 9169 annual reports for WIOA Adult, DLW, Youth and WP including Effectiveness in Serving Employers are also available in VJL. All VDOL program PIRL files are uploaded to WIPs for quarterly and annual report certification.

The Vermont Division of Vocational Rehabilitation (DVR) and the Division for the Blind and Visually Impaired (DBVI) utilize the Alliance Enterprises AWARE Case Management system to collect and report on the:

- The Vocational Rehabilitation 110 program including Pre-Employment Transition Services for students with disabilities
- The Title VI-B supported employment program for adults and youth with the most significant disabilities
- The DBVI Independent Living Program
- The DBVI Randolph Sheppard Business Enterprise Program

Utilizing AWARE, DVR and DBVI can collect and report all required data elements for the above programs to the Rehabilitation Services Administration. DVR and DBVI are also able to produce and share data with VDOL and AOE to track co-enrollment.

Adult Education and Literacy providers enter data directly into the web-based data system known as DataWorks. AEL providers are required to keep the data current at minimum every two weeks. Data includes student demographics, services provided, barriers to employment, and career services. DataWorks is programmed to produce National Reporting System reports and also is the source for data sharing with core partners.

These systems do not exchange real-time data and it is neither practical nor economically feasible, at this time, for the programs to integrate to a unified system. However, open and frequently used lines of communication exist between the partner programs at the state and local program level. The core partners are committed to supporting local service delivery teams to promote and develop information sharing at the community and participant level. Additionally, information is and will be shared between the core partners through data sharing MOUs to address co- enrollment and data collection and reporting.

The systems used by core partners to track, manage, and report program activities are outlined above.

2. THE STATE POLICIES THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES (E.G., CO-ENROLLMENT POLICIES AND UNIVERSAL INTAKE PROCESSES WHERE APPROPRIATE). IN ADDITION, PROVIDE THE STATE'S GUIDELINES FOR STATE-ADMINISTERED ONE-STOP PARTNER PROGRAMS' CONTRIBUTIONS TO A ONE-STOP DELIVERY SYSTEM

The State's One-Stop MOU includes policies that support the implementation of of the State's strategies discussed earlier in the plan. These include:

1.

a. **American Job Center (AJC) Locations**

Vermont's sole comprehensive one-stop AJC is located at 63 Pearl St, Burlington, VT 05401 and is referred to in this MOU as the "Burlington AJC." Other locations where one-stop services are delivered throughout the state are described in Table 5 (available upon request).

1.

a. **Common Identifier for Branding**

The required parties agree to use the federally designated branding protocols, either through use of the approved logo or printing "American Job Center network" or "A Proud Partner of the American Job Center network" on branded electronic resources and any newly printed, purchased or created materials.

1.

a. **Career Services Coordination and Delivery**

The following programs will offer services in the Burlington AJC and throughout the One-Stop AJC Network: (1) WIOA Adult Program, (2) WIOA Youth Program, (3) WIOA Dislocated Worker Program, (4) Wagner-Peyser Employment Services Program, (5) Trade Adjustment Assistance Program, (6) State Registered Apprenticeship Program, (7) State Unemployment Insurance Program, (8) Reemployment Services and Eligibility Assessments (RESEA) Program, (9) Jobs for Veterans Program, (10) Vocational Rehabilitation Program, Blind and Visually Impaired Services Program, (11) Senior Community Service Employment Program, (12) Training and Employment Support Programs offered through Champlain Valley Office of Economic Opportunity, (13) Migrant Seasonal Farmworker Program, (14) YouthBuild Program, (15) JobCorp Program, (16) Adult Education and Family Literacy Programs, (17) Employment and Training Support Programs offered by Vermont Department of Corrections, (18) Assistance for Needy Families (a.k.a. Reach-UP), (19) Vermont Technical College Employment and Training Outreach Programs, (20) Community College of Vermont Employment and Training Outreach Programs, (21) Vermont Student Assistance Corporation Employment and Training Outreach and Support Programs, (22) WIOA Native American Training and Employment Support Programs, and (23) Supplemental Nutrition Assistance Program (a.k.a. 3SquaresVT).

At a minimum, parties agree that all of the required career services described in 20 CFR §678.430, access to training services described in 20 CFR §680.200, access to any employment and training activities carried out under 29 U.S.C. §3151(b)(1)(B), access to programs and activities carried out by one-stop partners listed in §§678.400 through 678.410, including the employment service program authorized under the Wagner-Peyser Act, as amended by WIOA title III, and workforce and labor market information will be available at the Burlington AJC.

Parties agree to provide applicable career services listed in Table 1 (attached) and defined in Table 2 (attached) and described in Table 5 (attached) through walk-in appointments, scheduled one-on-one appointments, group orientations, and self-service resources. Where appropriate, partners who provide the same career services agree to deliver those services in a coordinated manner and will involve the One-Stop Operator in the design of the process as needed. VDOL has been selected by the SWDB as the One-Stop Operator from July 1, 2017 – June 30, 2021. The duties of the One-Stop Operator are further described in subsection (e) of this agreement.

At least one Title I staff person will be physically present during regular business hours and customers will have access to all programs, services, and activities described in this section. For the purposes of this agreement, "access" means that a program staff member or a staff member from a different program who is appropriately trained, will be physically present at the Burlington AJC, or that a direct connection via phone or real-time Web-based communication will be available at the Burlington AJC to connect a customer with a program staff member who can provide information or services to the customer, within a reasonable time.

. . .

1.

a. **Business Practices**

Parties to this agreement will follow their agency's or program's business practices in the provision of services under this MOU. These practices include, but are not limited to, those related to auditing, employee personnel practices, employee and client confidentiality, insurance, procurement, record keeping and retention, and employee and client confidentiality.

1.

a. **Management of the Burlington AJC and Vermont's AJC Network**

Parties recognize and respect that each agency has different philosophies, policies, practices and day-to-day operation and supervision requirements.

Parties acknowledge that the role of the designated One-Stop Operator ("Operator") is to coordinate the delivery of services by required One-Stop partners and service providers both within the Burlington AJC and across the Vermont AJC Network. Partners agree to assist the Operator in performance of its duties as necessary. Other responsibilities of the Operator include, but are not limited to:

- Providing reports and other information as required by the SWDB. The Operator will make available to the SWDB sufficient information to enable the SWDB to oversee the Vermont AJC Network, and to ensure that funds are appropriately used, managed, and invested in order to maximize performance outcomes.
- Assisting in the development of MOUs between the SWDB and the One-Stop partners that fully describe the roles and responsibilities of each One-Stop partner, including sharing the infrastructure and additional shared costs related to Vermont's AJC Network.
- Developing processes to ensure that all customers receive appropriate, timely, and effective career services.
- Coordinating reception and initial registration services for all customers.
- Coordinating access to virtual resources at appropriate partner locations, libraries, and other points.
- Identifying and recruiting additional system partners and resources.
- Performing continuous improvement activities to achieve high-level service quality and exceptional customer service, including: reviewing the various resources and services available to customers on an ongoing basis, and identifying additional services or enhancements; and measuring customer satisfaction, reviewing results, and making recommendations for improvement.
- Handling and resolving complaints related to the Burlington AJC and the Vermont AJC Network in accordance with an approved grievance procedure.
- Developing and implementing a coordinated staff development and training plan for the Burlington AJC and Vermont AJC Network.
- In coordination with the One-Stop partners, developing and implementing a formal referral process, including referral forms, as described in subsection (g) of this agreement.
- Ensure alignment of resources, services, and data as outlined in the State Plan.

- Monitoring compliance with all federal and state laws, regulations, policies, and procedures related to the Vermont AJC Network, including the Burlington AJC.

    - **Customer Referrals**

Vermont's AJC Network is designed to share service delivery infrastructure, empowering all partner organizations to provide the widest array of high-quality services to meet customer needs. Parties agree to create a policy for making and following-up on referrals and review it annually to ensure that the system is effective, efficient, and helpful to customers.

In addition, parties agree to:

- Participate in a customer focused referral system that seamlessly accesses resources from involved partners to increase quality outcomes;
- Offer customers information on how to apply for a partner's services and arrange an appointment for the customer, if needed;
- Identify a partner referral liaison for each program partner;
- Provide ongoing training to all partner frontline staff in each program's services and eligibility; and
- Establish a standard of real-time referrals to all applicable local program partners.

1.

    a. **Confidentiality**

Customer information will only be shared in accordance with each partner's respective confidentiality requirements. If shared, the information will be made available within a reasonable timeframe.

Information about Vocational Rehabilitation customers may only be shared if the customer has signed a written release. Information may only be shared for the period of time specified in the release and only with the persons identified in the release.

Personally identifiable information obtained from customers of specific programs during outreach, intake, system orientation, initial assessment, referral to a partner programs, referral to supportive services, or otherwise is confidential and will not be released, disclosed or re-disclosed without obtaining the proper program specific release. Parties agree to work with the One Stop Operator to design information sharing protocols for one stop partners that complies with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Family Educational Rights and Privacy Act (FERPA), and any other relevant federal or state privacy laws.

1.

    a. **Accessibility**

Activities, employment, information and services available to job seekers and employers through the Vermont AJC Network and the Burlington AJC must be both physically and programmatically accessible to all people. A person's race, creed, color, national origin, marital status, sex, sexual orientation, gender identity, age, political affiliation or belief, disability, veteran's status, or physical or mental condition will not impede their ability to access services, events, or programs.

Parties will comply with all relevant federal and state laws and regulations, including the Nondiscrimination and Equal Opportunity Provisions of WIOA, the Fair Employment and Housing Act; ADA Amendments Act of 2008, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Title VI of the Civil Rights Act of 1964.

Parties will comply with all relevant federal and state laws and regulations, including the Nondiscrimination and Equal Opportunity Provisions of WIOA' the Fair Employment and Housing Act; the Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Title VI of the Civil Rights Act of 1964.

Staff Training. Parties agree to assist the One-Stop Operator in coordinating ongoing trainings and sharing information so that program staff are trained in ways to modify environments, procedures, and information dissemination to avoid discrimination and to meet individual needs. Trainings will include instruction on how to provide services for all customers in compliance with the laws referenced above and best practices concerning accessibility, inclusiveness, and universal design.

Partners in Vermont's AJC Network will ensure that all locations where program services are available to customers meet the standards of physical and programmatic accessibility described below.

Evaluations of the Burlington AJC's physical and programmatic accessibility will include how customers with disabilities can access, fully participate in, or benefit from available services compared to customers without disabilities.

Physical Accessibility

Physical accessibility refers to the extent to which facilities are designed, constructed, or altered so they are accessible to and usable by individuals with disabilities. AJC partners will use universal design and human-centered design strategies to help all customers access services. Evaluations of physical accessibility will take into account exterior and interior accessibility and will include criteria evaluating how well the AJCs and delivery systems take actions to comply with disability-related regulations implementing WIOA section 188.

Location and Facility. The Burlington AJC is accessible by public transportation, driving, biking, or walking. The center's sign is clearly marked and visible from a main road. The required number parking spaces are dedicated and marked for individuals with disabilities and are located closest to an accessible entrance.

The physical layout of the Burlington AJC eliminates structural barriers to mobility and is accessible to individuals of all capabilities. The building complies with the most recent ADA standards for Accessible Design and the Uniform Federal Accessibility Standards. The center's layout supports a culture of inclusiveness, guided by laws and regulations referenced above.

Workspaces and Assistive Technology. All public workspaces will be physically accessible to all customers by July 1, 2018 and will include assistive technology for customer use. A plan will be implemented to select, install, maintain, and update assistive technology based on customer's needs. Staff will also be trained on the use of the assistive technology so they can support customers needing the tools to access services.

Hours of Operation. The Burlington AJC provides maximum access to partner program services during regular business hours. Partner staff will consider the unique work, childcare, or transportation needs of participants and try to offer flexibility in scheduling whenever possible.

Programmatic Accessibility

Programmatic accessibility means that services and activities provided through Vermont's AJC Network, specifically those provided in the Burlington AJC, will be offered and delivered in a way that enables all eligible job seekers and employers to participate regardless of their range of abilities, age, culture, learning style, intelligence, or education level, in the most integrated setting appropriate.

All customers with disabilities will be reasonably accommodated so that they are able to interact and communicate with service providers in the most conducive environment available. Accommodations will also be made for individuals who have communication challenges, such as individuals who are deaf or hard of hearing, individuals with vision impairments, and individuals with communication disorders.

Communication. Staff will communicate with persons with disabilities as effectively as with others, and provide appropriate auxiliary aids, services, or other accommodations as needed. Individuals with disabilities seeking information or services from the Burlington AJC will have equal access to all information and data provided by the center.

Resources through the Burlington AJC will be accessible to individuals with disabilities and made available in multi-lingual versions. Translation services will be available, as needed, for all customers and service providers. All information, including that which is in digital format, will be clearly identified, communicated in a way that the public can understand and use, and fully accessible for individuals utilizing assistive technology tools. Information will be presented in a way that is compliant with federal and state law.

Virtual Accessibility. Customers will have access to all partner program services in the Burlington AJC onsite or via technology located at the center in compliance with WIOA's "direct linkage" requirement further described in 20 CFR 678.305. Phone, real-time web-based communications, or other technology will be physically present, enabling real-time interactions either on-demand or within a reasonable time. Parties agree to establish a policy that defines and describes a reasonable response time and protocol and agree that partner program staff located remotely and at the Burlington AJC will comply with the policy.

AJC partners will work to ensure that job seekers and businesses have access to the same information online as they do in a physical facility. All information kept virtually will be updated regularly to ensure dissemination of correct information. Partners will either have their own web presences via a website or social media, or will enter into a separate agreement with another partner program to post content through its website. Partners will assure that their websites are fully accessible for customers utilizing assistive technology tools.

ONE-STOP AMERICAN JOB CENTER (AJC) OPERATING BUDGET

29 U.S.C. §3151(h)requires that one-stop partners use a portion of the funds available to them to maintain a one-stop service delivery system. The required parties to this MOU agree to jointly fund Vermont's AJC Network infrastructure and shared services out of the Burlington AJC. The shared services budget described in Table 3 (available) was negotiated and agreed upon by all the required partners.

Table 4 (available) totals the individual budgets for programs offering services through the Burlington AJC.

CONFLICT RESOLUTION

Parties agree to attempt in good faith to resolve disputes regarding policy or practice among themselves. If policy or practice disputes cannot be resolved at this level, parties will work with the One-Stop Operator to settle the disagreement. If necessary, parties may solicit support from the SWDB to resolve outstanding disputes. The SWDB shall be the final arbiter of disputes related to the funding and operation of the Vermont AJC Network and Burlington AJC.

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The Governor's guidance for one-stop partner programs' contributions to a one-stop delivery system is as follows:

Authority

The Workforce Innovation and Opportunity Act (WIOA), codified at 29 U.S.C. §315l(h)(l)(B), and the regulations issued thereunder (20 CFR §678.705), direct the Governor, after consultation with the State Workforce Development Board (SWDB), and consistent with the guidance and policies provided by the SWDB, to provide:

guidelines for State-administered one-stop partner programs, for determining such programs' contributions to the one-stop delivery system, based on the programs' proportionate use of the one-stop delivery system consistent with State and federal law, including determining funding for the costs of infrastructure; these contributions are required to be negotiated pursuant to the Memoranda of Understanding with the one-stop partners; and guidance to assist the State's one-stop partners in determining equitable and stable methods of funding the costs of infrastructure of one-stop centers throughout the State based on proportionate use and relative benefit received, and consistent with federal cost principles contained in federal regulation.

All required partners are expected to comply with these guidelines. The State will monitor local partners to assure compliance with these guidelines. As of the date of this Memorandum, all partners listed in Section IV have executed an MOU, including a consensus budget, with the Workforce Development Board. These MOUs shall be on file with the State of Vermont Department of Labor.

1. Scope

This document:

1.

    a. Provides guidance related to comprehensive one-stop center infrastructure costs, including guidance for budgeting, allocation, and negotiation of these costs.

    b. Provides guidance in identifying and negotiating other comprehensive one-stop service delivery system costs that will be shared among required partners.

    c. Prescribes timelines for negotiations ofMOUs and for reporting the outcomes of these negotiations.

d. Describes how one-stop center infrastructure costs and any additional shared one-stop service delivery system costs will be funded by required partner programs in the absence of agreement between partners.

e. Outlines a process through which required partners can appeal decisions made in the application of these guidelines.

II. Background

WIOA aims to leverage the value and benefit of services available to customers through federally funded workforce development programs by integrating workforce service programs into a comprehensive one-stop service delivery system. WIOA requires that each federally designated local area establish a comprehensive one-stop service delivery system that provides career services, access to training and employment services, access to employment data and information, and job search, placement, and recruitment services. The comprehensive one-stop delivery system must make each of its programs, services, and activities accessible at not less than one physical location in the local area. Vermont has been designated a Single State Local Area min accordance with federal law. The site of Vermont's single, federally-recognized one-stop center is 63 Pearl Street, Burlington, VT 05401.

III. Role of One-Stop Partner Programs

WIOA identifies the entities that are required partners in the one-stop delivery system. They include programs authorized under Title I of WIOA, including Adult, Dislocated Worker, Youth, Job Corps, YouthBuild, Native American programs, and Migrant and Seasonal Farmworker program; the Wagner-Peyser Act Employment Service program; the Adult Education and Family Literacy Act (AEFLA) program; the Vocational R habilitation (VR) programs authorized under tide 1 of the Rehabilitation Act of 1973;the Senior Community Service Employment Program authorized under Title V of the Older Americans Act; Career and technical education programs at the postsecondary level authorized under the Carl D. Perkins Career and Technical Education Act; Trade Adjustment Assistance activities; Jobs for Veterans State Grants programs; Employment and training activities carried out under the Community Services Block Grant; Employment and training activities carried out by the Department of Housing and Urban Development; programs authorized under State unemployment compensation laws; programs authorized under sec. 212 of the Second Chance Act; and Temporary Assistance for Needy Families (TANF).

Each required partner shall provide access to its programs or activities through the comprehensive one-stop service delivery system, use a portion of funds made available to the partner's program to provide applicable career services, work collaboratively with the SWDB to establish and maintain the comprehensive one-stop delivery system; enter into a memorandum of understanding (MOU) with the SWDB relating to the operation of the comprehensive one-

stop delivery system, participate in the operation of the comprehensive one-stop delivery system consistent with the terms of the MOU, provide representation on the SWDB, as required, and participate in SWDB committees as needed.

1. Negotiation of Comprehensive One-Stop System Funding

<u>Comprehensive One-Stop Center Infrastructure Budget and Funding Agreement</u>

1.

a. All one-stop partners will be required to negotiate in good faith in order to reach agreement with the SWDB on the joint operation and funding of Vermont's comprehensive one-stop service delivery system outlined in the MOU. While agreement on terms described under 20 CFR §678.500 is required by June 30, 2017, parties have until January 18, 2018 to reach agreement on infrastructure cost funding.

b. The SWDB will lead the negotiation of infrastructure costs by all required partners.

c. A budget for the comprehensive one-stop center infrastructure costs must be negotiated annually and incorporated into the MOU through the amendment procedures described in the MOU.

d. Each required partner program shall use a portion of the funds available for the program and activities carried out in the one-stop center to maintain the one-stop delivery system, including payment of the infrastructure costs.

e. One-stop center infrastructure costs to be shared among all required partners are non- personnel costs that are necessary for the general operation of the one-stop center. These include, but are not limited to:

    i. Rental .of facilities;

    ii. Utilities and maintenance;

    iii. Equipment (including assessment-related products and assistive technology for individuals with disabilities);

    iv. Technology to facilitate access to the one-stop center, including technology used for the center's planning and outreach activities; and

    v. Common identifier costs (e.g. Ame1ican Job Center branding costs).

f. One-stop partners shall jointly fund the one-stop delivery system infrastructure through partner contributions that are based upon:

    i. A reasonable cost allocation methodology by which infrastructure costs are charged to each partner based on propo1iionate use and relative benefit received;

    ii. Federal cost principles;

    iii. Any local administrative cost requirements in the Federal law authorizing the partner's program; and

    iv. A method that is consistent with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards described in 2 CFR §200.

g. Required partners may meet their shared infrastructure cost obligations through any of the following:

    i. Cash contributions provided either directly or by interagency transfer.

    ii. Locally agreed upon and fairly valued non-cash contributions comprised of expenditures incurred by one-stop partners on behalf of the one-stop

center or non-cash contributions of goods and services contributed by a required partner and used by the one-stop center that provide tangible benefits for the local service delivery system. Each non-cash contribution shall meet the following criteria:

1. Be recognized and accepted by all other partners;
2. Have the effect of offsetting a cash contribution toward local infrastructure costs of the comprehensive one-stop center that would otherwise be due from the partner making the non-cash contribution; and
3. Be valued consistent with 2 CPR §200.306 to ensure they are fairly evaluated and meet the contributing partner's proportionate share.

iii. Third-party in-kind contributions of space, equipment, technology or other non- personnel costs by a non-one-stop partner and intended to support the one-stop center in general or a specific partner's proportionate share of one-stop infrastructure costs.

h. Payments shall be made in accordance with 20 CPR §678.700; federal cost principles, which require that all costs must be allowable, reasonable, necessary, and allocable to the program; and all other applicable legal requirements.

i. At the end of the State's fiscal year or after all budgeted infrastructure costs have been incurred, the SWDB will assure budgeted costs are reconciled to actual costs and relative benefits received to assure each partner is contributing its proportionate share in accordance with the tem1s of the MOU.

<u>Absence of Agreement on Comprehensive One-Stop Center Infrastructure Funding</u>

1. If the required one-stop partners cannot reach agreement on the one-stop center infrastructure funding (IPA) by January 1, 2018, partner contributions shall be determined independently by the Governor through a Statewide Funding Mechanism ("SFM") outlined in Attachment A.
2. If agreement is not reached by December 15, 2017, the SWDB will provide the following written materials and documents for the Governor's use in applying the SFM:
   a. The comprehensive one-stop center budget,
   b. Any materials related to the negotiations conducted,
   c. A statement stating each partner’s available resources and use of the comprehensive one stop center and service delivery system,
   d. List of required partners not in agreement,
   e. A list and brief description of all outstanding areas on which required partners have failed to reach agreement.
3. Any required one-stop partner may appeal the Governor's decision regarding a program's contribution amount under the appeal process described in Section VIII of this guidance.

4. The Governor's infrastructure cost funding determination shall take effect January 1, 2018, absent agreement among the required one-stop partners.

Comprehensive One-Stop Delivery System Additional Costs and Funding

1. All required partners under WIOA are required to use a portion of their program funds to pay additional costs relating to operation of the comprehensive one-stop delivery system.
2. These costs must include applicable career services and may include other costs, including shared services, shared operating costs, costs to support SWDB functions, and other costs that promote integration of services.
3. The amount each required partner contributes to local one-stop service delivery system costs must be allowable under each required partner's statutory and regulatory requirements.
4. Contribution amounts must be proportionate to the benefit received and determined in accordance with Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards described in 2 CFR §200.

VII. Appeal

If a required one-stop partner disagrees with the Governor's decision about the partner program's contribution to the one-stop infrastructure funding, it may appeal the decision within 10 business days. Appeals shall be made in writing to the SWDB and shall describe the basis for objection, propose an agreeable contribution amount, and supply relevant information for the SWDB to make an infom1ed decision. The SWDB shall consider the appeal and, at the Chair's discretion, may make a determination by action of the Operating Committee or majority of the entire board. The appealing partner shall be notified in writing of the SWDB's decision to uphold the Governor's determination or otherwise alter the partner's required contribution amount within two weeks. The SWDB's determination shall be final.

VII Timeline

The SWDB and one-stop partners have negotiated and reached agreement on the operation of a comprehensive one-stop delivery system and budget by June 30, 2017.

An infrastructure funding agreement that demonstrates how comprehensive one-stop center infrastructure costs are charged to each partner shall be executed by January 1, 2018. In the event that an agreement is not reached, the SWDB shall notify the governor by December 15, 2017 and the SFM will be implemented on January 1, 2018.

Negotiations between the SWDB and the required partners shall begin not later than April 1, 2018 in order to reach agreement on MOUs and budgets not later than June 30, 2018 for fiscal year 2019.

VIII Effective Date.

Effective upon signing and will remain effective until July 1, 2018.

ATTACHMENT A

Statewide Funding Mechanism for Allocating Shared Costs of Vermont's Comprehensive One-Stop Service Delivery System

Between Required One-Stop Partners

One-stop partner programs shall contribute to Vermont's comprehensive one-stop service delivery system based on each programs' proportionate use of the system and relative benefit received, consistent with Office of Management and Budget (0MB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards in 2 CFR part 200, including determining funding for the costs of infrastructure; and Ve1mont' s Non-personal Services (NPS) Accounts and Allocation Methodologies (below).

Funds for infrastructure costs must come from the administrative funds of each respective program. Limitations are also placed on how much each partner can contribute to infrastructure costs. These limitations are as follows, by program:

- Adult, Dislocated Worker and Youth: Shall not exceed 3 percent of the federal funds provided to the State.
- Vocational Rehabilitation: Shall not exceed .75 percent of the federal funds provided to the State in the second full program year; 1 percent of the federal funds provided to the State in the third full program year; 1.25 percent of the federal funds provided to the State in the fourth full program year; 1.5 percent of the federal funds provided to the State in the fifth full program year and in each succeeding year.
- Other Partners: Shall not exceed 1.5 percent of the federal funds provided to the State.

If any program's proportional share of infrastructure cost exceeds the limitation outlined above, the partner may use other available funds if no funding is available, the partner program's use of the one-stop infrastructure shall cease until the next program year or funds become available.

At the end of the state's fiscal year or after all budgeted infrastructure costs have been incurred, the SWDB will assure budgeted costs are reconciled to actual costs and relative benefits received to assure each partner is contributing its proportionate share in accordance with the terms of the MOU.

Non-personal Services (NPS) Accounts and Allocation Methodologies

Supplies

Inventoried Supplies are added to general asset accounts when received. When issued to individual programs, they are charged to the requesting program. Charges are direct charged when appropriate or allocated based on personal service dollars.

Minor Supplies (not in inventory) are direct charged when appropriate or allocated based on personal service dollars.

Automatic Data Processing (ADP) Communications

ADP communications are charged to cost centers based on circuits and lines. All are allocated on personal service dollars.

Postage

Postage meter fees are added to a prepaid asset account and then, based on monthly reports from the mail room that itemize usage, are charged to cost centers and either direct charged to programs or charged to cost center overhead and allocated based on personal service dollars.

Travel

All travel is charged to employee's assigned cost center and direct charged to program(s) as signed in the time distribution system. Each employee states on their travel voucher the program(s) to be direct charged.

Equipment Rent

ADP equipment rent is direct charged based on a computer usage table (JOBACT) produced monthly by data processing which itemizes CPU run time by program. Datalines connecting district offices to ADP equipment are charged to these cost centers based on personal service dollars.

Equipment Expense

ADP equipment expense is charged in the same manner as ADP equipment rent.

Non-ADP equipment expense is allocated by cost center using personal service dollars. Capital equipment expenditures are direct charged to programs.

Non-capital property is ordered by requisition. It is direct charged to cost centers, and then, either charged directly to a program or to cost center overhead where it is allocated based on personal service dollars.

Premises Rent

Premises rent is charged to applicable cost center overhead and allocated to programs based on personal service dollars.

Premise Expense

For Heat, Water & Lights, district office costs are charged to cost center overhead and allocated to programs based on direct personal service dollars. All other Premise Repair and Maintenance expenses are treated in the same manner as Heat, Water and Light.

Services

Contractual Services are direct charged when program specific. When they are not program specific, they are charged to the applicable cost center's overhead and allocated based on direct personal service dollars.

Subscriptions/Publications

Subscriptions/Publications are direct charged to cost center and programs when they are program specific; otherwise, they are charged to applicable cost center overhead and allocated based on direct personal service dollars.

Printing

Printing is direct charged to cost center and program when applicable. When not program specific, Printing is charged to cost center overhead and allocated based on direct personal service dollars.

Transportation

Transportation is direct charged to cost center and program when applicable. When not program specific, Transportation is charged to cost center overhead and allocated based on direct personal service dollars.

Advertising

Advertising is direct charged when program specific; otherwise, it is charged to cost center overhead and allocated to programs based on direct personal service dollars.

Court Costs

Court costs are direct charged to specific programs.

Bonding/Insurance

Auto & Fire Insurance are direct charged to applicable cost center and program when program specific. If not program specific, they are charged to applicable cost center and allocated to programs by direct personal service dollars.

Miscellaneous

Miscellaneous is direct charged to cost center and program when applicable. When not program specific, Miscellaneous is charged to cost center overhead and allocated based on direct personal service dollars.

3. STATE PROGRAM AND STATE BOARD OVERVIEW

A. STATE AGENCY ORGANIZATION

Vermont Department of Labor (VDOL): WIOA Title I, III, TAA, & JVSG

VDOL is an independent department within the State government led by a Commissioner that reports directly to the Governor. The VDOL has roughly 250 employees, with approximately 150 staff working from the central office located in Montpelier. Within the Department are the following divisions: Unemployment Insurance; Workforce Development; Worker's Compensation & Safety; Labor Market Information; and Wage and Hour and Employment Practices. VDOL administers multiple One-Stop partner programs, including: the WIOA Title I Youth, Adult, Dislocated Worker, and Rapid Response Programs; employment services authorized under the Wagner-Peyser Act; Trade Adjustment Assistance activities authorized under the Trade Act; Jobs for Veterans State Grants programs; the state Registered Apprenticeship Program, RESEA, and Vermont's Unemployment Compensation programs. VDOL maintains a central office located in Montpelier and oversees 12 regional offices offering job seekers and businesses recruitment and placement assistance. These One-Stop Career Centers provide workforce development assistance to Vermonters through regional workforce development staff.

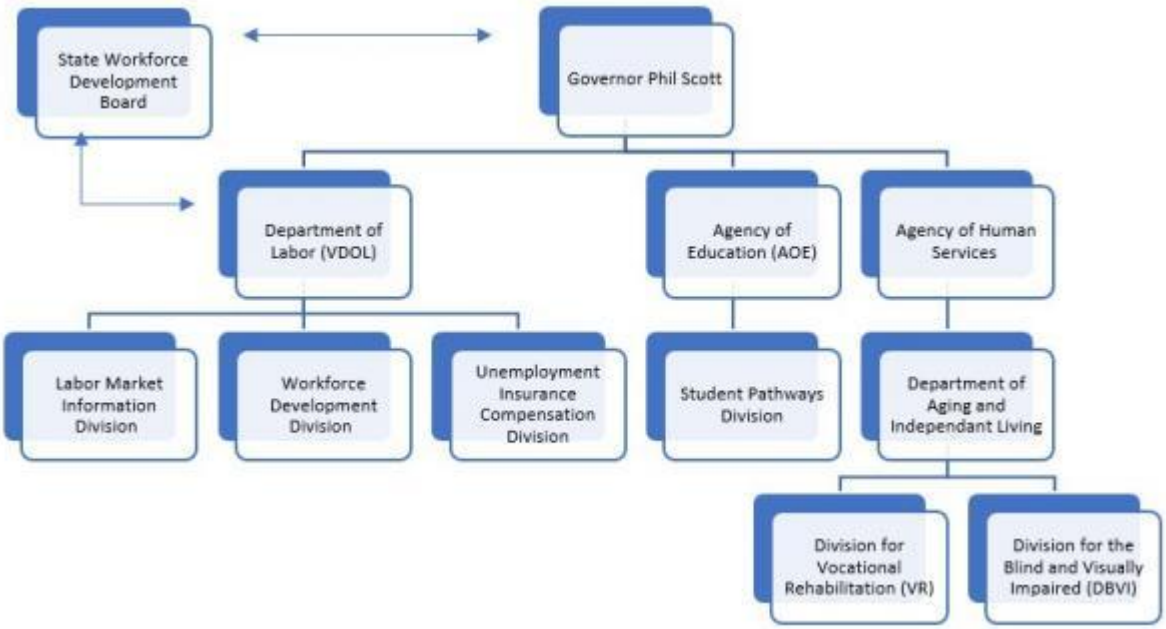
Agency of Education (AOE): Title II

AOE is a standalone agency within the State government structure. The Agency is administered by a Secretary that reports to both the Governor and the State Board of Education. The AOE is authorized to manage the adult education and literacy system and receives federal and state

funds for that purpose. Grants or contracts are awarded to eligible provider organizations, via an open Request for Proposal process, with funds distributed on the basis of county needs. The AOE Business Office monitors all expenditures and billing, as well as other relevant financial operations for funding AEL services. For the grant cycle beginning July 1, 2017 and ending June 30, 2020, the AOE staff supervised programs and funding for four AEL providers, with approximately 20 local learning centers statewide. The State Board of Education and AOE provide leadership, support, and oversight to ensure that the Vermont public education system enables all students, including adult learners, to be successful. The Agency's vision is that every learner in Vermont completes his or her public education with the knowledge and skills necessary for success in college, continuing education, careers, and citizenship.

Division for Vocational Rehabilitation (DVR) and Division for the Blind and Visually Impaired (DBVI): Title IV

DVR and DBVI are divisional units in the Department of Disabilities, Aging and Independent Living (DAIL), housed under the umbrella of the Agency of Human Services (AHS). The DAIL Business Office provides the financial operations for both Divisions and is responsible for all federal finance reporting. DAIL also provides overall operational support to the Divisions, including IT support and legal services. DVR has a central office and twelve offices statewide. The DVR Director supervises six regional managers, each managing two district offices. DVR has 70 VR counselors who operate through the 12 district offices. The DVR central office house program and operational managers and support staff for the Division. The Program Evaluation Unit is based in the DVR central office and is responsible for all DVR and DBVI reporting. DBVI has a central office and four district offices. The DBVI Director oversees four VR counselors and four rehabilitation associates located in the four district offices. This chart is only intended to reflect workforce development partners at the state level. There are numerous other Vermont workforce development partners at both the state and local level consisting of various other programs and services that help Vermonters through education and training. It is the intent of the Vermont core partners to engage and work with these other partners to ensure that Vermonters have access to all education and training services available throughout the state.



B. STATE BOARD

The State Workforce Development Board (SWDB) assists the Governor and Commissioner or Labor in carrying out federal and state activities in support of Vermont's workforce development system. The SWDB meets at least three times per year and currents consists of 48 appointed members. The SWDB Chair and the Commissioner of the VDOL may appoint members to committees and work groups to facilitate the work of the SWDB. These smaller, specialized committees and work groups are instrumental in implementing the functions of the SWDB as they allow for flexible decision making and closer monitoring of progress. The committees and work groups meet as frequently as needed to consider and recommend policies to the full SWDB to implement State Board functions. Additionally, they allow the full SWDB to focus on the development statewide policies (e.g., career pathways or credentials of value) at its regular meetings. At the recommendation of the Commissioner of the VDOL, and with the approval of the Operating Committee, the SWDB Chair may appoint non-SWDB members to serve standing on ad hoc committees, subcommittees, or work groups, for the purpose of adding subject-matter expertise or another important attribute to the group.

There are five standing committees of the SWDB: Operating Committee, Youth Committee, Policy Committee, Career Pathways Committee, and Training & Credentialing Committee.

The VDOL provides administrative and fiscal support to the SWDB, as well as connections to workforce and labor market information from the Economic & Labor Market Information Division of the VDOL. The USDOL, Region 1 provides federal oversight and technical assistance to the VDOL, which in turn assists SWDB members and staff in carrying out State Board functions effectively.

I. MEMBERSHIP ROSTER

1. Governor Phil Scott
2. Chair Adam Grinold, President, Brattleboro Development Credit Corporation
3. Mayor David Allaire, City of Rutland
4. Commissioner James Baker, Vermont Department of Corrections
5. Paul Biebel, President, Biebel Builders, Inc.
6. Janette Bombardier, Chief Technology Officer, Chroma Technology Corporation
7. Kiersten Bourgeois, Business Development and Communications Manager, St. Albans Cooperative Creamery (Dairy Farmers of America)
8. Steve Bryant, Owner, Dorset Inn
9. Frank Cioffi, President, Greater Burlington Industrial Corporation
10. Senator Alison Clarkson, Windsor District
11. Diane Dalmasse, Director, Vermont Division of Vocational Rehabilitation
12. Steven Dellinger-Pate, Principal, U-32 Middle & High School
13. Marguerite Dibble, CEO, Game Theory
14. Pat Elmer, President and CEO, Associates for Training and Development

15. Secretary Daniel French, Vermont Agency of Education
16. Suresh Garimella, President, University of Vermont
17. Don George, CEO, Blue Cross Blue Shield of Vermont
18. Gerry Ghazi, President, Vermont HITEC, Inc.
19. Scott Giles, President, Vermont Student Assistance Corporation
20. Commissioner Joan Goldstein, Vermont Department of Economic Development
21. Monica Greene, President, Vermont Precision Tools
22. Laurie Gunn, Chief Administrative & Experience Officer, University of Vermont Medical Center
23. Michael Harrington, Acting Commissioner, Vermont Department of Labor (VDOL)
24. Zach Hatch, Vice President of Manufacturing, Weidmann Electrical Technology
25. Melissa Hersh, Owner, Answers Within, LLC
26. Representative Matthew Hill, Lamoille District
27. Eileen Illuzzi, Director, North Country Career Center
28. Joyce Judy, President, Community College of Vermont
29. Ellen Kahler, Executive Director, Vermont Sustainable Jobs Fund
30. Brian Kerns, Vice President of Human Resources, Rutland Regional Medical Center
31. Secretary Lindsay Kurrle, Vermont Agency of Commerce & Community Development
32. Dennis LaBounty, Political Director, Vermont State Labor Council, AFL-CIO
33. Tom Longstreth, Executive Director, ReSOURCE
34. Chris Loso, President and CEO, Loso's Professional Janitorial Services, Inc.
35. Greg Maguire, Director of Strategic Initiatives, Liquid Measurement Systems, Inc.
36. Dale Miller, Senior Location Executive and Senior Director of Manufacturing Operations, GlobalFoundries
37. Jill Olson, Executive Director, Visiting Nurses Associations of Vermont
38. Carol Paquette, Owner, Sarducci's Restaurant
39. Brenan Riehl, President and CEO, GW Plastics
40. John Russell, Owner, Russell Constructions Services
41. Richard Schneider, President, Norwich University
42. Secretary Mike Smith, Vermont Agency of Human Services
43. Tim Smith, Mayor, St. Albans City
44. Grant Spates, Owner, Spates Construction, Inc.

45. Jeb Spaulding, Chancellor, Vermont State Colleges
46. Representative Tristan Toleno, Windham District
47. Dave Wheel, Executive Director, Vermont Employer Support of the Guard and Reserve
48. Jeff Wimette, International Representative, International Brotherhood of Electrical Workers

II. BOARD ACTIVITIES

There are five standing committees of the SWDB: Operating Committee, Youth Committee, Policy Committee, Career Pathways Committee, and Training & Credentialing Committee.

The Operating Committee is primarily responsible for conducting certain activities, as listed below, on behalf of the full SWDB between meeting dates, and for addressing urgent and/or time-sensitive business when a regular or special meeting cannot occur in time to meet the deadline. The Operating Committee is required to report all Committee decisions in writing to the full SWDB. Activities in which the Operating Committee may engage on behalf of the SWDB include:

- Participating in meetings and activities that promote the work of the SWDB, such as marketing and advocating for the goals of the SWDB, WIOA, and Vermont's workforce system;
- Reviewing and responding to state and federal legislative proposals that impact Vermont's workforce system, as necessary
- Overseeing the performance of the WIOA Core Partners relative to their state and federal performance measures and, when necessary, providing necessary approval for the submission of documents or reports;
- Approving the draw-down of federal funding, if necessary; and
- Addressing urgent and/or time sensitive business when a regular or special meeting of the full SWDB cannot occur in time to meet the deadline.

The Youth Committee is charged with providing information and assistance related to services for youth. Particular policies regarding the functions of the SWDB that are currently under consideration by the Youth Committee include the selection of youth service providers, and the effective provision of services to out-of-school youth.

The Policy Committee is charged with reviewing and recommending policies related to WIOA program implementation, One-Stop operations, SWDB governance and operation, and other workforce system policies, as necessary. Committee membership represents stakeholders across business, higher and career technical education, labor, and state agencies.

The Career Pathways Committee is charged with reviewing and approving state-endorsed Career Pathways that reflect a shared vision across multiple sectors and agencies for improving employment outcomes, meeting employers' and workers' needs, and leveraging available State and federal funding. Committee membership represents stakeholders across business, higher and career technical education, veterans' services, and state agencies.

The Training & Credentialing Committee is charged with overseeing and building on the WIOA Eligible Training Provider eligibility and approval process and creating tools and systems to assist in the recognition, use, and visibility of credentials of value to support employers,

workers, education and training providers, and workforce development partners. Committee membership represents stakeholders across business, higher and career technical education, and state agencies.

Ad hoc committees and limited-duration work groups of the SWDB are established as needed and have included: WIOA State Plan Modification Committee, One-Stop American Job Center Certification Committee, Adult Education Grant Review Committee, Training & Credentialing Work Group and 2020 WIOA State Plan Work Group.

The VDOL provides administrative and fiscal support to the SWDB and access to workforce and labor market information from the Economic & Labor Market Information Division of the VDOL.

4. ASSESSMENT AND EVALUATION OF PROGRAMS AND ONE-STOP PROGRAM PARTNERS

A. ASSESSMENT OF CORE PROGRAMS

The six common performance measures reported by the core partners (and TAA and JVSG) will serve as the primary indicator of how well the core partner programs are assessed. The common data elements collected on program participants and services will further indicate whether target populations are experiencing positive impacts as expected. The state's unemployment and labor market participation rates will indicate if employers' needs are being met. In VDOL's annual WIOA narrative report and VDOL's (state) Annual Workforce Report, outcomes from specific initiatives, progress in supporting targeted populations, progress in program alignment and development sector-based partnerships, etc. will also be reported

Each department or agency responsible for program services will conduct its own assessments on a regular basis. These include review of performance accountability measures, desk monitoring and field monitoring, ongoing communication, technical assistance, and targeted professional development and program improvement activities. In the coming years, partners will discuss methods for making these assessments more standardized and how to share findings and observations among one another. The administration and legislature also require the departments and agencies to follow results-based assessment (RBA) practices in reporting their budgets and outcomes to the Governor's office and legislative committees each year.

The Title IV DVR Program will be assessed on State performance accountability measures described in section 116(b) of WIOA, based on its progress in achieving the Goals and Priorities outlined in Section L of the core section of the State Plan. The Goals and Priorities 1,2,3, 4, 6 and 8 listed in the plan directly relate to the WIOA Common Performance Measures.

- DVR will align services to support consumers in achieving the WIOA Common Performance Outcome Measures.
- DVR will increase the percentage of consumers earning more than minimum wage at closure.
- DVR will increase consumer opportunities to participate in post-secondary education and training and gain industry recognized credentials.
- In partnership with VDOL, DVR will create more opportunities for DVR consumers to participate in apprenticeship programs and pre-apprenticeship programs.
- DVR will continue to expand efforts to effectively serve employers through Creative Workforce Solutions (CWS).

- DVR will improve outcomes for students and youth with emotional/behavioral disabilities served through the JOBS Supported Employment Program

All of the above goals and priorities have detailed metrics outlined in the DVR section of the plan. DVR expects to collaborate intensively with the other core programs to make progress under the goals and priorities.

The SWDB will review whether the state is meeting the common performance accountability measures across all programs for each indicator and across all indicators for each program. The frequency of the reviews will be determined by the SWDB, taking into account any potential duplication with other performance reporting obligations for programs, given that Vermont is a single-area state and state program leadership is involved in reporting as both the local area and state-level administrator.

The State Workforce Development Board's Policy Committee will continue to review and assess the physical and programmatic accessibility of the Burlington AJC and One-Stop system in 2021, including consideration of forthcoming customer satisfaction surveys administered by programs to learn if services are meeting the needs of Vermont's jobseekers, workers, and employers.

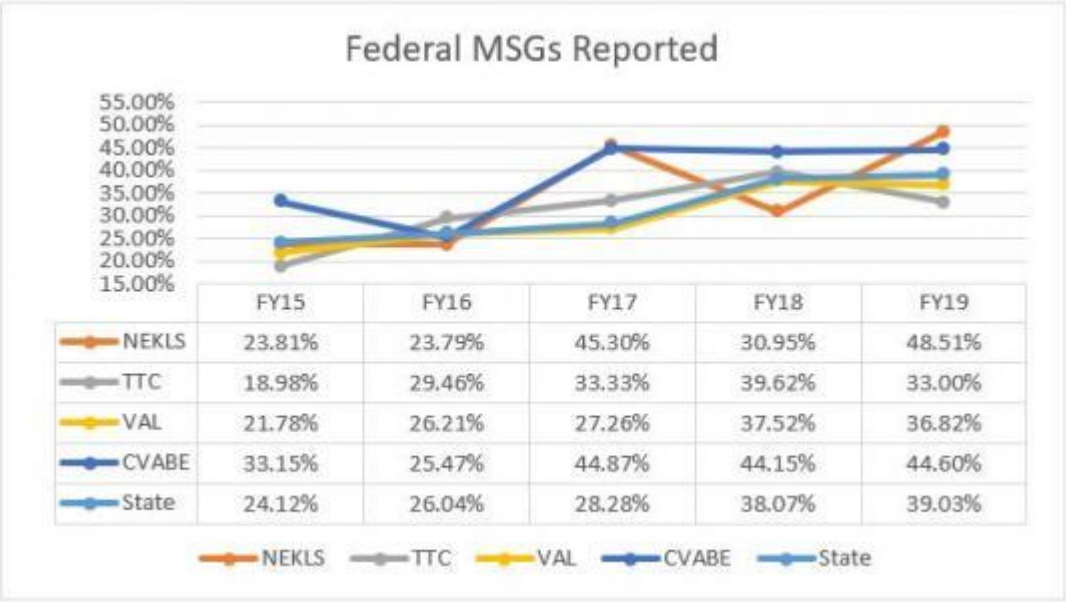
Finally, the State Workforce Development Board's Policy Committee will be working to establish a common set of workforce system performance measures that public and private stakeholders can look to in evaluating how well Vermont is meeting its labor force education, training, and employment needs. The SWDB may develop and maintain a reporting dashboard tool to optimize the collection and analysis of the performance data.

B. ASSESSMENT OF ONE-STOP PARTNER PROGRAMS

In VDOL's annual WIOA narrative report and VDOL's (state) Annual Workforce Report, outcomes from specific initiatives, progress in supporting targeted populations, progress in program alignment and development sector-based partnerships, etc. will also be reported. As noted above, the SWDB's policy committee will be working to establish a common set of workforce system performance measures that public and private stakeholders can look to in evaluating how well Vermont is meeting its labor force education, training, and employment needs. The SWDB may develop and maintain a reporting dashboard tool to optimize the collection and analysis of the performance data.

C. PREVIOUS ASSESSMENT RESULTS

Under WIOA Title II, the State of Vermont has met Federal performance targets for the past two years. This improvement in outcomes for students as demonstrated through increases in Educational Functioning Levels (EFLs) is a direct result of adherence to statute and policy. The chart below shows the percentage of Measurable Skill Gains (MSG) reported to the U.S. Department of Education. The chart below demonstrates that each AEL provider has also made significant increases in MSGs in the past three program years.



	FY15	FY16	FY17	FY18	FY19
NEKLS	23.81%	23.79%	45.30%	30.95%	48.51%
TTC	18.98%	29.46%	33.33%	39.62%	33.00%
VAL	21.78%	26.21%	27.26%	37.52%	36.82%
CVABE	33.15%	25.47%	44.87%	44.15%	44.60%
State	24.12%	26.04%	28.28%	38.07%	39.03%

The DVR Consumer Experience Survey is conducted every three years to determine consumers' overall satisfaction with the program. The survey is conducted by a third-party research firm, Market Decisions Research (MDR), who have an extensive background in working with other VR agencies nationwide.

Seven hundred consumers were contacted to provide information for our 2018 survey. The results were outstanding, and found that of the consumers surveyed:

- 81% reported they were satisfied or very satisfied with DVR.
- 96% said they would recommend that their friends or family members seek help from DVR.
- 92% of consumers reported they are satisfied with their experience working with DVR staff and DVR counselors; this statistic has risen two percent from our previous survey in 2016.

An area where DVR has enjoyed consistently high rates of satisfaction is in consumers feeling that they were treated by DVR staff with dignity and respect. In the 2018 survey, 98% of consumers reported feeling that they were treated by DVR staff with dignity and respect. The largest improvement in customer experience was seen in the ability of consumers to communicate with their DVR counselors. In 2016, 88% of consumers were satisfied with their ability to contact their counselor; in 2018 this percentage has risen to 91%, an all-time high for the agency.

The Market Decisions Research survey also included for the first time, measures of satisfaction for youth in transition. 97% of youth reported that they found working with a transition counselor helpful. Only 11% reported having problems working with their DVR transition counselor. To get more qualitative data, DVR is contracting with Market Decisions Research to conduct focus groups with youth in early 2020. We hope data from the focus groups will help inform how we provide services for students and youth going forward.

The VDOL is responsible for working with one-stop partners to ensure that services provided are both physically and programmatically accessible. As a condition of the SWDB's 2019 recertification of the Burlington AJC, the SWDB policy committee directed the VDOL to make

and report further progress on several key areas. Outlined below are the SWDB's requests and a summary of the progress updates provided.

1. *The One-Stop operator and required partners shall collaborate with partners including the Vermont Division of Vocational Rehabilitation and the Vermont Assistive Technology Program and Advisory Council to continue to improve the physical and programmatic accessibility of the One-Stop.*

VDOL has been working with VR, the Vermont Assistive Technology Program (AT), and DBVI to make the Burlington AJC fully accessible to individuals with disabilities. While there are tools for accessibility already in the One-Stop, VDOL is pursuing replacements and upgrades. Plans for improvements to physical and programmatic accessibility are as follows:

A. The interior and exterior of the building have been assessed for physical accessibility, with several recommendations for improvement including adding an additional handicapped parking space with clear designation that it is for one-stop customers and updating braille signage on elevators and restroom doors, etc.

B. Working with experts in accessibility from VR, DBVI and the AT program, VDOL staff have identified several technologies that would make the One-Stop more accessible to individuals with disabilities. By creating two distinct accessible workstations, one focused on accessibility for Blind and Visually Impaired customers, and the other equipped with tools for individuals with hearing impairments, VDOL is committed to making programs and services accessible to ALL Vermonters. VDOL will gather feedback from users and, with guidance from Assistive Technology specialists, work to ensure that equipment and software are continuously upgraded.

C. Creating plans to address some facility improvements, like move reception desk to front of the Resource Room to create a more welcoming atmosphere-greet customers at the door, new paint and carpeting in common areas, upgraded tables and chairs, elevator painting, replace carpet, create private office spaces on top floor for prospective new partners, upgrading upstairs meeting space, including new induction loop for hearing impaired, adding safety stripes to stairs for visually impaired, and providing digital displays of information.

D. Establish a customer feedback mechanism to get "real-time" feedback on services.

1. *The Committee recognizes the efforts of all One-Stop required and non-required partners to train and cross-train staff to share program/service information and best practices, however, the Committee understands that these trainings and cross-trainings are necessary on an ongoing, cyclical basis. The One-Stop operator and required and non-required partners shall develop and implement a plan to ensure that trainings and cross trainings are scheduled on a cyclical basis to ensure that all staff regularly receive up-to-date information.*

Cross-training of one-stop staff and community partners has begun and is described in more detail earlier in this plan.

1. *The Committee recognizes the work of the One-Stop operator and required partners to complete its memorandum of understanding (MOU) last year. Though this is an important step, the Committee found that the co-location of required partners remains only partially implemented due to several barriers as indicated by One-Stop leadership. The One-Stop operator and required partners shall convene to discuss co-location, including:*

- *The necessity and feasibility of physical colocation*
- *The potential benefits of virtual colocation*
- *The short-term and long-term steps to implement co-location*

Co-locating workforce service providers at 63 Pearl Street, Burlington has been a longstanding challenge. The building itself is co-owned by the federal government and the VDOL and is thus not managed like other state buildings. VDOL manages all aspects of the facility and its operation.

WIOA requires all required one-stop partners to be (physically or virtually) co-located in the state's comprehensive one-stop AJC (Vermont's only comprehensive center is in Burlington). While Vermont does indeed meet this collocation requirement, the lack of substantial physical collocation is seen by some as a missed opportunity to further integrate delivery of all employment and training focused services. VDOL agrees that promoting and facilitating physical co-location of some programs will improve outcomes for customers. However, for roughly half of the required One-Stop partners, co-location of their programs and services would have a significant financial and programmatic impact that is likely to outweigh the benefit of a physical move. VDOL encourages the SWDB to further explore those considerations with the partners directly if there is interest in learning more.

Barriers to increasing collocation include: the overall condition of the facility, breaking current leases (particularly challenging in BGS leases), scarcity of personal office spaces, and parking. Advantages to collocation include: a relatively low per square foot cost, proximity to public transportation and downtown Burlington, availability of space, proximity of partners, ease in access to building oversight officers.

Several partner programs have both an occasional presence and a full-time "virtual" presence via technology. VR is a good example. A VR counselor spends a few hours each week at the One-Stop, where they can assist any individual with a disability, often in partnership with their VDOL counterparts. In cases where a VR counselor isn't available in person, there is a mechanism to Skype over to the Burlington VR office, where the customer can interact face-to-face with a live person at VR, arrange for an initial meeting with a counselor, or find out more about services VR can offer. Core partners have found that this "warm" handoff between programs is a best practice.

1. *In order for the Committee to fulfill its charge to establish universal workforce system performance measures and identify necessary program data to be regularly collected for the purposes of maintaining a workforce program inventory, the One-Stop operator shall regularly report data and performance metrics to the Committee. As the Committee continues to develop a workforce performance "dashboard" by which it may evaluate the effectiveness of the system as a whole, it may choose to include some or all of the reported One-Stop performance data as a metric.*

All performance data for the One-stop system is captured in Vermont Job Link and has been made readily available to the committee.

1. *The One-Stop operator shall develop and implement an improved mechanism for collecting client feedback. This feedback shall inform the continuous improvement of the One-Stop and shall be reported to the Committee on a regular basis.*

The VDOL is currently exploring several options for collecting customer feedback, ranging from real-time feedback "buttons" a person could select after receiving services, written customer

feedback cards, to online surveys of customers to get more detail on their experiences. One initial tool VDOL is exploring to bring a basic level of customer feedback into the one-stop is the commercially available "happy-or-not" survey tool.

D. EVALUATION

The state does not currently have plans to conduct evaluation and research projects on activities under WIOA core programs. Vermont might consider exploring whether evaluating current local intake and referral protocols would be useful in standardizing a statewide protocol. It also might consider researching which measures of effectiveness in serving employers would be most useful to providers, business partners, and policymakers.

The Title IV program has a standing Program Evaluation Unit (PEU) that collects and reports program data for program management, quality assurance and research and evaluation. Among other activities the PEU manages the following:

- A dashboard of lead indicators, that provide staff and managers real time data on staff performance providing interventions likely to improve outcomes
- Providing data and support for formal research demonstrations such as the Linking Learning to Careers work-based learning demonstration funded through the Department of Education.
- Supporting a Kessler Foundation "Signature Employment Initiative Grant" intended to test new strategies to increase earnings outcomes for Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI) beneficiaries.
- Support of the Youth Transition Charter Group formed to assess and develop strategies to improve outcomes for youth with disabilities in transition.

5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

A. FOR TITLE I PROGRAMS

I. YOUTH ACTIVITIES IN ACCORDANCE WITH WIOA SECTION 128(B)(2) OR (B)(3)

As a Single-Area State, Vermont does not distribute funds to local areas. The Vermont Department of Labor receives and administers the local portion of Title I funding and delivers the required services in the twelve local One-stop career centers across the state.

II. ADULT AND TRAINING ACTIVITIES IN ACCORDANCE WITH WIOA SECTION 133(B)(2) OR (B)(3)

As a Single-Area State, Vermont does not distribute funds to local areas. The Vermont Department of Labor receives and administers the local portion of Title I funding and delivers the required services in the twelve local One-stop career centers across the state.

III. DISLOCATED WORKER EMPLOYMENT AND TRAINING ACTIVITIES IN ACCORDANCE WITH WIOA SECTION 133(B)(2) AND BASED ON DATA AND WEIGHTS ASSIGNED

As a Single-Area State, Vermont does not distribute funds to local areas. The Vermont Department of Labor receives and administers the local portion of Title I funding and delivers the required services in the twelve local One-stop career centers across the state.

B. FOR TITLE II

I. DESCRIBE HOW THE ELIGIBLE AGENCY WILL AWARD MULTI-YEAR GRANTS OR CONTRACTS ON A COMPETITIVE BASIS TO ELIGIBLE PROVIDERS IN THE STATE, INCLUDING HOW ELIGIBLE AGENCIES WILL ESTABLISH THAT ELIGIBLE PROVIDERS ARE ORGANIZATIONS OF DEMONSTRATED EFFECTIVENESS

The Vermont AOE will run competitions for its funds under WIOA Title II using the procedures established by the State of Vermont for awarding grants or contracts and the guidance available from WIOA regulations. The application to apply will be made available to all eligible providers on the Vermont AOE Website. The grant opportunity and availability of the application will be widely announced through AOE and other network list serves.

An eligible provider is an organization that has demonstrated effectiveness in providing adult education and literacy activities and is eligible to apply for funds under WIOA Title II. An eligible provider may include, but is not limited to: a local educational agency; a community-based organization or faith-based organization; a volunteer literacy organization; an institution of higher education; a public or private nonprofit agency; a library; a public housing authority; a nonprofit institution with the ability to provide adult education and literacy activities to eligible individuals; a consortium or coalition of the agencies, organizations, institutions, libraries, or authorities described above; and a partnership between an employer and an entity described above.

The AOE will determine an organization's status as an eligible provider by obtaining performance data from the organization on its record of improving skills of eligible individuals, particularly those who have low levels of literacy. Prior to accepting full proposals, the Vermont AOE will request an intent to apply form from interested organizations. The AOE will take questions and provide technical assistance to eligible providers preparing proposals. All full proposals will be submitted directly to the AOE exclusively. Each eligible provider will submit a single proposal to the AOE to fund one or more of sections 225, 231, and 243 and to serve one or more counties. As required by WIOA Title I B, local adult education and literacy activity proposals will be reviewed by the State Workforce Development Board (SWDB) for alignment with the State plan using a procedure and rubric established by the SWDB and the Vermont AOE. Because Vermont operates as a Single State Local Area, local proposals will be reviewed by the SWDB for alignment.

The AOE will score responses from eligible providers using a rubric based on the 13 considerations for awarding grants or contracts as described in WIOA as pertinent to the proposed scope of work.

AEFLA funds will be distributed in compliance with the Vermont State Board of Education's Funding Formula Rule. The formula links adult education and literacy funding to the need for services at the county level, is responsive to the needs of adults, and gives weight to populations most likely to demand services. The formula consists of three parts:

- Base of $30,000 to each county;
- 70% of balance for allocation on basis of statewide need - the need of the county relative to all counties in the state (State Need);
- 30% of balance allocated on basis of comparative density of need within each county (County Burden). Indicators of need for services, used in both the State Need and County Burden sections of the formula are:

- 15% … un- or under-employed persons without a high school diploma;
- 50% … persons 18 or older without a high school diploma;
- 20% … persons living at 125% of poverty
- 15% … persons in categories of offenders, mothers without high school diplomas, and for whom English is a second language.

Data for indicators are updated annually with the most current information available.

- Population: census data or most recent population estimates published by the Vermont Department of Health.
- Several data categories are based on census and therefore not updated annually:
  - persons 18 or older without a high school diploma;
  - persons living at 125% of poverty;
  - persons for whom English is a second language.
- Data for three indicators is available on a more regular basis from other State agencies:
  - un- or under-employed persons without a high school diploma;
  - offenders;
  - mothers without high school diplomas.

Funds will be awarded to eligible providers of adult education and literacy services on a basis of two years beginning July 1, 2021 for the purpose of establishing and operating programs that provide adult education and literacy activities within the service area of one or more particular counties. All providers will be subject to the same funding cycle. Providers will function as a required and valued partner in the regional AJC One-Stop Center Network, including as a partner in the development of regionally-relevant career pathways with specific entrance points for lower skilled adults.

II. DESCRIBE HOW THE ELIGIBLE AGENCY WILL ENSURE DIRECT AND EQUITABLE ACCESS TO ALL ELIGIBLE PROVIDERS TO APPLY AND COMPETE FOR FUNDS AND HOW THE ELIGIBLE AGENCY WILL ENSURE THAT IT IS USING THE SAME GRANT OR CONTRACT ANNOUNCEMENT AND APPLICATION PROCEDURE FOR ALL ELIGIBLE PROVIDERS

Direct and equitable access to all eligible providers to apply and compete for AEFLA funds is ensured through public announcements that drive eligible providers to the agency's ADA compliant Website. Each eligible provider will use the one application provided on the AOE website and all applications will adhere to the same timeline for submission without exception or extensions. The application will clarify that no other application will be made available to eligible providers and all applications must be submitted to AOE in order to compete for funds under Title II of WIOA. All eligible providers will be subject to the same competition process, i.e., the same procedures and rubric as described above. Each eligible provider will submit a single proposal to the agency to fund one or more of sections 225, 231, and 243 and to serve one or more counties.

C. VOCATIONAL REHABILITATION PROGRAM

The State of Vermont distributes Title IV funding for Vocational Rehabilitation as follows: 78% to the Division of Vocational Rehabilitation and 12% to the Division for the Blind and Visually Impaired. The funding distribution was established in the 1970s. Since then, the state has not been provided compelling data to alter the allocation in any way. The Division for the Blind is currently not in an order of selection and has funds to serve all eligible individuals. The Division of Vocational Rehabilitation is in an order of selection, but has had resources to routinely open the order in the last five years. Given the ability of both programs to serve eligible applicants, at this time the state is not considering any reallocation of Title IV funds.

6. PROGRAM DATA

A. DATA ALIGNMENT AND INTEGRATION

Vermont is working to maximize the efficient exchange of common data elements to support assessment and evaluation as each partner program works to improve and modernize its systems. For example, the VDOL will be working with WIOA and other workforce partners in 2021 and 2022 during its required system procurement process to develop an RFI and RFP that considers the needs of all partners in procuring the information management system that will support it for the foreseeable future. Further, Vermont's new Agency of Digital Services (ADS) is a partner in managing the state's IT systems and shares the aim of using interoperable information management systems and uses this consideration in its criteria for supporting system improvements.

Vermont has made some progress in streamlining intake and service delivery, and tracking participation in programs that involve multiple partners. SNAP E & T services, delivered through the state partnership program called ICAN, are now tracked and reported using VDOL's case management system. The process of adapting the system, ensuring all personal information remains protected, training staff, testing for data and system integrity, and launching the reporting protocols was costly and time-consuming. It's a victory for the state and has helped to inform core partners - though lessons learned and efficiencies gained – about the possibilities for future integration. The state will be moving very slowly in this regard, balancing costs associated with technology and change, and value added to customers, program administrators, and partner providers.

The state board has a minimal role in aligning technology and data systems across required one-stop partner programs. As a single-area state with state agencies providing core services, another state agency – the Agency of Digital Services (ADS) – performs this function of aligning technology and data systems across one-stop partners on behalf of the State.

The core and one-stop partners will work to develop strategies involving virtual systems to improve the quality of services and activities provided through the One-Stop delivery system and will include ADS in designing solutions. These strategies, developed over the next four years, will target key areas for improvement, including:

- modernization of technology used to deliver one-stop services;
- ensuring that assistive technology is accessible to individuals with disabilities and individuals residing in remote areas;
- enhancing participants' digital literacy skills;

- accelerating participants' acquisition of skills and r post-secondary or industry recognized credentials; and
- strengthening the professional development of workforce service providers.

Each core partner is responsible for their own reports as required by WIOA and their federal funding source. The VDOL is the designated partner for reporting on the employer satisfaction metrics. While Vermont currently reports this metric based on data available, core partners are working on new data sharing agreement to facilitate the collection and transfer of this information in a more streamlined and unduplicated way.

B. ASSESSMENT OF PARTICIPANTS' POST-PROGRAM SUCCESS

Each core partner will annually assess its performance according to its program requirements. Partners will also support the SWDB and its committees to assess participants' post-program success. This may include frequent reporting on the common performance data reported by the core programs in compliance with WIOA § 116 and 20 C.F.R. § 677.155, as that data pertains to participants' success after exit from the programs. As noted earlier, the SWDB Policy Committee will be establishing common metrics for evaluating how well the workforce development system is meeting the needs of its customers.

Under state law, the VDOL is required to report annually on the workforce development system. This report includes data related to the progress of participants who are exiting from core programs in entering and entering or remaining in employment. Legislators and the public are able to review this report. Similarly, AOE and regional higher education associations provide annual information on post-secondary education outcomes that is reported to the Legislature and relevant state boards.

C. USE OF UNEMPLOYMENT INSURANCE (UI) WAGE RECORD DATA

Vermont's Unemployment Insurance (UI) division is located within VDOL. The UI Division provides employee wage data through MOUs with partner agencies. Additionally, the UI Division, along with the core partners, have signed onto the State Wage Interchange System (SWIS) agreements on behalf of Vermont as of December 2019.

D. PRIVACY SAFEGUARDS

The protection of privacy is of the utmost importance to the state of Vermont. In order to ensure to protection of participant privacy, the core partner programs agree to secure handling of data sharing information. Relevant MOUs between the core program partners requires the security of all sensitive information and each partner ensures that the collection and use of information is in compliance with all applicable federal and state laws. Each partner ensures that relevant information is only made available to authorized staff and information is only made available for the limited purpose necessary to perform a required responsibility.

7. PRIORITY OF SERVICE FOR VETERANS

Vermont is dedicated to serving all veterans throughout the state by connecting them to the education and training that they need to be successful in post-military life. The state is committed to providing opportunities to veterans regardless of where they enter the workforce development system. The state is also committed to increasing awareness of available veterans' services among the WIOA partners to ensure that there is "no wrong door" for a veteran seeking employment. All case managers and labor exchange staff are trained on available services and how to refer appropriately.

Individuals enter the workforce development system one of two ways: by visiting a Vermont Department of Labor (VDOL) One-Stop Career Center or through the online Vermont JobLink (VJL) registration system. Regardless of the entry point, customers, whether they are veterans or a spouse of a veteran, are asked to self-identify their veteran status to ensure they can take full advantage of the available services to veterans.

After veteran status is determined via the Veterans Intake Form, they are immediately informed of their priority of service status and entitlement to priority of service. This includes all priority of service employment, training and placement services and applicable eligibility requirements for those programs and services.

Priority of service is defined under federal law as the right of covered persons to take precedence over non-covered persons in obtaining services. Taking precedence means that the covered person receives access to the service or resource earlier in time than the non-covered person; or if the service or resource is limited, the covered person receives access to the service or resource instead of the non-covered person. Furthermore, to be entitled to receive priority of service under any qualified employment and training program, including WIOA programs, a veteran still must meet each program's eligibility criteria.

Though WIOA includes a statutory requirement to provide priority of service to particular groups of people, there is a specific order to be followed in the provision of services involving veterans. The order of priority for services provided is the following:

- First, to veterans and eligible spouses, including surviving spouses. This means that Veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient receive first priority for services provided with WIOA adult formula funds. This priority must be provided regardless of the level of funds allocated.
- Second, to non-covered persons (individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds.
- Third, to veterans and eligible spouses who are not given statutory priority for WIOA adult formula funds
- Last, to non-covered persons outside all of the groups given priority under WIOA.

The priority of service provided to Vermont's veterans includes preference in job placement activities and the job referral process. The automated Labor Exchange System, Vermont Job Link (VJL), identifies Veterans at their point of entry into the system. Point of entry includes physical locations, such as the One-Stop Career Centers, websites and other virtual service delivery resources provided by the One-Stop Delivery System. Job placement activities and resume searches are coded for Veteran's priority of service. Veterans and other covered persons have a two-day advance on new job orders and see job postings on the same day they are processed. Additionally, only Veterans and other covered persons have resumes presented to self-service employers on the same day they post a job. Within the VJL system, an American flag symbol is displayed beside a Veteran account for employers to easily identify and match Veterans to open positions. VJL also provides queries that enable staff to search for newly registered Veterans to ensure follow up to make these Veterans aware of the services and programs available to them and their priority of service within those programs.

The VDOL will continue to monitor the priority of service provided to Veterans throughout the Vermont workforce system. Each One-Stop Career Center office manager reviews the priority of

service provided in the cases managed by their office. In addition to providing training and technical assistance, the VDOL central office staff perform on-site visits to the One-Stop Career Centers to monitor files annually and review managers' quarterly reports.

The VDOL will continue to provide training on the implementation of Veterans' Priority of Service. Training will be provided to DVOP specialists, LVER staff, One-Stop Career Center managers and staff, WIOA partners and other workforce partner personnel to assure full and effective implementation of Veterans' priority of service requirements at the local level.

The training emphasizes:

- The Identification of "points of entry" of federal employment and training programs for covered persons to take full advantage of priority of services;
- That staff must assure that at the initial contact point (point of entry) covered persons are made aware of their entitlement to priority of service and the full array of employment, training, and placement services to include any applicable eligibility requirements for those programs or services and
- That local policies and procedures ensure priority of service reporting requirements will be met.

In order to reinforce the training and increase awareness, VDOL staff will work with their WIOA partners to highlight the importance of identifying Veterans and helping them connect to Veterans services available in the One-Stop Career Centers. These awareness efforts will include posters, brochures and other materials highlighting services available to all Veterans.

The VDOL central office conducts regular reviews of internal policies and procedures to ensure that they comply with the priority of service requirements. The VDOL Assistant Workforce Development Director works closely with the Veterans Coordinator who is responsible for the day-to-day monitoring of Veterans' priority of service in the field offices by reviewing reports and conducting on-site visits.

To initiate the conversation with Veteran's, the VDOL will post noticeable signage to draw attention to the priority of service to Veterans and eligible spouses. A pre-screening tool will be utilized at the point of entry to determine the appropriate referral of its Veterans or eligible spouses. Together, the Intake and Intensive Services Determination Veterans & Eligible Spouse form is completed by the non-JVSG staff member and the Veteran or Eligible Spouse. Based on the information that is collected a referral is made to the appropriate VDOL case manager or community partner. A Veteran or Eligible Spouse that is not identified as having a significant barrier to employment are referred to the Labor Exchange staff, whereas, a Veteran or eligible spouse who are identified as having a significant barrier to employment, and in need of individualized career services, must be immediately referred to a DVOP specialist. In both instances, case management continues to be an appropriate service delivery strategy or framework within which basic & individualized services may be delivered, particularly for veterans.

8. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR INDIVIDUALS WITH DISABILITIES

Vermont's One-Stop partners have evaluated the one-stop delivery system to ensure that all employment education and training programs are available and accessible. Collectively, partners are providing resources to individuals in need of specific and specialized assistance in overcoming barriers to employment.

In Vermont's comprehensive AJC all services are provided through a combination of physical and virtual colocation, creating the most integrated setting appropriate for individuals to receive services. A significant effort is underway to update workstations in the resource areas to offer the most up-to-date assistive technology and to train One-stop staff and partners in how to use these resources. Later in the summer, partners will explore whether the to publicly highlight the technology and resources to the public – primarily employer partners – to demonstrate ways that they can be more inclusive and accommodating to future job applicants and current employers.

Vermont's one-stop career centers are fully accessible for individuals with disabilities and have access to a variety of specialized equipment to support employees and customers. Staff meet people where they are – physically, educationally, cognitively, and emotionally – to provide services. Clients have great autonomy and participate heavily in the development of their career plans. Orientations and workshops are provided in integrated settings unless an individual requests or demonstrates a need for separated service provision. VDOL and VR have partnered to provide Disability Etiquette training to VDOL staff through the winter and spring of 2020 and will expand this and subsequent inclusivity trainings to all One-stop staff beginning in the summer of 2020, as stand-alone trainings and integrated into the bi-annual cross-trainings described in Strategy C.

VDOL has identified Dirk Anderson, VDOL General Counsel, as it's EOO, while Sarah Buxton, State Director of Workforce Development, serves as the state-level EOO.

VDOL's non-discrimination and equal opportunity policy is provided here:

PROVIDING NOTICE OF EQUAL OPPORTUNITY AND NONDISCRIMINATION

Prohibited Discrimination

No individual in the United States may be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any Title I financially assisted program or activity, on the ground of race, color, religion, sex, national origin, age, disability, or political affiliation or belief and for beneficiaries only, citizenship or participation in any WIOA Title I program.

WIOA Sec. 188 and 29 CFR Part 38

Providing Initial and Continuing Notice

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    - All recipients receiving financial assistance under Workforce Innovation and Opportunity Act Title I, must provide initial and continuing notice that it does not discriminate on any prohibited ground.
    - Recipients for the purpose of equal opportunity and nondiscrimination regulations include, but are not limited to:
        - State level agencies that administer, or are financed in whole or in part by WIOA Title I funds;

        - State Employment Security Agencies;
        - State Workforce Investment Boards;
        - WIOA grant recipients such as service providers and eligible training providers;
        - One-stop operators; and
        - One-stop partners (by inclusion in one-stop centers)

-
    - Notice must be provided to:
        - Registrants/applicants and eligible applicants/registrants;
        - Participants;
        - Applicants for employment and employees in WIOA funded programs;
        - Unions or professional organizations that hold collective bargaining or professional agreements with the recipient; and
        - Members of the public, including those with impaired vision, hearing or Limited English Proficiency.
    - Recipients must take appropriate steps to ensure that communications with individuals with disabilities are as effective as communications with others.

WIOA Sec. 188; 29 CFR Part 38.34 and 20 CFR 683.600

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    - *Equal Opportunity Notice* Poster (**29 CFR 38.35**)

The posters, which are printed in English and Spanish, must be posted in prominent areas of the agency to provide notice of equal opportunity and nondiscrimination.

Note: "*Equal Opportunity is the Law*" posters are available through the VDOL.

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    - "*Equal Opportunity is the Law*" Signature Form
        - All individuals registered in WIOA should read, understand and sign the complaint procedure signature form with a copy to the individual and a copy in their file. (WFD-3 Rights and Benefits Form)
        - Service providers are required to provide the complaint procedure signature form to all current employees (WIOA partially or fully funded positions) and ensure that all new employees receive this form when they begin employment (again WIOA partially or fully- funded positions). All employees should read, understand and sign the complaint procedure

form. Furnish a copy to the employee and place a copy in their personnel file.

- Applicants for WIOA services or applicants for employment with the recipient are covered by the appropriate display of posters.

Publications

Recipients of Workforce Innovation and Opportunity Act funds must provide notice that WIOA Title I financially assisted programs or activities are an **"equal opportunity employer/program"** and that **"auxiliary aids and services are available upon request to individuals with disabilities"** in recruitment brochures and other materials that are ordinarily distributed or communicated in written and/or oral form, electronically and/or on paper, to staff, clients, or the public at large, to describe programs financially funded through WIOA Title I.

Recipients that publish or broadcast WIOA Title I program information on news media must ensure that such publications and broadcasts state that the program or activity is an equal opportunity employer/program (or otherwise indicate that discrimination in the WIOA Title I financially assisted program or activity is prohibited by Federal law) and indicate that auxiliary aids and services are available upon request to individuals with disabilities.

Where materials indicate that the recipient may be reached by telephone, the materials must state the telephone number of the TTY or relay services used by the recipients.

29 CFR Part 38.36

Notification of Grievance Due Process

All WIOA Title I and National Emergency Grant participants must be provided information about their right to file a grievance within 180 days of the alleged violation and the opportunity for an informal resolution that may include a hearing within sixty days of filing the grievance. Verification of notification must be included in all adult, youth and dislocated worker program participant files. (WFD-3 Statement of Rights and Benefits form)

WIOA Regs. at 20 CFR Part 683.600

9. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR INDIVIDUALS WHO ARE ENGLISH LANGUAGE LEARNERS

At least once every three years, the SWDB will assess the effectiveness, physical and programmatic accessibility, and continuous improvement of Vermont's One-stop AJC delivery systems using the procedures developed by the SWDB. The fully policy, application, and recent reports are available upon request. Taking into account any feedback from one-stop AJC customers, the SWDB evaluates the effectiveness of the AJC using a written application submitted by VDOL, the One-Stop Operator, considering the following factors:

a. Integration of available services across programs

b. Use of customer-focused processes in delivering services,

c. Alignment of workforce services provided with the needs of participants and employers,

d. Coordination of services among partner programs,

e. Physical and programmatic accessibility of all services,

f. Outreach to local employers to assist with meeting workforce demands,

g. Use of cross-training, expertise and information sharing, and other communication strategies to maximize referrals and co-enrollments,

h. Application of appropriate business and accounting protocols in program and facility management,

i. Coordination and partnership with Career Technical Education Centers,

j. Impact of performance measures on strategies to improve delivery of services, and

k. Any other factor the SWDB deems relevant.

The SWDB evaluates and certifies the effectiveness, physical and programmatic accessibility, and continuous improvement of Vermont's one-stop AJCs. Recent findings and determinations are described in earlier sections of this plan.

Vermont will continue to support the needs of English Language Learners through the following methods:

- Ensuring availability and high-quality of English language acquisition (ESL) services through AEL providers,
- By diversifying our own state workforce by hiring people of diverse ethnic, racial, cultural and socioeconomic backgrounds,
- Providing at no cost (to the customer) translation services, in person and online, to our customers for all core partner basic career services,
- Continue to develop an effective outreach strategy to Vermont's agricultural workers (migrant and seasonal, H2A, and others) in conjunction with community partners,
- Support the career advancement of New Americans in partnership with community organizations by providing more professional mentoring, networking, career counseling, and access to higher-level training and upskilling opportunities, and
- Updating and making available a tool-kit for employers of best practices in accessing and retaining New American workers.

As described in greater detail in Title II program discussions, Integrated English Literacy and Civics Education (IELCE), will be delivered by local AEL providers with a priority focus on serving communities with significant concentrations of adult English language learners. IELCE is defined as "education services provided to English language learners who are adults, including professionals with degrees and credentials in their native countries, that enables such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. Such services shall include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation and may include workforce training."

AEL providers of IELCE programs will collaborate with local employers, CTE centers, WIOA Title I and registered apprenticeship programs to develop and implement integrated education and training (IET) programs. Going forward the state will work to support IET programs that are

also pre-apprenticeship programs in order to prepare students to succeed in Vermont's Registered Apprenticeship programs, which has sponsors representing in-demand industries.

IV. COORDINATION WITH STATE PLAN PROGRAMS

VDOL (which includes WIOA Titles I and III Staff, TAA, Registered Apprenticeship, RESEA, JVSG, FLC, and WOTC), AOE, and VR leadership meet regularly to carry out the goals of the state, confer on policy initiatives, and share information about system level strengths and weaknesses. VDOL and VR leadership and regional staff continue to engage in regular facilitated meetings to help them jointly implement the state's workforce goals and strategies.

VDOL, AOE, VR, and DBVR met throughout the WIOA state planning development process to coordinate individual and collective planning. All core partners participated in SWDB-led goal and vision development processes, and subsequently met to discuss how the policy aims that were prioritized could be integrated into program delivery and shared strategies.

V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The State Plan must include	Include
1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;	Yes
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;	Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;	Yes
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administrating the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;	Yes
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;	Yes
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure	Yes

The State Plan must include	Include
compliance with the uniform administrative requirements under WIOA section 184(a)(3);	
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;	Yes
8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;	Yes
9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;	Yes
10. The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA);	Yes
11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and	Yes
12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.	Yes

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES UNDER TITLE I-B

A. GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

Vermont operates as a Single-Area State with the whole state comprising a single region and the entirety of the local workforce development area. Because of the smaller and population in comparison with other states, Vermont is more efficient and equitable for individuals to access services from a standardized state workforce development system. The services delivered by the required WIOA program partners are available at Vermont's comprehensive One-Stop American Job Center (AJC) located in Burlington. Regional One-Stop Career Resource Centers, local state offices, and community partners across twelve communities Barre, Bennington, Brattleboro, Burlington, White River Junction, Middlebury, Morrisville, Newport, Rutland, St. Albans, Springfield, and St. Johnsbury also deliver services as part of the state workforce development system. The strategic placement of these locations allows for services to be offered regardless of where an individuals resides.

These requirements do not apply to Vermont because it is a single- area state.

This requirement does not apply to Vermont because it is a single-area state.

The entire document "Guidance in Negotiating Costs and Services of Vermont's Comprehensive One Stop Service Delivery System Under the Workforce Innovation and Opportunity Act of 2014 (WIOA)" issued by Governor Scott on June 30, 2017 is included in this plan in the Common Elements Section - question III.b.2. Section VI states:

“If a required One-Stop partner disagrees with the Governor's decision about the partner program's contribution to the One-Stop infrastructure funding, it may appeal the decision within 10 business days. Appeals shall be made in writing to the SWDB and shall describe the basis for objection, propose an agreeable contribution amount, and supply relevant information for the SWDB to make an infom1ed decision. The SWDB shall consider the appeal and, at the chair's discretion, may make a determination by action of the operating committee or majority of the entire board. The appealing partner shall be notified in writing of the SWDB decision to uphold the Governor's determination or otherwise alter the partner's required contribution amount within two weeks. The SWDB determination shall be final.”

VDOL's Grievance and Complaint Process is located here:

Section l: Purpose:

The Vermont Department of Labor (VDOL) is committed to fair and timely resolution of complaints and grievances, from any person or organization, relating to VDOL's administration of federal programs. The procedure outlined in this document will cover any complaints or grievances relating to the federal programs and grants administered by the Workforce Development Division (WDD) Employment Service (ES). These include, but are not limited to, WIA/WIOA, Wagner-Peyser Act, Trade Adjustment Act, Jobs for Veterans Service Grant, Migrant and Seasonal Farmworker (MSFW), Registered Apprenticeship, MSHA, and special grant funds, such as National Dislocated Worker Grants.

Section 2: Program Administration Goal:

The VDOL will administer federal programs and funding in a manner that fully complies with the law; ensures the accessibility of program services and resources to all persons who may be, or who are determined, eligible; trains staff and monitors performance and data to ensure that service delivery, allocation of resources, and decisions and determinations are made consistent with applicable laws and rules, are free of bias or discriminatory motive, and are provided in a manner that is respectful, courteous, and professional. By federal law, VDOL is required to "attempt to resolve the complaint immediately, and may, if necessary, conduct a further investigation" (20 C.F.R. § 658.411(d)(4)(i)).

Section 3: Persons Filing a Complaint:

A complaint may be brought to the VDOL's attention through any mean or method, whether verbally or in writing. A complaint may be presented to VDOL by the person/complainant, by a person who is assisting the complainant, or by a person who may have simply witnessed the situation or action giving rise to a complaint. Consistent with applicable laws and a fair determination of the complaint, the VDOL shall, to the maximum extent possible, keep confidential any personal information, as well as the identity of the complainant and any other persons who furnish information relating to an investigation. VDOL staff shall ensure that they do not release or discuss any confidential or personal information without a VDOL authorized release form, signed by the complainant, to allow staff to discuss the matter with the person assisting the complainant.

The complaint may be, but is not required to be, made in person. It can be transmitted to VDOL via any reasonable method (for example: verbally, in writing, phone, fax, text, email, postal mail, etc.). Any staff member who receives a complaint shall:

1.

a. Record or assist the complainant in recording the complaint on the VDOL ES Complaint Form.

b. Record the complaint in the VDOL Complaint Log, outlining as much detail and information as is reasonably available at the time of entering the data into the log, including the names and contact information (home address, telephone number(s) and email address) for the complainant. It is very important to accurately record the person's name and contact information.

c. Keep copies of any document or materials given by the complainant

d. Immediately forward the complaint information to the appropriate VDOL staff person(s) as outlined in this policy.

Section 4: Types of Complaints:

Minor Complaints:

Not all complaints rise to the level of a formal review. For example, a client may complain that he/she has been waiting too long to see a staff member, or that he/she needs assistance with computer log-in. The resolution of those types of complaints should be relatively simple and apparent. In cases where the staff can assist and resolve the matter quickly and properly, staff shall do so.

Reportable Complaints:

In general, VDOL might anticipate certain types of complaint, such as:

- A complaint regarding a program's regulations or policies that may deny or limit services.
- A complaint about Employment Service actions or omissions.
- A complaint regarding service delivery by a VDOL staff person(s).
- A complaint regarding service delivery by a partner agency, or an organization or provider to whom VDOL has made a referral.
- A complaint against an employer to which the applicant was referred by Employment Service.
- A complaint that claimant was provided inaccurate or untimely information that adversely affected the claimant's services or benefits, or their decision-making or actions in relationship to services or benefits.
- A violation of employment related law(s) by an employer associated with the VDOL.
- A complaint of discrimination, harassment, intimidation or retaliation.

The above examples are illustrative; not intended to be exhaustive of complaints that VDOL might receive. All staff shall be active listeners and attentive to any information that is being shared with staff that might in any way be considered a complaint, and shall take immediate steps to document the information and initiate the complaint process to ensure a fair and timely resolution of the complainant.

Be aware that certain complaints are governed by provisions of state and federal laws and regulations. Do not attempt to determine the applicable law; rather, ensure that a Regional Manager is advised of complaints as soon as they are brought forward.

Section 5: Procedure for Handling a Complaint:

If present, a Regional Manager or Regional Supervisor shall take all complaints. If a Regional Manager or Supervisor is not present, a VDOL staff member shall:

1. Record or assist the complainant in recording the complaint on the VDOL ES Complaint Form.
2. Record the complaint in the VDOL Complaint Log
3. Inform the complainant that a Regional Manager will be notified of the complaint; and
4. Immediately notify a Regional Manager.

Instructions for Completing Employment Service Complaint Form/Log:

In completing the Complaint Form and Complaint Log for a reportable complaint, VDOL staff members shall:

1. Provide the complainant with a copy of the VDOL Employment Service Complaint Procedure.

1. Utilize only the form and log provided by VDOL Central Office to ensure compliance with federal regulations. Staff members shall comply with state and federal laws and rules relating to the privacy of data, social security numbers and other Personally Identifiable Information.
2. Ensure that the original and one copy of the complaint are maintained at the local office.
3. Provide the complainant with a copy of the statement entered on the Complaint Form. Ask if the statement reflects his/her complaint. If not, revise the Complaint Form until the complaint is recorded to the individual's satisfaction. Ask the person to date and sign or initial the complaint.
4. Sign and date the complaint and provide the individual a copy.

Once the nature of the complaint and the programs involved has been determined, the Regional Manager or Regional Supervisor shall:

1. Ensure that the staff member(s) involved in any conversation with the person(s) who made the complaint write a clear and accurate report of the complaint, conversation and any relevant information related to the complaint.
2. Ensure that any, and all materials, documents, emails, phone messages, etc., relating to the complaint are secured and preserved.
3. Ensure that the complaint has been logged into the VDOL Complaint Log.
4. Send a copy of the Complaint Form with related documents to the WDD Director.

5. Ensure that the confidentiality of the complaint and situation is maintained by all VDOL staff.
6. Ensure that the person(s) making the complaint is treated respectfully by all VDOL staff, and that they suffer no retaliation, adverse actions or consequences for their complaint.
7. Within not more than 24 hours, or sooner whenever possible, make an initial determination of the type of complaint, and, if necessary, contact the appropriate VDOL person(s) as outlined in this procedure.

It is expected that VDOL staff members will attempt to resolve any minor complaints that are called to their attention. VDOL staff shall record and report all reportable complaints to the Regional Manager. This mandate includes any, and all complaints that may be made against <u>any</u> VDOL staff member, other, state agencies, partner organizations, or their staff members. Failure to report a complaint is not an option, even if the complaint is against the recording staff member, a co-worker or another employee of the department, State, or partner organization. Staff shall advise a Regional Manager if he/she becomes aware of a complaint that has not been reported by another staff member. If a staff member fails to report a complaint, that omission may subject him/her to disciplinary action, up to and including dismissal. The Regional Manager shall immediately inform the Commissioner and WDD Director of any complaints regarding VDOL staff.

In a situation where the Regional Manager is attempting to resolve a complaint, the timeframes outlined under federal law shall be strictly followed (see 20 C.F.R. § 658.41 l(d)(2)(ii)). Regional Managers shall take steps to resolve the complaint within 15 working days after receipt of the complaint, unless the Regional Manager has made a written request for information. In resolving a complaint, the Regional Manager shall attempt to secure resolution confirmation, in writing, from the complainant. If the Regional Manager cannot resolve the complaint within these timeframes, the complaint shall be

forwarded to the WDD Director for State level resolution. The Regional Manager shall notify the complainant, in writing, of a referral to the VDOL Central Office.

The measure of whether something has been resolved is determined by the client's opinion, not the VDOL staff (see 20 C.F.R. § 658.41 l(e), outlined below). The complainant shall indicate satisfaction with the outcome. An Employment Service Complaint is considered resolved when:

1. The complainant indicates satisfaction with the outcome via written correspondence
2. The complainant chooses not to elevate the complaint to the next level of review
3. The complainant or the complainant's authorized representative fails to respond within 20 working days, or in cases where the complainant is an MSFW, 40 working days of a written request by the appropriate local employment service office or State agency
4. The complainant exhausts all available options for review

5. A final determination has been made by the enforcement agency to which the complaint was referred.

Section 6: Complaints Required to be Referred:

The Regional Manager shall try to resolve all complaints, except in the following circumstances:

- All complaints alleging discrimination by race, color, religion, national origin, sex, sexual orientation, gender identity, age, disability, or genetic information or complaints alleging retaliation for protected activity shall be forwarded to the VDOL EEO Officer.
- Complaints alleging violations of employment-related laws shall be forwarded to the WDD Director who shall immediately refer them to the appropriate enforcement authority.
- Complaints involving MSFWs shall be forwarded to the State Monitor Advocate.
- Complaints alleging criminal conduct shall be referred to the VDOL Commissioner's Office for investigation (see Incident Reporting Policy and Procedure).

Section 7: State Level Review:

If the complaint is filed initially with the VDOL Central Office, and is not transferred to a local office nor referred to an enforcement agency under Section 6, the Employment Service Complaint Officer (ESCO) shall investigate and attempt to resolve the complaint immediately upon receipt. If the VDOL receives the complaint on referral from a local office, the WDD Director shall forward the complaint to the ESCO who shall attempt to resolve the complaint immediately and may, if necessary, conduct a further investigation. The State Monitor Advocate will normally serve as the VDOL's ESCO, unless, in the opinion of the VDOL Commission, the specific circumstances warrant investigation by another individual. The ESCO, or other complaint investigator, shall be assigned complaint review and investigation at the State level, reporting information and findings to the VDOL Commissioner and WDD Director. If resolution has not been accomplished within 30 working days (20 working days with respect to complaints by MSFWs) after the complaint was received by the VDOL (whether the complaint was received directly or at a local office), the VDOL shall make a written determination regarding the complaint and shall send copies to the complainant and the respondent, except that if the VDOL has made a written request for information these time periods shall not apply until the complainant's response is received.

Section 8: Written Requests for Information:

In the course of investigating a complaint, the investigating officer may make a written request for information. The resolution timeframes shall not apply until the complainant's response is received. If the complainant or the complainant's authorized representative fails to respond

within 20 working days or, in cases where the complainant is an MSFW, 40 working days of a written request, the complaint shall be considered resolved.

Section 9: Written Determinations:

If the VDOL issues a complaint determination, the determination shall be made in writing, sent by certified mail and include the following:

- The results of any VDOL investigation.
- Conclusions reached on the allegations of the complaint.
- If a resolution was not reached, an explanation of why the complaint was not resolved.
- If the complaint is against an employer, and the VDOL has found that the employer has violated ES regulations, the determination shall state that the VDOL will initiate procedures for discontinuation of services to the employer in accordance with 20 C.F.R. part 658, subpart F.
- If the complaint is against an employer and has not been referred to an enforcement agency and the VDOL has found that the employer has not violated ES regulations, a notice to the complainant of the opportunity to request a hearing within 20 working days after the certified date of receipt of the notification.
- If the complaint is against the VDOL, an offer to the complainant of the opportunity to request, in writing, a hearing within 20 working days after the certified date of receipt of the notification.

Section 10: State Hearing Notification Letter:

If the VDOL receives a written request for a hearing, within 20 working days after the certified date of receipt of the resolution, the VDOL shall notify the respective parties, in writing, of the following:

- That the parties will be notified of the date, time, and place of the hearing
- The parties may be represented by an attorney or other representative, at their own expense
- The parties may bring witnesses and/or documentary evidence to the hearing
- The parties may cross-examine opposing witnesses at the hearing; and
- The decision on the complaint will be based on the evidence presented at the hearing.

Section 11: State Hearing Officer:

The VDOL Commissioner will appoint a Hearing Officer (HO), to oversee any complaint hearing, and will ensure that the HO has the qualifications, skills, and abilities to fairly, accurately, and without bias, assess the information and determine the facts.

Section 12: State Hearing Procedure:

A hearing shall be scheduled on a date and time mutually acceptable to the parties, but consistent with timeframes that ensure federal compliance. The hearing shall be conducted in a fair and impartial manner in accordance with the following procedures:

- All testimony at the hearing shall be recorded. Copies will be made available to the parties upon request.

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- Parties shall be afforded the opportunity to present, examine, and cross-examine witnesses.
- The Hearing Officer may elicit testimony from witnesses but, shall not act as advocate for any party.
- Any documentary evidence offered by a party and accepted by the Hearing Officer shall be included in the record. The party submitting the evidence shall concurrently provide copies to the other parties.
- Federal and State rules of evidence shall not apply; however, rules or principles designed to assure production of the most credible evidence available and to subject testimony to test by cross-examination, shall be applied where reasonably necessary. The Hearing Officer may exclude irrelevant, immaterial, or unduly repetitious evidence.
- Upon request, the case record, or any portion thereof, shall be available for inspection by any party at, prior to, or subsequent to the hearing. If copies are requested, the Department has the right to charge reasonable costs related to staff time to compile and produce such material.
- The Hearing Officer may allow other appropriate individuals, organizations, or associations to participate in the hearing as amicus curiae (friends of the court) with respect to any legal or factual issues relevant to the complaint. Documents submitted shall be included in the record.
- The State Hearing Officer may reschedule the hearing at the request of a party or its representative, provided the reschedule shall not cause undue delay or violate federal timeframes.
- With the consent of the State Workforce Agency and the· Hearing Officer, the party who requested the hearing may withdraw the request for the hearing in writing at any time prior to the hearing.

In conducting the hearing, the Hearing Officer shall:

- Regulate the course of the hearing
- Issue subpoenas if necessary
- Ensure that all relevant issues are considered

- Rule on the introduction of evidence
- Take all actions necessary to ensure an orderly proceeding; and
- If feasible, resolve the dispute at any time prior to the conclusion of the hearing.

The Hearing Officer's determination shall be in writing, based on the entire record, and include findings of fact and law, and the reasons thereof. The Hearing Officer shall send copies of the decision to all required parties and shall inform both the complainant and respondent that an appeal may be filed. For employment service decisions, appeals shall be with the Regional Administrator within 20 working days of the date of the decision in accordance with 20 C.F.R. § 658.418. For any WIA/WIOA related hearing, appeal shall be to the Secretary of the USDOL in accordance with 20 C.F.R. § 683.610. The decision shall provide the specifics as to which office, address and time for the parties to file any appeal.

Section 13: Complaints Involving Discrimination, Harassment. Intimidation or Retaliation:

The VDOL has a formally trained EEO Officer, appointed by the VDOL Commissioner. All complaints alleging discrimination, harassment, intimidation or retaliation· based upon race, color, religion, national origin, disability, sex (including pregnancy and gender identity), age, genetic information, parental status, sexual orientation or physical or mental status unrelated to job performance - including a

complaint from someone who alleges that he/she has witnessed such - shall be referred to the VDOL EEO Officer. The EEO Officer is responsible for receiving, reviewing and investigating all complaints about discrimination, and required to make findings and recommendations to the VDOL Commissioner for the resolution of all complaints. Such review and determination shall be done in compliance with 20 C.F.R. § 658.41l(c) and 29 C.F.R. Part 37. The EEO Officer shall utilize current federal reporting forms and file such forms with the USDOL Civil Rights Division.

Section 14: Situations Involving Life-Threatening Conduct:

For situations involving imminent danger to life or property, immediately contact law enforcement authorities and the VDOL Commissioner's Office.

Section 15: Complaints Involving VDOL Programs Administered by Other VDOL Divisions:

VDOL oversees many programs that are not under the direction or control of the Workforce Development Division or the Career Resource Centers but are administered by other VDOL divisions. Complaints may relate to other VDOL program areas. In that event, the complaint shall be referred to the VDOL Commissioner's Office. For example, complaints may be received on the following issues: Unemployment Insurance (UI), UI Employer Audits or Tax Assessment, Wage and Hour and Employment Practices, VOSHA, Workers Comp, Labor Market Information or other areas.

Section 16: Complaints Involving Non-VDOL Persons or Organizations:

If VDOL staff receives a complaint about a non-VDOL staff person or organization working in partnership with the VDOL Employment Service, the Regional Manager shall first attempt to resolve the complaint for the client by engaging the person or organization with whom VDOL is working to discuss the complaint and resolution. If resolution is not possible, the Regional Manager shall contact the VDOL Commissioner and WDD Director.

Section 17: Complaints Involving Other State of Vermont Agencies or Departments:

If the complaint involves another state agency or department, a Regional Manager shall advise the VDOL Commissioner's Office and WDD Director of the complaint. The Commissioner or WDD Director shall contact and advise the appropriate state agency head. The completed complaint form and other relevant documents shall be sent by VDOL to the other state agency, but that transmittal shall be handled by the VDOL Commissioner or WDD Director. Complaints against multiple agencies are handled as separate complaints to each agency.

Section 18: Other Jurisdictions, State Agencies. and VDOL's Mandate for Follow-Up:

- If a complaint concerns an employer in another state, the state agency receiving the complaint shall transfer the complaint directly to the state agency in the other state. Copies of the referral must be sent to the complainant and to the Regional Administrator with jurisdiction over both states.
- If a complaint involves more than one office of a state agency or alleges statewide practices in violation of the regulations or involves the VDOL, it is assigned to VDOL. In all cases where a complaint is being referred to another office or agency for handling, a copy of the referral shall be provided to the complainant.

- If a complaint concerns a violation of employment related law, it shall be referred to the enforcement agency with jurisdiction over that law.
- When an ES related complaint is referred to another enforcement agency, the VDOL shall provide the complainant with a periodic status report (monthly on MSFW complaints and quarterly on Non-MSFW complaints).
    - If a complaint is referred to an enforcement agency for determination, the following steps should occur: The complaint and the referral should be recorded on the Complaint System Log and referred to the WDD Director. The WDD Director shall forward the complaint to the appropriate enforcement agency. When the final determination is received back from the enforcement agency, the complaint should be considered "resolved". If no violation is found, the case is closed. If a violation is found, the procedures for Discontinuation of Services at 20 C.F.R. part 658, subpart F shall be initiated.

Section 19: Processing Apparent Violations: 20 C.F.R. *§* 658.419:

If a VDOL employee observes, has reason to believe, or is in receipt of information regarding a suspected violation of employment related laws or ES regulations by an employer, except as provided at Sec. 653.503 (field checks) or Sec. 658.411 of this chapter (complaints), the employee shall document the suspected violation and refer this information to the Regional Manager. The Regional Manager shall forward the information to the VDOL Commissioner and the WDD Director.

Section 20: Complaint Logs:

Regional Managers shall forward a copy of the Complaint Logs to the ESCO on a quarterly basis for recordkeeping. The ESCO shall maintain the master Complaint Log at the Central Office. The ESCO shall forward the Complaint Log to the VDOL Commissioner monthly. The VDOL Complaint Log will be forwarded by the VDOL Commissioner's Office to the U.S. Department of Labor Regional Administrator on a quarterly basis.

2. STATEWIDE ACTIVITIES

Vermont uses its authority to set aside 15% of Title I Funds to support employment and training activities under WIOA, as described in 20 CFR § 682.200. Decisions about how to spend the 15% reserve are made by the Commissioner of Labor as the head of the State Workforce Agency (SWA) and designated leader of workforce development in state statute. Vermont will also reserve 20% of the dislocated worker funds to conduct rapid response activities.

As a Single-Area State, it is the responsibility of VDOL to ensure that all applicable federal and state regulations and guidance pertaining to the use of each individual funding source for workforce investment activities are followed.

In addition to using the Governor's set aside funding to conduct all of the required statewide employment and training activities in 20 CFR § 682.200, Vermont plans to pursue the design, development, and implementation of the following activities:

- Coordinating delivery of employer services and developing common resources for all employers, including small employers, to assist them in accessing and retaining skilled workers to meet their employment needs,

- Improving the physical and programmatic accessibility of Vermont's Comprehensive One-Stop Center and VDOL's One-Stop Career Centers throughout the state,
- Developing and supporting education and training programs that are combined with, or lead to, work experiences that help participants secure long-term unsubsidized employment, targeting youth, mature workers, New Americans, individuals with disabilities, and ex-offenders,
- Creating sector-based demonstration projects that help employers upskill seasonal employees for permanent, full-time employment,
- Improving coordination between delivery of WIOA services with TAA and registered apprenticeship expansion activities, and
- Other permissible activities described in 20 CFR §682.210.

The Vermont Department of Labor (VDOL) employs a formal system of regular updates through the submission of weekly regional reports to the State Director of Workforce Development regarding possible at-risk businesses or rumors of company layoffs and closure. These notifications are reviewed by state leadership to determine the necessary next steps, assembling teams at the state and local level to address the concern. Additionally, the State Rapid Response Coordinator serves as the primary contact for notification of any potential layoffs or closures. Notifications are received from various sources including local media, local elected officials, company officials, regional and state economic development partners or affected workers contacting a WIOA One Stop Center in their local area. VDOL will look at ways to formalize an interagency notification system with the Vermont Agency of Commerce and Community Development to streamline the sharing of high-level, sensitive business information, thereby improving the effectiveness and timeliness of rapid response activities.

In Vermont, many layoffs or closures do not meet the thresholds required to activate the WARN Act. However, Vermont has a state specific layoff notification statute 21 V.S.A. § 413. This requires all employers who are closing or conducting mass layoffs of 50 or more employees over a 90-day period to notify the Secretary of Commerce and Community Development and the Commissioner of Labor 45 days prior to the effective closing or layoff date that reaches the required thresholds. Employers must send the Secretary and Commissioner the approximant number of employees affected, their job titles, and the anticipated date of job loss. Additionally, employers are required to pay all unpaid wages and compensation owed to any laid off worker. Employers are also required to give a 30-day notice to all local chief elected officials or administrative officers, the municipality and any bargaining unit.

Coordination and cooperation are key to a timely response. The Rapid Response Coordinator convenes all parties that provide outreach to the affected business and provides regular, coordinated communication between key partners including Economic Development, municipal and local officials, the Unemployment Claims Center, Agency of Human Services and education and training providers. A team is assembled and meeting with company officials is held to fully assess the company's needs. The company will be informed of possible services and alternatives available to them that could lessen the impact and/or avoid layoffs. Through a restructured Business Services Unit, focus will be on anticipating and reducing predictable seasonal layoffs. If the company is interested and able to explore these strategies, the appropriate team member will continue to work with the business to develop a layoff aversion plan. Simultaneously, the team will begin to develop a transition plan to support the affected workers if the layoff is deemed unavoidable. During the same initial phase, the company will be notified about the

Trade Adjustment Act (TAA) and the benefits available to their workers if the layoffs are TAA eligible. Assistance is provided by the State TAA Coordinator to facilitate the submission of the TAA petition.

The rapid response team will work to design a service delivery strategy to accelerate the impacted workers return to work. This will include the scheduling of a rapid response information session held on-site at the company, at the regional WIOA One-Stop Center, or at an appropriate location and time to encourage the highest possible attendance. A mass layoff spreadsheet provided by the company expedites the processing unemployment insurance (UI) claims and also contains contact information of the affected workers. In the event it is not possible to secure this document, a detailed sign-up sheet is made available at rapid response information sessions to create a database of affected workers. VDOL will explore opportunities to use technology to automate the collection of this information.

The rapid response information session will be facilitated by local WIOA One-Stop Center staff or the State Rapid Response Coordinator as appropriate. When possible, these sessions are scheduled in coordination with company officials. If the business operates multiple shifts, a flexible schedule is established to allow all affected workers attend. Attendees receive information about how to file UI claims, re-employment services available at their local WIOA One-Stop Center, health care information, and general labor market information. Individuals are introduced to the Vermont Job Link, the online Labor Exchange system, and notified that the creation of a Job Seeker Account is required as a condition of the receipt of UI benefits under Vermont law.

All attendees complete a Skills and Interest Survey to identify individual areas of service need. These services include: resume writing, interviewing skills training, online job search and applications, basic educational needs, ESL, financial literacy and specific skills training needs. WIOA One-Stop Center staff analyze this data and determine a plan for next steps. This individualized plan may include workshops, dislocated worker orientations, job fairs and referrals to community partners to both groups and individuals. If, through analysis of the data, there are themes or common areas of interest, training providers are engaged. This could include Community College of Vermont (CCV), Vermont Technical College (VTC), local Adult Career and Technical Education (CTE) Centers and Adult Education and Literacy (AEL) providers. Finally, at the rapid response session, affected workers are offered the opportunity to schedule individual follow up appointments with staff in their local WIOA One-stop center. If the affected workers are not in immediate need of services, they are provided contact information to connect with WIOA One-Stop Center staff in the future.

VDOL will be striving to expand the use of sector specific activities and services to further expedite the return to work of the affected workers and support the recruitment and hiring needs to related businesses.

Providing an effective rapid response following a disaster event (flood, fire, tornado, etc.) requires broad coordination with local and federal partners. Local partners in Vermont include municipal governments, local fire and rescue organizations, town health and transportation officials, local faith-based organizations, community action agencies, regional or town planning organizations, and others. The State agencies most involved in natural disaster relief efforts are the Department of Public Safety, which is the lead Vermont agency for statewide disaster response activities, the Agency of Transportation, the Agency of Human Services, the Agency of Natural Resources, and the Agency of Agriculture. Other statewide partners include the American Red Cross, the Green Mountain United Way, Vermont Air and National Guard (VTANG) and the Federal Emergency Management Agency (FEMA).

The VDOL Rapid Response team coordinates with these partners through our WIOA One-Stop Center staff and State Rapid Response Coordinator to determine the needs of those affected and the resources available. When responding to a natural disaster, the VDOL engages with the full state response team to provide guidance and/or financial assistance to establish community transition teams. These teams work to assist the impacted community in organizing support for dislocated workers. Rapid response sessions are scheduled and held as soon as possible to assess the basic needs of families including heat, shelter, food, clothing and other necessities and services. As part of its outreach and coordination efforts, the VDOL provides the information regarding the services available, and the filing timelines for the following programs: disaster unemployment insurance; national disaster grant funding; and other programs administered by the VDOL.

Disaster dislocated worker grant funds are sought to provide funding to create temporary employment opportunities to assist with clean-up, recovery, and other humanitarian efforts in one of three situations. First, when an area impacted by disaster is declared eligible for public assistance by FEMA; second, when another federal agency with jurisdiction recognizes the disaster as one of national significance that could result in a potentially large loss of employment; and third, when a substantial number of individuals, defined as 50 or more, relocate to another area from a disaster area. The VDOL is the agency eligible to apply for a Disaster DWG in Vermont, because it is designated to receive Dislocated Worker formula funds. In addition, the VDOL is also the fiscal agent responsible for the appropriate allocation of funding to the affected areas. As such, the VDOL rapid response team carries out its disaster response within the parameters of the Disaster DWG guidelines, and in coordination with state and national entities such as FEMA.

Members of the Rapid Response team are primarily responsible for initiating discussions with companies and affected workers about the Trade Adjustment Assistance (TAA) program and the eligibility criteria. Every effort is made to initiate the submission of a TAA petition as soon as the notice of a company closure or substantial/mass layoff is received. Local TAA staff or the State TAA coordinator assist with the filing of the petition. Whether the petition is filed by the State Coordinator, local American Jobs Center, company officials, union officials or three company employees, the State Coordinator will, upon notification of the filing, track the processing of the petition. Upon certification, TAA information sessions will be announced and held as soon as possible. Affected workers will receive a written notice of the scheduled TAA information orientation sessions. While the petition is under investigation, the affected workers are served with WIOA Title 1-DLW funding to advance their re-employment and training plans. The VDOL Business Services Manager serves as both the TAA and Rapid Response Coordinator, which facilitates program coordination and co-enrollment. New in this role, the TAA Coordinator is actively researching best practices, working closely with the FPO and attending peer-to-peer and other trainings to build capacity. An area of particular interest is developing innovative approaches to business engagement that could lead to increased TAA petitions being filed and certified.

TAA information orientation is presented jointly with local AJC TAA staff and state UI/TRA staff. TAA regional staff cover training, on-the-job training, job search allowances, relocation allowances and re-employment trade adjustment assistance. State UI/TRA staff present about trade readjustment allowance program requirements and enrollment deadlines for eligibility. The VDOL sees an opportunity to increase its use of technology and automation to ensure affected workers receive clear and timely information regarding trade benefits.

Affected workers are formally connected to One-Stop Career Center staff in their local area, if they are not already. As the WIOA Title I administrator, the VDOL is especially well positioned to ensure the alignment and coordination of funds and activities between WIOA adult and dislocated worker programs, the statewide rapid response activities and TAA. In many cases, the VDOL case managers provide services under both WIOA DLW and TAA, so co-enrollment is consistently achieved. These services include case management through the provision of basic and individualized career services in the WIOA One-Stop Centers. The focus is on skill-assessment and retraining workers who need further skills to obtain employment in emerging, in-demand occupations. Currently, the VDOL is exploring ways to build capacity and better utilize TAA funds to increase services to both affected workers and Vermont businesses

The State will reserve 20% of Title I Dislocated Worker Funds to provide rapid response activities. This will include rapid response services for every worker that files a TAA petition.

B. ADULT AND DISLOCATED WORKERS PROGRAM REQUIREMENTS

1. WORK-BASED TRAINING MODELS

There are several types of work-based training in Vermont, including on-the-job trainings (OJT), transitional jobs, registered apprenticeships, and customized trainings. Incumbent worker trainings are generally supported by the Department of Economic Development (DED) with state funds.

Jobseekers have access to basic career services and individualized career services through the state's One-Stop American Job Center (AJC) network. Vermont has one comprehensive AJC and eleven One-Stop Career Centers where WIOA One-Stop programs can be accessed. Case managers and labor exchange job specialists work with employers and participants to identify work opportunities, including work-based trainings that may be accompanied by other types of individualized employment supports.

Services for Title I adults and dislocated workers are easily coordinated in Vermont. Having a single agency to administer and deliver services for eligible participants provides a consistent approach to the needs of adults and dislocated workers throughout the state. Local One-Stop Career Center staff work with individuals to identify employment challenges and obstacles to long-term employment and progression along a career ladder. Support services are coordinated with other One-Stop and community partners as appropriate to the benefit of the individual. Local staff work with the individual to ensure decisions are made based on the best available labor market information and an individual assessment process. An individualized employment plan is developed as a guide to assist the participant in meeting their short and long-term career goals.

Vermont recognizes the importance that an industry recognized credential plays in entering and progressing through a career. In counseling jobseekers, case workers may recommend a classroom based occupational skills training before entering a work-based training experience. A key advantage of work-based training is that it includes and incorporates skill competencies that the employer has identified for the specific job. The trainee learns the skills needed in addition to learning how to apply the skills in the way the employer prefers. This makes the participant completing the training well-positioned to immediately add value in the workplace, with marketable skills that lay the foundation for upward mobility in their career ladder.

Combining work-based career exploration, internships, paid work experiences, transitional jobs, customized trainings, registered apprenticeships, and OJTs create a continuum of work-based experiences that allow participants to "learn and earn." The VDOL has seen great

successes using OJTs because they tend to be short-term, offer a direct connection to employment, and have high rates of placement and retention. With hands-on training that the employer designs, the employer is situated as a key player in monitoring the progress of the training and understands that they are making an investment in their business and future workforce by participating in the program.

The OJT program continues to be a key method of delivering hands-on training and has proven to be beneficial to both jobseekers and employers in both the private and public sectors. The program affords employers an opportunity to train jobseekers at a wage reimbursement rate of up to 50% for a determined amount of contract hours. OJT is designed to provide knowledge or skills essential to the satisfactory performance of the job. OJTs can be a pipeline to the registered apprenticeship program that more formally combines the on-the-job experience supplemented with technical related instruction. Qualified workers guide apprentices to develop their trade or skill and learn the techniques with specific materials, and equipment associated with that occupation.

Transitional jobs are work-based training experiences that are time limited and are usually subsidized through the VDOL Title I programs. They are intended for individuals with barriers to employment identified as chronically unemployed or have an inconsistent work history. Using this model, a participant can establish a work history to demonstrate their success in the workplace, develop occupational skills, and establish work references that support their entry into and retention in unsubsidized employment. Transitional jobs often benefit ex-offenders re-entering the labor force and individuals lacking a concrete history of long-term employment. This could include but is not limited to: homeless individuals, long term recipients of public assistance, and individuals with disabilities.

Customized trainings are developed to meet the needs of employer and participant. There is no single model that fits every training situation so each case is managed individually. Case managers work with the employer to develop a training contract describing how the needs of the employer and employee(s) are met. The contract document is intended to be comprehensive to ensure that the employee receives high-quality training, and, upon completion, the employer has an employee who has mastered specific skills and proficiencies. Success in customized training arrangements depends on frequent communication between caseworker, employer and participant. There are also regular on-site visits to ensure the agreements are being performed as intended, modifications can be made when necessary.

Brattleboro Memorial Hospital, in partnership with the VDOL, Vocational Rehabilitation (VR) and Community College of Vermont (CCV), is an example of a successful partnership incorporating a customized work-based training. The consortium created a support services training program to assist community job seekers who had been unemployed or underemployed, transition back to meaningful work. The program focused on both the housekeeping needs of the hospital and trainings regarding components of infection control and OSHA requirements. Participants were enrolled into CCV's Governors Career Readiness Certification program where they demonstrated and developed the necessary skills to be successful in the workplace.

Additionally, the participants worked with the VDOL case managers and labor exchange staff to access career counseling, resume building, and develop better communication and computer skills. Each participant completed a work experience at the hospital in an occupation they were hoping to become employed in. This model allows the participant to further explore a career of interest to them, essentially risk free. The employer and participant can then determine if the

career is a good fit. . By the end of the program, participants who successfully completed all phases of the program were enthusiastically offered employment opportunities within the hospital. Some participants chose to continue their education with CCV in pursuit of other available career pathways within the hospital that may be a better fit.

2. REGISTERED APPRENTICESHIP

The Vermont Department of Labor is the appointed state apprenticeship agency and oversees the registered apprenticeship program. A recent federal State Apprenticeship Expansion Grant, and Vermont's prioritization of expanding apprenticeship opportunities, has initiated the restructure of apprenticeship support with the VDOL.

One-Stop Career Center staff will receive training on the basic components of a pre-apprenticeship and registered apprenticeship. Staff will be trained supporting individuals interested in apprenticeship. Staff will also be a resource for employers enrolling participants in an existing program in addition to creating a new program. The Apprenticeship unit will continue to promote and develop programs, expand and support partnerships, assist the Apprenticeship Council, conduct quality and system improvement activities, monitor performance, and report on outcomes at the state and federal level.

Integrating outreach and supports for both apprentices and sponsors into each One-Stop Career Center will support the state goal to increase the number of apprenticeships.

3. TRAINING PROVIDER ELIGIBILITY PROCEDURE

Occupational skills training is a highly utilized service in Vermont. This training is available to youth, adult, dislocated worker, and trade program participants. Occupational skills trainings provide technical skill development, often accompanied with an industry recognized credential, often leading to employment. Vermont's eligible training provider list is available to participants to help make the best, most informed decision about progressing up their career ladder.

Section 1: Purpose:

The Workforce Innovation and Opportunity Act (WIOA) section 122 requires each state to approve a training provider's eligibility before WIOA funds can be used to pay for the provision of training services. The State, in consultation with the State Workforce Development Board (SWDB), is charged with developing the process for determining how training providers may qualify for inclusion on Vermont's Eligible Training Provider List (ETPL). The procedures outlined in this document will provide information on the eligible training provider application process. The ETPL will be made available to the SWDB, WIOA participants, and members of the public.

Section 2: Qualifications:

To be eligible to receive funds for the provision of training services, a provider shall be one of the following:

- An institution of higher education that provides a program that leads to a recognized post- secondary credential;
- An entity that carries out programs registered with the Vermont Department of Labor,
- Apprenticeship Division; or

- Another public or private provider of a program of training services, which may include joint labor-management organizations, and eligible providers of adult education and literacy activities under title II of WIOA if such activities are provided in combination with occupational skills training.

A "program of training services" is one or more courses or classes, or a structured regimen that leads to:

- A recognized post-secondary credential[1],
- secondary school diploma or its equivalent,
- Employment; or
- Measurable skill gains toward such a credential or employment.

Section 3: Identification of Respective Roles:

The State of Vermont is designated as a single State local area and, therefore, the State Workforce Development Board operates as both the State and local workforce development board. The State has designated the Vermont Department of Labor (VDOL) to assist in carrying out the process and procedures for determining the eligibility of training providers. All applications for addition to the ETPL shall be submitted to the Vermont Department of Labor for approval. Training providers approved under these procedures shall be included on the ETPL. The VDOL shall notify the SWDB of any updates to the ETPL at each SWDB meeting.

Section 4: Initial Eligibility Procedures:

To be included on the Vermont ETPL, all training providers and programs, not previously eligible to provide training services, shall provide the required information to the VDOL. The VDOL shall review the application, make a determination of approval, and notify the applicant of the determination within 30 days of receiving the completed application. The VDOL shall notify the applicant of the final determination in writing, including, in the case of a denial, reasons for the final determination and a statement that the provider may appeal the decision as provided in these procedures. The applicant may appeal the determination of the VDOL using the appeals procedures outlined in section 10 of this document.

Applicants approved under this section will receive initial eligibility for one (1) fiscal year. If the applicant wishes to continue providing training services, the applicant shall apply for continued eligibility as provided in this document.

The following information is required for an initial eligibility determination:

- A completed application;
- A copy of the provider's refund, equal employment opportunity and accessibility policies;
- A current class schedule; and
- Any additional information requested by the VDOL.

An initial eligibility determination will be decided for each training provider on a program by program basis and be based on the following criteria:

- A training provider's prior eligibility status or status of existing programs,

- The ability of the training provider to meet minimum performance levels based on the State Plan's performance measures required by the U.S. Department of Labor,
- Compliance with Vermont labor laws, such as workers' compensation, unemployment insurance, wage and hour, and nondiscrimination, and
- The degree to which the program relates to in-demand industry sectors and occupations in the State.

Section 5: Continued Eligibility Procedures:

All training providers shall annually apply to remain on the ETPL by submitting a completed application along with the required information. The VDOL shall review the application, make a determination of approval, and notify the applicant of the determination within 30 days of receiving the completed application. The VDOL shall notify the applicant of the final determination in writing, including, in the case of a denial, reasons for the final determination and a statement that the provider may appeal the decision as provided in these procedures. The applicant may appeal the determination of the VDOL using the appeals procedures outlined in section 10 of this document.

Any training provider that does not apply to remain shall be removed from the ETPL.

The following information is required for a continued eligibility determination:

- A completed application,
- Performance Reports for the past two years, as applicable, and
- Certification that the following have not changed from previous years:
    - the provider's refund, equal employment opportunity and accessibility policies, and
    - the class schedule. If changes have occurred new copies shall be provided.
- Any additional information requested by the VDOL.

A continued eligibility determination will be decided for each training provider on a **program by program** basis and be based on the following criteria:

- A training provider's prior eligibility status or status of existing programs,
- The performance of training providers on the performance accountability measures relating to the State Plan and the training provider's individual performance measures established by the VDOL,
- The availability of training services throughout the State,
- Information reported to State Agencies with respect to Federal and State programs involving training services, including the adult education and vocational rehabilitation programs,
- The degree to which the program relates to in-demand industry sectors and occupations in the State,
- Compliance with State licensing requirements, where applicable,

- The ability of the training provider to offer quality programs that lead to post-secondary credentials,
- The ability of the training provider to provide training services to individuals who are unemployed, underemployed, incumbent workers and individuals with barriers to employment,
- Demonstrated ability of the training provider to submit timely and accurate performance reports,
- Continued compliance with Vermont labor laws, such as workers' compensation, unemployment insurance, wage and hour, and nondiscrimination, and
- A training provider's ability to meet the State Plan's performance measures required by the U.S. Department of Labor.

Section 6: Registered Apprenticeship Programs:

Pursuant to section 122(a)(3) of WIOA, apprenticeship programs registered with the Vermont Department of Labor, Apprenticeship Division are automatically eligible to be included on the ETPL. Sponsors will be notified of their eligibility when they become recognized and offered an opportunity to decline being listed. Absent an affirmative response indicating that they do not wish to be listed, the program will be added to the list within 30 days of recognition.

Registered apprenticeship programs are not required to submit initial or continued eligibility applications under these procedures. Once an apprenticeship program is registered on the ETPL, the program will remain on the ETPL until the program is no longer registered with the Vermont Department of Labor or until the provider notifies the Apprenticeship Division, in writing, of the intention to be removed from the list.

Pursuant to section 122(a)(3) of WIOA and 20 C.F.R. § 677.230(b), registered apprenticeship programs are not required to do either of the following: submit performance information in order to be included on the ETPL; or comply with the ETP performance report required by section 116(d)(4) of WIOA. However, a registered apprenticeship program may voluntarily submit performance information to the Vermont Department of Labor, in which case the Department must include this information on the ETPL.

Section 7: On-the-Job Training, Customized Training, Incumbent Worker Training, and Other Training Exceptions:

Pursuant to section 122(h) of the WIOA, providers of on-the-job training, customized training, incumbent worker training, internships, paid or unpaid work experience opportunities, or transitional employment, as those terms are defined in WIOA, are not subject to the procedural requirements outlined in this document. Providers of these programs should consult with the VDOL, Workforce Development Division about the process to be identified as eligible providers of training services. If eligible, these programs shall submit such performance information and meet performance criteria as determined by the VDOL.

Section 8: Additional Requirements:

Eligible Training Providers are subject to applicable requirements in the WIOA as well as any applicable Federal and State laws and regulations, including the requirement to submit performance reports as required by WIOA section 116(d)(4).

Section 9: Enforcement:

Upon a determination by the VDOL that a training provider, or individual providing information on behalf of the provider, intentionally supplied inaccurate information or substantially violated any requirements of WIOA, any VDOL rule or regulation, or any State or Federal labor law, eligibility shall be terminated for a period of not less than 2 years. A training provider whose eligibility is terminated under this section shall be liable for the repayment of funds received during the period of violation. This section is construed to provide remedies and penalties that supplement, but shall not supplant, any additional civil and criminal remedies and penalties.

The VDOL shall notify a training provider in writing when the Department opens an investigation under this section. The notification shall include a brief description of the nature of the investigation and a reference to the applicable laws and rules, including these procedures.

The VDOL shall notify a training provider in writing upon a final determination of an investigation under this section. The notification shall include a detailed description of the investigation, reasons for the final determination, a reference to the applicable laws and rules, including these procedures, any penalties, including eligibility status and repayment amounts, and a statement that the provider may appeal the determination as provided in this document.

Any training provider determined to violate this section may appeal the determination of the VDOL as provided in section 10 of this document.

Section 10: Appeals:

Within 15 calendar days after receipt of a denial or termination of eligibility, a training provider may file a written request to receive an appeal by a formal hearing. The VDOL Commissioner will appoint a Hearing Officer (HO), or similar entity, to oversee any complaint hearing, and will ensure that the HO has the qualifications, skills, and abilities to fairly, accurately, and without bias, assess the information and determine the facts. A hearing shall be scheduled on a date and time mutually acceptable to the parties, but no later than 30 days after receiving the written request for a hearing. The hearing shall include an opportunity for the applicant to submit written and verbal information to the presiding HO. The hearing shall be conducted in a fair and impartial manner. The Hearing Officer shall issue a decision within 60 calendar days from the date of the hearing informing both parties (the complainant and respondent) of the decision. The decision of the HO or presiding entity shall be final.

Section 11: Waiver from Additional Information Request:

If the VDOL requests additional information as part of the application, other than what is required by the WIOA or applicable regulations, a training provider may request, in writing to the VDOL Commissioner, a waiver from the additional information request. To be granted a waiver, a training provider must be able to demonstrate that providing the information would be unduly burdensome or costly. If the Commissioner determines that the provider has demonstrated such extraordinary costs or undue burden, the VDOL shall provide access to cost-effective methods for the collection of information. Nothing in this section permits a training provider to request a waiver from any required information.

Section 12: Out-of-State Providers:

An out-of-state training provider wishing to provide training services within the State of Vermont shall comply with the procedures outlined in this document. Any out-of-state training provider wishing to offer Vermont WIOA participants training services outside of Vermont should contact the VDOL, Workforce Development Division for further information.

[1] WIOA § 3(52) defines 'recognized postsecondary credential' to include an associate or baccalaureate degree, an industry-recognized certificate or certification, a registered apprenticeship certificate, or a recognized State or Federal license.

4. DESCRIBE HOW THE STATE WILL IMPLEMENT AND MONITOR THE PRIORITY FOR PUBLIC ASSISTANCE RECIPIENTS, OTHER LOW-INCOME INDIVIDUALS, AND INDIVIDUALS WHO ARE BASIC SKILLS DEFICIENT IN ACCORDANCE WITH THE REQUIREMENTS OF WIOA SEC. 134(C)(3)(E), WHICH APPLIES TO INDIVIDUALIZED CAREER SERVICES AND TRAINING SERVICES FUNDED BY THE ADULT FORMULA PROGRAM

In Chapter 2 of the *WIOA Adult and Dislocated Worker Policy and Procedural Manual*, the VDOL states that priority of career and training services funded by and provided through the adult program shall be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient. Veterans also receive priority service. These policies reiterate the requirement to prioritize individualized career and training services to individuals with the most barriers to employment and to provide them with opportunities to benefit from employment and training services.

Many of the individuals the VDOL serves are considered low-income or likely eligible for public assistance and have substantial need and documented significant barriers to employment. The VDOL determines whether an individual meets priority of service requirements through the initial assessment process. Approved assessment tools and minimum passing scores are utilized in determining whether an individual is basic skill deficient. In addition, staff are provided with updated charts to determine if a person qualifies as low income. Staff record the priority of service category in the Vermont Job Link (VJL) case management record and maintain a record of verification documents in the case file. The VDOL Workforce Development Division central office staff provide training and technical assistance to the local staff to assist in prioritizing individualized career services and training services to those adults who are low income, on public assistance, basic skills deficient, or are veterans. Central office staff also perform the annual WIOA programmatic monitoring, including: desk monitoring and onsite interviews with staff and review of participant files, for adherence to federal law, regulations, and state policies.

The VDOL partners with Vermont's SNAP E&T Program to assist those individuals in obtaining the training and career enhancement resources needed to successfully enter the labor force. The majority of individuals enrolled in the SNAP E&T Program meet the public assistance, low-income and basic skills deficiency definitions. As a key partner in this program, the VDOL is a direct referral source to WIOA services, which may lead to co-enrollment.

Collaboration among community partners also leads to additional referrals which meet the priority of service targets. Key community partners include Employee Assistance Program (EAP), Vocational Rehabilitation, Adult Education and Family Literacy subgrantees, and Community Action Agencies. The VDOL also works closely with the Vermont Department of Corrections and Community Justice Centers to assist individuals exiting the corrections system and reentering the workforce. Additionally, the VDOL embeds staff in addiction recovery centers regularly, to assist individuals in accessing the career and employment supports necessary to be successful in the workforce when they are ready to reenter.

5. DESCRIBE THE STATE'S CRITERIA REGARDING LOCAL AREA TRANSFER OF FUNDS BETWEEN THE ADULT AND DISLOCATED WORKER PROGRAMS

As a single-area state, the VDOL manages the adult and dislocated worker programs at the State level. The transfer of funds between the programs is not anticipated. Should the need arise, the

VDOL would consult with US DOL and provide appropriate documentation of the justification as necessary.

C. WITH RESPECT TO YOUTH WORKFORCE INVESTMENT ACTIVITIES AUTHORIZED IN SECTION 129 OF WIOA—

1. IDENTIFY THE STATE-DEVELOPED CRITERIA TO BE USED BY LOCAL BOARDS IN AWARDING GRANTS OR CONTRACTS FOR YOUTH WORKFORCE INVESTMENT ACTIVITIES AND DESCRIBE HOW THE LOCAL BOARDS WILL TAKE INTO CONSIDERATION THE ABILITY OF THE PROVIDERS TO MEET PERFORMANCE ACCOUNTABILITY MEASURES BASED ON PRIMARY INDICATORS OF PERFORMANCE FOR THE YOUTH PROGRAM AS DESCRIBED IN SECTION 116(B)(2)(A)(II) OF WIOA IN AWARDING SUCH GRANTS OR CONTRACTS.[11]

As a single-area state, Vermont does not subaward youth funding to local areas. The VDOL receives all of the youth program funding and works with its twelve One-Stop Career Centers to deliver services to individuals and employers at the local level.

The VDOL occasionally solicits proposals for grants or contracts from One-Stop or community partners to carry out activities or services using youth program funding. On these occasions, the VDOL follows the State's procurement and contracting policy and policy for grant issuance and monitoring, as defined in the Agency of Administration Bulletins 3.5 and 5. All contractors and grantees are required to follow both state and federal requirements. Additionally, the VDOL requires all youth program activities not performed by the VDOL to be conducted in close coordination with the youth program manager, regional managers and local caseworkers. This coordination ensures the performance is being measured and opportunities are leveraging one another to maximize One-Stop partner involvement.

In program years 2020-2022 the VDOL expects to continue prioritizing paid work experiences and on-the-job learning and training opportunities to increase Vermont's youth labor participation rate. This includes new emphasis on developing paid work experiences, OJTs, and internships that exist throughout the year, not just in the summer. The VDOL is exploring how new partnerships with industry organizations and community-based service providers will help expand the development of opportunities with employers. Additionally, state policies related to increasing postsecondary credential attainment align with the youth program aims to increase measurable skill gains and credential attainment.

2. DESCRIBE THE STRATEGIES THE STATE WILL USE TO ACHIEVE IMPROVED OUTCOMES FOR OUT-OF-SCHOOL YOUTH AS DESCRIBED IN 129(A)(1)(B), INCLUDING HOW IT WILL LEVERAGE AND ALIGN THE CORE PROGRAMS, ANY COMBINED STATE PLAN PARTNER PROGRAMS INCLUDED IN THIS PLAN, REQUIRED AND OPTIONAL ONE-STOP PARTNER PROGRAMS, AND ANY OTHER RESOURCES AVAILABLE.

Since 2016, the VDOL and WIOA One-Stop partners have realigned methods of outreach, collaboration, and service delivery to meet the updated performance goals. The VDOL, Vocational Rehabilitation (VR), YouthBuild, JobCorps, and several AEFLA grantees have partnered in various initiatives to promote more intensive and individualized opportunities for at-risk youth.

Increased partnerships between WIOA required and voluntary partners helped align disconnected youth with basic and individualized career services and supported a more aligned delivery system. This allows participants to achieve both education and employment goals. In some regions of the state, local youth-focused teams have formed to coordinate services to youth and employers, develop new programs with braided funding, and promote the co-

enrollment of participants in various programs. This approach has helped participants navigate resources more effectively with a coordinated support team. . The VDOL and partner programs who support youth in Vermont, use a "meet them where they are at" approach to career service delivery and case management.

The VDOL will be working on several initiatives to strengthen career support and service delivery to youth, particularly out-of-school youth. VDOL has established the Vermont Youth Employment Program (VYEP) as directed by the Vermont legislature VYEP serves as an umbrella program for all youth focused state and federal workforce programs, serving youth and employers. Implementing a new, customer-based service approach allows administrators to better leverage program funds, case managers to serve more youth and support cohort-based models, and employers to have a predictable method to engage in developing pipelines to employment.

By 2021, the VDOL expects to stand up a system to recognize pre-apprenticeship programs at career and technical education (CTE) centers, the Community High School of Vermont (Vermont's recognized high school within the Department of Corrections), and with other training providers. The Agency of Education (AOE) and Vermont State Colleges (VSC) will also work with the VDOL to explore matriculation agreements that assist learners in moving into and through the registered apprenticeship program as they move through their career.

Act 80 of 2019, was part of a comprehensive, multi-year initiative to bolster, integrate, and align the state's workforce and training programs. The Vermont Legislature directed VDOL, AOE, VSC, and the Vermont Adult Technical Education Association to consider and report on the design, implementation, and costs of a fully integrated adult postsecondary CTE system. Partners will be working on the development of one or more designs of a fully integrated adult postsecondary career and technical education (CTE) system that:

1. provides Vermonters throughout the State with high quality programs that are standardized, replicable, and offered with regularity and consistency;

1. coordinates, or integrates where appropriate, the many programs and providers into the state's workforce education and training system to maximize the efficient use of training resources; and

1. features a governance structure that provides consistency across the system whenever appropriate, but also provides the flexibility necessary to respond to local and regional workforce demands.

This work is intended to further expand the coordination, alignment, and delivery of services to out-of-school youth (OSY).

Finally, VDOL will continue to locate case managers in addiction recovery centers, youth services locations, and adult education locations where disadvantaged youth are often found. Vermont continues to build partnerships with employers to offer work experience learning opportunities for disconnected youth. Vermont is continually looking to improve and develop partnerships with required partners and community-based organizations.

3. DESCRIBE HOW THE STATE WILL ENSURE THAT ALL 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2) ARE MADE AVAILABLE AND EFFECTIVELY IMPLEMENTED, INCLUDING QUALITY PRE-APPRENTICESHIP PROGRAMS UNDER THE WORK EXPERIENCE PROGRAM ELEMENT. [12]

VDOL is committed to providing high quality services for youth and young adults including: career exploration and guidance, continuing support for educational attainment, developing opportunities for skills training in in-demand industries and occupations, connecting participants with real work-based learning and training experiences. These services are intended to result in a job in the career pathway of interest to the participant or enrollment in postsecondary education. VDOL provides intensive case management for youth participants, and is increasingly adopting stronger approaches to supporting employers during work placements.

VDOL places an emphasis on professional development One-Stop Career Center staff so case managers are prepared to support the challenges that disadvantaged youth face. Professional development opportunities include: motivational interviewing, case management training, financial literacy and mental health training. VDOL is pursuing a partnership with the Annie E. Cassey Foundation to better serve at-risk teens and young adults. This partnership will help staff develop a more individualized approach to career exploration and service delivery to build on strengths and develop a path to sustainable careers.

Eligible participants in the youth program engage in a comprehensive review of the 14 program elements with VDOL case managers and develop an Individual Service Strategy (ISS) based on objective and subjective assessments and career counseling. VDOL takes a coordinated, team approach to providing the 14 program elements to participants. Case managers consider how to leverage resources through co-enrollment and appropriate partner program referrals to assist in meeting the participants goals.

VDOL ensures that all 14 program elements are made available and effectively implemented, by organizing a menu of options for a case manager and participant to consider, in collaboration with other State agencies, non-profit organizations, employers and community-based organizations. The specific partners that provide the program elements are listed below, in order of the program element that they provide. The provision of the program elements varies depending on the area of the State served and the particular needs of that area's Youth population.

1. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to high school diploma (or its recognized equivalent) or to a recognized postsecondary credential;

    Local AEL Providers

    Vocational Rehabilitation

    Northlands JobCorps

    ReSourceVT, including the YouthBuild Program

    Career and Technical Education Providers

    Higher Education Partners such as Community College of Vermont (CCV)

    Community High School of Vermont

    Vermont Student Assistance Corporation (VSAC)

    Youth Services

    HCRS Jobs Program

Local schools

1. Alternative secondary school services, or dropout recovery services, as appropriate;

Local AEL Providers

Vocational Rehabilitation

Community Action Agencies (CAA)

Spectrum Youth Services

Northlands JobCorps

ReSourceVT, including the YouthBuild Program

Career and Technical Education Providers

Higher Education Partners such as Community College of Vermont (CCV)

Community High School of Vermont

Vermont Works for Women

Vermont Student Assistance Corporation (VSAC)

Youth Services

1. Paid and unpaid work experiences with both an academic and an occupational component, including summer employment opportunities and other employment opportunities throughout school year; pre-apprenticeship programs; internships and job shadowing; and on-the-job training opportunities;

Local employers

Vocational Rehabilitation: Creative Workforce Solutions

ReSourceVT, including the YouthBuild Program

Career and Technical Education Providers

Community College of Vermont (CCV) and Vermont Technical College (VTC)

Vermont Youth Conservation Corps (VYCC)

Vermont Registered Apprenticeship Program

Regional Development Corporations (RDCs)

Youth Services

1. Occupational skill training (priority given to training programs that lead to recognized postsecondary credentials aligned with in-demand industry sectors or occupations);

Community Action Agencies (CAA)

Spectrum Youth Services

Northlands JobCorps

ReSourceVT, including the YouthBuild Program

Career and Technical Education Providers

Vermont Works for Women

Community College of Vermont (CCV) and Vermont Technical College (VTC)

Vermont Registered Apprenticeship Program

CDL Certificate Programs

Private training providers (e.g., Advanced Welding Institute)

VtHiTEC

Vermont Student Assistance Corporation (VSAC)

Youth Services

1. Education offered at the same time, and in the same context as preparation activities and training for a specific occupation;

Local AEL Providers

Vocational Rehabilitation

Community Action Agencies (CAA)

Spectrum Youth Services

Northlands JobCorps

ReSourceVT, including the YouthBuild Program

Career and Technical Education Providers

Community High School of Vermont

Vermont Works for Women

Community College of Vermont (CCV) and Vermont Technical College (VTC)

Vermont Youth Conservation Corps (VYCC)

Vermont Registered Apprenticeship Program

Vermont Student Assistance Corporation (VSAC)

Youth Services

1. Leadership development opportunities (including community service; activities encouraging positive social and civic behaviors);

Vermont Youth Employment Program

Vermont Works for Women

Vermont Youth Conservation Corps (VYCC)

Northlands JobCorps

ReSourceVT, including the YouthBuild Program

Local Rotaries and Chambers of Commerce

Youth Services

Emerging Leaders – Bennington

1. Supportive services

Vocational Rehabilitation

Community Action Agencies (CAA)

Spectrum Youth Services

ReSourceVT, including the YouthBuild Program

Vermont Registered Apprenticeship Program

Vermont Student Assistance Corporation (VSAC)

Trade Adjustment Assistance (TAA)

Unemployment Insurance Program (UI)

SNAP – 3SquaresVT

TANF – ReachUp

HCRS Jobs Program

Youth Services

1. Adult mentoring;

Vocational Rehabilitation

Local AEL Providers

Spectrum Youth Services

Northlands JobCorps

ReSourceVT, including the YouthBuild Program

Vermont Works for Women

Community College of Vermont (CCV) and Vermont Technical College (VTC)

Vermont Youth Conservation Corps (VYCC)

Vermont Registered Apprenticeship Program

Easter Seals

Big Brother/Big Sister Programs

My Brother's Keeper

Outright Vermont

Mobius

Windham County Sheriffs' Department

Rotary Clubs

Youth Services

HCRS Jobs Program

1. Follow-up services;

VDOL case managers provide follow-up services

1. Comprehensive guidance and counseling (including drug and alcohol abuse counseling and referral);

Private Counselors

Addiction Recovery Centers

Designated Mental Health Agencies

Easter Seals

Big Brother/Big Sister Programs

Outright Vermont

Windham County Sheriffs' Department

Youth Services

1. Financial Literacy Education

Department for Children and Families (DCF)

Community Action Agencies (CAA)

Vermont Student Assistance Corporation (VSAC)

Community College of Vermont (CCV) and Vermont Technical College (VTC)

TANF – Reach Up

Local Banks, Vermont State Employee Credit Union (VSECU)

Small Business Association (SBA)

VDOL's Financial Reality Fair

Adult Education and Literacy Providers

HCRS Jobs Program

The Vermont Agency of Human Services' Department for Children and Families has sponsored training events and projects to deliver a version of the curriculum called "Your Money, Your Goals". This curriculum was developed by the Consumer Finance Protection Bureau, and has been implemented by several of Vermont DCF's offices, including the Office of Economic Opportunity, and Vermont's TANF administrator, called Reach Up. The Reach Up program is

currently in piloting a project in four Vermont districts, where Post- Secondary Education (PSE) program participants are placed into financial coaching sessions with Community Action Partner (CAP) agencies. There are several banks and credit unions that provide statewide financial literacy education and other entrepreneurial skills training (e.g., Vermont State Employees Credit Union (VSECU)).

1. Entrepreneurial skills training;

Community Action Agencies (CAA)

Vermont Student Assistance Corporation (VSAC)

Community College of Vermont (CCV) and Vermont Technical College (VTC)

Small Business Association (SBA)

Windham Grows

13. Provide labor market and employment information about in-demand industry or occupations in local areas (career awareness, career counseling, and career exploration services): and

VDOL's Economic and Labor Market Information Division

Local Employers and Chambers of Commerce

Career and Technical Education Centers

1. Activities that help youth prepare for and transition to postsecondary education and training.

Vocational Rehabilitation

Vermont Student Assistance Corporation (VSAC)

Department for Children and Families (DCF)

Community College of Vermont (CCV) and Vermont Technical College (VTC)

Youth Services

Local Workforce Investment Boards or Alliances

4. PROVIDE THE LANGUAGE CONTAINED IN THE STATE POLICY FOR "REQUIRING ADDITIONAL ASSISTANCE TO ENTER OR COMPLETE AN EDUCATIONAL PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT" CRITERION FOR OUT-OF-SCHOOL YOUTH SPECIFIED IN WIOA SECTION 129(A)(1)(B)(III)(VIII) AND FOR "REQUIRING ADDITIONAL ASSISTANCE TO COMPLETE AN EDUCATION PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT" CRITERION FOR IN-SCHOOL YOUTH SPECIFIED IN WIOA SECTION 129(A)(1)(C)(IV)(VII). IF THE STATE DOES NOT HAVE A POLICY, DESCRIBE HOW THE STATE WILL ENSURE THAT LOCAL AREAS WILL HAVE A POLICY FOR THESE CRITERIA.

An administrative memo was issued on February 22, 2019 to provide guidance on the definition of the Needs Additional Assistance (NAA) eligibility criterion. It is the practice of the VDOL youth program to serve the most at-risk youth of Vermont through the provision of career and educational development services. The VDOL has a procedure for those individuals who do not

meet the specified WIOA eligibility markers (including high school dropouts, homeless youth, youth in foster care, pregnant or parenting teens, etc.), but who Need Additional Assistance (NAA) to complete an educational program or to secure or hold employment.

In-School Youth (ISY) age 14-21, who meet the low-income marker, but do not have a specified at-risk eligibility factor as determined under WIOA § 129(a)(1)(B), may be served as an at-risk youth, provided that they are determined by NAA to complete an educational program or to secure or hold employment. Not more than 5 % of the ISY newly enrolled in a given program year may be eligible based on the NAA criterion. If the individual needs additional assistance, a request for approval must be submitted to the Grant Manager prior to enrollment and after the Regional Manager has reviewed the file and supports the enrollment. The request for approval form (5% NAA funding) can be found in the Workforce Development (WFD) forms folder.

Out-of-School Youth (OSY) age 16-24, who does not have a specified at-risk eligibility factor as determined under WIOA § 129(a)(1)(C), may be served as an at-risk youth, provided that they are determined to NAA to complete an educational program or to secure or hold employment. In order for an OSY to qualify as NAA, the OSY must also be determined to be low income. If an OSY applicant is age 18 or older, and is determined to have a low-risk NAA, a referral to the Adult WIOA program for a training services eligibility determination will be considered.

Needs Additional Assistance (NAA) Definition: An individual who needs additional assistance to overcome barriers to completing an educational program or to securing or holding employment will qualify for WIOA services if they are determined eligible and their NAA is clearly documented in both their case notes and their Objective Assessment. The following table establishes the barriers, their definitions and the acceptable documentation to be provided in support of the existence of such a barrier.

Must meet at least one of the barriers listed below:	Definition	Acceptable Documentation
Incarcerated parent/legal guardian	Youth with a parent or legal guardian who is currently or has been incarcerated within the past 5 years	Letter or other documentation from Department of corrections or the court system; self-attestation
Youth who has experienced recent traumatic events, are victims of abuse, or reside in an abusive environment	Youth who has experience recent traumatic events, are victims of abuse, or reside in an abusive environment within the past 5 years	Letter or other form of documentation from: a social service agency, the legal system, a school official; self-attestation
Youth who has been referred to or is being treated by an agency for substance abuse or addiction issues.	Youth with a substance abuse problem or addiction issue, has been treated for a such a problem with the past 5 years or previously in treatment facility	Letter or other form of documentation from: a treatment facility, a school official, a court official, a doctor, or a social service agency. Signed statement from a parent or guardian; medical records or self-attestation
History of mental illness	Youth that has been diagnosed with cognitive, emotional, or behavioral	School documentation, medical records, letter or other documentation from mental

Must meet at least one of the barriers listed below:	Definition	Acceptable Documentation
	illnesses	health professional
Harassment, Victimization and Bullying	Youth who is/was a victim of verbal/physical harassment and/or bullying	School documentation, medical records, court documents, or self-attestation
Youth who is emancipated or in the process of being emancipated	Youth who is emancipated or in the process of being emancipated by the courts	Court Documents
A high school graduate or GED recipient who has not held a full-time regular job for more than 3 consecutive months and lacks work readiness skills necessary to obtain and retain substantial employment	Individual who has not been able to retain employment for more than three months	Documentation from past employers; self-attestation
Involved in gang activity	A gain is a group of three or more individuals who engage is criminal activity and identify themselves with a common name or sign	Court documentation; juvenile justice system documentation; self-attestation
Youth that are residing with family members with substance abuse or addiction issues	Youth that are currently residing with a family member that is enrolled in a treatment program or released within the past 12 months prior to enrollment	Letter or other documentation from the treatment facility verifying participation and/or release information

5. INCLUDE THE STATE DEFINITION, AS DEFINED IN LAW, FOR NOT ATTENDING SCHOOL AND ATTENDING SCHOOL AS SPECIFIED IN WIOA SECTION 129(A)(1)(B)(I) AND SECTION 129(A)(1)(C)(I). IF STATE LAW DOES NOT DEFINE "NOT ATTENDING SCHOOL" OR "ATTENDING SCHOOL," INDICATE THAT IS THE CASE AND PROVIDE THE STATE POLICY FOR DETERMINING WHETHER A YOUTH IS ATTENDING OR NOT ATTENDING SCHOOL.

16 V.S.A. § 1121 required children between the ages of six and 16 years "to attend a public school, an approved or recognized independent school, an approved education program, or a home study program for the full number of days for which that school is held, unless the child: is mentally or physically unable so to attend; or has completed the tenth grade; or is excused by the superintendent or a majority of the school . . . or is enrolled in and attending a postsecondary school . . . which is approved or accredited in Vermont or another state."

16 V.S.A §1122 requires minors over the age of 16 enrolled in a public school to attend the school continually for the full number of the school days of the term, unless the child is mentally or physically unable to continue, or is excused in writing by the superintendent or a majority of the school directors.

The VDOL follows the federal definition for attending school and not attending school as they are further defined in 20 C.F.R §681. For example, an individual "who is not enrolled or not attending a secondary or post-secondary educational program is considered out-of-school. An individual who attends a high school equivalency program or is enrolled in non-credit postsecondary courses is considered out-of-school." The rules go on to state that youth attending high school equivalency programs funded by the public K-12 school system that are classified by the school system as still enrolled in school are considered in-school youth.

The VDOL wishes to clarify in this plan that it considers youth who are enrolled in the Community High School of Vermont (CHSVT) to be out-of-school youth for the purposes of WIOA Youth Program eligibility. The CHSVT is an approved independent school, operated by the Department of Corrections for minors who are incarcerated and under the custody of the Commissioner of Corrections. Though publicly funded, the CHSVT is not funded like any other public or approved independent school in the state. The State agrees that students enrolled in CHSVT have characteristics and face barriers more than students enrolled in adult education and literacy programs, YouthBuild and JobCorps that are considered OSY, and enrolls these participants similarly.

6. IF USING THE BASIC SKILLS DEFICIENT DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INCLUDE THE STATE DEFINITION WHICH MUST FURTHER DEFINE HOW TO DETERMINE IF AN INDIVIDUAL IS UNABLE TO COMPUTE OR SOLVE PROBLEMS, OR READ, WRITE, OR SPEAK ENGLISH, AT A LEVEL NECESSARY TO FUNCTION ON THE JOB, IN THE INDIVIDUAL'S FAMILY, OR IN SOCIETY. IF NOT USING THE PORTION OF THE DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INDICATE THAT IS THE CASE.

A youth is defined as basic skills deficient if they have English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or is unable to compute or solve problems, or read, write or speak English at a level necessary to function on the job, in the individual's family, or in society. In assessing basic skills, the VDOL staff must use assessment instruments that are valid and appropriate for the target population, and must provide reasonable accommodation in the assessment process, If necessary, for individuals with disabilities.

An administrative memo was issued on June 14, 2018 to provide guidance on tools and resources available to determine basic skills deficiency. To determine if an individual is basic skills deficient, the VDOL case managers administers the Comprehensive Adult Student Assessment System Assessment (CASAS) to determine literacy levels. The CASAS is a competency-based assessment tool designed to assess and measure the basic skills and literacy skills needed to function effectively at work and in life.

In addition, case managers refer participants to Adult Education and Family Literacy (AEL) partners for the administration of the Test of Adult Basic Education (TABE). The TABE consists of three basic components: reading, language, and mathematics. The test assesses an individual's grasp on core skills necessary for success in education and the workplace. Other valid assessments administered within the last six months through other agencies or school systems are acceptable documentation of basic skills deficiency.

VDOL, AOE, and VR will be reexamining definitions over the next two years to ensure that the definition set in policy allows us to serve the most disadvantaged youth and provide the most opportunities. Further, the core partners are working toward common assessment tools and

policies that promote the sharing and recognition of results to limit repetitive testing of participants.

D. SINGLE-AREA STATE REQUIREMENTS

1. ANY COMMENTS FROM THE PUBLIC COMMENT PERIOD THAT REPRESENT DISAGREEMENT WITH THE PLAN. (WIOA SECTION 108(D)(3).)

2. THE ENTITY RESPONSIBLE FOR THE DISBURSAL OF GRANT FUNDS, AS DETERMINED BY THE GOVERNOR, IF DIFFERENT FROM THAT FOR THE STATE. (WIOA SECTION 108(B)(15).)

3. A DESCRIPTION OF THE TYPE AND AVAILABILITY OF WIOA TITLE I YOUTH ACTIVITIES AND SUCCESSFUL MODELS, INCLUDING FOR YOUTH WITH DISABILITIES. (WIOA SECTION 108(B)(9).)

No comments received in opposition to or disagreement with the Plan.

As the State Workforce Agency (SWA), the Vermont Department of Labor (VDOL) is the entity responsible for the disbursal of all Title I and III grant funds. The Vermont Agency of Education (AOE) is the entity responsible for the disbursal of all Title II grant funds. The Vermont Agency of Human Services (AHS) is the entity responsible for the disbursal of all Title IV grant funds.

The VDOL is committed to providing high quality services for youth and young adults beginning with career exploration and guidance; continuing support for educational attainment; developing opportunities for skills training in in-demand industries and occupations; connecting participants with real work-based learning and training experiences, and culminating with a good job in a career pathway of interest to the participant or enrollment in postsecondary education. The VDOL provides intensive case management for youth participants and is increasingly adopting stronger approaches to supporting employers during work placements.

The VDOL places an emphasis on professional development of its own staff so case managers are prepared to support the challenges that disadvantaged your face. Professional development opportunities include motivational interviewing, case management training, financial literacy and mental health trainings. . The VDOL is pursuing a partnership with the Annie E. Cassie Foundation to gain a deeper of understanding of how to serve at-risk teens and young adults. This partnership will allow staff to develop a more individualized approach to career exploration and service delivery to build on individuals strengths and develop a path to sustainable careers.

Eligible participants in the youth program engage in a comprehensive review of the 14 program elements with the VDOL case managers and develop an Individual Service Strategy (ISS) based on objective and subjective assessments and career counseling. VDOL takes a coordinated, teaming approach to providing the 14 program elements to its participants. Case managers consider ways to leverage resources through co-enrollment and appropriate partner program referrals to assist in meeting the participants goals.

The VDOL ensures that all 14 program elements are made available and effectively implemented, by organizing a menu of options for a case manager and participant to consider, in collaboration with other State agencies, non-profit organizations, employers and community-based organizations. The provision of the program elements varies depending on the area of the State served and the particular needs of that area's Youth population.

In addition to co-enrolling participants with disabilities in WIOA Youth and WIOA Vocational Rehabilitation services, The VDOL and VR are working to pilot targeted outreach to students in up to five communities across the state. This pilot is intended to braid resources and support more tightly around career exploration, provide training and skill enhancement opportunities, work-place training, pre-apprenticeship and registered apprenticeship development, progressive employment, career pathway advancement, and successful long-term unsubsidized employment outcomes.

4. A DESCRIPTION OF THE ROLES AND RESOURCE CONTRIBUTIONS OF THE ONE-STOP PARTNERS.

The following programs offer services in the Burlington One-Stop AJC and throughout the One-Stop AJC Network:

1. WIOA Adult Program (VDOL)
2. WIOA Youth Program (VDOL)
3. WIOA Dislocated Worker Program, including Rapid Response (VDOL)
4. Wagner-Peyser Employment Services Program (VDOL)
5. Trade Adjustment Assistance Program (VDOL)
6. Registered Apprenticeship Program (VDOL)
7. Unemployment Insurance Program (VDOL)
8. Reemployment Services and Eligibility Assessments (RESEA) Program (VDOL)
9. Jobs for Veterans Program (VDOL)
10. Vocational Rehabilitation Program, (VR)
11. Blind and Visually Impaired Services Program (DVBI)
12. Senior Community Service Employment Program (Associates for Training and Development (A4TD)
13. Training and Employment Support Programs offered through Champlain Valley Office of Economic Opportunity (CVOEO)
14. Migrant Seasonal Farmworker Outreach (VDOL and Pathstone)
15. YouthBuild Program (ReSourceVT)
16. JobCorp Program (Northlands Jobcorps)
17. Adult Education and Family Literacy Programs (AOE)
18. Temporary Assistance for Needy Families (a.k.a. Reach-UP) (ESD)
19. Vermont Technical College Employment and Training Outreach Programs (VTC)
20. Community College of Vermont Employment and Training Outreach Programs (CCV)
21. Vermont Student Assistance Corporation Employment and Training Outreach and Support Programs (VSAC)
22. WIOA Native American Training and Employment Support Programs, and

23. Supplemental Nutrition Assistance Program (a.k.a. 3SquaresVT) (ICAN).

The organizations that provide basic career services, described below, help customers access resources along with individualized career services or referrals to counseling or other training services available through partner programs. Customers can access services through any of the One-Stop Career Centers, through walk-in appointments, scheduled one-on-one appointments, group orientations, and self-service resources. Partners who provide the same career services agree to deliver those services in a coordinated manner. At least one member of the VDOL staff is to be physically present during regular business hours at the Burlington comprehensive AJC so customers have access to all programs, services, and activities described in this section.

The following services are provided by One-Stop partners in Vermont's One-Stop system:

Basic Career Services

Eligibility for Title I Services – Determination of whether a customer is eligible to receive services from the Adult, Dislocated Worker, or Youth programs.

Outreach, Intake, and System Orientation – Outreach is intended to promote awareness of the availability of the system services to/for individuals and businesses that may need these services. Intake and system orientation is the process of gathering basic information to determine the program(s) appropriate for the customer, and providing the customer with information on the services available to determine if he/she is interested in pursuing those services. **Note: "SYSTEM" means the One-Stop System where all required partners make their services available.**

Initial Assessment – The collection and assessment of information on a customer's skill levels, including literacy, numeracy, and English language proficiency; work history; employment barriers; employment goal(s) and occupational knowledge; supportive service needs; and whether referrals to other programs are appropriate or necessary.

Labor Exchange Services – Providing job search and placement services to the customer, including but not limited to, information on in-demand industry sectors and occupations and non-traditional employment, when appropriate; development of a work search plan; placement in workshops; posting jobs on the state job bank; providing job matching and referrals; and advising how to maintain a record of job search.

In some instances, programs may require their customers to maintain and submit a log detailing the amount of time spent on job search activities including identifying, applying, and interviewing for potential jobs, and time spent preparing and sending follow-up material to businesses.

Labor exchange services also include appropriate recruitment and other business services, which may include, but are not limited to, customized screening and referral of qualified customers in training services to businesses; customized services to businesses, business associations, or other such organizations, on employment-related issues; customized recruitment events for businesses and targeted job fairs; human resource consultation services which may include writing/reviewing job descriptions and employee handbooks, developing performance evaluations and personnel policies, creating orientation sessions for new employees, honing job interview techniques for efficiency and compliance, analyzing employee turnover, creating job accommodations and using assistive technologies, and explaining labor law to help businesses comply; and customized labor market information for specific businesses, sectors, industries, or clusters.

Referrals to Programs – Referrals and coordination of activities with other appropriate programs and services that meet specific customer needs, assist them in overcoming barriers to employment, and provide services to gain/retain employment. These other programs and services may include, but are not limited to, employment and training services; treatment for alcohol, substance abuse or mental health issues; Unemployment Insurance benefits; Workers' Compensation; VT Disability Insurance; and vocational rehabilitation services.

Labor Market Information – Staff provides workforce and labor market employment statistics to assist job seeking customers in the development of employment goal(s) and businesses in the development and implementation of sector partnerships and career pathways. The employment statistics include local, regional, and national labor market conditions; career counseling and career exploration services; characteristics of industries, occupations, and the workforce area; business-identified skill needs; short and long-term industry and occupational growth and salary projections; worker supply and demand; and high-growth and high-demand industries.

Performance and Program Cost of Eligible Providers – The provision of performance information and program cost information on eligible providers of education, training, and workforce services by program and type of provider.

Referrals to Supportive Services – Staff provides customers with referrals to supportive services that enable the customer to participate in authorized WIOA activities. Based on various partners' programmatic rules and regulations, these supportive services may include, but are not limited to, transportation; child care; dependent care; housing; needs related payments; interpreter services; reasonable accommodation for youth with disabilities; legal aid services; assistance with uniforms or other appropriate work attire; assistance with books, fees, and school supplies; payments and fees for employment and training related applications, tests, and certifications; and tools or instruments. Depending on the program, when appropriate, information may also be provided to customers on how to continue these supportive services after program services are completed.

Unemployment Insurance (UI) Information and Assistance – One-Stop Career Center and UI staff provides information and meaningful assistance to individuals seeking assistance in filing a claim for unemployment compensation. Meaningful assistance means providing assistance on-site using staff that is well trained in UI compensation claims filing and the rights and responsibilities of claimants or providing assistance by phone or via other technology as long as the assistance is provided by trained and available staff within a reasonable time.

Financial Aid Assistance – Providing assistance in establishing eligibility, accessing, and applying for programs of financial aid for training and education programs not provided under WIOA.

<u>Individualized Career Services</u>

Comprehensive Assessment – Staff conducts a specialized assessment of a job seeker's barriers to employment, occupational and employment goal(s), educational and skill levels, and personal circumstance to determine his/her service needs. This may include diagnostic testing and use of other assessment tools, and in-depth interviewing and evaluation. Under WIOA Title I, the comprehensive assessment is used to develop the Individual Employment Plan (IEP), while under Title IV, it is used to develop the Individualized Plan for Employment (IPE).

Individual Employment Plan (IEP)/Individualized Plan for Employment (IPE) – The IEP/IPE identifies the appropriate employment goal(s) chosen by the customer. The initial and

comprehensive assessment is used to develop the IEP/IPE in consultation with the customer. The plan outlines the necessary services to be provided to achieve the planned goals; steps and timelines for achieving the goals; and the terms, conditions, and responsibilities associated with the plan. The IEP for Title I Adult/DW/Youth programs also includes information about eligible training providers, when applicable. The IPE for Title IV Vocational Rehabilitation Programs must also include those specific rehabilitation services needed to achieve the employment outcome, including assistive technology devices and services, when applicable.

Career Planning and Counseling – One-on-one or intensive career planning and counseling with a professional counselor uses initial and comprehensive assessments and the IEP/IPE, and aims at enhancing job seeking and retention skills and career advancement of customers by:

- Helping the customer analyze and understand career information, and gain a better understanding of his/herself using career information gained through assessment tools and counseling strategies to more realistically choose or change short and long-term occupational goals; and
- Preparing service strategies to assist in the achievement of occupational goal(s) and to ensure customers have access to necessary workforce activities and supportive services, which may include, but are not limited to, drug and alcohol abuse counseling, mental health counseling, and referrals to partner programs appropriate to the needs of the customer.

Counseling may also include notification of available training in entrepreneurial skills which may include, but is not limited to, taking initiative; creatively seeking out and identifying business opportunities; developing budgets and forecasting resource needs; understanding options for acquiring capital; and communicating effectively to market oneself and ideas.

Short-term Pre-Vocational Services – Development of skills customers need to live independently and enter the workforce fully prepared to engage in employment. These services may include academic education and job readiness trainings for development of work readiness skills, including but not limited to, learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, higher-order reasoning, problem-solving skills, work attitudes, and professional conduct.

Internships and Work Experience – Based on partners' programmatic rules and regulations, the work experience is a planned, structured learning experience, in most cases linked to a career, that takes place in a private for-profit, non-profit or public sector workplace. For most partner programs, work experiences may be in the form of internships, work-study, externship, on-the-job training, apprenticeship, summer employment for youth, and/or other work placement opportunities. The purpose of a work experience is to provide the customer with an understanding of the work environment and job responsibilities, specific work skills, and experience on how the customer performs in the work setting. WIOA Title I Youth work experiences also include an academic and occupational education component. Partners follow all applicable work experience requirements for their respective program's State and Federal rules and regulations.

Out of Area Job Search and Relocation Assistance – Staff provides information on labor exchange activities in other local areas, regions, or states and whether businesses the customer may be interested in offer assistance with relocation. Allowable relocation expenses may be paid to eligible customers by the appropriate program.

Financial Literacy Services – Educate and support customers to gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability by using high quality relevant learning strategies. The learning, where possible, may include, but is not limited to, creating a budget; initiating checking and/or savings accounts at banks; learning how to effectively manage spending, credit, and debt; learning how to protect against identity theft; and benefits advisement. These services may also include opportunities to put financial literacy lessons into practice, based on the needs of the customer.

English Language Acquisition and Integrated Education – Adult Education staff provides an integrated program of services that incorporates English literacy and civics education concurrently and contextually with workforce preparation and training for a specific occupation/sector for the purpose of educational and career advancement of customers. These services allow customers to attain economic self-sufficiency and are designed for partnerships among adult education programs and postsecondary educational institutions, training providers, and/or businesses. Other partners provide direct linkages and information on how to locate and enroll in English as a Second Language (ESL) or English for Speakers of Other Languages (ESOL) classes.

Workforce Preparation – Activities to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education, training, or employment and other employability skills that increase an individual's preparation for the workforce. For Adult Education these activities are incorporated into all literacy instruction.

Comprehensive Assessment – Staff conducts a specialized assessment of a job seeker's barriers to employment, occupational and employment goal(s), educational and skill levels, and personal circumstance to determine his/her service needs. This may include diagnostic testing and use of other assessment tools, and in-depth interviewing and evaluation. Under WIOA Title I, the comprehensive assessment is used to develop the Individual Employment Plan (IEP), while under Title IV, it is used to develop the Individualized Plan for Employment (IPE).

Individual Employment Plan (IEP)/Individualized Plan for Employment (IPE) – The IEP/IPE identifies the appropriate employment goal(s) chosen by the customer. The initial and comprehensive assessment is used to develop the IEP/IPE in consultation with the customer. The plan outlines the necessary services to be provided to achieve the planned goals; steps and timelines for achieving the goals; and the terms, conditions, and responsibilities associated with the plan. The IEP for Title I Adult/DW/Youth programs also includes information about eligible training providers, when applicable. The IPE for Title IV Vocational Rehabilitation Programs must also include those specific rehabilitation services needed to achieve the employment outcome, including assistive technology devices and services, when applicable.

Career Planning and Counseling – One-on-one or intensive career planning and counseling with a professional counselor uses initial and comprehensive assessments and the IEP/IPE, and aims at enhancing job seeking and retention skills and career advancement of customers by:

- Helping the customer analyze and understand career information, and gain a better understanding of his/herself using career information gained through assessment tools and counseling strategies to more realistically choose or change short and long-term occupational goals; and

- Preparing service strategies to assist in the achievement of occupational goal(s) and to ensure customers have access to necessary workforce activities and supportive services, which may include, but are not limited to, drug and alcohol abuse counseling, mental health counseling, and referrals to partner programs appropriate to the needs of the customer.

Counseling may also include notification of available training in entrepreneurial skills which may include, but is not limited to, taking initiative; creatively seeking out and identifying business opportunities; developing budgets and forecasting resource needs; understanding options for acquiring capital; and communicating effectively to market oneself and ideas.

Short-term Pre-Vocational Services – Development of skills customers need to live independently and enter the workforce fully prepared to engage in employment. These services may include academic education and job readiness trainings for development of work readiness skills, including but not limited to, learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, higher-order reasoning, problem-solving skills, work attitudes, and professional conduct.

Internships and Work Experience – Based on partners' programmatic rules and regulations, the work experience is a planned, structured learning experience, in most cases linked to a career, that takes place in a private for-profit, non-profit or public sector workplace. For most partner programs, work experiences may be in the form of internships, work-study, externship, on-the-job training, apprenticeship, summer employment for youth, and/or other work placement opportunities. The purpose of a work experience is to provide the customer with an understanding of the work environment and job responsibilities, specific work skills, and experience on how the customer performs in the work setting. WIOA Title I Youth work experiences also include an academic and occupational education component. Partners follow all applicable work experience requirements for their respective program's State and Federal rules and regulations.

Out of Area Job Search and Relocation Assistance – Staff provides information on labor exchange activities in other local areas, regions, or states and whether businesses the customer may be interested in offer assistance with relocation. Allowable relocation expenses may be paid to eligible customers by the appropriate program.

Financial Literacy Services – Educate and support customers to gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability by using high quality relevant learning strategies. The learning, where possible, may include, but is not limited to, creating a budget; initiating checking and/or savings accounts at banks; learning how to effectively manage spending, credit, and debt; learning how to protect against identity theft; and benefits advisement. These services may also include opportunities to put financial literacy lessons into practice, based on the needs of the customer.

English Language Acquisition and Integrated Education – Adult Education staff provides an integrated program of services that incorporates English literacy and civics education concurrently and contextually with workforce preparation and training for a specific occupation/sector for the purpose of educational and career advancement of customers. These services allow customers to attain economic self-sufficiency and are designed for partnerships among adult education programs and postsecondary educational institutions, training providers, and/or businesses. Other partners provide direct linkages and information on how to locate and enroll in English as a Second Language (ESL) or English for Speakers of Other Languages (ESOL) classes.

Workforce Preparation – Activities to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education, training, or employment and other employability skills that increase an individual's preparation for the workforce. For Adult Education these activities are incorporated into all literacy instruction.

Follow-Up Services: Depending upon the individual partner's programmatic rules and regulations, follow-up services may include counseling regarding the workplace for customers in adult or dislocated worker programs, who are placed in unsubsidized employment, for up to 12 months after the first day of employment. For youth programs, the follow-up services include critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or postsecondary education and training. These services may include regular contact with a youth's business and education provider, including assistance in addressing work-related or education-related problems that arise.

The requirements and resource contributions of the one-stop partners are outlined in the One-Stop MOU as follows:

1.

    a. Career Services Coordination and Delivery

The following programs will offer services in the Burlington AJC and throughout the One-Stop AJC Network: (1) WIOA Adult Program, (2) WIOA Youth Program, (3) WIOA Dislocated Worker Program, (4) Wagner-Peyser Employment Services Program, (5) Trade Adjustment Assistance Program, (6) State Registered Apprenticeship Program, (7) State Unemployment Insurance Program, (8) Reemployment Services and Eligibility Assessments (RESEA) Program, (9) Jobs for Veterans Program, (10) Vocational Rehabilitation Program, Blind and Visually Impaired Services Program, (11) Senior Community Service Employment Program, (12) Training and Employment Support Programs offered through Champlain Valley Office of Economic Opportunity, (13) Migrant Seasonal Farmworker Program, (14) YouthBuild Program, (15) JobCorp Program, (16) Adult Education and Family Literacy Programs, (17) Employment and Training Support Programs offered by Vermont Department of Corrections, (18) Assistance for Needy Families (a.k.a. Reach-UP), (19) Vermont Technical College Employment and Training Outreach Programs, (20) Community College of Vermont Employment and Training Outreach Programs, (21) Vermont Student Assistance Corporation Employment and Training Outreach and Support Programs, (22) WIOA Native American Training and Employment Support Programs, and (23) Supplemental Nutrition Assistance Program (a.k.a. 3SquaresVT).

At a minimum, parties agree that all of the required career services described in 20 CFR §678.430, access to training services described in 20 CFR §680.200, access to any employment and training activities carried out under 29 U.S.C. §3151(b)(1)(B), access to programs and activities carried out by one-stop partners listed in §§678.400 through 678.410, including the employment service program authorized under the Wagner-Peyser Act, as amended by WIOA title III, and workforce and labor market information will be available at the Burlington AJC.

Parties agree to provide applicable career services listed in Table 1 (attached) and defined in Table 2 (attached) and described in Table 5 (attached) through walk-in appointments, scheduled one-on-one appointments, group orientations, and self-service resources. Where appropriate, partners who provide the same career services agree to deliver those services in a coordinated manner and will involve the One-Stop Operator in the design of the process as

needed. VDOL has been selected by the SWDB as the One-Stop Operator from July 1, 2017 – June 30, 2021. The duties of the One-Stop Operator are further described in subsection (e) of this agreement.

At least one Title I staff person will be physically present during regular business hours and customers will have access to all programs, services, and activities described in this section. For the purposes of this agreement, "access" means that a program staff member or a staff member from a different program who is appropriately trained, will be physically present at the Burlington AJC, or that a direct connection via phone or real-time Web-based communication will be available at the Burlington AJC to connect a customer with a program staff member who can provide information or services to the customer, within a reasonable time.

1.

a. **Infrastructure Cost Share Agreement**

Required Partners. Section 121(b)(1)(B) of WIOA identifies the programs responsible for sharing the infrastructure costs of the Burlington AJC. The partners who administer these programs and carry this responsibility are as follows:

1. WIOA Title I Adult Program, VDOL;
2. WIOA Title I Dislocated Worker Program, VDOL;
3. WIOA Title I Youth Program, VDOL;
4. Job Corps, Northlands JobCorps;
5. YouthBuild, ReSource;
6. Migrant and Seasonal Farmworker Programs, PathStone;
7. Wagner-Peyser Act Employment Service Program, VDOL;
8. WIOA Title II Adult Education and Family Literacy Act program, AOE;
9. WIOA Title IV Vocational Rehabilitation Program, DVR;
10. WIOA Title IV Vocational Rehabilitation Program, DBVI;
11. Senior Community Service Employment Program, Vermont Associates;
12. Perkins Career and Technical Education Programs at the Postsecondary Level, AOE;
13. Title II Trade Act Trade Adjustment Assistance Activities, VDOL;
14. Jobs for Veterans State Grants Programs, VDOL;
15. Employment and Training Activities under the Community Services Block Grant, CVOEO;
16. State Unemployment Compensation Program, VDOL; and
17. Temporary Assistance for Needy Families, ESD.

Non-Required, Contributing Partners. The following programs voluntarily agree to share the infrastructure costs of the Burlington AJC:

1. RESEA, VDOL; and
2. State Apprenticeship Program; VDOL

Non-Required, Non-Contributing Partners. For the purpose of sharing infrastructure costs, the following program partners are not subject to cost assessments under this section for the reasons stated next to their name:

1. Native American Programs, Maquam Bay of Missisquoi, Inc., excluded from obligation under WIOA;
2. Second Chance Act, DOC, excluded from obligation because funding under this Act doesn't currently exist in Vermont;
3. Supplemental Nutrition Assistance Program, ESD, excluded from obligation because it is not a federally required partner;
4. Vermont Student Assistance Corporation; excluded from obligation because it is not a federally required partner but will pay for use of space to deliver services under a separate agreement with VDOL as appropriate;
5. Community College of Vermont, excluded from obligation because it is not a federally required partner; and
6. Vermont Technical College, excluded from obligation because it is not a federally required partner.

Burlington AJC Programs. In addition to the required partner programs listed above, the following entities provide services out of the Burlington AJC: VSAC, and Vermont HITEC. In calculating the proportional infrastructure use of the Burlington AJC these programs will be included. VDOL agrees to assume financial responsibility for their proportional share of the infrastructure cost.

Use of Federal Funds to Maintain Burlington AJC. Each entity that carries out a program or activity in the Burlington AJC will use a portion of their available funds to maintain the one-stop delivery system, including payment of the infrastructure costs for the Burlington AJC. These payments will be in accordance with 20 CFR § Subpart E; federal cost principles, which require that all costs must be allowable, reasonable, necessary, and allocable to the program; and all other applicable legal requirements.

Shared Costs. Table 3 (available) identifies three categories of costs that will be shared by the Burlington AJC required partners: Infrastructure, Shared Services, and Shared Costs.

Infrastructure Costs. The cost categories listed under Infrastructure represent the costs that will be billed proportionally to required partner programs and other co-located programs on a quarterly basis, as accrued. The total amount assessed to programs for the Shared One-Stop Space will not exceed sixteen percent of the total proportional amount budgeted for the Burlington AJC. Partner programs who are also co-located in the building, will be assessed an additional amount for their proportional square foot use.

Additional Costs. Table 3 (available) limits the amounts and types of Shared Services and Additional Costs expenditures that may be proportionally assessed to the partner programs. Each program will be assessed their proportional share of the Additional Costs on a quarterly basis, after costs have been incurred.

Duration. Partners named in this section agree to share the cost of maintaining the Burlington AJC infrastructure, as outlined above, from July 1, 2018 to June 30, 2019.

1.

a. **Business Practices**

2. Parties to this agreement will follow their agency's or program's business practices in the provision of services under this MOU. These practices include, but are not limited to, those related to auditing, employee personnel practices, employee and client confidentiality, insurance, procurement, record keeping and retention, and employee and client confidentiality.

3.

a. **Management of the Burlington AJC and Vermont's AJC Network**

Parties recognize and respect that each agency has different philosophies, policies, practices and day-to-day operation and supervision requirements.

Parties acknowledge that the role of the designated One-Stop Operator ("Operator") is to coordinate the delivery of services by required One-Stop partners and service providers both within the Burlington AJC and across the Vermont AJC Network. Partners agree to assist the Operator in performance of its duties as necessary. Other responsibilities of the Operator include, but are not limited to:

- Providing reports and other information as required by the SWDB. The Operator will make available to the SWDB sufficient information to enable the SWDB to oversee the Vermont AJC Network, and to ensure that funds are appropriately used, managed, and invested in order to maximize performance outcomes.
- Assisting in the development of MOUs between the SWDB and the One-Stop partners that fully describe the roles and responsibilities of each One-Stop partner, including sharing the infrastructure and additional shared costs related to Vermont's AJC Network.
- Developing processes to ensure that all customers receive appropriate, timely, and effective career services.
- Coordinating reception and initial registration services for all customers.
- Coordinating access to virtual resources at appropriate partner locations, libraries, and other points.
- Identifying and recruiting additional system partners and resources.
- Performing continuous improvement activities to achieve high-level service quality and exceptional customer service, including: reviewing the various resources and services available to customers on an ongoing basis, and identifying additional services or enhancements; and measuring customer satisfaction, reviewing results, and making recommendations for improvement.
- Handling and resolving complaints related to the Burlington AJC and the Vermont AJC Network in accordance with an approved grievance procedure.
- Developing and implementing a coordinated staff development and training plan for the Burlington AJC and Vermont AJC Network.
- In coordination with the One-Stop partners, developing and implementing a formal referral process, including referral forms, as described in subsection (g) of this agreement.

- Ensure alignment of resources, services, and data as outlined in the State Plan.
- Monitoring compliance with all federal and state laws, regulations, policies, and procedures related to the Vermont AJC Network, including the Burlington AJC.

    - **Customer Referrals**

Vermont's AJC Network is designed to share service delivery infrastructure, empowering all partner organizations to provide the widest array of high-quality services to meet customer needs. Parties agree to create a policy for making and following-up on referrals and review it annually to ensure that the system is effective, efficient, and helpful to customers.

In addition, parties agree to:

- Participate in a customer focused referral system that seamlessly accesses resources from involved partners to increase quality outcomes;
- Offer customers information on how to apply for a partner's services and arrange an appointment for the customer, if needed;
- Identify a partner referral liaison for each program partner;
- Provide ongoing training to all partner frontline staff in each program's services and eligibility; and
- Establish a standard of real-time referrals to all applicable local program partners.

1.

    a. **Confidentiality**

Customer information will only be shared in accordance with each partner's respective confidentiality requirements. If shared, the information will be made available within a reasonable timeframe.

Information about Vocational Rehabilitation customers may only be shared if the customer has signed a written release. Information may only be shared for the period of time specified in the release and only with the persons identified in the release.

Personally identifiable information obtained from customers of specific programs during outreach, intake, system orientation, initial assessment, referral to a partner programs, referral to supportive services, or otherwise is confidential and will not be released, disclosed or re-disclosed without obtaining the proper program specific release. Parties agree to work with the One Stop Operator to design information sharing protocols for one stop partners that complies with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Family Educational Rights and Privacy Act (FERPA), and any other relevant federal or state privacy laws.

1.

    a. Accessibility

Activities, employment, information and services available to job seekers and employers through the Vermont AJC Network and the Burlington AJC must be both physically and programmatically accessible to all people. A person's race, creed, color, national origin, marital status, sex, sexual orientation, gender identity, age, political affiliation or belief, disability, veteran's status, or physical or mental condition will not impede their ability to access services, events, or programs.

Parties will comply with all relevant federal and state laws and regulations, including the Nondiscrimination and Equal Opportunity Provisions of WIOA, the Fair Employment and Housing Act; ADA Amendments Act of 2008, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Title VI of the Civil Rights Act of 1964.

Parties will comply with all relevant federal and state laws and regulations, including the Nondiscrimination and Equal Opportunity Provisions of WIOA' the Fair Employment and Housing Act; the Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Title VI of the Civil Rights Act of 1964.

Staff Training. Parties agree to assist the One-Stop Operator in coordinating ongoing trainings and sharing information so that program staff are trained in ways to modify environments, procedures, and information dissemination to avoid discrimination and to meet individual needs. Trainings will include instruction on how to provide services for all customers in compliance with the laws referenced above and best practices concerning accessibility, inclusiveness, and universal design.

Partners in Vermont's AJC Network will ensure that all locations where program services are available to customers meet the standards of physical and programmatic accessibility described below.

Evaluations of the Burlington AJC's physical and programmatic accessibility will include how customers with disabilities can access, fully participate in, or benefit from available services compared to customers without disabilities.

Physical Accessibility

Physical accessibility refers to the extent to which facilities are designed, constructed, or altered so they are accessible to and usable by individuals with disabilities. AJC partners will use universal design and human-centered design strategies to help all customers access services. Evaluations of physical accessibility will take into account exterior and interior accessibility and will include criteria evaluating how well the AJCs and delivery systems take actions to comply with disability-related regulations implementing WIOA section 188.

Location and Facility. The Burlington AJC is accessible by public transportation, driving, biking, or walking. The center's sign is clearly marked and visible from a main road. The required number parking spaces are dedicated and marked for individuals with disabilities and are located closest to an accessible entrance.

The physical layout of the Burlington AJC eliminates structural barriers to mobility and is accessible to individuals of all capabilities. The building complies with the most recent ADA standards for Accessible Design and the Uniform Federal Accessibility Standards. The center's layout supports a culture of inclusiveness, guided by laws and regulations referenced above.

Workspaces and Assistive Technology. All public workspaces will be physically accessible to all customers by July 1, 2018 and will include assistive technology for customer use. A plan will be implemented to select, install, maintain, and update assistive technology based on customer's needs. Staff will also be trained on the use of the assistive technology so they can support customers needing the tools to access services.

Hours of Operation. The Burlington AJC provides maximum access to partner program services during regular business hours. Partner staff will consider the unique work, childcare, or transportation needs of participants and try to offer flexibility in scheduling whenever possible.

Programmatic Accessibility

Programmatic accessibility means that services and activities provided through Vermont's AJC Network, specifically those provided in the Burlington AJC, will be offered and delivered in a way that enables all eligible job seekers and employers to participate regardless of their range of abilities, age, culture, learning style, intelligence, or education level, in the most integrated setting appropriate.

All customers with disabilities will be reasonably accommodated so that they are able to interact and communicate with service providers in the most conducive environment available. Accommodations will also be made for individuals who have communication challenges, such as individuals who are deaf or hard of hearing, individuals with vision impairments, and individuals with communication disorders.

Communication. Staff will communicate with persons with disabilities as effectively as with others, and provide appropriate auxiliary aids, services, or other accommodations as needed. Individuals with disabilities seeking information or services from the Burlington AJC will have equal access to all information and data provided by the center.

Resources through the Burlington AJC will be accessible to individuals with disabilities and made available in multi-lingual versions. Translation services will be available, as needed, for all customers and service providers. All information, including that which is in digital format, will be clearly identified, communicated in a way that the public can understand and use, and fully accessible for individuals utilizing assistive technology tools. Information will be presented in a way that is compliant with federal and state law.

Virtual Accessibility. Customers will have access to all partner program services in the Burlington AJC onsite or via technology located at the center in compliance with WIOA's "direct linkage" requirement further described in 20 CFR 678.305. Phone, real-time web-based communications, or other technology will be physically present, enabling real-time interactions either on-demand or within a reasonable time. Parties agree to establish a policy that defines and describes a reasonable response time and protocol and agree that partner program staff located remotely and at the Burlington AJC will comply with the policy.

AJC partners will work to ensure that job seekers and businesses have access to the same information online as they do in a physical facility. All information kept virtually will be updated regularly to ensure dissemination of correct information. Partners will either have their own web presences via a website or social media, or will enter into a separate agreement with another partner program to post content through its website. Partners will assure that their websites are fully accessible for customers utilizing assistive technology tools.

TABLE 1: Services Provided in Burlington AJC

X = Program Provides the Service

O = Program Partially/Somewhat Provides Service

[Blank] = Program Does Not Provide Service

Services	Adult	Dislocated Worker	Youth	Adult Education	Wagner-Peyser	Voc. Rehab		VT Associates	Registered Apprentice	Trade Assist.	RESEA	Unemploy. Insurance	Jobs for Veterans	Pathstone	Native American	CVOEO	Job Corps	ReSOURCE	SNAP	Reach-up	VTC	CCV	VSAC
Eligibility for Title I services	**X**	**X**	**X**		**O**	**O**								**X**			**X**				**X**		
Outreach, intake, system orientation	**X**	**X**	**X**	**X**	**X**	**O**	**X**	**X**	**X**	**X**	**X**		**X**	**X**	**X**	**X**	**X**			**X**	**X**		**X**
Initial assessment	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**		**X**	**X**		**X**	**X**	**X**	**X**	**X**	**X**		**X**	**X**		**X**
Labor exchange services	**X**	**X**	**X**		**X**	**X**		**X**	**X**	**X**	**X**		**X**		**X**		**X**			**X**	**X**		
Referrals to programs	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**		**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	
Labor market information	**X**	**X**	**X**		**X**	**X**		**X**	**X**	**X**	**X**		**X**	**X**	**X**		**X**			**X**	**X**	**X**	**X**
Performance & program cost of Eligibl	**X**	**X**	**X**	**O**	**O**		**X**		**X**	**X**			**X**		**X**								

Services	Adult	Dislocated Worker	Youth	Adult Education	Wagner-Peyser	Voc. Rehab		VT Associates	Registered Apprentice	Trade Assist.	RESEA	Unemploy. Insurance	Jobs for Veterans	Pathstone	Native American	CVOEO	Job Corps	ReSOURCE	SNAP	Reach-up	VTC	CCV	VSAC
e Providers																							
Referrals to supportive services	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**
UI information and assistance	**X**	**X**	**O**		**X**					**X**	**X**	**O**	**X**	**X**	**X**								
Financial aid information	**X**	**X**	**X**		**O**				**X**	**X**	**X**		**X**	**X**	**X**		**O**				**X**	**X**	**X**
Comprehensive assessment	**X**	**X**	**X**		**O**	**X**	**X**	**X**		**X**			**X**	**X**	**X**		**X**	**X**		**X**	**X**		**O**
Individual employment plan	**X**	**X**	**X**			**X**	**X**	**X**		**X**	**X**		**X**	**X**	**X**			**X**		**X**			**O**
Career planning & counseling	**X**	**X**	**X**		**X**	**X**	**X**	**X**	**X**	**X**			**X**	**X**	**X**		**X**	**X**		**X**	**X**	**X**	**O**
Short-term pre-vocatio	**X**	**X**	**X**			**X**	**X**								**X**		**X**	**X**		**X**	**X**	**X**	**O**

Services	Adult	Dislocated Worker	Youth	Adult Education	Wagner-Peyser	Voc. Rehab	VT Associates	Registered Apprentice	Trade Assist.	RESEA	Unemploy. Insurance	Jobs for Veterans	Pathstone	Native American	CVOEO	Job Corps	ReSOURCE	SNAP	Reach-up	VTC	CCV	VSAC
nal services																						
Internships and work experiences	**X**	**X**	**X**			**X**	**X**	**X**				**X**	**X**	**X**		**X**	**X**		**X**	**X**	**X**	
Out of area job search and relocation assistance	**X**	**X**	**X**		**X**	**X**		**X**	**X**			**X**	**X**	**X**		**O**				**X**		
Financial literacy services	**X**	**X**	**X**		**X**				**X**			**X**	**X**	**X**		**X**	**X**	**X**	**X**	**X**		**X**
English language acquisition and integrated education	**X**	**X**	**O**	**X**	**O**									**X**		**X**			**X**	**X**		**O**
Workforce preparation	**X**	**X**	**X**	**X**	**X**	**X**	**X**		**X**			**X**	**X**	**X**		**X**	**X**		**X**	**X**	**X**	**O**

Services	Adult	Dislocated Worker	Youth	Adult Education	Wagner-Peyser	Voc. Rehab	VT Associates	Registered Apprentice	Trade Assist.	RESEA	Unemploy. Insurance	Jobs for Veterans	Pathstone	Native American	CVOEO	Job Corps	ReSOURCE	SNAP	Reach-up	VTC	CCV	VSAC
Follow-up services	**X**	**X**	**X**			**X**	**X**		**X**	**x**		**X**	**X**	**X**		**X**	**X**		**X**	**X**		

5. THE COMPETITIVE PROCESS USED TO AWARD THE SUBGRANTS AND CONTRACTS FOR TITLE I ACTIVITIES.

VDOL adheres to the State of Vermont's *Procurement and Contracting Procedures* (Agency of Administration Bulletin 3.5) and *Policy for Grant Issuance and Monitoring* (Agency of Administration Bulletin 5) respectively.

6. HOW TRAINING SERVICES OUTLINED IN SECTION 134 WILL BE PROVIDED THROUGH INDIVIDUAL TRAINING ACCOUNTS AND/OR THROUGH CONTRACTS, AND HOW SUCH TRAINING APPROACHES WILL BE COORDINATED. DESCRIBE HOW THE STATE WILL MEET INFORMED CUSTOMER CHOICE REQUIREMENTS REGARDLESS OF TRAINING APPROACH.

Vermont offers Title I training opportunities to eligible participants in the adult, dislocated worker, and youth (OSY) programs, using both training funds and contracts with employers to provide on-the-job training or customized training. Vermont does not use a standard individual training account (ITA) approach. Rather, each participant works with their case manager to develop and work through an individualized employment plan that can include enrolling in classes or workplaces to meet their needs. Case managers work through an internal and tiered process of approving expenses and contracts.

Vermont maintains an extensive Eligible Training Provider List (ETPL) located at: https://labor.vermont.gov/document/wioa-eligible-training-provider-list-121319.

Because of its small size, VDOL does not maintain a list of workplace-based training providers. Rather, on-the-job training is generally approached as job development negotiated with an employer for eligible participants.

The ETPL is updated and posted regularly on the VDOL website as well as the website of the State Workforce Development Board. The VDOL meets informed customer choice requirements by ensuring that participants have labor market information, occupational exposure, and employment demand information for the training path they are considering. A case manager works with them to review the list, cost, time commitment, licensing requirements (if relevant), and performance information before pursuing enrollment. The state meets all the requirements of publishing and making available the ETPL.

7. HOW THE STATE BOARD, IN FULFILLING LOCAL BOARD FUNCTIONS, WILL COORDINATE TITLE I ACTIVITIES WITH THOSE ACTIVITIES UNDER TITLE II. DESCRIBE HOW THE STATE BOARD WILL CARRY OUT THE REVIEW OF LOCAL APPLICATIONS SUBMITTED UNDER TITLE II CONSISTENT WITH WIOA SECS. 107(D)(11)(A) AND (B)(I) AND WIOA SEC. 232.

AOE has established a competitive basis for awarding multiyear grants under Title II. The State Workforce Development Board (SWDB) will appoint a sub-committee to review applications submitted under Title II for alignment with the state plan. The committee will meet first to learn about their responsibilities and understand how Adult Education and Literacy (AEL) services are funded and delivered in Vermont. Committee members will review applications and provide recommendations for alignment with the state plan to the AOE. The established procedure and scoring rubric will be utilized.

Cooperative agreements between Title I and Title II programs exist through the three (including Vocational Rehabilitation and Division for Blind and Visually Impaired) core member data-sharing MOU and the complete One-Stop Partner MOU that describes how each programs' services are administered in coordination.

8. COPIES OF EXECUTED COOPERATIVE AGREEMENTS WHICH DEFINE HOW ALL LOCAL SERVICE PROVIDERS WILL CARRY OUT THE REQUIREMENTS FOR INTEGRATION OF AND ACCESS TO THE ENTIRE SET OF SERVICES AVAILABLE IN THE ONE-STOP DELIVERY SYSTEM, INCLUDING COOPERATIVE AGREEMENTS WITH ENTITIES ADMINISTERING REHABILITATION ACT PROGRAMS AND SERVICES.

AOE has established a competitive basis for awarding multiyear grants under Title II. The State Workforce Development Board (SWDB) will appoint a sub-committee to review applications submitted under Title II for alignment with the state plan. The committee will meet first to learn about their responsibilities and understand how Adult Education and Literacy (AEL) services are funded and delivered in Vermont. Committee members will review applications and provide recommendations for alignment with the state plan to the AOE. The established procedure and scoring rubric will be utilized.

Cooperative agreements between Title I and Title II programs exist through the three (including Vocational Rehabilitation and Division for Blind and Visually Impaired) core member data-sharing MOU and the complete One-Stop Partner MOU that describes how each programs' services are administered in coordination.

One-Stop MOU is as follows:

One-Stop American Job Center Services

Coordination and Deliverry in Vermont

Memorandum of Understanding

between

Vermont State Workforce Development Board

and the

Required and Additional Partners of the American Job Center Network

July 1, 2018 – July 1, 2019

- **I.** PARTIES

This Memorandum of Understanding (MOU) is entered into by Vermont's State Workforce Development Board ("SWDB"); the Vermont Department of Labor ("VDOL"); Northlands JobCorps; ReSOURCE A Nonprofit Community Enterprise, Inc. ("ReSOURCE"); the Vermont Agency of Education ("AOE"); the Vermont Department of Disabilities, Aging, and Independent

Living, Division of Vocational Rehabilitation ("DVR"); the Vermont Department of Disabilities, Aging, and Independent Living, Division for the Blind and Visually Impaired ("DBVR"); the Vermont Department for Children and Families, Economic Services Division ("ESD"); Vermont Associates for Training and Development ("Vermont Associates"); PathStone; Maquam Bay of Missisquoi, Inc.; and Champlain Valley Office of Economic Opportunity ("CVOEO"), as required one-stop partners under the Workforce Innovation and Opportunity Act (WIOA) of 2014, 29 U.S.C. §3151(b) and (c).

Other parties to this agreement are the Vermont Department of Corrections ("DOC"), Community College of Vermont ("CCV"), Vermont Technical College ("VTC"), and the Vermont Student Assistance Corporation ("VSAC") who sign as additional partners without the obligation to contribute funding under section VI of this agreement.

- **II.** SCOPE

This MOU is intended to describe the roles and responsibilities of One-Stop partner programs in the Vermont American Job Center (AJC) Network generally and the Burlington comprehensive AJC specifically. The partners executing this MOU acknowledge and agree that this document is not a contract, and the MOU does not create, or otherwise give rise to, any contractual rights or obligations between the partners and their representatives. Each partner's responsibilities, which are generally summarized in this MOU, may only be legally enforced in the event relevant partners execute a separate contract. The MOU memorializes, in writing, the way the partners will work collaboratively together to satisfy the federal regulations for the Vermont AJC Network.

This MOU does not replace or supersede any prior agreements entered into by any partner described in the MOU, including but not limited to separate agreements partners have executed.

- UTHORITY

The Workforce Innovation and Opportunity Act (WIOA) requires the SWDB, with the agreement of the Governor, to develop and enter into an MOU between the SWDB and One-Stop partners, concerning the operation and funding of Vermont's AJC Network. 29 U.S.C §3151. This requirement is further described at 20 CFR §678.500, 34 CFR §361.500, and 34 CFR §463.500, and in federal guidance issued by the US Dept. of Labor, US Dept. of Education, and US Agency of Health & Human Services.

Additionally, the sharing and allocation of infrastructure costs among One-Stop partners is governed by 29 U.S.C. §3151(h), its implementing regulations, and the Federal Cost Principles contained in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 CFR part 200.

IV. INTENT

Parties intend for this MOU to serve as a framework for developing and aligning Vermont's workforce preparation and employment system so that it meets the needs of businesses, job seekers, and those who want to further their careers. In designing a "one-stop" system of service delivery, program partners will become connected to one another in ways that will promote integration, innovation, and better employment outcomes for Vermont businesses and job seekers. A closely aligned system of workforce development programs will help all of Vermont's jobseekers and businesses access the broad array of services and supports available to them through a more robust and personalized delivery system. Partners believe the system

will grow stronger as the network embraces best practices, makes evidence-based decisions, and stays accountable to customers by focusing on continuous improvement and soliciting feedback.

In general terms, WIOA is designed to increase access to opportunities for the employment, education, training, and support services for all citizens, particularly those with barriers to employment. The Vermont AJC Network will support the alignment of workforce investment, education, and economic development systems to create a comprehensive, accessible, and high-quality workforce development system. It will strengthen the quality and labor market relevance of workforce investment, education, and economic development efforts to provide Vermont's workers with the skills and credentials necessary to secure and advance in employment with good-paying jobs to provide Vermont's businesses with the skilled workers the employers need to succeed in a global economy.

- **V.** TERMS OF AGREEMENT
    - American Job Center (AJC) Locations

Vermont's sole comprehensive one-stop AJC is located at 63 Pearl St, Burlington, VT 05401 and is referred to in this MOU as the "Burlington AJC." Other locations where one-stop services are delivered throughout the state are described in Table 5 (attached).

1.

    a. Common Identifier for Branding

The required parties agree to use the federally designated branding protocols, either through use of the approved logo or printing "American Job Center network" or "A Proud Partner of the American Job Center network" on branded electronic resources and any newly printed, purchased or created materials.

1.

    a. Career Services Coordination and Delivery

The following programs will offer services in the Burlington AJC and throughout the One-Stop AJC Network: (1) WIOA Adult Program, (2) WIOA Youth Program, (3) WIOA Dislocated Worker Program, (4) Wagner-Peyser Employment Services Program, (5) Trade Adjustment Assistance Program, (6) State Registered Apprenticeship Program, (7) State Unemployment Insurance Program, (8) Reemployment Services and Eligibility Assessments (RESEA) Program, (9) Jobs for Veterans Program, (10) Vocational Rehabilitation Program, Blind and Visually Impaired Services Program, (11) Senior Community Service Employment Program, (12) Training and Employment Support Programs offered through Champlain Valley Office of Economic Opportunity, (13) Migrant Seasonal Farmworker Program, (14) YouthBuild Program, (15) JobCorp Program, (16) Adult Education and Family Literacy Programs, (17) Employment and Training Support Programs offered by Vermont Department of Corrections, (18) Assistance for Needy Families (a.k.a. Reach-UP), (19) Vermont Technical College Employment and Training Outreach Programs, (20) Community College of Vermont Employment and Training Outreach Programs, (21) Vermont Student Assistance Corporation Employment and Training Outreach and Support Programs, (22) WIOA Native American Training and Employment Support Programs, and (23) Supplemental Nutrition Assistance Program (a.k.a. 3SquaresVT).

At a minimum, parties agree that all of the required career services described in 20 CFR §678.430, access to training services described in 20 CFR §680.200, access to any employment

and training activities carried out under 29 U.S.C. §3151(b)(1)(B), access to programs and activities carried out by one-stop partners listed in §§678.400 through 678.410, including the employment service program authorized under the Wagner-Peyser Act, as amended by WIOA title III, and workforce and labor market information will be available at the Burlington AJC.

Parties agree to provide applicable career services listed in Table 1 (attached) and defined in Table 2 (attached) and described in Table 5 (attached) through walk-in appointments, scheduled one-on-one appointments, group orientations, and self-service resources. Where appropriate, partners who provide the same career services agree to deliver those services in a coordinated manner and will involve the One-Stop Operator in the design of the process as needed. VDOL has been selected by the SWDB as the One-Stop Operator from July 1, 2017 – June 30, 2021. The duties of the One-Stop Operator are further described in subsection (e) of this agreement.

At least one Title I staff person will be physically present during regular business hours and customers will have access to all programs, services, and activities described in this section. For the purposes of this agreement, "access" means that a program staff member or a staff member from a different program who is appropriately trained, will be physically present at the Burlington AJC, or that a direct connection via phone or real-time Web-based communication will be available at the Burlington AJC to connect a customer with a program staff member who can provide information or services to the customer, within a reasonable time.

1. **Infrastructure Cost Share Agreement**

Required Partners. Section 121(b)(1)(B) of WIOA identifies the programs responsible for sharing the infrastructure costs of the Burlington AJC. The partners who administer these programs and carry this responsibility are as follows:

1. WIOA Title I Adult Program, VDOL;
2. WIOA Title I Dislocated Worker Program, VDOL;
3. WIOA Title I Youth Program, VDOL;
4. Job Corps, Northlands JobCorps;
5. YouthBuild, ReSource;
6. Migrant and Seasonal Farmworker Programs, PathStone;
7. Wagner-Peyser Act Employment Service Program, VDOL;
8. WIOA Title II Adult Education and Family Literacy Act program, AOE;
9. WIOA Title IV Vocational Rehabilitation Program, DVR;
10. WIOA Title IV Vocational Rehabilitation Program, DBVI;
11. Senior Community Service Employment Program, Vermont Associates;
12. Perkins Career and Technical Education Programs at the Postsecondary Level, AOE;
13. Title II Trade Act Trade Adjustment Assistance Activities, VDOL;
14. Jobs for Veterans State Grants Programs, VDOL;
15. Employment and Training Activities under the Community Services Block Grant, CVOEO;

16. State Unemployment Compensation Program, VDOL; and
17. Temporary Assistance for Needy Families, ESD.

Non-Required, Contributing Partners. The following programs voluntarily agree to share the infrastructure costs of the Burlington AJC:

1. RESEA, VDOL; and
2. State Apprenticeship Program; VDOL

Non-Required, Non-Contributing Partners. For the purpose of sharing infrastructure costs, the following program partners are not subject to cost assessments under this section for the reasons stated next to their name:

1. Native American Programs, Maquam Bay of Missisquoi, Inc., excluded from obligation under WIOA;
2. Second Chance Act, DOC, excluded from obligation because funding under this Act doesn't currently exist in Vermont;
3. Supplemental Nutrition Assistance Program, ESD, excluded from obligation because it is not a federally required partner;
4. Vermont Student Assistance Corporation; excluded from obligation because it is not a federally required partner but will pay for use of space to deliver services under a separate agreement with VDOL as appropriate;
5. Community College of Vermont, excluded from obligation because it is not a federally required partner; and
6. Vermont Technical College, excluded from obligation because it is not a federally required partner.

Burlington AJC Programs. In addition to the required partner programs listed above, the following entities provide services out of the Burlington AJC: VSAC, and Vermont HITEC. In calculating the proportional infrastructure use of the Burlington AJC these programs will be included. VDOL agrees to assume financial responsibility for their proportional share of the infrastructure cost.

Use of Federal Funds to Maintain Burlington AJC. Each entity that carries out a program or activity in the Burlington AJC will use a portion of their available funds to maintain the one-stop delivery system, including payment of the infrastructure costs for the Burlington AJC. These payments will be in accordance with 20 CFR § Subpart E; federal cost principles, which require that all costs must be allowable, reasonable, necessary, and allocable to the program; and all other applicable legal requirements.

Shared Costs. Table 3 (attached) identifies three categories of costs that will be shared by the Burlington AJC required partners: Infrastructure, Shared Services, and Shared Costs.

Infrastructure Costs. The cost categories listed under Infrastructure represent the costs that will be billed proportionally to required partner programs and other co-located programs on a quarterly basis, as accrued. The total amount assessed to programs for the Shared One-Stop Space will not exceed sixteen percent of the total proportional amount budgeted for the Burlington AJC. Partner programs who are also co-located in the building, will be assessed an additional amount for their proportional square foot use.

Additional Costs. Table 3 (attached) limits the amounts and types of Shared Services and Additional Costs expenditures that may be proportionally assessed to the partner programs. Each program will be assessed their proportional share of the Additional Costs on a quarterly basis, after costs have been incurred.

Duration. Partners named in this section agree to share the cost of maintaining the Burlington AJC infrastructure, as outlined above, from July 1, 2018 to June 30, 2019.

1. **Business Practices**
2. Parties to this agreement will follow their agency's or program's business practices in the provision of services under this MOU. These practices include, but are not limited to, those related to auditing, employee personnel practices, employee and client confidentiality, insurance, procurement, record keeping and retention, and employee and client confidentiality.

    a. **Management of the Burlington AJC and Vermont's AJC Network**

Parties recognize and respect that each agency has different philosophies, policies, practices and day-to-day operation and supervision requirements.

Parties acknowledge that the role of the designated One-Stop Operator ("Operator") is to coordinate the delivery of services by required One-Stop partners and service providers both within the Burlington AJC and across the Vermont AJC Network. Partners agree to assist the Operator in performance of its duties as necessary. Other responsibilities of the Operator include, but are not limited to:

- Providing reports and other information as required by the SWDB. The Operator will make available to the SWDB sufficient information to enable the SWDB to oversee the Vermont AJC Network, and to ensure that funds are appropriately used, managed, and invested in order to maximize performance outcomes.
- Assisting in the development of MOUs between the SWDB and the One-Stop partners that fully describe the roles and responsibilities of each One-Stop partner, including sharing the infrastructure and additional shared costs related to Vermont's AJC Network.
- Developing processes to ensure that all customers receive appropriate, timely, and effective career services.
- Coordinating reception and initial registration services for all customers.
- Coordinating access to virtual resources at appropriate partner locations, libraries, and other points.
- Identifying and recruiting additional system partners and resources.
- Performing continuous improvement activities to achieve high-level service quality and exceptional customer service, including: reviewing the various resources and services available to customers on an ongoing basis, and identifying additional services or enhancements; and measuring customer satisfaction, reviewing results, and making recommendations for improvement.

- Handling and resolving complaints related to the Burlington AJC and the Vermont AJC Network in accordance with an approved grievance procedure.
- Developing and implementing a coordinated staff development and training plan for the Burlington AJC and Vermont AJC Network.
- In coordination with the One-Stop partners, developing and implementing a formal referral process, including referral forms, as described in subsection (g) of this agreement.
- Ensure alignment of resources, services, and data as outlined in the State Plan.
- Monitoring compliance with all federal and state laws, regulations, policies, and procedures related to the Vermont AJC Network, including the Burlington AJC.

    - **Customer Referrals**

Vermont's AJC Network is designed to share service delivery infrastructure, empowering all partner organizations to provide the widest array of high-quality services to meet customer needs. Parties agree to create a policy for making and following-up on referrals and review it annually to ensure that the system is effective, efficient, and helpful to customers.

In addition, parties agree to:

- Participate in a customer focused referral system that seamlessly accesses resources from involved partners to increase quality outcomes;
- Offer customers information on how to apply for a partner's services and arrange an appointment for the customer, if needed;
- Identify a partner referral liaison for each program partner;
- Provide ongoing training to all partner frontline staff in each program's services and eligibility; and
- Establish a standard of real-time referrals to all applicable local program partners.

1.

    a. **Confidentiality**

Customer information will only be shared in accordance with each partner's respective confidentiality requirements. If shared, the information will be made available within a reasonable timeframe.

Information about Vocational Rehabilitation customers may only be shared if the customer has signed a written release. Information may only be shared for the period of time specified in the release and only with the persons identified in the release.

Personally identifiable information obtained from customers of specific programs during outreach, intake, system orientation, initial assessment, referral to a partner programs, referral to supportive services, or otherwise is confidential and will not be released, disclosed or re-disclosed without obtaining the proper program specific release. Parties agree to work with the One Stop Operator to design information sharing protocols for one stop partners that complies with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Family Educational Rights and Privacy Act (FERPA), and any other relevant federal or state privacy laws.

1.

a. Accessibility

Activities, employment, information and services available to job seekers and employers through the Vermont AJC Network and the Burlington AJC must be both physically and programmatically accessible to all people. A person's race, creed, color, national origin, marital status, sex, sexual orientation, gender identity, age, political affiliation or belief, disability, veteran's status, or physical or mental condition will not impede their ability to access services, events, or programs.

Parties will comply with all relevant federal and state laws and regulations, including the Nondiscrimination and Equal Opportunity Provisions of WIOA, the Fair Employment and Housing Act; ADA Amendments Act of 2008, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Title VI of the Civil Rights Act of 1964.

Parties will comply with all relevant federal and state laws and regulations, including the Nondiscrimination and Equal Opportunity Provisions of WIOA' the Fair Employment and Housing Act; the Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Title VI of the Civil Rights Act of 1964.

Staff Training. Parties agree to assist the One-Stop Operator in coordinating ongoing trainings and sharing information so that program staff are trained in ways to modify environments, procedures, and information dissemination to avoid discrimination and to meet individual needs. Trainings will include instruction on how to provide services for all customers in compliance with the laws referenced above and best practices concerning accessibility, inclusiveness, and universal design.

Partners in Vermont's AJC Network will ensure that all locations where program services are available to customers meet the standards of physical and programmatic accessibility described below.

Evaluations of the Burlington AJC's physical and programmatic accessibility will include how customers with disabilities can access, fully participate in, or benefit from available services compared to customers without disabilities.

<u>Physical Accessibility</u>

Physical accessibility refers to the extent to which facilities are designed, constructed, or altered so they are accessible to and usable by individuals with disabilities. AJC partners will use universal design and human-centered design strategies to help all customers access services. Evaluations of physical accessibility will take into account exterior and interior accessibility and will include criteria evaluating how well the AJCs and delivery systems take actions to comply with disability-related regulations implementing WIOA section 188.

Location and Facility. The Burlington AJC is accessible by public transportation, driving, biking, or walking. The center's sign is clearly marked and visible from a main road. The required number parking spaces are dedicated and marked for individuals with disabilities and are located closest to an accessible entrance.

The physical layout of the Burlington AJC eliminates structural barriers to mobility and is accessible to individuals of all capabilities. The building complies with the most recent ADA standards for Accessible Design and the Uniform Federal Accessibility Standards. The center's layout supports a culture of inclusiveness, guided by laws and regulations referenced above.

Workspaces and Assistive Technology. All public workspaces will be physically accessible to all customers by July 1, 2018 and will include assistive technology for customer use. A plan will be implemented to select, install, maintain, and update assistive technology based on customer's needs. Staff will also be trained on the use of the assistive technology so they can support customers needing the tools to access services.

Hours of Operation. The Burlington AJC provides maximum access to partner program services during regular business hours. Partner staff will consider the unique work, childcare, or transportation needs of participants and try to offer flexibility in scheduling whenever possible.

Programmatic Accessibility

Programmatic accessibility means that services and activities provided through Vermont's AJC Network, specifically those provided in the Burlington AJC, will be offered and delivered in a way that enables all eligible job seekers and employers to participate regardless of their range of abilities, age, culture, learning style, intelligence, or education level, in the most integrated setting appropriate.

All customers with disabilities will be reasonably accommodated so that they are able to interact and communicate with service providers in the most conducive environment available. Accommodations will also be made for individuals who have communication challenges, such as individuals who are deaf or hard of hearing, individuals with vision impairments, and individuals with communication disorders.

Communication. Staff will communicate with persons with disabilities as effectively as with others, and provide appropriate auxiliary aids, services, or other accommodations as needed. Individuals with disabilities seeking information or services from the Burlington AJC will have equal access to all information and data provided by the center.

Resources through the Burlington AJC will be accessible to individuals with disabilities and made available in multi-lingual versions. Translation services will be available, as needed, for all customers and service providers. All information, including that which is in digital format, will be clearly identified, communicated in a way that the public can understand and use, and fully accessible for individuals utilizing assistive technology tools. Information will be presented in a way that is compliant with federal and state law.

Virtual Accessibility. Customers will have access to all partner program services in the Burlington AJC onsite or via technology located at the center in compliance with WIOA's "direct linkage" requirement further described in 20 CFR 678.305. Phone, real-time web-based communications, or other technology will be physically present, enabling real-time interactions either on-demand or within a reasonable time. Parties agree to establish a policy that defines and describes a reasonable response time and protocol and agree that partner program staff located remotely and at the Burlington AJC will comply with the policy.

AJC partners will work to ensure that job seekers and businesses have access to the same information online as they do in a physical facility. All information kept virtually will be updated regularly to ensure dissemination of correct information. Partners will either have their own web presences via a website or social media, or will enter into a separate agreement with

another partner program to post content through its website. Partners will assure that their websites are fully accessible for customers utilizing assistive technology tools.

- **VII.** ONE-STOP AMERICAN JOB CENTER (AJC) OPERATING BUDGET

29 U.S.C. §3151(h)requires that one-stop partners use a portion of the funds available to them to maintain a one-stop service delivery system. The required parties to this MOU agree to jointly fund Vermont's AJC Network infrastructure and shared services out of the Burlington AJC. The shared services budget described in Table 3 (attached) was negotiated and agreed upon by all the required partners.

Table 4 (attached) totals the individual budgets for programs offering services through the Burlington AJC.

1. CONFLICT RESOLUTION

Parties agree to attempt in good faith to resolve disputes regarding policy or practice among themselves. If policy or practice disputes cannot be resolved at this level, parties will work with the One-Stop Operator to settle the disagreement. If necessary, parties may solicit support from the SWDB to resolve outstanding disputes. The SWDB shall be the final arbiter of disputes related to the funding and operation of the Vermont AJC Network and Burlington AJC.

- **IX.** INDEMNIFICATION

Nothing in this agreement shall be deemed to constitute a waiver of the sovereign immunity of the State. Each non-state party to this agreement shall defend, indemnify and hold harmless the State, its officers and employees, from and against any and all losses suffered by the State, its officers and employees, from and against any and all claims, liabilities or penalties asserted against the State, its officers and employees, by or on behalf of any person, arising out of the acts or omissions of the non-state party.

- **X.** AMENDMENTS

This agreement may be modified or amended at any time, provided that all parties are in mutual agreement. Modifications or amendments shall be in writing, signed by the parties to this agreement, and attached to the original agreement

- **XI.** DURATION

The term of the MOU is from July 1, 2018 to July 1, 2019 and shall be effective upon signature by the parties' authorized representatives.

-

The organizations listed below are required partners of Vermont's AJC Network, unless otherwise noted.

_____ _____

Frank Cioffi **Date**

Chair, State Workforce Development Board

_____ _____

Lindsay Kurrle **Date**

Commissioner, Vermont Department of Labor

WIOA Title I Youth Program, WIOA Title I Dislocated Worker Program , WIOA Title I Adult Program, Jobs for Veterans State Program, State Unemployment Insurance Program, RESEA, State Apprenticeship Program*, Trade Assistance Program, and Wagner-Peyser Employment Services Program.*

_____ _____

Heather Bouchey **Date**

Acting Secretary, Agency of Education

Carl D. Perkins Post-Secondary Career and Technical Education Programs and WIOA Title II Adult Education and Family Literacy Act Programs

_____ _____

Diane Dalmasse **Date**

Director, Division of Vocation Rehabilitation

WIOA Title V Vocational Rehabilitation Programs and Senior Community Service Employment Program

_____ _____

Fred Jones **Date**

Director, Division for Blind and Visually Impaired

WIOA Title V Vocational Rehabilitation Programs

_____ _____

Sean Brown **Date**

Deputy Commissioner, Economic Services Division Director

Temporary Assistance for Needy Families (TANF) Programs

*Supplemental Nutrition Assistance Program (SNAP)**

_____ _____

Pat Elmer **Date**

President and CEO, Vermont Associates for Training & Development

Senior Community Service Employment Program

_____ _____

Jan Demers **Date**

Executive Director, Champlain Valley Office of Economic Opportunity

Community Services Block Grant Employment and Training

Program Activities

_____ _____

Jeff Lewis **Date**

Vice-President, Pathstone

WIOA Title I Migrant and Seasonal Farmworker Programs

_____ _____

Alicia Grangent **Date**

Center Director, Northlands JobCorps

WIOA Title I Job Corps

_____ _____

Louise Larivee **Date**

WIOA Director, Maquam Bay of Missisquoi, Inc.

WIOA Title I Native American Programs

_____ _____

Thomas Longstreth **Date**

Executive Director, ReSOURCE A Nonprofit Community Enterprise, Inc.

WIOA Title I YouthBuild Programs

_____ _____

Lisa Menard **Date**

Commissioner, Department of Corrections*

_____ _____

Joyce Judy **Date**

President, Community College of Vermont*

_____ _____

Pat Moulton **Date**

President, Vermont Technical Center*

_____ _____

Patrick Leduc **Date**

Vice-President, Vermont Student Assistance Corporation*

* = Not a required partner or partner program under 20 CFR §678.400

Table 2: Definitions of Services

In the following definitions, "customer" is equivalent to participant, consumer, client, student, or recipient, as used by the various partners.

Basic Career Services (20 CFR §678.430(a) and §678.435)

Eligibility for Title I Services – Determination of whether a customer is eligible to receive services from the Adult, Dislocated Worker, or Youth programs.
Outreach, Intake, and System Orientation – Outreach is intended to promote awareness of the availability of the System services to/for individuals and businesses that may need these services. Intake and System orientation is the process of gathering basic information to determine the program(s) appropriate for the customer, and providing the customer with information on the services available to determine if he/she is interested in pursuing those services. **Note: "SYSTEM" means the One-Stop System where all required partners make their services available.**

Initial Assessment – The collection and assessment of information on a customer's skill levels, including literacy, numeracy, and English language proficiency; work history; employment barriers; employment goal(s) and occupational knowledge; supportive service needs; and whether referrals to other programs are appropriate or necessary.

Labor Exchange Services – Providing job search and placement services to the customer, including but not limited to, information on in-demand industry sectors and occupations and non-traditional employment, when appropriate; development of a work search plan; placement in workshops; posting jobs on the state job bank; providing job matching and referrals; and advising how to maintain a record of job search.

In some instances, programs may require their customers to maintain and submit a log detailing the amount of time spent on job search activities including identifying, applying, and interviewing for potential jobs, and time spent preparing and sending follow-up material to businesses.

Labor exchange services also include appropriate recruitment and other business services, which may include, but are not limited to, customized screening and referral of qualified customers in training services to businesses; customized services to businesses, business associations, or other such organizations, on employment-related issues; customized recruitment events for businesses and targeted job fairs; human resource consultation services which may include writing/reviewing job descriptions and employee handbooks, developing performance evaluations and personnel policies, creating orientation sessions for new employees, honing job interview techniques for efficiency and compliance, analyzing employee turnover, creating job accommodations and using assistive technologies, and explaining labor law to help businesses comply; and customized labor market information for specific businesses, sectors, industries, or clusters.

Referrals to Programs – Referrals and coordination of activities with other appropriate programs and services that meet specific customer needs, assist them in overcoming barriers to employment, and provide services to gain/retain employment. These other programs and services may include, but are not limited to, employment and training services; treatment for alcohol, substance abuse or mental health issues; Unemployment Insurance benefits; Workers' Compensation; VT Disability Insurance; and vocational rehabilitation services.

Labor Market Information – Staff provides workforce and labor market employment statistics to assist job seeking customers in the development of employment goal(s) and

businesses in the development and implementation of sector partnerships and career pathways. The employment statistics include local, regional, and national labor market conditions; career counseling and career exploration services; characteristics of industries, occupations, and the workforce area; business-identified skill needs; short and long-term industry and occupational growth and salary projections; worker supply and demand; and high-growth and high-demand industries.

Performance and Program Cost of Eligible Providers – The provision of performance information and program cost information on eligible providers of education, training, and workforce services by program and type of provider.

Referrals to Supportive Services – Staff provides customers with referrals to supportive services that enable the customer to participate in authorized WIOA activities. Based on various partners' programmatic rules and regulations, these supportive services may include, but are not limited to, transportation; child care; dependent care; housing; needs related payments; interpreter services; reasonable accommodation for youth with disabilities; legal aid services; assistance with uniforms or other appropriate work attire; assistance with books, fees, and school supplies; payments and fees for employment and training related applications, tests, and certifications; and tools or instruments. Depending on the program, when appropriate, information may also be provided to customers on how to continue these supportive services after program services are completed.

Unemployment Insurance (UI) Information and Assistance – Career Center and UI staff provides information and meaningful assistance to individuals seeking assistance in filing a claim for unemployment compensation. Meaningful assistance means providing assistance on-site using staff that is well trained in UI compensation claims filing and the rights and responsibilities of claimants or providing assistance by phone or via other technology as long as the assistance is provided by trained and available staff within a reasonable time.

Financial Aid Assistance – Providing assistance in establishing eligibility, accessing, and applying for programs of financial aid for training and education programs not provided under WIOA.

Individualized Career Services (20 CFR §678.430(b))

Comprehensive Assessment

– Staff conducts a specialized assessment of a job seeker's barriers to employment, occupational and employment goal(s), educational and skill levels, and personal circumstance to determine his/her service needs. This may include diagnostic testing and use of other assessment tools, and in-depth interviewing and evaluation. Under WIOA Title I, the comprehensive assessment is used to develop the Individual Employment Plan (IEP), while under Title IV, it is used to develop the Individualized Plan for Employment (IPE).

Individual Employment Plan (IEP)/Individualized Plan for Employment (IPE)

– The IEP/IPE identifies the appropriate employment goal(s) chosen by the customer. The initial and comprehensive assessment is used to develop the IEP/IPE in consultation with the customer. The plan outlines the necessary services to be provided to achieve the planned goals; steps and timelines for achieving the goals; and the terms, conditions, and responsibilities associated with the plan. The IEP for Title I Adult/DW/Youth programs also includes information about eligible training providers, when applicable. The IPE for Title IV Vocational Rehabilitation Programs must also include those specific rehabilitation services needed to achieve the employment outcome, including assistive technology devices and services, when applicable.

Career Planning and Counseling

– One-on-one or intensive career planning and counseling with a professional counselor uses initial and comprehensive assessments and the IEP/IPE, and aims at enhancing job seeking and retention skills and career advancement of customers by:

- Helping the customer analyze and understand career information, and gain a better understanding of his/herself using career information gained through assessment tools and counseling strategies to more realistically choose or change short and long-term occupational goals; and
- Preparing service strategies to assist in the achievement of occupational goal(s) and to ensure customers have access to necessary workforce activities and supportive services, which may include, but are not limited to, drug and alcohol abuse counseling, mental health counseling, and referrals to partner programs appropriate to the needs of the customer.

Counseling may also include notification of available training in entrepreneurial skills which may include, but is not limited to, taking initiative; creatively seeking out and identifying business opportunities; developing budgets and forecasting resource needs; understanding options for acquiring capital; and communicating effectively to market oneself and ideas.

Short-term Pre-Vocational Services

– Development of skills customers need to live independently and enter the workforce fully prepared to engage in employment. These services may include academic education and job readiness trainings for development of work readiness skills, including but not limited to, learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, higher-order reasoning, problem-solving skills, work attitudes, and professional conduct.

Internships and Work Experience

– Based on partners' programmatic rules and regulations, the work experience is a planned,

structured learning experience, in most cases linked to a career, that takes place in a private for-profit, non-profit or public sector workplace. For most partner programs, work experiences may be in the form of internships, work-study, externship, on-the-job training, apprenticeship, summer employment for youth, and/or other work placement opportunities. The purpose of a work experience is to provide the customer with an understanding of the work environment and job responsibilities, specific work skills, and experience on how the customer performs in the work setting. WIOA Title I Youth work experiences also include an academic and occupational education component. Partners follow all applicable work experience requirements for their respective program's State and Federal rules and regulations.

Out of Area Job Search and Relocation Assistance

– Staff provides information on labor exchange activities in other local areas, regions, or states and whether businesses the customer may be interested in offer assistance with relocation. Allowable relocation expenses may be paid to eligible customers by the appropriate program.

Financial Literacy Services

– Educate and support customers to gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability by using high quality relevant learning strategies. The learning, where possible, may include, but is not limited to, creating a budget; initiating checking and/or savings accounts at banks; learning how to effectively manage spending, credit, and debt; learning how to protect against identity theft; and benefits advisement. These services may also include opportunities to put financial literacy lessons into practice, based on the needs of the customer.

English Language Acquisition and Integrated Education

– Adult Education staff provides an integrated program of services that incorporates English literacy and civics education concurrently and contextually with workforce preparation and training for a specific occupation/sector for the purpose of educational and career advancement of customers. These services allow customers to attain economic self-sufficiency and are designed for partnerships among adult education programs and postsecondary educational institutions, training providers, and/or businesses. Other partners provide direct linkages and information on how to locate and enroll in English as a Second Language (ESL) or English for Speakers of Other Languages (ESOL) classes.

Workforce Preparation

– Activities to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education, training, or employment and other employability skills that increase an individual's preparation for the workforce. For Adult Education these activities are incorporated into all literacy instruction.

Follow-Up Services (20 CFR §678.430(c))

Depending upon the individual partner's programmatic rules and regulations, follow-up services may include counseling regarding the workplace for customers in adult or dislocated worker programs, who are placed in unsubsidized employment, for up to 12 months after the first day of employment. For youth programs, the follow-up services include critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or postsecondary education and training. These services may include regular contact with a youth's business and education provider, including assistance in addressing work-related or education-related problems that arise.

Table 5: Vermont's One-Stop Programs and Service Locations

* = Program & services offered at a different local location

Career Resource Center Location	Vermont Dept of Labor Programs	One-Stop Partner Programs
Burlington American Job Center **[Comprehensive One-Stop Location in Vermont]** 63 Pearl Street Burlington, VT 05401	• WIOA Youth • WIOA Adult • WIOA Displaced Worker • Jobs for Veterans • Trade Adjustment Assistance	• Vermont Student Assistance Corporation (VSAC) • Adult Education and Family Literacy (VAL) • Vocational Rehabilitation • TANF (Reach-UP)

Career Resource Center Location	Vermont Dept of Labor Programs	One-Stop Partner Programs
802-863-7676	• Migrant & Seasonal Farm Worker • Unemployment Insurance • Wagner-Peyser Employment and Employer Services • Reemployment Services and Eligibility Assessments • State Apprenticeship Program	• Blind and Visually Impaired Services • YouthBuild (ReSource) • JobCorps • Champlain Valley Office of Economic Opportunity (CVOEO) • MSFW Services; PathStone • Technical and Community College (CCV & VTC)* • Vermont Associates for Training and Development (SCSEP)
St. Albans Career Resource Center 27 Federal Street, Suite 100 St. Albans, VT 05478 802-524-6585	• WIOA Youth • WIOA Adult • WIOA Displaced Worker • Jobs for Veterans • Trade Adjustment Assistance • Migrant & Seasonal Farm Worker • Unemployment Insurance • Wagner-Peyser Employment and Employer Services • Reemployment Services and Eligibility Assessments	• Vermont Student Assistance Corporation (VSAC) • Adult Education and Family Literacy (VAL)* • Vocational Rehabilitation • TANF (Reach-UP) • Blind and Visually Impaired Services • MSFW Services; PathStone* • Technical and Community College (CCV & VTC)* • Vermont Associates for Training and Development (SCSEP)* • Champlain Valley Office of Economic Opportunity (CVOEO) •
Newport Career Resource Center	• WIOA Youth	• Adult Education and Family Literacy (NEKLS)*

Career Resource Center Location	Vermont Dept of Labor Programs	One-Stop Partner Programs
Emory E. Hebard State Office Building 100 Main Street, Suite 210 Newport, VT 05855-0375 802-334-6545	• WIOA Adult • WIOA Displaced Worker • Jobs for Veterans • Trade Adjustment Assistance • Migrant & Seasonal Farm Worker • Unemployment Insurance • Wagner-Peyser Employment and Employer Services • Reemployment Services and Eligibility Assessments	• Vocational Rehabilitation • TANF (Reach-UP) • Blind and Visually Impaired Services • Technical and Community College (CCV & VTC)* • Vermont Associates for Training and Development (SCSEP)*
St. Johnsbury Career Resource Center PO Box 129 1197 Main Street, Suite 1 St. Johnsbury, VT 05819-0129 802-748-3177	• WIOA Youth • WIOA Adult • WIOA Displaced Worker • Jobs for Veterans • Trade Adjustment Assistance • Migrant & Seasonal Farm Worker • Unemployment Insurance • Wagner-Peyser Employment and Employer Services • Reemployment Services and Eligibility Assessments	• Vermont Student Assistance Corporation (VSAC) • Adult Education and Family Literacy (NEKLS)* • Vocational Rehabilitation* • TANF (Reach-UP)* • Blind and Visually Impaired Services* • Technical and Community College (CCV & VTC)* • Vermont Associates for Training and Development (SCSEP)*
Morrisville Career Resource Center 197 Harrel Street Morrisville, VT 05661-0429	• WIOA Youth • WIOA Adult • WIOA Displaced Worker • Jobs for Veterans	• Vermont Student Assistance Corporation (VSAC) • Adult Education and Family Literacy (CVABE)*

Career Resource Center Location	Vermont Dept of Labor Programs	One-Stop Partner Programs
802-888-4545	• Trade Adjustment Assistance • Migrant & Seasonal Farm Worker • Unemployment Insurance • Wagner-Peyser Employment and Employer Services • Reemployment Services and Eligibility Assessments	• Vocational Rehabilitation* • TANF (Reach-UP) • Blind and Visually Impaired Services • Technical and Community College (CCV & VTC)* • Vermont Associates for Training and Development (SCSEP)*
Barre Career Resource Center McFarland State Office Building 5 Perry Street, Suite 200 Barre, VT 05641 802-476-2600	• WIOA Youth • WIOA Adult • WIOA Displaced Worker • Jobs for Veterans • Trade Adjustment Assistance • Migrant & Seasonal Farm Worker • Unemployment Insurance • Wagner-Peyser Employment and Employer Services • Reemployment Services and Eligibility Assessments	• Vermont Student Assistance Corporation (VSAC) • Adult Education and Family Literacy (CVABE)* • Vocational Rehabilitation • TANF (Reach-UP) • Blind and Visually Impaired Services • YouthBuild (ReSource)* • Technical and Community College (CCV & VTC)* • Vermont Associates for Training and Development (SCSEP)*
White River Junction Career Resource Center 118 Prospect Street, Suite 302 White River Junction, VT 05001 802-295-8805	• WIOA Youth • WIOA Adult • WIOA Displaced Worker • Jobs for Veterans • Trade Adjustment Assistance • Migrant & Seasonal Farm Worker	• Vermont Student Assistance Corporation (VSAC) • Adult Education and Family Literacy (VAL)* • Vocational Rehabilitation • TANF (Reach-UP) • Blind and Visually

Career Resource Center Location	Vermont Dept of Labor Programs	One-Stop Partner Programs
	• Unemployment Insurance • Wagner-Peyser Employment and Employer Services • Reemployment Services and Eligibility Assessments	Impaired Services • Technical and Community College (CCV & VTC)* • Vermont Associates for Training and Development (SCSEP)*
Middlebury Career Resource Center 1590 Route 7 South, Suite 5 Middlebury, VT 05753 802-388-4921	• WIOA Youth • WIOA Adult • WIOA Displaced Worker • Jobs for Veterans • Trade Adjustment Assistance • Migrant & Seasonal Farm Worker • Unemployment Insurance • Wagner-Peyser Employment and Employer Services • Reemployment Services and Eligibility Assessments	• Adult Education and Family Literacy (VAL)* • Vocational Rehabilitation* • TANF (Reach-UP) • Blind and Visually Impaired Services • JobCorps • Champlain Valley Office of Economic Opportunity (CVOEO)* • Technical and Community College (CCV & VTC)* • Vermont Associates for Training and Development (SCSEP)* •
Rutland Career Resource Center 200 Asa Bloomer Building Rutland, VT 05701 802-786-5837	• WIOA Youth • WIOA Adult • WIOA Displaced Worker • Jobs for Veterans • Trade Adjustment Assistance • Migrant & Seasonal Farm Worker • Unemployment Insurance • Wagner-Peyser	• Vermont Student Assistance Corporation (VSAC) • Adult Education and Family Literacy (VAL)* • Vocational Rehabilitation • TANF (Reach-UP) • Blind and Visually Impaired Services • JobCorps • MSFW Services;

Career Resource Center Location	Vermont Dept of Labor Programs	One-Stop Partner Programs
	Employment and Employer Services • Reemployment Services and Eligibility Assessments • State Apprenticeship Program	PathStone • Technical and Community College (CCV & VTC)* • Vermont Associates for Training and Development (SCSEP)
Springfield Career Resource Center 56 Main Street, Suite 101 Springfield, VT 05156 802-289-0999	• WIOA Youth • WIOA Adult • WIOA Displaced Worker • Jobs for Veterans • Trade Adjustment Assistance • Migrant & Seasonal Farm Worker • Unemployment Insurance • Wagner-Peyser Employment and Employer Services • Reemployment Services and Eligibility Assessments	• Vermont Student Assistance Corporation (VSAC) • Adult Education and Family Literacy (VAL)* • Vocational Rehabilitation* • TANF (Reach-UP) • Blind and Visually Impaired Services • JobCorps • Technical and Community College (CCV & VTC)* • Vermont Associates for Training and Development (SCSEP)*
Brattleboro Career Resource Center Marlboro College Graduate School 28 Vernon Street, Suite 212 Brattleboro, VT 05301 802-254-4555	• WIOA Youth • WIOA Adult • WIOA Displaced Worker • Jobs for Veterans • Trade Adjustment Assistance • Migrant & Seasonal Farm Worker • Unemployment Insurance • Wagner-Peyser Employment and Employer	• Vermont Student Assistance Corporation (VSAC) • Adult Education and Family Literacy (VAL)* • Vocational Rehabilitation* • TANF (Reach-UP) • Blind and Visually Impaired Services • Technical and Community College (CCV & VTC)* • Vermont Associates for

Career Resource Center Location	Vermont Dept of Labor Programs	One-Stop Partner Programs
	Services • Reemployment Services and Eligibility Assessments	Training and Development (SCSEP)*
Bennington Career Resource Center 200 Veterans Memorial Drive, Suite 2 Bennington, VT 05201 802-442-6376	• WIOA Youth • WIOA Adult • WIOA Displaced Worker • Jobs for Veterans • Trade Adjustment Assistance • Migrant & Seasonal Farm Worker • Unemployment Insurance • Wagner-Peyser Employment and Employer Services • Reemployment Services and Eligibility Assessments	• Vermont Student Assistance Corporation (VSAC) • Adult Education and Family Literacy (Tutorial Center)* • Vocational Rehabilitation • TANF (Reach-UP) • Blind and Visually Impaired Services • Technical and Community College (CCV & VTC)* • Vermont Associates for Training and Development (SCSEP)
Partner Program Sites		
Maquam Bay of Missisquoi, Inc. 100 Grand Avenue Swanton, VT 05488		• WIOA Native American Employment and Training Programs
Northlands Job Corps Center 100A MacDonough Dr Vergennes, VT 05491-1057 800-733-5627 877-889-		• Job Corps Training and Programs

Career Resource Center Location	Vermont Dept of Labor Programs	One-Stop Partner Programs
5627 TTY		

Adult Education and Family Literacy:

CVABE = Central Vermont Adult Basic Education

NEKLS = Northeast Kingdom Learning Services

The Tutorial Center

VAL = Vermont Adult Learning

The Core Partner Data Sharing MOU is as follows:

1. **PARTIES**

This Agreement is entered into by the Vermont Agency of Education ("AOE"), the Vermont Department of Labor ("VDOL"), and the Vermont Agency of Human Services, Division of Vocational Rehabilitation ("VR") for the purpose of sharing protected personally identifiable information ("Protected PII"), Unemployment Compensation (UC) information, and other personal information, in order to comply with the State performance accountability and reporting requirements of the Workforce Innovation and Opportunity Act of 2014 ("WIOA").

1. **BACKGROUND**

AOE, VDOL, and VR, in their capacity as administrators of the WIOA Core Programs in Vermont, are required to report their program performance to their respective federal agencies: U.S. Departments of Education and Labor ("USDOE" and "USDOL"), and the Rehabilitation Services Administration ("RSA"). Each Core Program must collect and report its performance data according to a different schedule, either on a quarterly or an annual basis. Under the performance measures established in section 116(b) of WIOA and 20

C.F.R. § 677.155, all Core Programs are required to report the employment status of program participants, namely retention in unsubsidized employment and median earnings. Pursuant to section 116(i)(2) of WIOA and 20 C.F.R. § 677.175, where available, the use of wage records is required t<:> fulfill these reporting requirements.

1. **PURPOSES AND SCOPE**

The purposes of this agreement are the following:

1.

    a. to authorize, in a manner compliant with the requirements of the Family Educational Rights and Privacy Act of 1974 (FERPA), 34 C.F.R. § 99.35, and 9

V.S.A. § 2440, sharing of Protected PII, including SSNs, from AOE to VDOL, as AOE's authorized representative;

b. to authorize, in a manner compliant with the requirements of 34 C.F.R. § 361.38(d) and 9 V.S.A. § 2440, sharing of personal information, including SSNs, from VR to VDOL;

c. to authorize, in a manner compliant with the requirements of 20 C.F.R. § 603, 21

V.S.A. § 1314, and 9 V.S.A. § 2440, sharing of UC information, including SSNs, wages, and the name, address, state, and Federal Employer Identification Number (FEIN) of the employer, from VDOL to AOE and VR; and

1.

a. to clarify that the authorized uses of the information shared under this Agreement are solely for the purpose of complying with the State performance accountability and reporting required under WIOA.

LEGAL AUTHORITY

SHARING OF SSNs UNDER VERMONT LAW

1. Vermont law sets out broad prohibitions against revealing PII, including SSNs, in 9 V.S.A. §§ 2430-2445. However, multiple exceptions exist. Under 9 V.S.A. § 2440(d)(l), the prohibition against revealing PII does not apply when the State and any State agency are authorized by law, State or federal regulation to collect SSNs, or when the collection of SSNs is related to the performance of that agency's duties and responsibilities as prescribed by law. Additionally, under 9 V.S.A. § 2440(e)(l) these prohibitions do not apply when SSNs are disclosed to another governmental entity if disclosure is necessary for the receiving entity to perform its duties and responsibilities. Lastly, under 9 V.S.A. § 2440(e)(4), the collection, use, or release of a SSN is permissible when "reasonably necessary for administrative purposes or internal verification. Internal verification includes the sharing of information for internal verification between and among governmental entities and their agents, employees, contractors, grantees, and grantors."

Subsection 116(i)(2) of WIOA and 20 C.F.R. § 677.175 not only authorize, but also obligate Core Partner Programs to use wage records, where possible and available, to report performance reporting. This means that AOE, VDOL, and VR are generally required to collect, share, and disclose SSNs in order to perform their duties and responsibilities prescribed by law. In doing so, they disclose SSNs to another governmental entity: initially from AOE and VR to VDOL, and then from VDOL to AOE and VR in return. This sharing is reasonably necessary for both administrative purposes and "internal verification" between and among governmental entities. Therefore, the purposes and uses of SSNs under this agreement are permissible under Vermont law.

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    - **DISCLOSURE OF PII FOR AUDIT AND EVALUATION**
        - **FERPA: AUTHORIZED DISCLOSURE OF PII FOR AUDIT OR Ev ALUATION**
- **XIV.** FERPA describes circumstances under which a State Educational Agency (SEA), such as AOE, is authorized to release data from an education record. The SEA must

designate an authorized representative, such as VDOL, to receive the Protected PII from education records under 34 C.F.R. § 99.35(a). Protected PII may be disclosed to organizations for the audit and evaluation of federal or state supported education programs, and for conducting evaluative studies on behalf of SEAs, provided that federal, state, or local law authorizes the evaluation in question.

AOE is an SEA. Under this Agreement, AOE authorizes VDOL as its representative to receive PII for the purpose of matching that data with wage records, which is necessary for reporting performance under WIOA. WIOA authorizes the performance reporting for purposes of conducting audits and evaluations of the Core Programs. Therefore, the purpose for disclosure of PII by AOE to VDOL under this Agreement is permissible under 34 C.F.R.§ 99.35.

n. AUTHORIZED RELEASE OF PII FOR AUDIT AND EVALUATION DIRECTLY CONNECTED TO VR PROGRAM ADMINISTRATION

- **XV.** Under 34 C.F.R. § 361.38(d), personal information may be released to an organization, agency, or individual engaged in audit, evaluation, or research only for purposes directly connected.with the administration of the Vocational Rehabilitation program.

WIOA requires VR to report its performance to the RSA according to the statutory performances measures. In order to report on these measures, VR must obtain wage records for individual participants, which requires sharing those participants' personal information, including SSNs, with VDOL to enable VDOL to match SSNs with individual wage records. The purpose of this sharing is directly connected with the administration of the VR program. Therefore, the purpose for disclosure of PII by VR to VDOL under this Agreement is permissible under 34 C.F.R. § 361.38.

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    - **UC INFORMATION**
- **XVI.** The requirements regarding sharing and confidentiality of Vermont UC information are governed at the federal level through 20 C.F.R. § 603 and at the state level through 21 V.S.A.

§ 1314. These provisions authorize the use of UC information to a public official for the purposes of public administration.

1. AUTHORIZED DISCLOSURE OF UC INFORMATION TO PUBLIC OFFICIALS FOR PUBLIC ADMINISTRATION

- **XVII.** Pursuant to 20 C.F.R. § 603.S(e), disclosure of confidential UC information to a public official for use in the performance of his or her official duties is permissible. "Performance of official duties" means administration or enforcement of law or the execution of the official responsibilities of a Federal, State, or local elected official.

"UC information" is defined in 20 C.F.R. § 603.2(i) as information in the records of a State or State UC agency that pertains to the administration of the state UC law... which includes those State wage reports collected under the IEVS (Section 1137 of the Social Security Act (SSA)) that are obtained by the State UC agency.

"Public official" is defined in 20 C.F.R. § 603.2(d) as an official, agency, or public entity within the executive branch of Federal, State or local government who (or which) has responsibility for administering or enforcing a law, or an elected official in the Federal, State, or local government. Disclosure of confidential UC information to an agent or contractor of a public official to whom disclosure is permissible is allowable pursuant to 20 C.F.R. § 603.2(e).

21 V.S.A. § 1314(e)(l) states:

Subject to such restrictions as the Board may by regulation prescribe, information from unemployment insurance records may be made available to any public officer or public agency of this or any other state or the federal government dealing with the administration or regulation of relief, public assistance, unemployment compensation, a system of public employment offices, wages and hours of employment, workers' compensation, misclassification or miscoding of workers, occupational safety and health, or a public works program for purposes appropriate to the necessary operation of those offices or agencies.

ii. **AGENCY QUALIFICATIONS FOR RECEIVING UC INFORMATION**

- **XVIII.** In order to disclose confidential UC information, VDOL shall ensure that the receiving entity is a public official, and that the public official's purpose for receiving the information is for use in the performance of his or her official duties. AOE is a State agency responsible for administering the adult education and family literacy act programs and funds amended in Title II of the WIOA. VR is a division of the Vermont Agency of Human Services, a State agency responsible for administering the vocational rehabilitation programs and funds amended in Title IV of the WIOA. The purpose for disclosure of UC information to AOE and VR is for the administration of federal law at the state level. Therefore, disclosure of UC information to AOE and VR is permissible, because both agencies meet the definition of a "public official" as defined in 20 C.F.R. § 603.2(d), and the purpose is to use the UC information disclosed for the performance of their official duties.

1. **AGREEMENT TERMS**

1. **No INDIVIDUAL IDENTITY REVEALED**

- **XIX.** AOE, VDOL, and VR shall not publicly report any assessment or accountability results based on the Protected PII, UC information, or other personal information shared under this Agreement except when permissible under the applicable federal and State privacy laws. In particular, AOE, VDOL, and VR shall not publicly report performance results when there are less than 11 participants in a category.

<u>Federal Privacy Standards</u>

Under 34 C.F.R. § 99.35(b)(l), disclosed PII shall be protected in a manner that does not permit personal identification of individuals by anyone other than the SEA or their authorized representatives. Under 34 C.F.R. § 361.38(d)(5), personal information released for purposes directly connected with the administration of the vocational rehabilitation program is permissible only if the final product will not reveal any personal identifying information without the informed written consent of the involved individual or the individual's representative. Under 20 C.F.R. § 603.4(b), States shall maintain the "confidentiality of any UC information which reveals the name or any identifying particular about any individual or any past or present employer or employing unit, or which could foreseeably be combined with other publicly available information to reveal any such particulars".

Under 20 C.F.R. § 677.175(c)(3) the Governor or other appropriate State entity designated to assist in carrying out the WIOA performance requirements is responsible for preventing disaggregation that would violate applicable privacy standards. Section 116(d)(6)(C) WIOA exempts the requirement for disaggregation of data for reporting purposes when "the number of participants in a category is insufficient to yield statistically reliable information or when the results would reveal personally identifiable information about an individual participant."

Vermont Privacy Standards

In addition to the broad protections against revealing PII, including SSNs, established in 9 V.S.A. §§ 2430-2445, the protection of student privacy in the context of performance reporting is set out in 1 V.S.A. § 317(c)(11) and the Vermont State Board of Education Rule 2555. Rule 2555 states that to "ensure the confidentiality of individual students' results, public reporting of any assessment or accountability result shall require a minimum of 11 students."

1. **No INFORMATION RELEASED TO VRPARTICIPANTS**

Pursuant to 34· C.F.R. § 361.38(d)(4), the personal information shared under this Agreement shall not be released to the individual involved in the VR program.

1. **NEED-TO-KNOW ACCESS**

Pursuant to 20 C.F.R. § 603.l0(b)(ii), those parties who request or receive UC information under this Agreement, AOE, VR, or their contractors, shall be limited to those with a need to access that UC information for purposes listed in this Agreement.

AOE, VDOL, and VR shall ensure that the PII, UC information, and other personal information shared under this Agreement will be accessed only by those individuals given express authorization to do so by their respective agencies, or by the individual's release granted through written consent, and that the PII, UC information and other personal information received will be used only for the specific purposes authorized in that release.

1. **METHOD, TIMING, AND FORMAT OF REQUESTS**

Pursuant to 20 C.F.R. § 603.l0(b)(iii), the methods and timing ofrequests for UC information and responses to those requests, as well as the format to be used for those requests shall be determined cooperatively by VDOL, AOE, and VR in order to ensure the ongoing efficiency and security of the data transfers, including best practices for security and data encryption.

On an exceptional basis, authorized individuals may have cause to contact either the VDOL Director of Operations and Information Technology or the VDOL Employer Services Chief for information authorized under this agreement. If, in VDOL's opinion, such contacts are more than occasional and incidental, additional cost reimbursement consistent with the terms set forth in the following section will be required.

1. **COST REIMBURSEMEN**

Pursuant to 20 C.F.R. §§ 603.l0(b)(iv) and 603.8, VDOL may not use any UC grant funds to pay any of the costs associated with making disclosures or furnishing UC information under 20 C.F.R. § 603.5.

VDOL, AOE and VR as administrators of the WIOA Core Programs in Vermont agree to a reciprocal cost sharing agreement for disclosure of data between the three state entities to

accomplish each program's respective performance measures reporting requirements. VDOL, AOE and VR agree to a reciprocal cost reimbursement schedule as follows in accordance with 20 C.F.R. §603.8:

Individual Record Request

1-10,000

10,000 - 50,000

50,001 or more

Flat Fee per Request

$200- Includes admin. costs

$250 - Includes admin. costs

$300 - Includes admin. costs

INFORMATION SAFEGUARDS

20 C.F.R. § 603.9 requires this Agreement to include provisions for safeguarding disclosed UC information. 21 V.S.A. § 1314(d)(l) requires that VDOL maintain confidentiality with regard to UC information, except for the limited purposes referenced in Section IV (Legal Authority) of this Agreement. In addition, the information transmitted pursuant to this agreement is personally identifiable information subject to the protections of 9 V.S.A. §§ 2430-2445.

All AOE and VR employees and all AOE and VR contractors shall be regularly reminded of the need to keep client data confidential, including UC information regarding individuals and employers, and that information may only be accessed on a need-to-know basis in the administration of programs. Expectations regarding confidentiality, use, and access to information for Vermont Agency of Human Services (AHS) employees are clearly specified in AHS Rule No. 08-048, "Consumer Information and Privacy Rule".

Information shall be maintained and accessed in a secure manner, meeting guidelines published in IRS Publication 1075, Sections 3.0-5.0 and 9.0, and the provisions ofFERPA.

Information shall be destroyed in a secure manner, meeting guidelines published in IRS Publication 1075, Section 8.0, and 34 C.F.R. § 99.35(b)(2).

Employees of AOE and VR with access to VDOL information shall receive annual training in the protection of federal tax information consistent with the requirements of IRS Publication 1075.

Pursuant to 34 C.F.R. §99.35(a)(3)(v), VDOL shall maintain policies and procedures, consistent with FERPA and other Federal and State confidentiality and privacy provisions, to protect PII contained in education records from further disclosure (except back to the disclosing entity) and unauthorized use, including limiting use of PII from education records to only authorized representatives with legitimate interests in the audit or evaluation of a federal or state supported education program or for compliance or enforcement of federal legal requirements related to these programs.

1. **INSPECTIONS**

At its discretion, VDOL may conduct on-site inspections of AOE and VR or their contractors who receive UC data to ensure that the requirements of Vermont law and this Agreement are being met.

1. **AMENDMENTS**

This Agreement may be modified or amended at any time, provided that all parties are in mutual agreement. Modifications or amendments shall be in writing, signed by the parties to this Agreement, and attached to the original agreement.

1. **SEVERABILITY**

If any part of this Agreement is found to be null and void, or is otherwise stricken, the rest of this Agreement shall remain in force.

1. **BREACH AND CANCELLATION**

Pursuant to 20 C.F.R. § 603.lO(c), if AOE or VR or their contractors fails to comply with any provision of this Agreement required by 20 C.F.R. § 603.10, including timely payment of VDOL's costs billed to those parties who request or receive UC information, then this Agreement shall be suspended as it relates to that party, and further disclosure of information (including any disclosure being processed) to such party is prohibited, until VDOL is satisfied that corrective action has been taken. In the absence of prompt and satisfactory corrective action, this Agreement shall be canceled, and AOE or VR or their contractors shall surrender to VDOL all confidential UC information (and copies thereof) obtained under this Agreement that has not previously been returned to VDOL.

Pursuant to 20 C.F.R. § 603.I0(a), VDOL reserves the right to terminate this Agreement at any time, if VDOL determines that the safeguards in this Agreement are not adhered to by those parties who request or receive UC information.

In the event of a security breach for UC data held or transported by AOE or VR or their contractors, AOE or VR or their contractors shall comply with the State of Vermont's Security Breach Notice Act, 9 V.S.A. § 2430 and§ 2435, shall notify VDOL of the security breach as soon as possible, but no less than 10 business days of its discovery of that event, and shall reimburse VDOL for mitigation expenses related to that breach of security on the part of AOE or VR or their contractors.

In the case of any use or disclosure of data by VDOL that is not provided for by this Agreement, VDOL shall make a report to the AOE within 24 hours of the discovery of such unauthorized use or disclosure of data. In the event that such unauthorized use or disclosure does occur, VDOL shall take all reasonable steps to mitigate the unauthorized use or disclosure of data.

1. **EFFECTIVE DATE**

This Agreement shall be effective upon signature by the parties' authorized representatives.

E. WAIVER REQUESTS (OPTIONAL)

TITLE I-B ASSURANCES

The State Plan must include	Include
1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;	Yes
2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;	Yes
3. The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	Yes
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);	Yes
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	Yes
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	Yes
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);	Yes
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;	Yes
9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;	Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	Yes
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);	Yes

ADULT PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	72.5%	72.5%	73.0%	73.0%

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Fourth Quarter After Exit)	63.0%	63.0%	63.5%	63.5%
Median Earnings (Second Quarter After Exit)	$5,606	$5,800	$5,720	$6,100
Credential Attainment Rate	63.0%	65.0%	64.0%	67.0%
Measurable Skill Gains	50.9%	50.9%	51.5%	51.5%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

DISLOCATED PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	82.0%	82.0%	83.0%	83.0%
Employment (Fourth Quarter After Exit)	74.0%	74.0%	75.0%	75.0%
Median Earnings (Second Quarter After Exit)	$10,000	$10,000	$10,150	$10,150
Credential Attainment Rate	70.0%	70.0%	71.0%	71.0%
Measurable Skill Gains	60.0%	60.0%	61.0%	61.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	71.0%	71.0%	71.5%	71.5%
Employment (Fourth	57.5%	57.5%	59.0%	59.0%

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Quarter After Exit)				
Median Earnings (Second Quarter After Exit)	$3,978	$3,978	$4,058	$4,058
Credential Attainment Rate	47.8%	47.8%	47.9%	47.9%
Measurable Skill Gains	36.9%	36.9%	37.5%	37.5%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

PROGRAM-SPECIFIC REQUIREMENTS FOR WAGNER-PEYSER PROGRAM (EMPLOYMENT SERVICES)

A. EMPLOYMENT SERVICE STAFF

1. DESCRIBE HOW THE STATE WILL STAFF THE PROVISION OF LABOR EXCHANGE SERVICES UNDER THE WAGNER-PEYSER ACT, SUCH AS THROUGH STATE EMPLOYEES, INCLUDING BUT NOT LIMITED TO STATE MERIT STAFF EMPLOYEES, STAFF OF A SUBRECIPIENT, OR SOME COMBINATION THEREOF.

The VDOL will staff the provision of labor exchange services under the Wagner-Peyser Act with employees of the State of Vermont, Vermont Department of Labor, Workforce Development Division. Staff will be located in the state's comprehensive one-stop AJC and in regional offices throughout the state, co-located with other WIOA Title I staff.

2. DESCRIBE HOW THE STATE WILL UTILIZE PROFESSIONAL DEVELOPMENT ACTIVITIES FOR EMPLOYMENT SERVICE STAFF TO ENSURE STAFF IS ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBSEEKERS AND EMPLOYERS

The VDOL has enhanced professional development opportunities for staff over the past year and plans to expand the number and quality of training going forward. In the last year, the VDOL's program leadership offers a "WIOA World Series" skype training that is delivered on a monthly basis to One-Stop Career Center staff. Topics include; eligibility determination, assessments, creating effective individual service strategies, a comprehensive review of the 14 program elements and cross training with other programs such as WIOA Adult and Dislocated Worker programs. In addition, the VDOL program leadership staff convene quarterly in-person meetings where staff apply what they have learned through the WIOA World Series. Many topics covered in the trainings stem from feedback from staff surveys or are as a result of monitoring programs, or leadership recommendation.

In PY 2020 -2021, the VDOL intends to develop and offer more professional development opportunities to staff. These may include; motivational interviewing, case management training, career counseling aligned with pathway exploration and advancement, financial literacy, trauma-informed case management, mental health and substance abuse awareness, implicit

bias training, facilitation and project management trainings, etc. The VDOL is also pursuing a partnership with the Annie E. Cassie Foundation to gain a deeper of understanding of how to serve at-risk teens and young adults and develop a more individualized approach to career exploration and service delivery to build on young people's strengths and develop a path to sustainable careers.

3. DESCRIBE STRATEGIES DEVELOPED TO SUPPORT TRAINING AND AWARENESS ACROSS CORE PROGRAMS AND THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING PROVIDED FOR EMPLOYMENT SERVICES AND WIOA STAFF ON IDENTIFICATION OF UI ELIGIBILITY ISSUES AND REFERRAL TO UI STAFF FOR ADJUDICATION

The Unemployment Insurance (UI) and Workforce Development (WFD) Divisions work closely together to meet the employment needs of UI recipients. Wagner-Peyser funded staff (labor exchange staff) in the One-Stop Career Centers meet face-to-face with UI recipients, document that they are registered for work, review their job search activities and make referrals to available jobs, WIOA training and other community resources as appropriate.

One-Stop Career Centers staff are continuously kept informed on the UI claims process and given information on changes to the state UI program to ensure that staff can assist individuals in filing claims. Trainings on UI related issues are completed annually for all targeted areas. When there are changes to UI, in areas that affect claimants and/or information that needs to be provided to jobseekers, UI and WFD leadership works closely together to assure that training and information is dispensed accurately, efficiently, and in a timely manner.

Written communication between UI and labor exchange staff is conducted via e–mail when there are UI programmatic changes, and other updates related to claimants that Wagner-Peyser (WP) staff members need to know. Typically, the updates are shared through an administrative memo, and distributed to all WFD staff, which can be easily referenced by staff. In addition to written communication, webinars, in-person training and SKYPE sessions are conducted for labor exchange staff to inform of changes or new initiatives.

Labor exchange and UI staff members communicate regularly and coordinate any UI law, program or service changes. Dialogue between the UI and WFD division leaders result in shared and agreed upon best practices, training and processes to assist in the parameters of eligibility issues and when it is best to work with UI staff. Written guidance letters and processes are available via webinars, conference calls and informational printed materials.

B. EXPLAIN HOW THE STATE WILL PROVIDE INFORMATION AND MEANINGFUL ASSISTANCE TO INDIVIDUALS REQUESTING ASSISTANCE IN FILING A CLAIM FOR UNEMPLOYMENT COMPENSATION THROUGH ONE-STOP CENTERS, AS REQUIRED BY WIOA AS A CAREER SERVICE

Labor exchange staff play a key role in providing re-employment assistance to unemployment insurance (UI) claimants and other unemployed individuals. UI claimants have access to all comprehensive services, support and assessment services available through the One-Stop Career Centers, as well as individually designed service and guidance as identified.

Posters and brochures providing claimants information on how to file unemployment insurance claims are available in the resource centers both in print form and on the VDOL website. Labor exchange staff provide claimants with a step-by-step guide to filing their unemployment claim.

Labor exchange staff in the twelve One-Stop Career Centers focus their assistance with UI customers on re-employment activities, such as job search assistance, resume writing activities, online application assistance, local labor market information, interview preparation, job hunting

workshops, providing information on upcoming job fairs and hiring events, training and educational opportunities and access to computers, printers, copiers, fax machines and telephones. In addition, staff are trained and have the knowledge to assist claimants in filing weekly online claims and to provide general information to the claimant on their responsibilities as a claimant.

Staff offer services which provide many avenues and resources to match skill sets with job opportunities, assistance from a WIOA case manager for assessments to identify interests, skills, experience and education to match up with existing job postings on Vermont JobLink.

When individuals meet with labor exchange staff, referrals are made to internal partners including: WIOA case managers, ICAN case managers, JVSG staff, registered apprenticeship staff, as well as external community partners for a wide range of services and resources to increase current and future employment options.

C. DESCRIBE THE STATE'S STRATEGY FOR PROVIDING REEMPLOYMENT ASSISTANCE TO UI CLAIMANTS AND OTHER UNEMPLOYED INDIVIDUALS

UI Re-employment Services and Eligibility Assessment (RESEA) staff is responsible for the delivery of the RESEA program. WFD Trade Adjustment Assistance (TAA) staff deliver services with the TAA program. The goal of each of these programs is re-employment.

In Vermont, all claimants who are selected to participate in RESEA are required to participate in an in-person orientation that provides them with re-employment information, resources that are available to them through the One-Stop Career Centers such as resume writing, tips for interviewing, career exploration, and referrals to community resources.

Labor exchange staff also assist with rapid response events across the state by helping impacted workers find new jobs. Workers who are not interested in training opportunities, but rather need to get back to work as quickly as possible are assisted by labor exchange staff.

The TAA program provides participants with comprehensive of re-employment assistance including an in–depth assessment, career exploration and planning, case management support, and if needed for reemployment, classroom training or on–the–job training.

RESEA works with UI customers who are profiled as likely to exhaust UI benefits. The RESEA activities consist of a One-Stop Career Center orientation, job search activity overview, community resource overview and referral to WIOA One-Stop services. Due to the increased focus of service integration and the increase in funding opportunities, the RESEA program will be looking to expand the service delivery model to include as many UI claimants as possible, instead of limiting the program to those most likely to exhaust and unemployment claimants.

The RESEA program design has been shown to increase participant's competitive advantage by returning claimants to work for up to an average of at least two weeks earlier, thereby reducing the average duration of their claim.

D. DESCRIBE HOW THE STATE WILL USE W-P FUNDS TO SUPPORT UI CLAIMANTS, AND THE COMMUNICATION BETWEEN W-P AND UI, AS APPROPRIATE INCLUDING THE FOLLOWING:

Labor exchange services in local One-Stop Career Centers are based on an all-inclusive philosophy; there are no eligibility requirements or program specific requirements as a barrier to accessing comprehensive, quality, group and individual services provided by labor exchange staff.

Labor exchange staff make certain UI claimants are aware of the services available to them while working toward their next employment opportunity. Labor exchange staff enter specific UI claimant information into the Vermont JobLink computer database to document services accessed by the claimant.

There is a close working relationship between the UI and WFD, enhancing the ability to coordinate services in the One-Stop Career Centers regarding UI claimants. Locating RESEA activities within the One-Stop Career Centers strengthens the service delivery, referrals to additional resources and access to community resources.

UI and workforce and employment services both are under the oversight of the VDOL. All UI claimants are required to register in the state's labor exchange system and primary job matching tool, Vermont JobLink (VJL), within a pre-determined time period to secure UI benefits.

Registering with VJL also ensures all claimants have access to resources that will assist them in finding employment. In addition, the state also requires selected UI claimants to follow through with additional services provided by labor exchange staff and as recommended by RESEA staff, as criteria to continuation of UI benefits.

Unless waived from work search efforts, UI claimants are required to complete three documented work search contacts weekly. When time permits, UI staff members review work searches to determine if searches fall within the UI guidelines and provide guidance to claimants on work search activities. Additionally, RESEA staff review work search efforts for UI participants during weekly RESEA meetings. UI claimants have access to all comprehensive services, support and assessment services available, as well as individually designed service and guidance as needed. The UI staff provides program management as well as conducts continuous eligibility review, work search verification and ongoing case management activities.

Over the next reporting period, the UI Program is looking to expand and update the VDOL work search requirements. The UI Division will utilize the newly issued training and employment notice on model work search requirements (TEN 17-19) and will look to integrate the services provided by the WP funded employment services identified below into the State's work search permissible activities.

The WP staff provides employment services using Wagner-Peyser funding. Those services include:

- Skills and interest assessments
- Career exploration and counseling
- Job referrals to employment and training opportunities
- Job development with employers on behalf of individuals
- Resume and cover letter development
- Workshops, including interviewing skills and networking
- Local labor market information
- Information on hiring events and job fairs
- WIOA Training (Adult, Dislocated Worker and Youth Programs)

- JVSG Referrals (Veteran Programs)
- Referrals to community partners
- Rapid Response events
- TRADE activities

As mentioned in previous answers, when a UI claimant enters a One-Stop Career Center, an initial assessment process begins to determine what services and programs the individual will need in order to successfully become re-employed. The claimant is provided with an introduction and overview to all of the resources available within the One-Stop Career Center, including WIOA training opportunities, adult technical education offerings, college course listings, adult basic education, universal classes and Vermont Student Assistance Corporation (VSAC) for additional tuition assistance.

Upon completion of initial assessment, claimants are referred to specific program case managers and community partners for eligibility determinations, more information and potential enrollment.

One-Stop partners working collaboratively in the referral process to facilitate smooth transition, dual enrollments and avoidance of duplication of services.

E. AGRICULTURAL OUTREACH PLAN (AOP). EACH STATE AGENCY MUST DEVELOP AN AOP EVERY FOUR YEARS AS PART OF THE UNIFIED OR COMBINED STATE PLAN REQUIRED UNDER SECTIONS 102 OR 103 OF WIOA. THE AOP MUST INCLUDE AN ASSESSMENT OF NEED. AN ASSESSMENT NEED DESCRIBES THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

1. ASSESSMENT OF NEED. PROVIDE AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

Agriculture has long been an important part of Vermont's economy. The industry has a tremendous direct and indirect economic impact on the State. Some of Vermont's top commodities are: dairy, maple syrup, apples, assorted field crops, and strawberries. The majority of agricultural activity continues to be from small family farm producers.

Most agricultural workers in Vermont come from the local communities and return to their permanent residence in the same day. For the few hundred MSFWs that live and work in Vermont during a season, the primary challenge they face is transportation. Vermont has work to be done to create and strengthen relationships with other state agencies, non-profit and private organizations such as the Northeast Organization Farming Association of Vermont (NOFA), Migrant Justice Organization, the University of Vermont Extension Service, and the Vermont Sustainable Jobs Fund to develop a more complete and comprehensive outreach plan into both the employer and farmworker populations in Vermont. These relationships will provide the basis for reaching out to farmworkers to assess and address their employment, training, and housing needs in the future.

2. AN ASSESSMENT OF THE AGRICULTURAL ACTIVITY IN THE STATE MEANS: 1) IDENTIFYING THE TOP FIVE LABOR-INTENSIVE CROPS, THE MONTHS OF HEAVY ACTIVITY, AND THE

GEOGRAPHIC AREA OF PRIME ACTIVITY; 2) SUMMARIZE THE AGRICULTURAL EMPLOYERS' NEEDS IN THE STATE (I.E. ARE THEY PREDOMINANTLY HIRING LOCAL OR FOREIGN WORKERS, ARE THEY EXPRESSING THAT THERE IS A SCARCITY IN THE AGRICULTURAL WORKFORCE); AND 3) IDENTIFYING ANY ECONOMIC, NATURAL, OR OTHER FACTORS THAT ARE AFFECTING AGRICULTURE IN THE STATE OR ANY PROJECTED FACTORS THAT WILL AFFECT AGRICULTURE IN THE STATE

Agricultural activity in the state has not changed significantly from the previous years. The top five labor-intensive crops are hay, vegetables, apples, strawberries, and raspberries. The months of heavy activity are June - October and the geographic areas of prime activity are Franklin, Addison, Orleans, Windsor, and Rutland counties.

Agricultural employers are primarily hiring locally, but still face significant labor force shortages. Vermont, overall, has seen a labor force decline over the last decade and our aging workforce does not yield as many able-bodied agricultural laborers as it once did. There has been an increase in interest and need for foreign labor in recent years. As the State's policies continue to support small, diversified farms, local economies, and value-added food products, there will continue to be a need for year-round and seasonal agricultural workers.

3. AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS MEANS SUMMARIZING MIGRANT AND SEASONAL FARM WORKER (MSFW) CHARACTERISTICS (INCLUDING IF THEY ARE PREDOMINANTLY FROM CERTAIN COUNTRIES, WHAT LANGUAGE(S) THEY SPEAK, THE APPROXIMATE NUMBER OF MSFWS IN THE STATE DURING PEAK SEASON AND DURING LOW SEASON, AND WHETHER THEY TEND TO BE MIGRANT, SEASONAL, OR YEAR-ROUND FARMWORKERS). THIS INFORMATION MUST TAKE INTO ACCOUNT DATA SUPPLIED BY WIOA SECTION 167 NATIONAL FARMWORKER JOBS PROGRAM (NFJP) GRANTEES, OTHER MSFW ORGANIZATIONS, EMPLOYER ORGANIZATIONS, AND STATE AND/OR FEDERAL AGENCY DATA SOURCES SUCH AS THE U.S. DEPARTMENT OF AGRICULTURE AND THE U.S. DEPARTMENT OF LABOR (DOL) EMPLOYMENT AND TRAINING ADMINISTRATION

Vermont primarily sees MSFW's from Jamaica and Puerto Rico responding to H-2A job orders. The majority of identified crop workers (about 530). The number of domestic MSFWs in Vermont is difficult to estimate and could be understated as some of these workers cannot be located or may be incorrectly self-reported in the Vermont MIS Vermont JobLink. Some of the workers may meet the guidelines of seasonal farm workers, the number of which is anticipated to be approximately 100 or less. This takes into account information from PathStone, the National Farmworkers Jobs Program (NFJP), Workforce Innovation and Opportunity Act (WIOA) section 167 grantee. During peak season (June - October) there are roughly 330 MSFWs, while there are approximately 200 MSFWs. The majority of MSFWs speak English, with Spanish being the second and Jamaican Creole being the third most commonly used language. The majority of the MSFWs in Vermont are seasonal workers, with only a few dozen identified as migrant.

VDOL's One-Stop Career Center staff will conduct MSFW outreach and ensure that employment and training services are being delivered appropriately. The staff will focus on agriculture-heavy counties including Franklin, Addison, Rutland, Windsor, and Orleans. MSFW outreach will also be conducted in partnership by the state's WIOA 167 provider, Pathstone.

Local VDOL staff will conduct field visits to the working and living areas of MSFWs to provide employment services. An explanation of workforce services available to MSFWs, including the availability of referrals to agricultural and nonagricultural employment, training, and supportive services, and other job development services will be provided in a language readily

understood by them. When known, staff and or staff interpreters will be prepared to conduct outreach in the MSFW's native language.

Each outreach worker will maintain a log of daily contacts which will include the number of MSFWs contacted and details of assistance provided. The name of the individual contacted will be recorded in all cases where an application for work is taken, a referral to a job is made, and/or a complaint is filed. Detailed reports relative to the number of MSFWs, their office of registration, and services provided can be retrieved through the reporting section of VJL after an account is established for the worker.

Staff will also meet and work with community-based organizations and other employment-related agencies to coordinate other services to MSFWs. When necessary, staff will raise issues as appropriate to ensure that the development of new systems/strategies for service delivery among all partners includes meeting the needs of MSFW customers.

Outreach activities will be conducted proportionate to the number of MSFWs identified statewide. The VDOL estimates that the number of days of outreach contact, including visits to working, living, and gathering areas, will range from 80 to 100 days during peak season, and about 40 days during the remainder of the year. The number of days of outreach will be distributed appropriately according to the crop activity throughout the program year. For example, from September to November, visits will most likely be concentrated on apple orchards. June through August will be concentrated on berry farms, and August through October will be on vegetable farms.

Vermont is currently not classified as a significant MSFW state. Formerly, the SMA conducted all outreach activities and efforts. VDOL is shifting the delivery of outreach and employment services to the field staff, focusing in Franklin, Addison, Bennington, Rutland, Orange, Lamoille, Windsor, and Orleans counties. The SMA will attend various training conferences to become more familiar with best practices and assist in disseminating information on services available through the WIOA One-Stop Network, the complaint system, and information on the entities serving MSFWs in Vermont. Outreach staff will provide information on farmworker rights. Training has been and will continue to be provided to all VDOL One-Stop Career staff through the state by the SMA. The most recent statewide training sessions were carried out in September, 2018. The training targets both new and existing staff and provides programmatic updates and best practices. Staff training is recorded and is available to staff statewide. The VDOL will also work with partner organizations to inform them of MSFWs in the area and programs and services provided.

Outreach workers will be familiar with working and living conditions of the migrant and seasonal farm workers. If they observe, have reason to believe, or are in receipt of information regarding an apparent violation of employment related laws or employment service regulations by an employer, the outreach worker shall document the apparent violation and provide the information to the corresponding VDOL Regional Manager. They will provide assistance in the preparation of job service and non-job service complaints. Complaints will be recorded using the Employment Services (ES) Complaint Log and resolved using the ES Complaint System.

Outreach workers will be trained on core programs along with specialty trainings designed to help them in their specific jobs. Training will be provided in the areas of resume development, customer service, sales, and career development facilitator. The current outreach worker is already knowledgeable in the appropriate circumstances for referral of an MSFW to unemployment insurance. Training will be provided to any potential new outreach workers as

necessary to assist outreach workers in assessing when an MSFW ought to be referred to unemployment insurance for assistance and an eligibility determination.

Professional development opportunities are available for the VDOL outreach staff such as resume writing certification, career development training, labor market information training, and career pathway growth awareness. The VDOL is focused on improving and standardizing professional development opportunities for all staff in providing basic and individualized career services and employment support.

The VDOL has developed an MOU with Pathstone, the JFJP grantee, to address the coordination of outreach efforts in Vermont. The MOU sets out responsibilities to ensure most effective and efficient utilization of US DOL funds for the administration and operation of the Migrant Seasonal Farm Worker outreach programs. It describes that both organizations will coordinate outreach, require participants to be registered in VJL, refer eligible participants in appropriate WIOA One-Stop partner programs, share information and collaborate on special projects, training, and professional development activities.

The VDOL SMA will coordinate in person visits with Pathstone at least annually. Further, the VDOL leadership will support public and private community service agencies and MSFW groups by attending meetings, providing services, making resources available, and helping in other ways when requested. In addition, staff will continue to foster cooperation with other governmental and community-based organizations in providing information and promoting the MSFW program at appropriate meetings and through other avenues.

5. SERVICES PROVIDED TO FARMWORKERS AND AGRICULTURAL EMPLOYERS THROUGH THE ONE-STOP DELIVERY SYSTEM

Outreach workers will inform MSFWs of and refer them to verified employment opportunities and the Employment Services Complaint System. Outreach workers will encourage the MSFWs to utilize the VDOL One-Stop Career Centers to obtain the full range of employment services; however, on—site assistance will also be offered in the preparation of applications, on a limited basis.

Outreach workers will refer individual MSFWs, or family members, who may be eligible, to WIOA and supportive services at VDOL One-Stop Career Centers or other appropriate agencies. Further, the outreach workers will make follow-up contacts as necessary and appropriate to provide, to the maximum extent possible, the foregoing described services. MSFWs also will be shown how to use VJL, an internet-based workforce data management and service delivery system. Through VJL, MSFWs can establish a labor exchange account, develop a resume, and apply for jobs.

In the event that a lack of English language skills is identified as a barrier to services, and/or training, translation services will be offered through the VDOL One-Stop Career Centers. Pathstone is also a partner of the WIOA One-Stop network and can provide additional services to migrants and seasonal farm workers. In the coming program years, efforts will be initiated to establish closer cooperation and service collaboration with partners such as Pathstone, to ensure greater alignment of intensive and training services to MSFWs.

Outreach to agricultural employers is an on-going process. This is critical to maintaining interpersonal contact with the employers. Examples of services provided to agricultural employers by the VDOL staff include:

- Local, regional and national recruitment assistance

- Screening job applicants
- Connection and coordination of services with government and community agencies
- Technical assistance with foreign labor certification
- Soliciting and filling job orders
- Disseminating information on farm-related rules and regulations
- Conducting prevailing wage and prevailing practice surveys
- Providing pre-occupancy inspections of migrant housing as required for H-2A applications
- Referring complaints to proper enforcement agencies
- Assisting employers in obtaining work-related posters and notices
- Participating in agricultural related meetings and notifying farmers of these meetings

Many contacts with agricultural employers are made as a result of referrals from other agencies such as the Vermont Agency of Agriculture or other farm associations, as well as by word of mouth from other workers or farmers. Continued efforts will be made in the upcoming year to increase the market penetration of agricultural employers.

The most basic service provided to agricultural employers is the filling of job openings. Job orders from agricultural employers are entered in VJL and qualified candidates are referred. All H-2A order users are mandated to take all qualified United States referrals through the workforce system. In addition, training is being provided to the VDOL One-Stop Career Center staff throughout the state to encourage local domestic US workers to apply for H-2A jobs.

The VDOL will educate farmworkers about the complaint system through in-person visits to farms by staff, and by posting a poster on-site that informs readers of the complaint system. Staff will also continue to make partner organizations aware of the complaint system during meetings and formal contacts.

The VDOL published a Vermont farmworker wage, hour, and housing factsheet in collaboration with several partner organizations (available on the VDOL's website in both English and Spanish):

https://labor.vermont.gov/sites/labor/files/doc_library/Vermont-Farm-Labor-Wage-and-Hour-and-Housing-Fact-Sheet.pdf

https://labor.vermont.gov/sites/labor/files/doc_library/Vermont-Farm-Labor-Wage-and-Hour-and-Housing-Fact-Sheet.pdf

The VDOL recognizes the importance of the agricultural industry in Vermont and has devoted resources to meet the labor needs of agricultural employers and MSFWs. VDOL will provide information about the Agricultural Recruitment System for US workers on its website and make information available about how to develop and place job orders - and how to work with VDOL to recruit for the positions locally, statewide, nationally, and, if necessary, through the foreign labor program.

A number of employment-related services for businesses are available at the local One-Stop Career Centers. These include:

- Posting of jobs
- Assistance with small and large-scale recruitment activities
- Help planning job fairs
- Testing and assessment of job candidates
- Labor market information
- Information on training grants and tax credits

The VDOL has recently reorganized its Workforce Development Division to include a manager of Business Services. Over the coming year, this individual will become trained in the MSFW program and include greater outreach to agricultural employers.

Additionally, services available to farmers and farmworkers are available online at www.labor.vermont.gov and the Vermont Job Link website at www.vermontjoblink.com. These websites include useful phone numbers and services provided to both farmworkers and agricultural employers.

6. OTHER REQUIREMENTS

A. COLLABORATION

The VDOL executed an MOU with Pathstone Corporation, Vermont's NFJP grantee in 2018. The VDOL will be pursuing an MOU with the Agency of Agriculture in 2020 to conduct housing inspections for H-2A workers. That MOU may also include MSFW outreach components.

In addition, staff will continue to foster cooperation with other governmental and community-based organizations in providing information and promoting the MSFW program at appropriate meetings and through other avenues.

B. REVIEW AND PUBLIC COMMENT

The following organizations were contacted for comment on the AOP:

- Rural Vermont
- Pathstone Corporation
- Vermont Agency of Agriculture, Food & Markets
- University of Vermont Extension Service
- Northeast Organic Farming Association of Vermont
- Vermont Farm Bureau
- Vermont Vegetable & Berry Growers Association
- Vermont Sustainable Jobs Fund
- Migrant Justice

No comments were received.

C. DATA ASSESSMENT

Statewide assessments have shown an opportunity to increase services directly provided to migrants. The state has had limited success in referrals to employment, referrals to supportive services and MSFWs placed in jobs. Referrals for career guidance, job development, and to staff assisted services and placement in non-agricultural jobs is an area that could be improved through quarterly monitoring of performance. If individuals identify themselves as MSFWs during the online registration process on Vermont Job Link, their profiles will be flagged for follow up so that they may be notified of services available in the One-Stop Career Centers.

D. ASSESSMENT OF PROGRESS

Vermont has no significant offices and very few workers who meet the definition for MSFWs. In 2018, the VDOL updated its MOU with Pathstone, reconnecting our efforts to support MSFWs. In 2019, the VDOL experienced significant leadership changes at the federal, state, and program level, and lost some subject matter expertise in working with MSFWs and conducting program outreach. The VDOL remains committed to ensuring that central office and field staff will rebuild this expertise and, in reorganizing staff functions, will make this a priority. Additionally, the VDOL will strengthen relationships with agricultural and farmworker organizations to educate those who might interact with MSFWs about the services available through the One-Stop American Job Center network and the VDOL directly.

E. STATE MONITOR ADVOCATE

In accordance with 20 CFR § 653.108(g)(4), the State Monitor Advocate has reviewed and approved the Agricultural Outreach Plan included in Vermont's Unified State plan.

WAGNER-PEYSER ASSURANCES

The State Plan must include	Include
1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));	Yes
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	Yes
3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and	Yes
4. SWA officials: 1) Initiate the discontinuation of services; 2) Make the determination that services need to be discontinued; 3) Make the determination to reinstate services after the services have been discontinued; 4) Approve corrective action plans; 5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days; 6) Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and	Yes

The State Plan must include	Include
7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.	

WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	62.6%	62.6%	63.5%	63.5%
Employment (Fourth Quarter After Exit)	57.1%	57.1%	58.0%	58.0%
Median Earnings (Second Quarter After Exit)	$5,035	$5,035	$5,180	$5,180
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAMS

A. ALIGNING OF CONTENT STANDARDS

The Vermont AOE has committed to the implementation of college and career readiness standards for all students. This means the adoption of the Common Core State Standards for its K-12 public schools, and the College and Career Readiness Standards for Adult Education (CCRS). The CCRS is an exact subset of the Common Core State Standards that has been winnowed and validated for applicability to adult learners by expert panels commissioned at the national level. Both documents define three "key advances" or "instructional shifts" each for the broad content areas of English language arts/literacy and mathematics for adults functioning from the most basic level through high school completion. English language arts/literacy standards specify skills in reading, writing, speaking and listening, language, and reading foundational skills.

By virtue of the origin of the CCRS in Common Core State Standards, the standards are aligned.

Vermont's Flexible Pathways Initiative includes Dual Enrollment, Early College, Career and Technical Education, Work-Based Learning, Expanded Learning Opportunities, and the High School Completion Program (HSCP). This statute, "Flexible Pathways to Secondary School Completion," also requires secondary schools serving publicly-funded students to create Personalized Learning Plans (PLPs) for all students in grades 7-12, and flexible pathways to

secondary school completion which can include opportunities for learning that fall outside of a traditional school setting.

The HSCP is a potential component of a flexible pathway for any Vermont student who is at least 16 years old, who has not received a high school diploma, and who may or may not be enrolled in a public or approved independent school. The majority of students (approximately 86% in 2018-2019) who participate in the HSCP are unenrolled from school. Adult Education and Literacy providers are responsible for developing a personalized learning plan with the student and the assigned high school that will meet the graduation requirements of the high school in the student's district of residence.

Additionally, Vermont's State Plan for the Every Student Succeeds Act (ESSA) aligns with adult education in several ways. Career and College Readiness indicators will be used to measure academic proficiency, as well as graduation rates, English language proficiency, and standards in English language arts and mathematics. Of special note are the career and college ready indicators that will be used as part of ESSA, which are also outcomes tracked under WIOA, including Industry Recognized Credentials.

ESSA requires that States hold schools accountable for the graduation rate using the federal definition of a 4-year cohort calculation. Vermont also measures the percentage of students graduating within a 6-year extended graduation rate. In 2014, the Vermont State Board of Education adopted the Education Quality Standards, which call for a proficiency-based graduation requirement that emphasizes mastery rather than time as the critical factor in determining if a student has met career and college ready expectations. As such, students are encouraged to pursue flexible pathways that enrich their learning and better prepare them for positive post-secondary outcomes. Consistent with this legislation and with adult education, Vermont places greater value on completion of secondary school with mastery of critical skills than completion within a traditional timeframe.

B. LOCAL ACTIVITIES

ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

The Vermont AOE runs competitions for its funds under WIOA Title II using the procedures established by the State of Vermont for awarding grants or contracts, and the guidance available in the final WIOA regulations. The funds are awarded to eligible providers of services for two or more years for the purpose of establishing AEL and operating programs that provide some or all of the WIOA Title II activities as warranted by demographic data within the service area of one or more particular counties. In so doing, AEL programs function as a required and valued partner in the regional One-Stop Center (also known in Vermont as local American Job Centers or Career Resource Centers), including functioning as a partner in the development of regionally-relevant career pathways that reflect employer engagement. Career pathways will have specific entrance points for lower skilled adults, but will also map out additional entrance and exit points (e.g., postsecondary education and job opportunities) for adult learners. A Memorandum of Understanding (MOU) signed between the operator of the one-stop centers and each of its required partners was executed in July of 2017 and updated in July of 2018. Adult education programs will adhere to the MOU established between the One-Stop Center operator (Vermont DOL) and the Vermont AOE.

State-required local activities will include the following:

- Adult Education;

- Literacy;
- English language acquisition (ESL) activities;
- Integrated English Literacy and Civics Education (IELCE);
- Workforce preparation activities; and
- Integrated Education and Training that provides AEL activities concurrently and contextually with both workforce preparation activities and workforce training for a specific occupation or occupational cluster, and is for the purpose of educational and career advancement.

Other local activities may include:

- Workplace AEL activities or
- Family literacy activities.

As required by WIOA Title I B, local AEL activities proposals are reviewed by the State Workforce Development Board (SWDB) for alignment to the State Plan using a procedure established by the State Workforce Development Board (SWDB) and the Vermont AOE. Because Vermont operates as a single service area in its Workforce Development Board structure, local proposals are reviewed by the SWDB for alignment. A sub-committee of the SWDB is trained by AOE staff on Title II requirements and activities to inform committee members' review of applications.

The Vermont AOE uses the 13 considerations for awarding grants or contracts as described in WIOA as pertinent to the proposed scope of work:

1. the degree to which the provider would be responsive to regional needs of the workforce and serving individuals most in need of AEL activities;
2. the ability of the provider to serve individuals with disabilities, including learning disabilities;
3. past effectiveness of the provider in improving literacy of individuals especially who have low levels of literacy, and past effectiveness in meeting established performance targets;
4. the extent of alignment between proposed services and the regional strategies and goals of the workforce development system, and alignment with the services of the other one-stop partners;
5. whether the provider's program is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains, and uses instructional practices that include the essential components of reading instruction;
6. whether the provider's activities, including reading, writing, speaking, math and English language acquisition instruction are based on best practices based on most rigorous research available and appropriate;
7. whether the provider's activities effectively use technology, services, and delivery systems, possibly to include distance education in a manner sufficient to increase the

amount and quality of learning and how such technology, services, and systems lead to improved performance;

8. whether the provider's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship;
9. whether the provider's activities are delivered by well-trained instructors and program staff who access high quality professional development opportunities, including via the Literacy Information and Communication System (LINCS) and potentially other electronic means;
10. whether the provider's activities, for the development of career pathways, coordinate with other available education, training, and social service resources in the community and other one-stop center partners;
11. whether the provider's activities offer flexible schedules and coordination with Federal, state, and local support services that are necessary to enable individuals, including individuals with disabilities and other special needs, to attend and complete programs;
12. whether the provider maintains a high-quality information system which has the capacity to report measurable participant outcomes and to monitor program performance.
13. whether the local areas served by the provider have a demonstrated need for additional English language acquisition and civics education programs.

In addition, local activities will include career services identified in Program Memorandum OCTAE 17-2, Table C and the below:

- Systematic outreach and recruitment to target populations.
- Intake and enrollment procedures that welcome learners and establish a strong commitment, support, and clear expectations for each learner's AEL participation, making full use of education plans and enabling learners to make fully informed decisions regarding program options.
- Basic skills Adult Basic Education (ABE), Adult Secondary Education (ASE), and English Language Acquisition/English for Speakers of other Languages (ESL) instruction that is standards-based and:
    - addresses the transferable skills as described in Vermont's Education Quality Standards;
    - integrates the development of core literacy skills with transferable skills;
    - engages learners for continuous participation;
    - engages learners in ongoing assessment and documentation of their skill gains;
    - makes maximum use of small learning communities as appropriate; and
    - uses varied instructional approaches in response to varied learning abilities, styles, and preferences.

- Student skill assessments and credentials through:
    - State approved standardized testing in reading, writing, mathematics, and ESL for baseline and post-assessment of skill levels;
    - formal and informal assessments used by teachers and learners during instruction for ongoing guidance and documentation of learning;
    - official GED testing in compliance with GEDTS regulations and state policy for earning a GED Certificate; and,
    - High School Completion Program in compliance with state statute, policy and structures for earning a high school diploma.
- Guidance, coaching, and support services that support student persistence and progress, including such support for postsecondary transitions.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

If the State awards funds for Corrections Education, the State will ensure that no more than the 20% of the eligible funds awarded under WIOA statute will be allocated. Any funds allocated under section 225 will be tracked according to the budget submitted by the awarded local provider and approved by Vermont AOE. The local provider will be required to report on individuals served using funds under section 225 through the AEL database system. In addition, AOE report requirements will monitor all local providers' expenditures of AEL grant funds including those awarded for Corrections Education, if any.

Currently, it is not expected that the State will award funds under Title II for Corrections Education for the following reason: incarcerated individuals who do not have a diploma and/or are basic skills deficient and/or are English language learners, are enrolled in the Community High School (CHSVT) of Vermont and therefore, do not meet the definition of eligible individuals under Title II.

Eligible individual means an individual who is at least 16 years of age; is not enrolled in school or required to be enrolled in secondary school under State law; and who is basic skills deficient; does not have a secondary school diploma or its recognized equivalent, and has not achieved an equivalent level of education; or is an English language learner.

The CHSVT is operated and regulated by the Vermont Department of Corrections (DOC). It is an independent school approved by the Vermont State Board of Education and operates in service of its learners at multiple sites around the state. The Community High School serves all incarcerated persons under the custody of the Commissioner of Corrections who meet their eligibility definition. Under Vermont law, incarcerated individuals under the age of 23 who do not have a diploma are required to be enrolled at CHSVT upon admission into the correctional facility.

Referrals are routinely made to local AEL providers as learners transition from CHSVT back to the community. DOC personnel, including probation officers and CHSVT staff, refer adults re-entering to local AEL providers. At that point of engagement with the local AEL provider, the students are eligible individuals and will receive the range of services afforded any adult learner.

At the State level, core partners have been participating with other one-stop partners in the Adult Reentry and Employment Strategic (ARES) Planning Grant's Cross-Disciplinary Workgroup, which is identifying how to improve job readiness for moderate to high-risk

offenders re-entering the community. The group has conducted an assessment of services for this population and documented assessments across systems used to determine basic skill levels, career interests, readiness for specific industries, and psychosocial readiness for employment. Members of this group have committed to continue to identify strategies to better serve adults re-entering, whether or not further grant funds are obtained to financially support implementation of statewide strategies to integrate service delivery to this population.

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

Integrated English Literacy and Civics Education (IELCE) is defined as "education services provided to English language learners who are adults, including professionals with degrees and credentials in their native countries, that enables such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. Such services shall include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation and may include workforce training."

IELCE funds are allocated to States by the federal government using a model that takes into account need for services that references adult English language learner demographics for a state and immigration patterns. It is anticipated that the Vermont AOE will receive the established minimum as it historically has, $60,000 per year; this amount is distributed by the Vermont AOE in one or more grants or contracts to provide IELCE services through an open competition for funding.

The Vermont AOE will request formal proposals from local service providers eligible for funding under WIOA Title II to provide the services of IELCE with a priority focus on serving communities with significant concentrations of adult English language learners, and operating in partnership with established programs so as to supplement and not supplant existing efforts while accomplishing the purpose of IELCE.

IELCE programs will be delivered in combination with integrated education and training (IET) activities. Grantees will collaborate with local employers, Career Technical Education (CTE) centers, WIOA Title I programs and/or others to develop and implement IET programs. In addition, grantees will explore developing IET programs that are also pre-apprenticeship programs in order to prepare students to succeed in Vermont's Registered Apprenticeship programs, which has sponsors representing in-demand industries including line maintenance, electrical, childcare, plumbing, carpentry, and others.

IELCE will not be provided in every county or community through this funding source. The Request for Proposals (RFP) will be shaped by an in-state demographic data analysis, environmental scan of existing programs and funding sources outside of WIOA Title II, and ability to work with partners to accomplish the purposes of IELCE, as demonstrated in the funding competition.

The Vermont AOE will comply with Subpart C by requesting formal proposals to provide IELCE services from eligible providers under WIOA Title II. As described above, eligible providers may submit proposals as part of a single grant application in response to the funding opportunity that will compete all Title II funds under sections 225, 231, and 243. The funding opportunity will be widely announced as an open competition for eligible providers as previously described.

No more than four awards will be made to serve AOE identified geographic regions with significant concentrations of adult English language learners. Vermont does not have a large population of English language learners, but has geographic concentrations of refugee

resettlement. AOE will use demographics and data from the Vermont Refugee Resettlement Program, census data, and other relevant sources in order to determine the geographic regions that are positioned to meet the intended goals as set forth in section 243 (c) IELCE funds. The grant application will specify the geographic regions to be served by IELCE funds.

In consideration of proposals for Integrated English Language and Civics Education funds, the Vermont AOE will apply the 13 considerations specified in section 231(e) and review whether the program makes use of highly trained instructors including those who hold degrees, credentials, or coursework in Teaching English to Speakers of Other Languages (TESOL).

IELCE programs will prepare adults who are English language learners for and place such adults in unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency. Grantees will use the state plan and local workforce system data to identify in-demand industries. They will collaborate with local employers, in coordination with the one-stop network, in these industries to identify the specific skills that will be addressed in the workforce training component of the IET programs designed for the IELCE participants. Whenever possible, grantees will obtain commitments from employers to hire IELCE participants upon completion of their training and studies.

The risk of overwhelming employers with contacts from multiple "helpful" one-stop partners dictates the need for coordination with local regional core partners in offering services to employers and in identifying job placement opportunities for students. AEL providers participate in local Creative Workforce Solutions (CWS) groups hosted by the Division of Vocational Rehabilitation. These groups share information about employers who are hiring and what skills are needed. Though the CWS groups focus on placing disabled workers in gainful employment, the connections established and information disseminated through these regular meetings with local one-stop partners benefits all customers and students. Other services that facilitate access to employment are coordinated in response to the in-demand local industries. AEL providers have also historically engaged in state-level collaboratives for Work-Based Learning, which provides opportunities for sharing of best practices, alignment of strategies and resources and coordination across systems.

As a small state, Vermont has one workforce development board that is responsible for meeting WIOA requirements and one Federally-recognized One-Stop Center. The One-Stop Center is located in Burlington, the center of the most populous region of the state. Regional workforce development systems include the one-stop partner convenings, and local workforce investment boards (some are state-recognized), secondary and adult career and technical education centers, local colleges, the Vermont Refugee Resettlement program, and others. Local AEL providers will design IELCE programs to integrate with the local workforce development system and its functions to carry out IELCE activities, including IET programs. This will be accomplished through participation in meetings and events of the local workforce development system and ongoing communication and collaboration with the one-stop partner network.

E. STATE LEADERSHIP

1. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT THE REQUIRED STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA

State Leadership activity requirements are well-defined in WIOA Title II Section 223. The funds are intended to be used to develop or enhance the adult education system in Vermont. The Vermont AOE will be responsible for using the modest funds allotted to carry out the required State Leadership activities as follows:

- Align AEL activities with other core partners and one-stop partners, to implement the strategy identified in the State Plan. Achieving this alignment requires communication and working in concert with our partners at the Vermont DOL and the Vermont DVR at the state level in light of our common strategic vision for the workforce development system. In particular, the workforce development system goal of "seamless coordination amongst the workforce development system partners" requires joint cross-training of one-stop center staff for common intake and joint referral processes, with the AEL contribution to this effort considered a State Leadership activity. This includes:
    - support for cross- core-program efforts on the development of career pathways that provide access to employment and training services for individuals in AEL activities, and
    - support for promoting an understanding in the field of the development and use of Integrated Education and Training models in partnership with employers.
- Provide and/or oversee high quality professional development programs designed to improve instruction, including:
    - the essential components of reading instruction through an evidence-based reading training such as Student Achievement in Reading (STAR) or similar;
    - instruction related to the specific needs of adult learners as determined by a needs assessment of the field; and
    - dissemination of information about promising practices related to such professional development programs and setting expectations for AEL staff participation.
- Provide technical assistance to AEL providers including:
    - dissemination of instructional and programmatic practices based on the most rigorous or scientifically valid research available and appropriate, in reading, writing, speaking, mathematics, English language acquisition programs (ESOL), distance education, and staff training;
    - support for the role of adult education providers as one-stop partners to provide access to employment, education, and training services;
    - assistance in the use of technology, including for staff training, to adult education providers, especially the use of technology to improve system efficiencies.
- Monitor and evaluate the quality of, and the improvement in, AEL activities and disseminate information about models and proven or promising practices within Vermont.

The Vermont Agency of Education (AOE) will ensure to the fullest extent possible equitable access to and participation in its State-level activities, as required in Section 427 of the General Education Provisions Act, including the technical assistance provided to local providers and professional development opportunities provided for local provider staff.

Technical assistance is produced in compliance with ADA regulations and posted materials are Section 508 compliant. The AOE does not discriminate on the basis of gender, race, national origin, color, disability, age or any other status or classification protected by federal, state or law

in its education and AEL leadership activities. It provides reasonable and appropriate accommodations in response to the needs of provider staff.

2. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT PERMISSIBLE STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA, IF APPLICABLE

The Vermont AOE will be responsible to carry out permissible State Leadership activities as follows as funding permits:

- Maintaining active membership in the New England Literacy Resource Center, as well as active partnership in the Literacy Information and Communication System (LINCS) in order to foster collaboration amongst other agencies and minimize duplication of effort;
- The development and implementation of a distance education policy, including professional development to support the use of instructional technology;
- The provision of assistance to AEL providers in meeting the State-adjusted levels of performance, commonly known as performance targets, via technical assistance, desk monitoring, ongoing communication, site visits and targeted professional development and program improvement activities;
- Integration of literacy and English language instruction with workforce training, including promoting linkages with employers; and,
- Continuing our work on standards implementation, including the use of aligned and approved assessments when available, so that students are prepared for college and careers as a result of their participation in AEL.

F. ASSESSING QUALITY

In partnership with adult education providers, the Vermont AOE will continue to collect data from its adult education providers pertaining to student demographics, outcomes, and program performance in a relational, web-based database. The Vermont AOE tracks and reports follow-up performance measures relating to employment and post-secondary entrance through a data sharing Memorandum of Understanding with the core partners. Of notable importance is increasing the number of low-skilled students served in AEL activities in Vermont, and helping students achieve measurable skill gains particularly at the lower skill levels.

To be accountable for the public investment in the learners that we serve, to communicate our efforts more transparently, and to be able to acknowledge our strengths and successes, the Vermont AOE will establish a particular, simplified report. In plain language it will show the number of students served, the distribution of levels and skill gains, results against the common performance indicators, and other basic information determined to be relevant to assessing quality. Vermont AOE will continue its on-going and regular (quarterly) communication about program performance with adult education providers with achieving target levels of performance as a primary goal. The annual performance targets are anticipated to be set in a climate of realistic continuous program improvement. Program performance that is on target will be acknowledged and celebrated. Program performance that does not meet targets will receive the timely attention of the Vermont AOE. Targeted technical assistance and further training and support will be delivered to AEL providers with demonstrated need. Those requiring intensive supports may also receive improvement plans.

Professional development activities are planned in response to provider need and performance. Annual needs assessments inform the approach to offer opportunities that address identified

gaps in knowledge and skills. Written evaluations collected from participants will be used to assess quality of workshops and trainings and to adjust subsequent professional development activities. The AEL information management system is utilized to monitor changes in student outcomes and whether these changes are correlated with professional development activities. Evaluation tools will also include classroom observations and instructor anecdotes of experiences with integration of new strategies.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS

The State Plan must include	Include
1. The plan is submitted by the State agency that is eligible to submit the plan;	Yes
2. The State agency has authority under State law to perform the functions of the State under the program;	Yes
3. The State legally may carry out each provision of the plan;	Yes
4. All provisions of the plan are consistent with State law;	Yes
5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;	Yes
6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;	Yes
7. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and	Yes
8. The plan is the basis for State operation and administration of the program;	Yes

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM ASSURANCES

The State Plan must include	Include
1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);	Yes
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;	Yes
3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;	Yes
4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.	Yes
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy	Yes

The State Plan must include	Include
American Act (41 U.S.C. 8301-8303).	

AUTHORIZING OR CERTIFYING REPRESENTATIVE

APPLICANT'S ORGANIZATION	**Enter information in this column**
Vermont Agency of Education	
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	**Enter information in this column**
Heather	
Bouchey	
Deputy Secretary of Education	
Heather.Bouchey@vermont.gov	

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

Vermont remains committed to providing students equitable access to and participation in educational programs in accordance with state and federal civil rights protections, including section 427 of the General Education Provisions Act (GEPA). Section 427 of GEPA aligns with Vermont Agency of Education's (AOE) commitment to ensure all students are provided a high-quality education.

AOE will ensure to the fullest extent possible equitable access to, participation in, and appropriate educational opportunities for all teachers and students with special needs. The AOE does not discriminate on the basis of gender, race, national origin, color, disability, age or any other status or classification protected by federal, state or law in its education and outreach activities. It provides reasonable and appropriate accommodations in response to the needs of its students and teachers.

In Vermont, all entities that carry out Adult Education and Literacy (AEL) activities must also comply with 9 V.S.A. § 4502 (2017), Public Accommodations, which provides the following purpose; "(a) An owner or operator of a place of public accommodation or an agent or employee of such owner or operator shall not, because of the race, creed, color, national origin, marital status, sex, sexual orientation, or gender identity of any person, refuse, withhold from, or deny to that person any of the accommodations, advantages, facilities, and privileges of the place of public accommodation."

Under 9 V.S.A § 4501(1), any "establishment, or other facility at which services, facilities, goods, privileges, advantages, benefits, or accommodations are offered to the general public" is defined as a place of public accommodation.

The AOE will identify whether barriers may prevent students, teachers, etc. from such access or participation in, federally-funded projects or activities and will take the necessary steps to overcome barriers to equitable access to all federally-funded programs. Such steps will include, but are not limited to:

1. Ensuring AEL provider compliance with section 427 of the GEPA for all federally funded programs and with state regulations regarding equity for both teachers and students. Example:

As a part of desk monitoring, the AOE will review disaggregated data to identify potential areas of concern or limited student access to program activities.

2. Ensuring AEL educational materials are accessible to individuals with disabilities and English learners (including translating material, when appropriate). Example: The AOE requires that students are co-enrolled with core partners as appropriate, including Vocational Rehabilitation, which provides access to Assistive Technology.

3. Providing professional development and technical assistance to ensure AEL students have equitable access to assessments and program services to address those needs from traditionally underrepresented populations including students with disabilities, English learners, and economically disadvantaged students. Example: Technical assistance is provided to AEL providers regarding access to consultation and services that best serve students experiencing multiple barriers to their education and to employment. Example: The AOE, per its assessment policy, requires that AEL providers assist students to apply for and access accommodations when taking assessments, as appropriate.

In accordance with section 427 of the GEPA, AOE will continue to ensure compliance with these regulations as it pertains to all locally developed educational programs, including those under WIOA, Title II.

ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	44.0%	44.0%	45.0%	45.0%
Employment (Fourth Quarter After Exit)	45.0%	45.0%	46.0%	46.0%
Median Earnings (Second Quarter After Exit)	$3,800	$3,800	$4,000	$4,000
Credential Attainment Rate	27.0%	27.0%	28.0%	28.0%
Measurable Skill Gains	39.0%	39.5%	40.0%	40.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (COMBINED OR GENERAL)

A. INPUT OF STATE REHABILITATION COUNCIL

1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF

CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;

The State Rehabilitation Council (SRC) and DVR continue to enjoy a collaborative working relationship. SRC members are invited to participate on various DVR planning and implementation committees. The DVR Director provides quarterly written and oral updates on programs, activities, and outcomes. In addition, DVR Program Managers, Regional Managers and field staff frequently make presentations to the full SRC and gather feedback and suggestions to improve services. The following is a summary of the SRC's activities taken directly from the 2019 SRC annual report. For more information on the VT SRC and a copy of this report go to www.VTSRC.org

Full SRC Report by Sarah Launderville, SRC Chair

It has been a pleasure to continue to serve as the SRC Chair for a second year. The majority of the work is completed at the committee level and you will see from the reports submitted that our council is engaged and continues to work towards a strong system of supporting individuals with disabilities in employment.

I'm so proud to be connected to the work of our council as we have so many dedicated council members focusing on VR programs. The volunteer time is appreciated as those hours go into questioning, exploring and advising VocRehab Vermont on the programs that support individuals with disabilities when returning to work.

Our council continues to grow and we focus on recruitment at all of the steering committee meetings ensuring that we have a strong membership that is a balance of people representing different areas which translates into differing opinions and rich conversations at our meetings.

On a personal note, I want to express my deep gratitude to the members of the SRC and to Vice Chair Brian Smith for filling in when I was unavailable for some time during the year. Finally, we will be saying goodbye to our Coordinator Debra L. Kobus. A behind the scenes, hard worker who keeps our council going. She will be greatly missed. We wish her all the very best in the future.

SRC Performance Review Committee Report by Marlena Hughes, PR Committee Chair

The Vermont State Rehabilitation Council's Performance Review Committee (PR) reviews, analyzes, and advises the Vermont Division of Vocational Rehabilitation (DVR) on its performance in fulfilling its mission and responsibilities.

This year the PR Committee reviewed and made recommendations on a broad range of topics affecting DVR's effectiveness, including the following:

Overview and Purpose of Casework Practices (Chapter 209) as a result of the Workforce Innovation and Opportunity Act (WIOA). PR reviewed the Federal indicators used to evaluate the DVR Program, development of IPEs (long-term career goals), and case service expenditures.

Loss of Re-Allotment Funding on DVR Services as a result of the Workforce Innovation and Opportunity Act (WIOA). WIOA created pre-employment transition services for high school students who were on 504 plans or had IEPs. WIOA required that chunks of funding be moved from one program area to another for direct services. PR engaged in a comprehensive discussion about DVR's consumer population changes since the enactment of WIOA.

Satisfaction Surveys of Employers, Consumers, Youth, and Partners. Performance Review gave feedback on the phone surveys being performed by Market Decisions Research who were

contracted by DVR in order to perform these surveys. Market Decisions Research presented the results of the Employers and Consumers Satisfaction Surveys to the full SRC at the October 3, 2019 SRC Annual Retreat.

- **Employer and Consumer Satisfaction Surveys** (phone) – PR reviewed the telephone survey, posing questions, suggestions were documented, and incentives for consumer and employer participation were discussed.

- **Youth Survey** (texting) **–** Will be developed utilizing the Youth Advocacy Committee and include school personnel.

- **Partner Survey** (online) – For partners including alternative programs.
  SAMHSA Grant Application: "Vermont Works for Recovery: an evidence based supported employment project." Performance Review reviewed the proposal. The grant requests revenue for Supported Employment Services for outpatient clients, including wrap around services through a pilot program with mental health services.

  The **AWARE Case Review Tool** was extensively explored by the PR Committee. This tool helps improve services through consistency, utilizing best practices, and reducing audit findings. Performance Review completed a comprehensive review with presentations, including counselor feedback.

  Central Case Review Presentation. PR reviewed the process for documentation of consumer barriers, strengths, and interests, along with defining assessment measures. Documentation of the consumer needs, progressive employment, education, and credentials go into AWARE. Reports from counselors indicate that the process is appreciated and helpful.

  Quality Assurance (QA). PR reviewed the QA process and its data from White River Junction's Central Office Case Review Summary. The process was shown to encourage clarification and decrease counselor anxiety around case review. It was shown that information, garnered through conversations during meetings with counselors, hone and inform the documentation process, ensuring relevant data gets entered into AWARE.

  <u>SRC Policy & Procedures Committee Report by Sherrie Brunelle, P&P Committee Chair</u>

  Fall is here and with it comes beautiful foliage, apples, pumpkins, and holiday gatherings. It is also a time to reflect on our accomplishments at the close of the 2019 fiscal year. As Chair of the Policies and Procedures (P&P) Committee, I am proud of the work that this small but dedicated group of VR staff and SRC members have accomplished.

  The work this group has done over the past fiscal year has resulted in significant changes to Chapter 204 (Case Closure) and Chapter 209 (Casework Practices) of the P&P Manual. These revisions provide counselors with clear guidance and resources as they make decisions in each consumer's case. A goal of the revisions is to ensure consistent practice by VR staff across the state. Another goal is to ensure that the rights of consumers are protected as they navigate the VR system. Training and guidance in the implementation of the changes is ongoing. So far, field staff and managers have been supportive of the changes. These revisions also will make navigating the VR process clearer for consumers seeking services.

  In addition to these major accomplishments, the P&P Committee made a short-term adjustment to Chapter 311 (Post-Secondary Education). The revision clarifies that short-term training focuses on training over a period of up to 2 years rather than 6 months. This adjustment brings the VR policy in line with current VR practice. The P&P Committee will undertake a more in-depth review of this Chapter in the coming year.

For the 3rd year, the P&P and VR staff have continued its efforts to revise and update Chapter 308 (Self-Employment). The task has been more challenging than initially thought. But everyone in the work group has diligently explored what other states are doing and considered whether we want to incorporate various elements from those states into the revised Chapter 308. We have a starting framework for what we think will work in VT. But more discussion, drafting, and vetting of proposed changes is ahead of us in the 2020 fiscal year.

It is hoped and expected that the work done this fiscal year will result in clearer, more consistent, and efficient use of VR's limited resources while improving outcomes for consumers wanting to enter, return, maintain, or advance in competitive, integrated employment.

Advocacy, Outreach and Education Committee Report by Sam Liss Chair

The Advocacy, Outreach and Education (AOE) Committee of the Vermont State Rehabilitation Council (SRC) has, per its charge, explored both State and Federal legislation relevant to employment issues for people with disabilities (PWD) and, most specifically, to the needs of Vocational Rehabilitation (VR). In addition, the committee has regularly discussed relevant event opportunities for SRC members. As appropriate topics arise, the Committee has also held thoughtful discussions to those ends.

The AOE Committee has also emphasized to its members the importance of up-to-date knowledge of issues important to VR in relation to their ability and readiness to inform, advocate and testify (e.g. before the State legislature).

Federal legislative initiatives discussed include those that would remove employment disincentives for PWD at/above (Social Security) retirement age – particularly important in a state with a markedly aging population and the needs within that population to maintain employment (with supports, if necessary).

Raising the age of eligibility, based upon age of onset of disability, for tax-free ABLE account was also discussed, as was potentially enhanced tax incentives for employers who hire people with disabilities. Legislation to reauthorize the Money Follows the Person (MFP) program, along with protections against spousal impoverishment for spouses of those found eligible for home and community-based Medicaid, was followed closely. The Committee was also informed of and discussed legislative plans to reduce the occurrence of long-term unemployment within targeted populations and, specifically, to create Federal grants to be awarded to VR agencies to implement such initiatives.

The committee also reviewed Federal legislation that would phase out sheltered workshops and subminimum wage exceptions within the Fair Labor Standards Act (although Vermont had eliminated the practice several years ago). Also discussed was employment implications for PWD within the proposed Social Security 2100 Act, as well as within the relatively broad Disability Integration Act (DIA).

On a State level, much attention was paid to attempts by advocates for PWD to unfreeze (to potential new applicants) the general-funded Attendant Services Program (ASP) – aka Personally-directed Attendant Care (PDAC) program. Various approaches to legislative advocacy for this initiative were highlighted for session 2020. Peripheral but important discussions centered around background checks for personal care attendants and statewide numbers of those with developmental disabilities in nursing homes.

The Committee followed progress on legislation to raise the State minimum wage and institute a family leave policy. (Both measures were deferred to session 2020.) In addition, the proposals by the MS Society to enhance opportunities for home modification projects for PWD were elucidated.

The Committee has been active in planning agenda and representation by the

SRC for the annual cardroom event at the Statehouse. It has also actively discussed SRC participation in the annual Youth Core Transition event. In addition, all were informed about such relevant upcoming events as the annual Youth Summit, Vermont Family Network (VFN) upcoming annual meeting, Disability Awareness Day at the Statehouse, the Hope and Resilience Conference, the Statewide Independent Living Council (SILC) Networking Breakfast and Quarterly meeting(s) and the SILC-sponsored Olmstead Summit.

An idea that originated in the AOE Committee breakout session of the SRC Annual Retreat of 2018 was the creation and implementation of a "Governor's" Transportation Summit. That idea has come to fruition with a set date of Dec. 2nd, 2019 at the Doubletree at the Hilton Hotel in South Burlington. At time of writing, agenda is close to finalization and other final preparations are under way.

A request for targeted input to the State Plan for Independent Living (SPIL) was made at an AOE Committee meeting as the SILC considered an updated strategic plan.

The Committee was informed of the Governor's Committee for Employment of People with Disabilities (GCEPD)-sponsored Spirit of the ADA Awards – most specifically, the creation of the David Sagi Award in memoriam to the late State ADA Coordinator and long-time VR Regional Manager. It also discussed the possibility of inviting the Executive Director of the SILC to discuss areas of mutual interest and potential for collaboration.

Finally, very thoughtful discussions were held regarding the recently opened Perky Planet Café in Burlington. Various opinions were expressed as to the impact of the restaurant's hiring, personnel and marketing policy on the disability right movement. All agreed that Perky Planet Café's intentions were good, but opinions varied as to whether it promotes or deters established employment and integration goals.

All throughout, Marlena Hughes, SRC members and liaison to Vermont Coalition of Disability Rights (VCDR), has been reporting out, as much as possible, on relevant discussions at VCDR meetings.

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

(2) The designated State unit's response to the Council's inputand recommendations;

DVR has a strong collaborative relationship with the SRC. DVR and the SRC worked very closely together to develop the State Plan and in particular, the goals and priorities. On December 5, 2019, the full SRC reviewed DVR's progress towards achieving the goals and priorities for Program Year 2019 and DVR's proposed goals and priorities for Program Year 2020.. The SRC made the following recommendations.

- DVR must continue to explore opportunities to develop or improve services for underserved populations including individuals who need supported employment.
- DVR should make credential attainment a priority and increase the low number of DVR consumers achieving credentials.
- DVR must include maintaining consumer satisfaction in the goals and priorities of the State Plan.

DVR accepted the SRC recommendations for the State Plan update.

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

Not applicable

B. REQUEST FOR WAIVER OF STATEWIDENESS

1. A LOCAL PUBLIC AGENCY WILL PROVIDE THE NON-FEDERAL SHARE OF COSTS ASSOCIATED WITH THE SERVICES TO BE PROVIDED IN ACCORDANCE WITH THE WAIVER REQUEST;

Not applicable Vermont is not requesting a Waiver of Statewideness

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

Not Applicable

3. REQUIREMENTS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN WILL APPLY TO THE SERVICES APPROVED UNDER THE WAIVER.

Not Applicable

C. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

Vermont DVR has a partnership with its Employee Assistance Program (EAP); the Vermont Association of Business, Industry and Rehabilitation (VABIR); and the State of Vermont Office of Child Support (OCS), to serve non-custodial parents with disabilities. The program, called Work4Kids, is offered statewide with designated VR Counselors in each region. VR Counselors provide a range of services to help Work4Kids participants obtain and sustain employment, so they can consistently meet their child support obligations. These services include vocational and other assessments, creating an individualized plan to address potential barriers to employment, counseling and guidance, and referral to other service providers when appropriate. In addition, each VR Counselor works with an Employment Consultant (VABIR), who provides assistance in work search, job placement and post-employment services. For individuals presenting multiple barriers to employment, an individualized service model is utilized. The approach focuses on progressive steps to employment including company tours, informational interviews, work experiences, community service placements, work assessments, and job shadowing. Many non-custodial parents with disabilities have never been helped in any way by the State. Reaching out to and assisting this population has produced positive outcomes. DVR has assisted many Work4Kids participants in securing employment. As of January 31, 2019:

- 945 NCPs have participated in the program;
- Total Employer payments (wage withholding) for these 945 participants was 1,906,320.01; and
- Employer payments 6 months after referral to Work4Kids were 8 times greater than those 1 month before referral.

DVR also serves offenders with disabilities to achieve employment. Employment is a critical component to prevent recidivism and to assist offenders released from prison in successful reintegration into their communities. DVR has designated VR Counselors in each district office to serve as a single point of contact for the Department of Corrections. Currently there is one Offender Reentry Employment Specialist based in Burlington who is dedicated to employment assistance to offenders with disabilities. Jointly funded by VR and the Department of Corrections, this specialist runs employment groups and does one-on-one job placement for individuals exiting jail or who are on probation.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

The Vermont Assistive Technology program (VATP), funded by the federal Assistive Technology Act, is housed within the Division of Vocational Rehabilitation (DVR) as part of the Department of Disabilities Aging and Independent Living (DAIL). The VATP staff receive operational and business office support through DAIL and DVR. The program maintains a contract, in conjunction with DVR, for Assistive Technology (AT) Specialist services currently provided by the University of Vermont. These include AT Core services such as tech demonstrations, loans, information and assistance, and trainings as well as consultations for VR consumers that could benefit from Assistive Technology or devices. The AT program also has three AT Specialists on staff. Two are funded through the Linking Learning to Careers, Work Based Learning Demonstration funded through the US Department of Education. They provide AT services for youth and students in transition. The third AT Specialist is funded to provide AT services for VR eligible consumers in the south eastern part of the state. The AT program is also constantly looking for new ways to extend our reach and have partnered with Fanny Allen, the No Wrong Door program in cooperation with DAIL's Adult Services Division, the Area Agencies on Aging, and Castleton State College who recently agreed to host a new tryout center available to the general public. Finally, the VATP partners with Opportunities Credit Union to provide low interest, variable term loans for purchasing AT equipment such as modified vehicles and hearing aids, that would be beyond the reach of some consumers.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

None

4. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

DVR has a long-standing agreement with the Department of Mental Health, Children's Unit, Department of Corrections, and Department for Children and Families to fund the JOBS program serving youth with emotional/behavioral disabilities. The JOBS program is a supported employment program serving youth with emotional behavioral disabilities ages 14 to 22. The partnering departments provide the state general fund match for the Medicaid Global Commitment to fund the ongoing support services. The JOBS programs are housed within the Designated Community Mental Health Agencies within the twelve Agency of Human Services Districts.

5. STATE USE CONTRACTING PROGRAMS.

None

D. COORDINATION WITH EDUCATION OFFICIALS

1. THE DESIGNATED STATE UNIT'S PLANS, POLICIES, AND PROCEDURES FOR COORDINATION WITH EDUCATION OFFICIALS TO FACILITATE THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO THE RECEIPT OF VR SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, AS WELL AS PROCEDURES FOR THE TIMELY DEVELOPMENT AND APPROVAL OF INDIVIDUALIZED PLANS FOR EMPLOYMENT FOR THE STUDENTS

In DVR Central Office, there is a Transition Program Director who supports all transition activities statewide. The DVR Transition Program Director, DVR Linking Learning to Careers Director, and DVR Director routinely meet with Vermont Agency of Education staff to coordinate services, and include Department of Labor, Developmental Disabilities Services Division, Department of Health, VT Assistive Technology Program, and Division for the Blind and Visually Impaired staff in these meetings.

Vermont DVR has a long-standing commitment to serve students in transition. With the passage of the Workforce Innovation and Opportunity Act (WIOA) in July 2014, DVR built on their existing infrastructure for transition aged youth, to implement Pre-Employment Transition Services (Pre-ETS). DVR currently has fourteen Transition Counselors that serve exclusively in-school students and focus on Pre-Employment Transition Services activities as required in WIOA. DVR Transition Counselors recruit students eligible for Pre-ETS services ages 14 to 22 from the local school districts and other independent or private secondary educational programs. The Transition Counselors are operating out of all twelve DVR district offices and cover all Vermont high school districts. Counselors serve as a community resource to the schools, facilitating inter-agency partnerships through routine Core Transition Team meetings in each of the twelve DVR districts. The goals of these teams are to share resources, partner to support youth, and act as catalysts for change to improve the transition process for youth with disabilities. For student consumers found eligible for VR services, the Transition Counselor is required to develop and IPE prior to high school exit. DVR tracks IPE completion prior to high school exit as part of our quality assurance dashboard. The Transition Counselors also coordinate with Adult Counselors each spring to facilitate moving VR consumers to adult caseloads to ensure that students graduating and moving on to either post-secondary education or careers have consistent, seamless support during this important transition.

To provide Pre-ETS, DVR determined we needed specialized employment placement services designed to meet the needs of students. Therefore, DVR created the Youth Employment Specialist model, and contracted with the Vermont Association of Business, Industry, and Rehabilitation (VABIR) for youth employment services in Vermont. VABIR provides Youth Employment Specialists (YES) to work one on one with Transition Counselors to support Pre-employment Transition Services (Pre-ETS) in all areas of the state. The YES and the Transition Counselor work as a team with each high school, and these teams meet regularly with the Transition Program Director to provide training and share best practices.

The Jump on Board for Success (JOBS) program provides supported employment services for out of school youth aged 16-22 with severe emotional and behavioral disabilities. Transition Counselors and JOBS staff collaborate to identify youth who are at risk of dropping out of school or are within six months of graduation and may be eligible for JOBS services. The Transition counselors and JOBS staff coordinate with local high schools for services to help youth successfully transition from high school. There are ten JOBS programs around the state and a total of 13 JOBS sites operated by the Designated Agencies.

The Developmental Services (DS) program also works collaboratively with the Transition Counselors to ensure that students who may be both eligible and meet funding priorities for

developmental services are referred through the schools to the local Designated Agencies. The Transition Counselors and DS staff coordinate with the local high schools for services to youth exiting high school. There are fifteen DS programs around the state run by Designated Agencies or Specialized Service Agencies.

The Transition Counselors collaborate with the VR Benefits Counseling program to provide services to youth and families in high schools. The VR Benefits Counseling program provides information and resources about state and federal benefits as well as information on Social Security work incentives. It is crucial that students and their families have access to accurate and appropriate information when making informed decisions around employment and education choices.

The Linking Learning to Careers (LLC) Work-Based Learning grant funded through the Rehabilitation Services Administration is a five-year research study to improve career and college readiness outcomes for Vermont high school students with disabilities. This initiative will provide qualitative and quantitative evidence regarding the impact of LLC services on students' early career outcomes, including paid competitive employment, post-secondary school enrollment, and improved confidence to achieve career goals. The partnership between Community College of Vermont, Agency of Education, Vermont Association of Business, Industry, and Rehabilitation, high schools and career and technical educational centers throughout the state, and DVR, is integral to effective delivery of the services provided within the model. A Linking Learning to Careers Director and Assistant Director support one FTE Career Consultant, ten PTE Career Consultants, and two FTE Assistive Technology Specialists, who provide these individualized services to students in the treatment group. There are currently 441 students who are receiving Enhanced Services as part of the grant.

2. INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

A. CONSULTATION AND TECHNICAL ASSISTANCE TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING VR SERVICES;

The DVR Director, DVR Transition Director, and LLC Director meet quarterly with the Special Education Director of the Vermont Agency of Education and AOE Transition staff, to coordinate the annual Transition Conference, to discuss support and collaboration regarding improvement for Indicators 13 and 14, and to stay coordinated on other transition issues. AOE Transition staff provide ongoing technical assistance to the DVR Transition Counselors, and the DVR Transition Counselors coordinate information and education with schools in their local service areas, including AOE staff attending the monthly DVR Transition Counselor meeting at least once a year. AOE and DVR have completed a new Interagency Agreement as required under WIOA. The Agreement specifically allows for consultation and technical assistance via alternative means include video conference and other remote methods.

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

All DVR Transition Counselors and Career Consultants use resources and trainings within statewide meetings, as well as those offered through WINTAC, NTACT, and Y-TAC to support

strong school relationships and best understand their roles within the implementation of the individualized education program. They also use the internal *Pre-Employment Transition Services Manual* for guidance. There are facilitated "meet and greet" meetings in the fall with school staff to identify specific needs, issues and obstacles in their schools, and to create a plan to address these needs. Local and State Agency Core Transition Team meetings occur around the state to support the work of Pre-ETS in WIOA.

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

DVR/DBVI Responsibilities

DVR and DBVI are the Designated State Units for the public vocational rehabilitation program in the State of Vermont. In this role DVR and DBVI will:

A. Provide access to Pre-Employment Transition required services for potentially eligible students to LEAs statewide including:

- Job exploration counseling
- Workplace readiness training to develop social skills and independent living
- Work-based learning experiences which may include in-school or after school opportunities, or experiences outside the traditional school setting
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education
- Self-advocacy training

B. Provide vocational rehabilitation and school-to-work transition services for youth determined eligible for DVR or DBVI services with an approved Individual Plan for Employment (IPE) including but not limited to:

- Vocational assessment
- Counseling and consultation around the development of the Individual Plan for Employment (IPE) that is coordinated with the IEP or 504 plan
- Vocational counseling and guidance
- Job placement services
- Other paid services that are part of an approved IPE

Financial Responsibility

DVR/DBVI Responsibility

To the extent funds are available, DVR/DBVI are responsible for paying for pre-employment transition services for potentially eligible students. In addition, to the extent funds are available, DVR/DBVI are responsible for paying for vocational rehabilitation and school-to-work transition services for students and youth determined eligible for DVR or DBVI services with an approved Individual Plan for Employment (IPE).

LEA Responsibility

LEAs are responsible for paying for any transition services that are also considered to be special education or related services necessary for providing a free appropriate public education to students with disabilities.

Criteria to Determine Which Agency is Responsible to Pay for Similar Services Both Can Provide Under Their Respective Law

The following criteria shall be used, when determining which entity should pay for a similar service that both entities can provide under their respective laws:

A. The purpose of the Service

Is the purpose of the service primarily related to an educational outcome or an employment outcome?

B. Customary Services

Is the service one that the school customarily provides under IDEA part B?

For example, if a school ordinarily provides work-based learning experiences for students with disabilities, the fact those services are now authorized under the Rehabilitation Act as pre-employment transition services does not mean the school should cease providing those services and refer those students to DVR or DBVI.

C. Eligibility

Is the student with a disability eligible for transition services under IDEA?

Because the definition of "student with a disability" for the DVR and DBVI programs includes an individual with a disability for the purposes of Section 504 of the Rehabilitation Act, it is a broader than the definition under IDEA. DVR and DBVI are authorized to provide transition services for students with disabilities who meet the definition of an individual with a disability for purposes of section 504 of the Rehabilitation Act.

Nothing in this agreement is to be construed as reducing the responsibility of the local educational agencies or any other agencies under IDEA to provide or pay for any transition services that are also considered to be special education or related services necessary for providing a free appropriate public education to students with disabilities.

Since Vermont does not permit sub-minimum wage employment there was no need to address 511 in this agreement

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

The DVR transition counselors and DBVI counselors will maintain contact with school personnel in each LEA to ensure early identification of students who are in special education, or are either receiving or eligible for 504 services. This early identification may occur as early as the freshman year and includes DVR/DBVI involvement in IEP/Transition Team meetings and in

504 plan meetings, as requested by the school staff, student or families. DBVI counselors will also identify potentially eligible students through the Vermont Association for the Blind and Visually Impaired educators located in LEAs statewide. As part of outreach efforts DVR and DBVI will provide at minimum the following:

- A description of the purpose of the DVR or DBVI program
- The eligibility requirements for the DVR or DBVI program
- The application procedures
- The scope of services that maybe provided

DVR and DBVI will provide brochures and other materials to schools to be shared with students with disabilities and their families. Additionally, local core transition teams and other partners will provide the DVR counselor and DBVI counselor with a forum to discuss projections of numbers of students who will need transition services from DVR and/or DBVI and how best to collaborate and support these students.

Outreach activities by DVR and DBVI, may include:

Sharing the DVR transition pamphlet or DBVI pamphlet with Special Education staff, students and their families

- Conducting DVR and DBVI orientation sessions in the school for Special Education staff, students and their families to explain VR eligibility and services
- Participation in local Core Transition Teams, in which members of local agencies working with youth collaborate around best practices and share resources
- Ways to identify students at risk for dropping out of school
- Visits with guidance counselors at each school to share materials
- Participation in statewide and local youth-focused conferences

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

DVR maintains Social Security Administration, Ticket to Work cooperative agreements with most of the private non-profit employment service providers in the state. Agreements exist with all community mental health and developmental services agencies. In the spring of 2008, DVR negotiated a new Ticket to Work cooperative agreement with the agencies in anticipation of the new regulations to be published later that year. The new agreement has been in place since July 1, 2008 and has generated significant new revenue for providers that help beneficiaries earn at higher levels.

DVR has contractual fee for service agreements with VABIR (DVR's primary CRP) to provide job development and job placement services for VR consumers. DVR also has a fee for service with VABIR to provide Pre-ETS services for students in coordinator with the VR Transition Counselors.

DVR has contracts for supported employment services provided through the local community mental health system. This includes the JOBS supported employment program for youth with severe emotional/behavioral disabilities and the Community Rehabilitation and Treatment program for adults with severe mental illness. Services are coordinated with local VR supported employment liaision counselors.

F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

DVR has a well-established agreement with the Vermont Development Disabilities Services Division (DDSD) to provide extended services for individuals with developmental disabilities. The primary source of funding for extended services for individuals with developmental disabilities is Home and Community Based Medicaid Waiver funds. DVR continues to contribute funding for DS Post-Secondary Education and career training through individual support services.

DVR funds supported employment services for youth with emotional/behavioral disabilities in partnership with the Department of Mental Health, Children's Division. The JOBS programs are a model for serving this high need and high-risk population. DVR provides the upfront job placement and support through grants to community agencies. The extended supports are provided through Medicaid Global Commitment funds.

In prior fiscal years, DVR also had an agreement with the Department of Mental Health to provide extended services for adults with significant mental illness served through the Community Rehabilitation and Treatment Program (CRT). In July 2015, DVR decided to reallocate the VR grant funds to Pre-Employment Transition Services in order to meet the federal mandate. The CRT programs continue to provide supported employment services using a Medicaid case rate funding model. DVR continues to partner with the CRT programs to provide VR services at the local level.

For individuals with other disabilities, no state funding for extended services exists in Vermont. As a result, there are limited options for providing extended services for individuals with brain injuries, sensory disabilities, severe learning disabilities and other disabilities. There are some limited options to use Social Security Administration Impairment Related Work Expenses or Plans to Achieve Self Support. These options however, are only feasible in a minority of cases. New in 2018, are job coach positions in every VR office to support individuals with other disabilities. The job coaches provide tutoring and training at education sites, as well as on the job supports for those who obtain competitive employment. These services only exist for a short period of time however, with a place, train, fade model.

G. COORDINATION WITH EMPLOYERS

1. VR SERVICES; AND

DUAL CUSTOMER DESIGN

Vermont's dual-customer approach considers both individuals with disabilities and the business community as key customers of the Vocational Rehabilitation program. To that end, Vermont DVR has established a cadre of Business Account Managers across the state whose primary responsibilities are to develop and sustain relationships with the businesses in their respective communities. The Business Account Managers also facilitate local Employment Teams made up of the various employment programs serving Vermonters with disabilities. The Employment

Teams are designed to improve collaboration between programs and streamline employer outreach in order to maximize resources and increase opportunities for candidates served by the Vocational Rehabilitation program.

In addition to the Business Account Managers, Vermont DVR contracts Employment Consultants who provide placement services and assistance to individual candidates, including retention services. These Employment Consultants, in concert with their respective Business Account Managers, are in the community developing contacts and establishing relationships with businesses of all sizes. Due to the rural nature of Vermont, and the fact that trusting relationships are built over time, Vermont has successfully developed ways to track employer engagement.

EMPLOYER DATA

DVR tracks employer outreach utilizing Salesforce, a Customer Relations Management (CRM) solution used by many large corporations. All Business Account Managers and Employment Consultants enter information into this system. The information is transparent to everyone and only business information, not client information, is captured. To track employer engagement, the following information is gathered:

Opportunities:

Opportunities are defined as any activity, paid or unpaid, offered by a particular business. These activities range from informational interviews and job shadows, to short-term work experiences and paid employment. All opportunities are captured for each business.

Contacts:

Contacts are defined as the individuals in a business with whom Employment Consultants and/or Business Account Managers have developed a relationship. In many cases these contacts are Hiring Managers, Owners and Supervisors.

Activities:

Each time an Employment Consultant or Business Account Manager interacts with a contact, an activity note is entered into Salesforce. This allows all Employment Team members to see a running history of conversations and activities with that business.

IMPLICATIONS FOR DVR CUSTOMERS

Business outreach has been a priority for Vermont DVR because:

- In developing relationships over time, we are able to position ourselves as a staffing service with a variety of options for businesses to consider;
- Coordinated business outreach, captured in Salesforce, allows for greater variety in the kinds of businesses we are meeting, and the concurrent variety in opportunities for DVR candidates;
- Gathering information on businesses willing to offer worksite experiences, company tours, and informational interview, will better support career exploration and skill development for both adults and students;
- Our business partners can support Pre-Employment Transition Services activities in schools, including practice interviews, company tours and overviews, as well as identify summer employment opportunities;

- Business partners can support the work of our in-school Transition Counselors, providing information on industry trends, skill requirements and other factors related to particular employment sectors;
- By engaging businesses in working with students, the students will have a better understanding of their local labor market through work experiences, job shadows and paid employment. This in turn should prepare them for transition to either post-secondary education or employment.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

As noted in the prior section, the Business Account Managers are a major resource to the DVR Transition Counselors and Youth Employment Specialists, who work exclusively with students to provide Pre-Employment Transition Services. In particular the Business Account Managers provide:

- Contacts with employers who are willing to provide work-based learning experiences for students;
- Contacts with employers who are willing to participate IN informational interviews, company tours, practice interviews and other exploratory activities with students;
- Information on industry trends, skill requirements and other factors related to particular employment sectors;
- Identification of summer or part time competitive employment opportunities for students.

The Business Account Managers also convene local employment teams including the Youth Employment Specialists. The local employment teams coordinate outreach to employers across DVR programs. This coordinated approach maximizes the impact of DVR employer outreach and reduces duplicate contacts with employers.

H. INTERAGENCY COOPERATION

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

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As Divisions within the Department of Disabilities, Aging and Independent Living (DAIL), DVR and DBVI have entered an Intergovernmental Agreement with the Department of Vermont Health Access (DVHA). The agreement is in effect for five years. The purpose of the agreement is to describe how Vocational Rehabilitation Title I and Title VI-B funding will be utilized with Medicaid Global Commitment funding to support employment services for the following populations:

- Supported employment services for adults with developmental disabilities served through the Vermont Department of Disabilities, Aging and Independent Living (DAIL) Developmental Disabilities Services Division, hereinafter referred to as DDSD.
- Youth with severe emotional disturbance (SED) served by the Department of Mental Health (DMH), Children's Division through the JOBS programs.

- Adults with psychiatric disabilities served through the Community Rehabilitation and Treatment (CRT) program administered by the Department of Mental Health (DMH).

The agreement sets out the following guiding principles:

DAIL/DVR/DBVI and DVHA are committed to implementing employment services through the blending and braiding of VR Title I and Title VI-B funding with DDSD Global Commitment Medicaid funding. The goal is to support a seamless and well-integrated system to provide employment services for individuals with developmental disabilities, youth with SED and adults with psychiatric disabilities through a statewide network of community providers.

The agreement also lays out eligibility criteria for the respective programs and the financial responsibilities of each State Unit as follows:

Funding of Time-Limited Supported Employment Services

Except for youth with the most significant disabilities, DAIL/DVR/DBVI funding of supported employment is time-limited for a period of not more than 24 months unless a determination is made that a longer period is necessary based unpon the individuals needs. Funded services must be based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment. DAIL/DVR/DBVI will fund the following services with Title I funds prior to placement and with either Title I or Title VI B funds following placement.

-
    - Supported employment assessment services
    - Supported employment job search and placement services
    - Supported employment work supports
    - Customized employment
    - Benefits and work incentive counseling
    - Progressive employment
    - Case services for additional work supports such as work clothes and transportation

Funding for Extended Services

Extended services are the ongoing support services that are needed to support and maintain an individual with a most significant disability in supported employment, after an individual has made the transition from DAIL/DVR/DBVI time-limited services. Extended services can be funded by DAIL/DVR/DBVI for youth with the most significant disabilities, for a period not to exceed four years until a youth reaches age 25. DAIL/DVR/DBVI may not provide extended services to individuals with the most significant disabilities who are not youth with the most significant disabilities.

DHVA Global Commitment Funding of Employment Services

Developmental Services

Supported employment and extended employment services are through the Global Commitment, Home and Community Based Medicaid Services (HCBS) for people who meet the

eligibility criteria for DDS. DAIL/DDSD HCBS funding is individualized based on the support needs of the consumer. If the HCBS has a line item for employment, then an employment outcome must be included in the Individualized Support Agreement (ISA). HCBS funding can be used to support both short term assessment, job development, job placement services and extended services.

JOBS Program

The JOBS program supported employment services and extended employment services are funded through Global Commitment, Medicaid case rate funding administered by DMH. Funds will be provided through the DA Master Grant Agreements.

CRT Evidence Based Supported Employment Services

CRT evidence-based supported employment services are funded through the Global Commitment, Medicaid CRT Case Rate administered by DMH. Funds will be provided through the DA Master Grant Agreements.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

DVR and DBVI are housed within the same department as the Developmental Disabilities Services Division (DDSD). An Intradepartmental Agreement was developed within DAIL and signed on September 5th 2017. The agreement is in effect for five years. The purpose of this agreement is to describe how DVR, DBVI and DDSD will cooperate to implement, expand and improve supported employment services for adults with developmental disabilities in the State of Vermont. Supported employment services for adults with developmental disabilities are provided through a system of approved nonprofit community providers, including the Designated Agencies (DA), the Specialized Service Agencies (SSA) and Independent Service Organizations (ISO). DDSD, DVR and DBVI fund supported employment services jointly through grant and contractual relationships with these community providers.

The agreement sets out the following guiding principles:

DDSD, DVR and DBVI are sister Divisions within DAIL and operate under the direction of the DAIL Commissioner. As such, DVR, DBVI and DDSD take a "one agency" approach to the funding and implementation of supported employment services for adults and youth with developmental disabilities.

DVR, DBVI and DDSD have collaborated for over thirty years to implement supported employment services for adults with developmental disabilities. DVR, DBVI and DDSD are committed to continuing this collaboration based on the following:

- All people with developmental disabilities, who want to, can work with the appropriate supports.
- Work benefits people with developmental disabilities in the same way it does people without disabilities. Increased income, a sense of contribution and skill acquisition, increased confidence, independence and social connections all enable people to develop meaningful careers.
- The value of work extends far beyond wages earned. Employers and the community benefit from the social inclusion and diversity people with developmental disabilities

bring to the workforce through improved morale, customer loyalty and overall productivity.

The agreement includes an inter-division planning and policy group that will meet at least quarterly and include all of the Directors. There is a commitment to joint monitoring of supported employment services and joint training and technical assistance. The agreement also describes the eligibility criteria for each program and lays out the fiscal responsibilities as follows:

Joint Responsibilities

DVR, DBVI and DDSD are committed to implementing supported employment services through the blending and braiding of VR Title I and Title VI-B funding with DDSD Global Commitment Medicaid funding. The goal is to support a seamless and well-integrated system to provide supported employment services for individuals with developmental disabilities through a statewide network of community providers.

DVR and DBVI Responsibilities

Funding of Time-Limited Supported Employment Services

Except for youth with significant disabilities, DAIL/DVR/DBVI funding of supported employment is time-limited for a period of not more than 24 months. Funded services must be based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment. DAIL/DVR/DBVI will fund:

- Supported employment assessment services
    - Supported employment job search and placement services
    - Supported employment work supports
    - Customized employment

Funding for Extended Supports

Extended services are the ongoing support services that are needed to support and maintain an individual with a most significant disability in supported employment, after an individual has made the transition from DVR time-limited services. Extended services can be funded by DVR and DBVI for youth with the most significant disabilities, for a period not to exceed four years. DVR may not provide extended services to individuals with the most significant disabilities who are not youth with the most significant disabilities.

DDSD Responsibilities

Funding for Supported Employment Services and Extended Services

DDSD will fund supported employment and extended employment through the Global Commitment, Home and Community Based Medicaid Services (HCBS) for people who meet the eligibility criteria for DDS. HCBS funding is individualized based on the support needs of the consumer. If the HCBS has a line item for employment, then an employment outcome must be included in the Individualized Support Agreement (ISA). HCBS funding can be used to support both short term assessment, job development, job placement services and extended services.

Availability of Funding

The DDSD commitment to funding supported employment services is contingent on the availability of state and federal funds. In the event state or federal funds are reduced or eliminated, DDSD may reduce or end funding for supported employment services.

3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

DVR and DMH have a long history of collaboration around the provision of supported employment services for adults with psychiatric disabilities and youth with severe emotional behavioral disorders. This is reflected in the MOU's overview and purpose as follows:

The purpose of this agreement is to describe how DAIL/DVR/DBVI and DMH will cooperate to implement, and improve employment services, supported employment services and evidence based supported employment services for youth and adults with psychiatric disabilities in the State of Vermont. Supported employment and employment services for youth and adults with psychiatric disabilities are provided through a system of approved non-profit community providers, including the Designated Agencies (DAs). DMH and DAIL/DVR/DBVI fund supported employment services jointly through grant and contractual relationships with these community providers. There are two primary programs within the DMH system that provide employment services:

- The JOBS Program: JOBS provides supported employment services for youth with Severe Emotional Disturbance (SED)
- The Community Rehabilitation and Treatment (CRT) Program: CRT provides employment services and supported employment for adults with severe psychiatric disabilities.

The agreement sets out the following guiding principles:

DAIL/DVR/DBVI/DBVI and DMH have collaborated for over thirty years to implement supported employment services for youth and adults with psychiatric disabilities. DAIL/DVR/DBVI and DMH are committed to continuing this collaboration based on the following:

- **All people with psychiatric disabilities, who want to, can work with the appropriate supports.**
- **Work benefits people with psychiatric disabilities in the same way it does people without disabilities. Increased income, a sense of contribution and skill acquisition, increased confidence, independence and social connections all enable people to develop meaningful careers.**
- **Employment is an essential component of the recovery process for people with psychiatric disabilities.**

The agreement forms an interagency planning and policy development group including the DVR/DBVI Directors and the DMH Directors of Adult Mental Health and Children's Mental Health, and is in effect for five years from date of signature. The agreement also includes a commitment to joint monitoring of the programs and joint training and technical assistance. DAIL/DVR/DBVI and DMH support two models of individualized supported employment

services in competitive, integrated employment settings The agreement describes the eligibility criteria for both systems and the service models as follows:

JOBS

The JOBS Program is an innovative supported employment and intensive case management service for youth with psychiatric disabilities, who have dropped out or left school. It uses work as a means to reach this challenging population. JOBS is a voluntary program where youth, once engaged, are assisted in transitioning from school, prison, or the streets and supported in accessing services to help them reach their individual goals and greater independence.

Individualized Placement and Support (IPS): Evidence Based Supported Employment Services.

IPS supported employment is an evidence-based approach to providing vocational services for adults with severe psychiatric disabilities. IPS integrates employment services within community mental health treatment and case management services.

DAIL/DVR/DBVI and DMH do not support any type of group or segregated employment service model such as sheltered workshops, work crews, enclave placements or any approach that does not result in competitive, integrated employment. DAIL/DVR/DBVI and DMH will promote and support evidence based supported employment as the primary service model, through policy development, contract/grant language, training and technical assistance, and monitoring and quality review.

The agreement describes the fiscal responsibilities of the respective Departments as follows:

Joint Responsibilities

DAIL/DVR/DBVI and DMH are committed to implementing supported employment services through the blending and braiding of VR Title I and Title VI-B funding with DMH Global Commitment Medicaid funding. The goal is to support a seamless and well-integrated system to provide supported employment services for adults with psychiatric disabilities and youth with SED through a statewide network of community providers.

DAIL/DVR/DBVI Responsibilities

Funding for Time Limited Supported Employment Services

Except for youth with significant disabilities, DAIL/DVR/DBVI funding of supported employment is time-limited for a period of not more than 24 months. Funded services must be based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment. DAIL/DVR/DBVI will fund

- Supported employment assessment services
- Supported employment job search and placement services
- Supported employment work supports
- Customized employment
- Benefits and work incentive counseling
- Progressive employment
- Case services for additional work supports such as work clothes and transportation

Funding for Extended Supports

Extended services are the ongoing support services that are needed to support and maintain an individual with a most significant disability in supported employment, after an individual has made the transition from DAIL/DVR/DBVI time-limited services. Extended services can be funded by DAIL/DVR/DBVI for youth with the most significant disabilities, for a period not to exceed four years until age 25. DAIL/DVR/DBVI may not provide extended services to individuals with the most significant disabilities who are not youth with the most significant disabilities.

DMH Responsibilities

Funding for JOBS

DMH will fund the JOBS program supported employment services and extended employment services through Global Commitment, Medicaid Case Rate funding. Funds will be provided through the DA Master Grant Agreements.

Funding for IPS Supported Employment Services and Extended Services

DMH will fund evidence-based supported employment through the Global Commitment, Medicaid CRT Case Rate. Funds will be provided through the DA Master Grant Agreements.

Availability of Funding

The DMH commitment to funding JOBS and IPS supported employment services is contingent on the availability of state and federal funds. In the event state or federal funds are reduced or eliminated, DMH may reduce funding for supported employment services.

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I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

1. SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

A. QUALIFIED PERSONNEL NEEDS

I. THE NUMBER OF PERSONNEL WHO ARE EMPLOYED BY THE STATE AGENCY IN THE PROVISION OF VR SERVICES IN RELATION TO THE NUMBER OF INDIVIDUALS SERVED, BROKEN DOWN BY PERSONNEL CATEGORY;

DVR has a total of 121.5 Full Time Equivalent (FTE) staff positions. The Division operates using a matrix management structure headed by the Division Director. The breakdown of staff is as follows:

Full Time Equivalents	Position Titles and Functions
1	Division Director
7	Senior Central Office Managers including the Field Services Manager, Employment Services Manager, Staff Development and Training Coordinator, Quality Assurance and Business Systems Manager, DVR Administrative Services

Full Time Equivalents	Position Titles and Functions
	Manager, Budget and Policy Manager, and the Transition Program Director
7	Regional Managers overseeing the 12 district offices
13.5	DVR Transition Counselors serving an in-school youth caseload
36	DVR Counselors serving a general caseload
5	Benefits Counselors
2	Rehabilitation Counselors for the Deaf
17	Program Techs and Administrative Support Staff
12	Employee Assistance Manager and Specialists
1	Special Project Coordinator
1	Data Management and Program Evaluation Staff
3	Business Account Managers
5	Assistive Technology Staff and Manager
3	Miscellaneous Central Office Staff
8	Linking Learning to Careers Managers and Counselors

DVR expects to serve a total of 6,500 eligible individuals in PY 20. The average caseload for the General VR counselor is about 80 consumers. The average caseload for VR Transition Counselors tends to be higher at 120.

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II. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

VR currently has sufficient staff to meet the needs of eligible individuals who have applied for services.

III. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES IN 5 YEARS BASED ON PROJECTIONS OF THE NUMBER OF INDIVIDUALS TO BE SERVED, INCLUDING INDIVIDUALS WITH SIGNIFICANT DISABILITIES, THE NUMBER OF PERSONNEL EXPECTED TO RETIRE OR LEAVE THE FIELD, AND OTHER RELEVANT FACTORS.

DVR assesses the ability to provide an adequate supply of qualified State rehabilitation professionals and paraprofessional personnel through analyzing customer data collected on a yearly basis and comparing it to staff capacity to provide services adequately. DVR collects data related to caseload size, number of referrals received, applications submitted, cases certified, plans created, and training and employment outcomes at individual, district, regional and statewide levels This analysis informs the number of positions designated to each geographic

area and the design and delivery of services. This analysis and subsequent staffing decisions, related to assurance of adequate personnel development, are completed with the oversight of the DVR Senior Management team and the input of the DVR Regional Management team. Projections of personnel that will be needed in five years to meet the demand of the number of individuals to be served are static. This is due in part to the way the DVR program is structured, which will allow an increasing number of individuals to receive quality service with the existing personnel. All State rehabilitation personnel will continue to obtain the required level of education and training within established time-frames and with adequate supervision to ensure quality service delivery

B. PERSONNEL DEVELOPMENT

I. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM;

Vermont has no accredited graduate school offering a master's degree in Rehabilitation Counseling. To meet the Comprehensive System for Professional Development (CSPD) standards, a counselor needs either a master's degree in Rehabilitation Counseling or a master's degree in a related field plus completion of four additional core rehabilitation courses. Assumption College, University of Massachusetts, and Springfield College of Human Services typically have a range of 35-45 students who graduate with a master's or CAG degree in Rehabilitation Counseling per year. These graduates would be qualified to fill counseling vacancies without additional coursework. New England colleges, which offer degrees in Social Work, Special Education School Guidance, Mental Health Counseling, or Community Mental Health Services, also produce qualified graduates. Currently four (4) students are taking required core classes through Assumption College and UMASS Boston.

II. THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

Two (2) staff will begin their CSPD coursework in the Spring 2020 semester. Three (3) staff are currently enrolled in University of Southern Maine's master's degree program in Rehabilitation Counseling and one (1) will begin the program in the Spring 2020 semester.

In the future DVR will request data on the number of students enrolled in relevant programs for the purpose of planning future recruitment.

III. THE NUMBER OF STUDENTS WHO GRADUATED DURING THE PRIOR YEAR FROM EACH OF THOSE INSTITUTIONS WITH CERTIFICATION OR LICENSURE, OR WITH THE CREDENTIALS FOR CERTIFICATION OR LICENSURE, BROKEN DOWN BY THE PERSONNEL CATEGORY FOR WHICH THEY HAVE RECEIVED, OR HAVE THE CREDENTIALS TO RECEIVE, CERTIFICATION OR LICENSURE.

In the prior year, four (4) VR Counselors met the educational requirements of the CSPD courses through Assumption University, University of Massachusetts and other accredited universities.

In the future DVR will request information on the number of students in relevant programs to help and inform recruitment efforts.

2. PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL

DVR recruits qualified personnel through Assumption College, University of Massachusetts, and Springfield College of Human Services, who have received a master's degree in Rehabilitation Counseling. These graduates meet the highest standard of education and obtain certification at the highest level for this field. DVR also recruits qualified personnel in a related field such as Social Work, Special Education, School Guidance, Mental Health Counseling, or Community Mental Health Services from New England colleges, by posting positions on internal employment pages of the various college websites. All these graduates are candidates for counseling vacancies if they are willing to complete the four core rehabilitation courses.

State personnel policies require DVR to consider qualified applicants on the Reduction in Force list before other applicants. DVR advertises openings through the State recruitment system, through local newspapers (coordinated ad program), on-line on USA Today Job Network, and by listing openings through college placement services. Assumption College, University of Massachusetts, and Springfield College of Human Services advertise counselor openings by forwarding job opportunities to their list of recent graduates.

When recruiting staff to serve a specific population such as the deaf and hard of hearing, additional recruitment efforts are employed to reach professionals within that community and associated training programs. This has included posting in the Boston Globe and connecting with deaf and hard of hearing student organizations in New England based colleges.

The state of Vermont is an equal opportunity employer and there is emphasis on recruiting and hiring individuals with disabilities. We encourage DVR consumers to apply for posted positions and obtain the education necessary to be competitive. DVR also promotes close working partnerships with the Vermont Center for Independent Living, Designated Mental Health Agencies, the Refugee Resettlement program, Vermont Works for Women and other organizations who serve people with disabilities and/or are of a minority status.

3. PERSONNEL STANDARDS

A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND

The Division follows standards set forth in the Comprehensive System for Professional Development (CSPD). This prescribes a national standard for vocational rehabilitation counselor qualifications. This standard gives highest priority to counselors with a master's degree in Rehabilitation Counseling. The second level of priority is for counselors with related degrees in Social Work, Psychology, Mental Health Counseling or Special Education. This group must complete four additional courses to meet the standard: Foundations of Rehabilitation, Career Counseling, Vocational Assessment, and Medical and Psychosocial Aspects of Disability. When unable to recruit qualified candidates that meet the two highest levels, DVR hires counselors with bachelor's degrees and supports their graduate training through Title I funds. Though not required by the Division or by RSA, some counselors continue on to become Certified Rehabilitation Counselors (CRC) through the Commission on Rehabilitation Counselor Certification.

In the future DVR may request data from New England college programs about the number of students in relevant programs. We would use this data to plan future recruitment activities.

The following is a breakdown of the educational plans for DVR staff. These plans fall into a three-category system, based on the availability of existing financial resources and are consistent with any national or State-approved or recognized requirements that apply to the profession or discipline in which personnel are providing VR services:

Category 1: Staff who meet the highest standards for education and/or certification: Staff in this category have completed a master's degree in Rehabilitation Counseling and/or have received certification as a Rehabilitation Counselor.

Category 2: Staff who do not yet meet the highest standards and are currently enrolled in an approved graduate or undergraduate program: Staff in this category are pursuing a master's degree in Rehabilitation Counseling or a related field and have additional supervision and oversight.

Category 3: Staff who have graduate degrees in counseling or a related field and are required to take four core rehabilitation courses in order to comply with the CSPD requirements.

The percentage of our current counselors having met the CSPD standard through Categories 1 and 3 is 80%, which is 39 counselors out of 49. The timelines for meeting graduate training are written into the job specifications, which all candidates have access to on the State of Vermont Department of Human Resources website. Counselors are required to meet the standard within three years. All training information related to core courses and completion of master's degrees is stored on a spreadsheet maintained by the Division's Staff Development and Training Coordinator. Supervisors are given quarterly updates to monitor progress.

DVR staff upon hire, are required to attend a 30-hour DVR services training program taught by the Staff Development and Training Coordinator. This training covers DVR's Policies and Procedures Manual, the full vocational rehabilitation process from referral to successful closure, effective caseload management, collaboration with partners providing employment services, and all other aspects of vocational rehabilitation.

B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE WITH SECTION 101(A)(7)(B)(II) OF THE REHABILITATION ACT, TO ENSURE THAT THE PERSONNEL HAVE A 21ST CENTURY UNDERSTANDING OF THE EVOLVING LABOR FORCE AND THE NEEDS OF INDIVIDUALS WITH DISABILITIES.

See Section A.

4. STAFF DEVELOPMENT

A. A SYSTEM OF STAFF DEVELOPMENT FOR PROFESSIONALS AND PARAPROFESSIONALS WITHIN THE DESIGNATED STATE UNIT, PARTICULARLY WITH RESPECT TO ASSESSMENT, VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND

Staff development opportunities are provided annually to ensure all personnel receive appropriate and adequate training in multiple categories that include assessment, vocational counseling, job placement, and rehabilitation technology. DVR staff receive training related to assessment through webinars and in-person training offered by the Staff Development and Training Coordinator, and the Career Counseling and Assessment Specialist team, which is comprised of staff who are knowledgeable about administration, interpretation, and application of various vocational assessments. This team also reviews assessment tools to identify those that are no longer relevant or those that need to be included in the DVR Career Assessment

Inventory, which is a selection of assessment tools used to assess a person's interests, values, aptitudes, and skills. Skillful interviewing also serves as a form of assessment and DVR staff and contracted partners receive introductory and advanced training in Motivational Interviewing to enhance this skill set.

Motivational Interviewing (MI) training was introduced to DVR with comprehensive training for all staff in 2014. In alignment with the goals of the initiative, internal trainers are now in place statewide and provide monthly training for district staff. Statewide introductory and advanced MI trainings are offered quarterly for all new staff. Motivational Interviewing is a counseling approach that enhances counseling skills in many arenas and is an especially good fit for vocational rehabilitation counseling. Nationally, Motivational Interviewing is being used by many State Vocational Rehabilitation Agencies/Departments to provide services and effectively engage consumers in making changes that improve their lives. MI is a person-centered approach with a focus on client choice, self-efficacy, and autonomy. This practice is especially useful for consumers with disabilities. There are also well-established results available regarding its effectiveness with those who experience substance abuse issues as disabling conditions. A high number of DVR consumers struggle with substance and alcohol addiction, which reinforces the relevance of having staff trained in MI techniques and practice. Sustainability of this initiative is underway and will occur through ongoing development of the internal DVR MI trainers to ensure training is available to all DVR staff and meets the training requirements of those providing direct service. The internal DVR MI trainers have already received additional MI focused facilitation training and next steps include advanced audio recording coding and scoring training. This will allow the MI trainers to evaluate staff level of proficiency in use of MI skills, strategies, and approach in the vocational counseling process with fidelity to the model/approach and design training and support that responds to the area needing development.

Staff development related to job placement is provided through several venues. Newly hired contracted staff who provide placement services, participate in a required online training program, created in collaboration by DVR and Community College of Vermont. Internal structures that ensure development of knowledge related to the labor market and effective job placement include regularly scheduled meetings hosted by the DVR funded Business Account Managers. One such meeting is comprised of employment staff connected by Creative Workforce Solutions, a DVR initiated collaboration of Agency of Human Services funded employment programs, which promotes cooperative job placement and employer relationships. Training related to rehabilitation technology is provided initially through the DVR services training program for new hires. Additional training and staff development are provided in collaboration with the Assistive Technology Program through on-site, video conferencing, and webinar-based trainings, information sessions, and regularly scheduled staff meetings.

A specific staff group, the DVR Benefit Counselors, receive specialized training to ensure the provision of quality services in working with customers who receive monetary or medical benefits. Ongoing training and support are provided by a DVR Project Manager. The local Social Security Administration (SSA) Area Work Incentives Coordinator provides quarterly trainings to the Benefits Counselors on a variety of SSA Work Incentives issues. SSA also provides training and technical assistance for Benefits Counselors through contracts with Cornell and Virginia Commonwealth University. DVR is the SSA Work Incentives Planning and Assistance grantee for the State of Vermont. The five Benefits Counselors working under that project are certified by SSA as Certified Work Incentive Counselors (CWIC). To achieve certification, Benefits Counselors must attend a weeklong training and complete a comprehensive "take home" assignment that is evaluated by Virginia Commonwealth University staff.

B. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO DESIGNATED STATE UNIT PROFESSIONALS AND PARAPROFESSIONALS.

The DVR Staff Development and Training Coordinator is the primary hub for dissemination of research and training resources to field staff. Program managers, including the Transition Program Director, the Employment Services Manager and the Benefits Counseling Program Coordinator collect and disseminate information from local and national resources. Program managers and staff are encouraged to become members of national organizations in their fields. Organizations like the National Skills Coalition or the National Association of Benefits Planning and Work Incentive Counseling (NABWIS) are excellent resources for managers and front-line staff.

5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

The Agency of Human Services has a contract with the Association of Africans Living in VT for on-site interpretation and translation services. If an appropriate interpreter is not available, AHS has a contract with Telelanguage Inc. in Portland, Oregon, which provides telephonic interpretation.

DVR oversees the statewide contract for ASL interpreters. ASL Interpreters are available through the State Interpreter Referral Services. DVR utilizes a variety on assistive technology tools to assist consumers who are deaf or heard of hearing communicate with VR staff, other service providers and employers. This includes video phones, the telephone relay service and other tools. DVR also has two Rehabilitation Counselors for the Deaf who are fluent in ASL and serve an exclusively deaf and hard of hearing caseload. DVR consults extensively with DBVI around assistive technology and other tools to support consumers who are blind and visually impaired. This includes use of Dragon and other voice activated tools. Through the interpreter contract DVR can also access specialized ASL interpreters to translate for consumers who are deaf blind.

6. COORDINATION OF PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

The DVR Director and other senior managers meet quarterly with the Deputy Commissioner of the Agency of Education (AOE) and the Special Education Director to coordinate activities and trainings, especially around transition issues. DVR and AOE have a long history of co-sponsoring trainings and conferences for front line staff.

The Transition Director regularly reviews and shares training provided by the technical assistance centers, WINTAC and NTACT, to ensure that staff are aware of the most recent and relevant information. The Post-Secondary Transition Coordinator from the VT Agency of Education (AOE) attends an annual VR Transition Counselor meeting to provide information as needed around IDEA and Transition Planning, specific to Vermont schools.

In collaboration with the AOE and other core partners who provide services to students, an annual Inter-agency Core Team event designs workshops and content specific to how to best serve youth in VT. This conference supports the work that this happening locally across the state with Transition Core Teams; the goal is to effectively collaborate around services, providing both trainings and information about resources available to support youth in their post-secondary and career planning process.

J. STATEWIDE ASSESSMENT

1. PROVIDE AN ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, PARTICULARLY THE VR SERVICES NEEDS OF THOSE:

A. WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES;

The most recent Statewide Needs Assessment was conducted in 2017. Vermont DVR is currently in the process of developing the 2020 Needs Assessment. The following is a summary of the 2017 assessment and the major findings.

The Rehabilitation Act (1973) requires the Vermont Division of Vocational Rehabilitation (DVR) and the Vermont State Rehabilitation Council (SRC) to jointly conduct a needs assessment every three years. The assessment is intended to form the basis for the DVR annual State Plan and strategic planning activities. The 2017 DVR and SRC Needs Assessment focused particularly on the VR services needs of the following populations:

- Individuals with the most significant disabilities, particularly their need for supported employment;
- Individuals with disabilities who are minorities, including refugees;
- Individuals who have been unserved or underserved by DVR;
- Individuals with disabilities served through the statewide Workforce Investment System; and
- Individuals who are youth with disabilities and students with disabilities, including, as appropriate, their need for Pre-Employment Transition services or other transition services.

A comprehensive report of the results of the Vermont DVR and SRC Needs Assessment was submitted in 2017. The report includes data from a variety of sources, including DVR's Rehabilitation Services Administration (RSA) reporting database, information from the United States Census Bureau, the American Community Survey, as well as surveys conducted by DVR. Although not specifically designed to assess unmet needs, these surveys assisted DVR in determining ways to better serve individuals with disabilities, thereby making its services more accessible and welcoming to populations that may not be currently served.

B. WHO ARE MINORITIES;

The ACS provides data on disability and race by state. Overall, 3.8% of Vermonters are from an ethnic minority. The following table shows the ACS estimates of the incidence of disability by race.

Table 16: Incidence of Disability by Race for Adults Aged 18 to 64

Race	Total Number of Working Age	Percentage Reporting a Disability	Estimated Potential VR Eligible Consumers

Race	Total Number of Working Age	Percentage Reporting a Disability	Estimated Potential VR Eligible Consumers
White	346,300	11.9	41,209
Black/African American	6,000	20.2%	1,212
Asian	5,600	22.4%	1,254
American Indian	1,900	16.5	313

The disability rates for African Americans and Asians in Vermont exceed the average. However, the estimates for the Vermont non-white populations with disabilities are from sample sizes of less than 40 people and too small to be statistically reliable. As a result, this data may substantially over state the actual rate of disability in these groups. In Program Year 2018, 8% of DVR closures were for individuals from an ethnic minority. Given this data it appears that individuals with disabilities from ethnic minorities are accessing the VR program at a higher rate to individuals who are white.

C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

Older Vermonters with Disabilities

The percentage of individuals with disabilities age 55 and above, increased from 12.3% to 13.9% between 2013 and 2016. This seems to reflect the overall aging of the Vermont demographic. The percentage of people served over 65 also increased during this period, from 1% to 3%. Individuals over the age of 55 are working longer, not only for financial reasons but because people are living longer and choosing to remain in the workforce. It is likely that many individuals over the age of 55 experience disabilities and may be eligible for VR services. DVR now oversees the Senior Community Service Employment Program (SCSEP), and has hired a "Mature Worker Program Coordinator". A primary role of the coordinator is to facilitate the referral of eligible individuals to DVR, by building and supporting strong linkages with services for mature workers.

Individuals with Physical Disabilities

DVR suspects that individuals with physical disabilities may be underserved, especially since the number of individuals with psychiatric disorders and substance disorders has increased. It may be that individuals with physical disabilities are not seeking services because their needs are less complex. In addition, DVR recognizes that employers require a more diverse selection of candidates to fill more skilled positions. Although DVR has initiated preliminary outreach to medical providers and community partners to diversify its caseload, more systematic and strategic planning is required.

Individuals with Traumatic Brain Injury (TBI)

It is estimated that at least 10,000 Vermonters are recovering from brain injury, but less than 5% of these individuals are seeking services to help them succeed in the workplace. DVR counselors and CRP (Community Rehabilitation Provider) staff have received training on TBI. There are no discrete employment services for individuals with TBI.

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

At the time of the 2017 Needs Assessment, DVR did not have good data on the needs of individuals who have been served through other components of the workforce development system. Since, 2017 DVR and VDOL have been working on data sharing strategies to look at consumers co-enrolled across programs and better assess the unmet needs. At the field level DVR and VDOL staff are routinely meeting and coordinating efforts to serve individuals across programs. In eight out of twelve locations DVR and DOL offices are either co-located or in the same building facilitating close coordination of services. DVR and VDOL management meet at least quarterly to make sure services are aligned and well coordinated.

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

In 2017 DVR conducted a Comprehensive Needs Assessment including an assessment of the needs of youth and students with disabilities. The primary findings were as follows:

Strengths of the Vermont System

In the school year 2016-17, approximately 1 in 5 (18.5%) eligible students received Pre-ETS services statewide. This suggests DVR has been successful in making Pre-ETS services accessible to eligible students.

Overall, youth with disabilities appear to be accessing DVR services at a high rate (up to 35% of the eligible population). This data suggests DVR has been successful in making services accessible to youth.

DVR has a strong collaborative partnership with AOE at the state level. At the local level, almost all Vermont high schools are working in partnership with DVR to facilitate the provision of and access to Pre-ETS and transition services.

Vermont has a good infrastructure to provide supported employment for youth with developmental disabilities and emotional/behavioral disabilities.

Areas for Development in the Vermont System

Core transition teams have formed and met in all 12 Agency of Human Services districts. Most are in the early development stage however, and are working out local processes and agreements. These teams will need time and support to become fully functional and effective groups.

Youth with disabilities are less likely to obtain competitive employment during the transition years. Early employment experiences are a strong predictor of adult employment success. According to VFN, students who have had work experiences expressed more confidence in their ability to work. This suggests youth need more opportunities for real work based learning experiences and/or competitive employment.

Post-secondary education and training opportunities are key for students and youth with disabilities to access higher wage jobs and develop long term career opportunities. Students and youth with disabilities are less likely than their peers without disabilities, to access postsecondary education.

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

Because of the small population and rural nature of Vermont, there are very few CRPs in the state. VABIR (the Vermont Association of Business, Industry and Rehabilitation) is the primary CRP for the DVR program with the exception of supported employment. VABIR has capacity to serve DVR consumers statewide and has an excellent track record. VABIR also serves individuals without disabilities through the state TANF program.

DVR contracts with Vermont's Designated Agencies for employment services for individuals with developmental disabilities and individuals with severe and persistent psychiatric disabilities. Easter Seals also has a small presence in Vermont. While DVR is open to supporting the development of new CRPs as well as existing CRPs who come to Vermont, there is limited funding available to support multiple agencies.

DVR partnered with other state agencies, VABIR and the Designated Agencies, to create an online training program for CRP staff hosted by Community College of Vermont. The program allows cohorts of employment staff to access training statewide. The content is modified to the specific populations served.

3. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

1. Students with Disabilities

The State of Vermont has sixty supervisory unions serving students in primarily rural communities. During the 2016 to 2017 school year, 5,390 Vermont high school students were served. All were between the ages of 14 and 22 and either on an IEP or 504 plan, and therefore met the definition of a student with a disability.

1. Youth with Disabilities

According to American Community Survey (ACS), 7.5% of youth ages 16 to 20 (3,450) reported having a disability. The ACS does not provide data for youth ages 14 to 24 who report having disability, which is the WIOA definition. However, extrapolating the ACS data for youth ages 16 to 20 would suggest that there are approximately 8,600 youth with disabilities in Vermont. It is important to note that the ACS uses primarily self-reported data and youth may be less likely to self-identify as a person with a disability. Therefore, this number maybe an underestimate of the actual prevalence.

1. Employment Rates for Youth with Disabilities

The ACS provides data on the employment rate of youth with disabilities ages 16 to 20. As Table 4 shows, youth with disabilities are much less likely to be employed than their counterparts without disabilities at both the national and state level. It is well documented that early work experiences for students and youth are the best predictor of future employment. The gap in employment rates in this age group is likely to continue into adulthood unless students and youth with disabilities have opportunities for work based learning experiences.

Table 4: Employment Rates for Youth With and Without Disabilities

Population	Total	Employed Count	Employed Percentage
US Youth without Disabilities	20,268,600	7,539,919	37.2%

Population	Total	Employed Count	Employed Percentage
Vermont Youth without Disabilities	42,600	18,190	42.7%
US Youth with Disabilities	1,266,800	288,830	22.8%
Vermont Youth with Disabilities	3,400	952	28%

K. ANNUAL ESTIMATES

1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES

Based on the American Community Survey (ACS), DVR estimates that there are 45,076 Vermonters between the ages of 16 and 64 with a disability. All these people are potentially eligible for services under this Plan. We estimate 6,459 individuals will be eligible for DVR services in FFY 2021.

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

An estimated 8,205 individuals will receive VR Program services FFY 2021 with funds provided under either Part B of Title I of the Act or under Part B of Title VI.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

For FFY 21 we estimate that 400 individuals will receive supported employment services through DVR. This number does not include individuals receiving extended supported employment services funded through Medicaid and other non-VR funding sources.

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION.

On July 1, 2016, DVR transitioned to a new Order of Selection with four categories instead of three. Under the order of selection, we estimate that in FFY 2021:

- 4,542 Priority Category 1 customers will be served;
- 1,865 Priority Category 2 customers;
- 49 Priority Category 3 customers; and
- 2 Priority Category 4 customers.

For FY 2021 we expect Category 4 to be a closed Category and individuals found eligible under this category to go on a waiting list. DVR will consult with the SRC at least quarterly to determine if the category should be opened.

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

Under the Order of Selection, we anticipate that individuals in Category 4 will be put on a waiting list for the program. We estimate about 2 individuals will be found eligible under this category in FFY 2021.

4. THE COST OF SERVICES FOR THE NUMBER OF INDIVIDUALS ESTIMATED TO BE ELIGIBLE FOR SERVICES. IF UNDER AN ORDER OF SELECTION, IDENTIFY THE COST OF SERVICES FOR EACH PRIORITY CATEGORY.

Total costs to serve individuals in all four categories for FY 2021 will be approximately $15,600,000. Estimated costs of services for each category are:

- Priority Category 1: $10,968,599 Title I, $201,600 Title VI-B
- Priority Category 2: $4,506,081 Title I, $83,520 Title VI-B
- Priority Category 3: $123,683 Title I
- Priority Category 4: $1,637 Title I

L. STATE GOALS AND PRIORITIES

1. IDENTIFY IF THE GOALS AND PRIORITIES WERE JOINTLY DEVELOPED AND AGREED TO BY THE STATE VR AGENCY AND THE STATE REHABILITATION COUNCIL, IF THE STATE HAS A COUNCIL, AND JOINTLY AGREED TO ANY REVISIONS

Based on the DVR/SRC Needs Assessment completed in December of 2017, DVR and the SRC have established targets for Program Year 2020 for DVR's Strategic Plan goals. DVR and the SRC have also established goals and priorities in response to the new mandates and requirements included in the Workforce Innovation and Opportunities Act (WIOA). In particular, DVR and the SRC established goals and priorities related to the implementation of the WIOA Common Performance Measures. All DVR goals and priorities are established within the Division's long-established strategic themes as follows:

- *Organizational Effectiveness*
- *Valued and Empowered Employees*
- *Prepared Job Seekers*
- *Collaborative Partnerships*

1. **Program Year 2020 Goals and Priorities**

1. **DVR will align services to support consumers in achieving the WIOA Common Performance Outcome Measures.**
   DVR is a strong supporter of the WIOA Common Performance Measures. We believe the new measures support consumers in their career goals and promote higher wages and more sustainable employment. However, the WIOA measures are extremely lagging, meaning most of the desired outcomes occur well after services end. For example, the measure of median earnings occurs two full quarters after case closure. As a result, the measures are not very useful in guiding the work of frontline staff on a day-to-day basis. Therefore, DVR decided to establish leading measures of activities expected to improve the longer-term WIOA outcome measures. The section below outlines these lead measures and how they are expected to influence the lagging outcome measures.

- Leading Measure One: The use of career assessment tools to support exploration of higher wage and higher skill options.
- Leading Measure Two: The involvement of other team members (employment placement staff, benefits counselors and others) strengthens consumer engagement in completing their employment goal
- Leading Measure Three: Career focused education and training leads to higher wage and higher quality employment.
- Leading Measure Four: VR counseling with an emphasis on career focused plans will lead to higher wage and higher quality employment.
- Leading Measure Five: Continued support and encouragement after job placement results in better job retention and career advancement.

Targets for the Lead Indicators:

- 50% of cases will include use of career assessment tools to support exploration of higher wage and higher skill options.
- 50% of cases will involve other team members (employment placement staff, benefits counselors and others) to strengthen consumer engagement in completing their employment goal
- 35% of consumers in plan status will be enrolled in career focused education and training that leads to higher wages and higher quality employment.
- 35% consumers in plan status will have plans directed to achieving careers in higher wage employment
- 75% of DVR consumers will continue to be engaged in DVR services after job placement.

2. DVR will increase the percentage of consumers earning more than minimum wage at closure.
DVR believes that in order to increase median earnings six months post closure, the agency must increase earnings at closure. Based on Needs Assessment data from 2017, 55% of DVR consumers were earning 110% of minimum wage or less at closure and only 18% of DVR consumers were earning over 150% of minimum wage at closure. These numbers improved by Program Year 2018 as follows:

- **58% had wage rates at or above 110% of the minimum wage at closure**
- **38% had wage rates at or above 125% of minimum wage at closure**
- **23% had wage rates at or above 150% of the minimum wage (above $16 per hour) or at closure**

DVR's continued focus of careers and higher wage employment will further improve these results. Therefore, the Program Year 2020 targets are as follows:

- 65% of DVR consumers will earn at or above 110% of minimum wage at closure
- 50% of DVR consumers will earn at or above 125% of minimum wage at closure
- 30% of DVR consumers will earn at or above 150% of minimum wage at closure

3. DVR will increase consumer opportunities to participate in post-secondary education and training and gain industry recognized credentials.
Post-secondary credentials are a proven mechanism for consumers to access higher wage employment and meaningful careers. In Program Year 2018, 244 participants were enrolled in programs potentially leading to a credential, and 48 participants completed a post-secondary degree or industry-recognized credential. DVR seeks to dramatically increase participation in program years 2020 and 2021.

Targets:

Program Year 2020 Target: 500 DVR consumers will enroll in training leading to a credential and 125 DVR consumers will achieve a credential

Program Year 2021 Target: 600 DVR consumers will enroll in training leading to a credential and 150 DVR consumers will achieve a credential

4. In partnership with VDOL, DVR will create more opportunities for DVR consumers to participate in apprenticeship programs and pre-apprenticeship programs.
Apprenticeships offer DVR consumers the opportunity to earn money while receiving necessary training to achieve a credential. Apprenticeships generally lead to higher wage employment. The development of apprenticeships is a new strategy for DVR. Therefore, we have partnered with the Vermont Department of Labor to establish apprenticeships for DVR consumers.

Targets:

Program Year 2020: 10 DVR consumers will enroll in registered apprenticeship and pre-apprenticeship programs.

Program Year 2021: 15 DVR consumers will enroll in registered apprenticeship and pre-apprenticeship programs.

5. DVR will establish a Charter Group to determine how to improve transition services for youth and implement those improvements.
In 2015, DVR implemented a major restructuring of school to work transition services in response to the WIOA requirement to provide Pre-Employment Transition Services (Pre-ETS). This included establishing a cadre of VR counselors and Youth Employment Specialists to work exclusively with high school students. DVR believes it is time to reassess this restructuring and

look at how both Pre-ETS and VR services for students and youth could be improved.

In Program Year 2020 the Charter Group will develop a series of recommendations on how to improve and enhance Pre-ETS services in Vermont. Upon review and approval by the DVR management team, these recommendations will be implemented in Program Years 2020 and 2021.

6. DVR will improve outcomes for students and youth with emotional/behavioral disabilities served through the JOBS Supported Employment Program. To align the JOBS supported employment programs with the wider DVR Careers Initiative, we have spent the last year working with designated agencies to establish new performance measures. DVR felt it was very important for JOBS youth to be included in the Careers Initiative and that our contracted performance measures reflect that intent. The JOBS program staff and managers were closely involved in the development of the new measures. There is strong buy in and support. The new measures are listed below:

- Total number of youth served with a DVR IPE
- Total number of youth who received at least one career assessment during the fiscal year (50% of total served)
- Total number of youth enrolled in career focused training or supported education during the fiscal year (30% of total served)
- Total number of youth placed in competitive employment for ten working days (70% of total served)
- Total number of youth with a higherwage IPE goal during the federal fiscal year (30% of total served)
- Total number of consumers employed at or above 125% of Vermont minimum wage at any time during the federal fiscal year (30% of total served)

7. DVR will explore and implement strategies to better serve job seekers with disabilities who are 55 and older.

Vermont is the second oldest state in the USA (behind Maine). More Vermonters are or want to stay in the workforce beyond retirement age. The Vermont economy needs older workers to meet the workforce needs of employers in the state. Despite this, Vermont DVR has only seen a modest increase in the percentage of applicants 55 and older. DVR will plan and implement strategies to engage older job seekers. These may include job fairs specifically for older workers, targeted outreach, staff training, and new partnerships. Because DVR is still in the planning stage, we have not developed specific targets for Program Years 2020 and 2021.

8. DVR will continue to expand efforts to effectively serve employers through Creative Workforce Solutions (CWS).

Employer engagement continues to be a critical activity to ensure DVR consumers have access to employment opportunities and careers. Creative Workforce Solutions is the employer engagement and marketing arm of DVR. DVR measures employer engagement through the following three metrics:

- **New Employer Contacts: These are defined as new contacts with employers who have never engaged with CWS**
- **Employer Activities: These are defined as ongoing engagement activities with employers who have an ongoing relationship with CWS**
- **Employer Opportunities: These are defined as specific consumer opportunities such as a job opening, training opportunity, work based learning opportunity, company tour or informational interview**

The annual targets for the CWS team for Program Years 2020 and 2021 are as follows:

- Contacts: 750 new contacts per program year
- Activities: 2,250 distinct engagement activities per program year
- Opportunities: 2,500 discrete consumer opportunities developed per program year

9. DVR will continue to seek opportunities to expand and/or improve services for underserved populations including individuals who need supported employment. DVR recognizes that there continue to be populations of Vermonters with disabilities that are unserved or underserved in the state. These include, but are not limited to:

- Individuals with severe disabilities who need supported employment services but are not eligible for long term supports through the Division of Developmental Services or the Department of Mental Health.
- Individuals with disabilities who are offenders and are transitioning into the general community
- Individuals with substance abuse/use disorders
- Survivors of traumatic brain injuries

DVR has formed a development team to explore opportunities to expand or improve services to address the unmet needs of these groups. This includes exploring new partnerships or expanding existing partnerships with other agencies, funding sources and stakeholders. It also includes the development of grant applications to implement new services or expand and improve existing services.

10. DVR will continue to track consumer satisfaction with the program's services through the bi-annual consumer satisfaction survey. DVR will also implement strategies to assess student and youth satisfaction with vocational rehabilitation and pre-employment

transition services.
DVR contracts bi-annually with an independent survey organization to assess consumer satisfaction statewide and by district. This data is critical to helping us improve services and provide better customer service. DVR has consistently maintained high overall rates of satisfaction. In 2018, 96% of consumers said that they would recommend that their friends or family members seek help from DVR; this is up one percent from the 2016 survey. Another area of strength revealed in the 2018 survey, was 92% of consumers reporting they were satisfied with their experience working with DVR staff and DVR counselors; this is a two percent increase from the previous survey.

In part because of the implementation of Pre-ETS in Vermont, the overall population served by DVR has trended younger. In Program Year 2018 over 50% of participants where either youth or students under the age of 24. Because of this shift we think it is important for DVR to develop new strategies to assess student and youth satisfaction with DVR services.

Targets:

- In the 2021 Consumer Satisfaction Survey, at least 96% of DVR consumers will report they would recommend DVR to family and friends and 92% will report they were satisfied or very satisfied with their experience working with DVR staff and counselors.
- In Program Year 2020, DVR will implement youth specific strategies to assess satisfaction with VR and Pre-ETS services.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS

See Goals 6 and 8 in Section (A)

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

The goals and priorities outlined in the prior sections are based on the DVR and SRC Needs as outlined in Section (j). Because this Needs Assessment was conducted in 2017 (the 2020 Needs is currently being developed), some of the priorities identified are no longer applicable. For example, the need to manage the loss of re-allotment funds has been resolved since DVR achieved financial stability in FFY 2020. Therefore, DVR and the SRC have focused on areas that still need continued work and development, and new needs that have emerged since 2017.

Based on the data gathered and discussions with the State Rehabilitation Council, DVR Senior and Regional Managers, and the DVR Implementation Team, the following are the key findings of the 2017 DVR Needs Assessment (*not* ordered by priority):

The need for increased attention to the employment needs of the mature worker.

Despite a very modest increase, the overall percentage of VR consumers over 65 remains very low (3% in FFY 2016). This is despite the fact that Vermont has an aging demographic. Older Vermonters are increasingly staying in the workforce beyond normal retirement age for financial reasons or just because they want to. Many mature workers may experience age related disabilities and could benefit from DVR services. It is not clear why they are not seeking DVR services in greater numbers, and this is an area DVR may need to research in partnership with programs serving older Vermonters.

DVR needs to identify and implement strategies to increase consumer hourly wages at closure.

In FFY 16 55% of individuals were closed earning less than 110% of minimum wage. While this can partly be explained by the concurrent increases in the state minimum wage in 2015 and 2016, it is still an area of concern. The minimum wage in Vermont was $9.60 in 2016. This compares to a median hourly wage for all occupations in Vermont of $18.23 for 2016. While entry level employment is appropriate for some consumers, DVR should be looking at ways for individuals to move up the career ladder into higher wage employment.

DVR consumers need opportunities to gain industry recognized credentials in middle skills professions.

DVR data suggests that consumers who gain industry recognized certifications such as Licensed Nursing Assistant (LNA) or Commercial Driver's License (CDL), are closed in higher wage employment. Such middle skill certifications are often the quickest way to help individuals move from entry level employment to higher paying employment with genuine career prospects. There is a high demand from employers for individuals with these types of certifications. Historically, DVR has set aside case service funds to support consumers in certification programs. DVR may need to expand these set asides and look at more system wide efforts to make these opportunities available.

DVR must develop strategies to meet and exceed the outcome targets under the Common Performance Measures.

The WIOA Common Performance Measures significantly change the way DVR is measured. The emphasis on career development, credential attainment, and measurable skills gains, will require DVR to consider changing current practice. As previously noted, DVR will be looking at strategies to increase wages and assist consumers in obtaining industry recognized credentials. In addition DVR will look at how to help consumers develop a career path.

B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

In Program Year 2018, sufficient data collection had occurred to begin reporting on three of the five measures that are reported at the program level (employer engagement is reported as a combined measure for all WIOA core partners):

- Employment rate in the second quarter post closure was 49%
- Median earnings in the second quarter post closure was $3,516
- Measurable skill gains rate was 54.9% compared to 37.8% in PY 2017

C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS RECEIVED FROM THE STATE REHABILITATION COUNCIL AND FINDINGS AND RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER SECTION 107.

Not applicable

M. ORDER OF SELECTION

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AND ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES

Vermont continues to operate under the Order of Selection established in FFY 1999. With the approval of the State Rehabilitation Council, the category definitions were rewritten in FFY 2017 to clarify the intent of the Rehabilitation Act to serve those most in need of services. These category definitions replace the definitions that were in the FFY 2015 State Plan.

Category I: Individuals who have been determined by DVR to have a physical or mental impairment that constitutes or results in a substantial impediment to employment and that seriously limits function in four or more areas of functional capacity (mobility, communication, work tolerance, work skills, self-care, self-direction, interpersonal skills, dexterity/coordination), requiring multiple services over a period of six months or more.

Category 2: Individuals who have been determined by DVR to have a physical or mental impairment that constitutes or results in a substantial impediment to employment and that seriously limits function in two to three areas of functional capacity (mobility, communication, work tolerance, work skills, self-care, self-direction, interpersonal skills, dexterity/coordination), requiring multiple services over a period of six months or more.

Category 3: Individuals who have been determined by DVR to have a physical or mental impairment that constitutes or results in a substantial impediment to employment and that seriously limits function in one area of functional capacity (mobility, communication, work tolerance, work skills, self-care, self-direction, interpersonal skills, dexterity/coordination), requiring multiple services over a period of six months or more.

Category 4: Individuals who have been determined by DVR to have a physical or mental impairment that constitutes or results in a substantial impediment to employment and that seriously limits function in one area of functional capacity (mobility, communication, work tolerance, work skills, self-care, self-direction, interpersonal skills, dexterity/coordination), requiring multiple services over a period of less than six months.

B. THE JUSTIFICATION FOR THE ORDER

DVR made the changes to the definitions of Categories 1, 2, 3 and 4 because the old definitions did not provide sufficient clarity for counselors. As a result, a high proportion of individuals

were found to be eligible under Category 1. The new definitions have helped staff better distinguish the categories.

In FFY 17, DVR experienced a significant reduction in funding due to reduced re-allotment funding being available. DVR considered reducing the open categories at that time. However, since then, DVR's financial situation has stabilized and we are able to keep categories 1, 2 and 3 open.

C. THE SERVICE AND OUTCOME GOALS

For FFY 20, DVR expects to serve the following number of individuals in each category:

- Category 1: 4,542
- Category 2: 1,865
- Category 3: 49
- Category 4: 2

DVR projects the following rehabilitation outcomes for the individuals found eligible under the Order of Selection. These are the projected outcomes over the lifetime of the above cases:

- Category 1: 2,043
- Category 2: 839
- Category 3: 22

D. TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER; AND

Individuals found eligible under Categories 1, 2 and 3 are expected to require at least six months of services from the development of the plan to the achievement of the employment goal. The actual amount of time needed will vary widely depending on the goals and needs of the individual. On average in Vermont it takes 13 months from application to successful employment outcome for individuals in the above categories.

Individuals found eligible under Category 4 will be expected to achieve their employment goal within six months of plan development. However, these individuals will have to wait one or more quarters for the Order of Selection to be opened (if it is opened), before a plan can be developed. Therefore, assuming one quarter for the Order of Selection to be opened and up to 90 days for plan development, outcomes for individuals under this category may take up to one year or more.

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES

In Vermont services for Category 1 eligible individuals are never delayed (as long as they are available for services), when eligible individuals in Priority Categories 2, 3 or 4 are open for services. This assumes all other variables are equal such as application date, IPE date and the individual's availability for services at any given time.

2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS, REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT

Vermont DVR has elected to serve eligible individuals, regardless of the order of selection, who require specific services or equipment to maintain employment.

N. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS

1. SPECIFY THE STATE'S GOALS AND PRIORITIES FOR FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

These funds will be directed to the JOBS supported employment program serving youth ages 16 to 22, individuals with developmental disabilities (youth and adults) served through the State Division of Developmental Services supported employment programs, and adults with psychiatric disabilities served through the State Community Rehabilitation and Treatment programs.

2. DESCRIBE THE ACTIVITIES TO BE CONDUCTED, WITH FUNDS RESERVED PURSUANT TO SECTION 603(D), FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING:

A. THE PROVISION OF EXTENDED SERVICES FOR A PERIOD NOT TO EXCEED 4 YEARS; AND

DVR has committed VI-B funding for youth to the JOBS program, because that program is specifically designed to serve eligible youth with the most severe disabilities. DVR counselors will authorize the use of funds for extended services through the JOBS program for up to the maximum of four years until the youth reaches age 25. The DVR contractual agreements for JOBS include Title I and Title VI-B funds clearly set parameters for the use of each funding source. Title I funds are only used for initial upfront assessment, job development services. Title VI-B funds are only used for post placement supports for employed consumers. A description of the JOBS program is as follows:

The JOBS Program is an innovative supported employment and intensive case management service for youth with emotional and behavioral disturbances (EBD) that uses work as a means to reach this challenging population. As a result of a unique partnership between the Department of Mental Health's Child, Adolescent and Family Unit (CAFU), the Department for Children and Families, the Department of Corrections, the Division of Vocational Rehabilitation, and contract agencies, the JOBS Program is operational in twelve (12) sites across the state. The JOBS Program is funded through a combination of Medicaid Global Commitment funds and a VR grant funds.

JOBS involves employers and the business community in meeting the needs of youth through intensive job development, placement, and on and off site training support. JOBS differs from other traditional employment models by providing intensive case management services to assist young people in meeting other areas of need in their lives, e.g., dealing with legal issues, homelessness, drug/alcohol abuse, transportation and probation and parole. Within this model, DVR funds are used to provide the employment focus and upfront employment assessment, education or training, and placement services. The case management and ongoing support is provided through state general funds, (contributed by the different state departments noted above) which are matched to Medicaid through a fee for service arrangement with DMH.

VR counselors will also be able to use VI-B funds to support extended services for youth not served by the JOBS programs. These services will be funded on a case by case basis for youth with developmental disabilities who have exited school but have not yet meet eligibility or system of care priorities for the developmental services program.

B. HOW THE STATE WILL LEVERAGE OTHER PUBLIC AND PRIVATE FUNDS TO INCREASE RESOURCES FOR EXTENDED SERVICES AND EXPANDED SUPPORTED EMPLOYMENT OPPORTUNITIES FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

As noted in Section (F), DVR has a partnership with the Department of Mental Health (DMH) to provide extended services for youth and adults with psychiatric disabilities. The JOBS program uses Medicaid Global Commitment funds to provide extended supports post DVR closure. In addition, the adult mental health program can provide ongoing supports through the Medicaid case rate for individuals eligible for the Community Rehabilitation and Treatment (CRT) program or outpatient Medicaid Case Management services.

Also as noted in Section (F), DVR has a partnership with the Vermont Development Disabilities Services Division (DDSD) to provide extended services for individuals with developmental disabilities. The primary source of funding for extended services for individuals with developmental disabilities is Home and Community Based Medicaid Waiver funds.

As noted DVR can also use Title I and Title VI-B to provide funds for youth with the most significant disabilities for extended services four up to four years until the youth reaches age 25.

O. STATE'S STRATEGIES

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES

In Section (l) of the State Plan, DVR outlined its goals and priorities for Program Year 2020. The ten strategic goals established by DVR and the SRC are as follows:

A. DVR will align services to support consumers in achieving the WIOA Common Performance Outcome Measures.

B. DVR will increase the percentage of consumers earning more than minimum wage at closure.

C. DVR will increase consumer opportunities to participate in post-secondary education and training and gain industry recognized credentials.

D. In partnership with VDOL, DVR will create more opportunities for DVR consumers to participate in apprenticeship programs and pre-apprenticeship programs.

E. DVR will establish a Charter Group to determine how to improve transition services for youth and implement those improvements.

F. DVR will improve the outcomes for students and youth with emotional/behavioral disabilities served through the JOBS Supported Employment Program.

G. DVR will explore and implement strategies to better serve job seekers with disabilities who are 55 and older.

H. DVR will continue to expand efforts to effectively serve employers through Creative Workforce Solutions (CWS).

I. DVR will continue to seek opportunities to expand and/or improve services for underserved populations including individuals who need supported employment.

J. DVR will continue to track consumer satisfaction with the program's services through the bi-annual consumer satisfaction survey. DVR will also implement strategies to assess student and youth satisfaction with vocational rehabilitation and pre-employment transition services.

Strategy 1: DVR will implement a series of initiatives to realign staff practices, services and assignment of resources to meet the WIOA Common Performance Measures. Goals A, B, C, and J.

In order to maximize DVR outcomes under the WIOA Common Performance Measures, DVR will implement or continue to implement the following:

- DVR will utilize the DVR Dashboard to track leading case practice indicators that we believe will result in improved outcomes. The five primary lead indicators are:
    - Teaming cases with other staff and partners
    - Participation in career assessments
    - Participation in post-secondary education and training
    - Setting higher wage career goals
    - Follow up post-employment
- Every step of the rehabilitation process will message and support the DVR commitment to careers.
- DVR casework practices will support serving consumers more than once on their journey. DVR will continue to implement a follow up system to reach out to consumers after job placement to offer continued support and assistance.
- DVR counselors will provide long term aspirational career counseling. All staff will be trained to support long term career goals.
- Motivational Interviewing (MI) coaches will facilitate coaching circles that support career counseling using MI strategies.
- All DVR staff will be trained to do vocational assessments and use assessments as a career planning tool.
- All staff will be familiar with education and training providers in their communities, as well as what career pathways and stackable credentials are offered. Counselors will be able to speak to consumers about possible career paths, based on assessments.
- BAMs (Business Account Managers) will understand the career paths in the businesses they serve.

<u>Strategy 2</u>: Expand post-secondary training and education opportunities that result in higher wage job opportunities for DVR consumers through progressive education strategies. Goals A, B, C, D, F, H and J.

We know that the most reliable routes to higher wage employment are post-secondary credentials, especially in high demand fields. However, a high proportion of DVR consumers come to the program initially unwilling or unable to pursue post-secondary training or education. Often this is because they need to work due to financial necessity. They may also have had bad experiences in school and feel they are not able to succeed.

To address these challenges, DVR will implement progressive education strategies. That is to say, we will offer consumers safe options to explore and try out training and educational opportunities. This might include a campus tour of Community College of Vermont, support taking an introductory college class, informational interviews with training providers, and assistance improving basic skills. It will also include the use of one on one coaches to support consumers' participation in educational activities and programs.

The DVR Progressive Education Charter Team has identified three broad priorities to move this strategy forward. First, DVR central office will establish a training and support framework that ensures staff have the knowledge, skills and tools to support consumer engagement in progressive education. Second, the DVR Regional Managers will implement routine ways to engage local workforce training providers to coordinate training opportunities for DVR consumers. Third, the Business Account Managers and Employment Consultants will consistently engage employers regarding career ladders and in house training opportunities for DVR consumers.

<u>Strategy 3</u>: Coordinate efforts with the Agency of Education (AOE) and the Department of Labor (VDOL) to ensure individuals with disabilities have access to other components of the workforce system. Goals A, B, C, E and G.

As noted in the Unified Section of the plan, DVR will be working closely with VDOL and AOE to ensure DVR consumers have access to all the workforce development opportunities available in their communities. DVR will be implementing a number of strategies to make this happen including the following:

- DVR and VDOL Regional Managers will continue to have joint meetings at the statewide level and local level to facilitate coordination of services.
- DVR, AOE and VDOL will implement systems to track and manage co-enrollment in each other's programs.
- DVR will pursue actual or virtual co-location of DVR and VDOL staff.
- DVR, with the support of AOE, will develop stronger partnerships with the local Technical Educational Centers and Adult Basic Education programs.

<u>Strategy 4</u>: Expand employer outreach and engagement efforts through Creative Workforce Solutions (CWS) to effectively meet the needs of employers. Goals A, B, C, D, H and J.

As described in Section (g) of the State Plan, CWS is the primary employer outreach and engagement infrastructure for DVR. CWS, and in particular the Business Account Managers, have been a very effective approach to engaging employers and developing employment opportunities for DVR consumers. DVR will expand these efforts through the following strategies:

- Seek opportunities to coordinate employer engagement with the Vermont Department of Labor.
- Analyze Salesforce account management data to determine if there are industry sectors that are underrepresented.
- Develop strategies to engage those sectors in partnership with local employers.
- Build on and expand employer events such as job fairs, employer breakfasts and business recognition events designed to engage employers.

Strategy 5: DVR will form a Charter Group to assess youth transition services including Pre-ETS and develop and implement strategies to improve and expand services. Goal E.

In 2015, DVR implemented a major restructuring of school to work transition services in response to the WIOA requirement to provide Pre-Employment Transition Services (Pre-ETS). This included establishing a cadre of VR counselors and Youth Employment Specialists to work exclusively with high school students. DVR believes it is time to reassess this restructuring and look at how both Pre-ETS and VR services for students and youth could be improved.

In Program Year 2020 the Charter Group will develop a series of recommendations on how to improve and enhance Pre-ETS services in Vermont. Upon review and approval by the DVR management team, these recommendations will be implemented in Program Years 2020 and 2021.

Strategy 6: Explore and expand strategies to serve and support the older worker with disabilities. Goal F.

DVR will implement the following strategies to expand and improve services for older workers:

- In partnership with CWS, DVR will implement job fairs specifically designed for older workers in local districts.
- DVR will reach out to the Area Agencies on Aging to make them aware of DVR services as an option for older Vermonters with disabilities.
- DVR will provide training to counseling and job placement staff related to serving older Vermonters with disabilities.

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Strategy 7: Explore strategies to assist DVR consumers retain and advance in employment. Goals A, B, C and J.

DVR will develop and implement a systematic approach to follow up with consumers after job placement. The intent will be to re-engage the consumer at key points to determine:

- If they need or want more support to retain their employment?
- If they want assistance with career development and training in their current employment?
- If they want to pursue further career development with a different employer on in a different field?

The follow up will occur at key points after initial job placement. The first contact will be immediately after initial job placement through a congratulations letter and follow up call from the VR counselor. The second contact will occur at 60 days post placement. The final contact will occur at three months post-employment closure.

The hope is that this systematic follow up will both help consumers retain employment and identify opportunities for career advancement.

Strategy 8. Continue to explore strategies to develop and expand services for underserved populations including individuals who require supported employment through partnerships and grant and funding opportunities. Goals I and J.

DVR has an ongoing development group specifically designed to identify and respond to grant and other funding opportunities to develop and expand services for underserved populations. The group meets monthly to research and review opportunities and when appropriate apply for funding.

DVR has strong relationships with other state and community agencies. We consistently rely on these partner relationships to explore opportunities to meet the needs of underserved populations. For example in 2019, DVR partnered with the Vermont Department of Health to use opioid funding to implement employment services for individuals in recovery. This population includes individuals with disabilities.

Strategy 9: In partnership with VDOL plan and implement apprenticeship opportunities for DVR consumers. Goals A, B, C, D and J.

DVR is a sub-awardee in a grant project with VDOL to develop and implement apprenticeship and pre-apprenticeship opportunities. As part of the grant project DVR and VDOL will:

- Develop a tool kit for Business Account Managers on how to establish apprenticeships with local employers.
- Partner with Community College of Vermont and other training providers to provide the required training curriculum
- Pilot apprenticeships in local DVR districts with the local DVR counselors, employment staff

2. HOW A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES WILL BE PROVIDED TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS

The State Assistive Technology Program is managed within the DVR program. The AT Project Director sits on the senior management team of the DVR program to make sure AT services are well integrated into VR services statewide.

DVR provides funds for AT services through a contract with the University of Vermont (UVM). UVM has three AT specialists on staff and they provide consultation and training services for DVR consumers. In addition, DVR has three AT specialists on staff providing direct services for DVR consumers. Two are funded through the Linking Learning to Careers, Work Based Learning Demonstration. They provide AT services for youth participating in that demonstration. In addition, DVR has one full time AT specialist on staff providing services to the general DVR caseload in the South East part of the state.

DVR has established a set aside to fund higher cost AT equipment purchases. The AT staff provide guidance to VR counselors around the selection and purchase of AT equipment.

3. THE OUTREACH PROCEDURES THAT WILL BE USED TO IDENTIFY AND SERVE INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES, INCLUDING THOSE WITH THE MOST SIGNIFICANT DISABILITIES, AS WELL AS THOSE WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM

Most of the minorities living in VT reside within Chittenden County, and are served by the Burlington district office. In particular, Burlington has a high proportion of refugees and new Americans. There are several organizations within Burlington that serve individuals who are minorities and/or refugees. The Burlington VR office has a well-established relationship with the Vermont Refugee Resettlement Program and the Association of Africans Living in Vermont.

DVR will also be providing diversity and cultural awareness training for all staff in Program Year 2020. Thereafter, we anticipate the training will be repeated every two years for existing staff. Diversity and cultural awareness training will also be added to the orientation training for all new DVR staff.

4. THE METHODS TO BE USED TO IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POSTSECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES)

DVR continues to implement a highly effective Pre-Employment Transition Services (Pre-ETS) for students statewide.

Vermont DVR developed a comprehensive strategy to implement Pre-ETS in the state. Implementation started in the spring of 2015, and now Pre-ETS are fully operationalized. The following are the primary activities.

1. DVR has implemented an in school Transition counselor model providing Pre-ETS services. DVR has assigned 20% of the program's counseling capacity (13.5 FTEs) to work exclusively with students. This provides coverage to all 54 supervisory unions and high schools in the state.

2. DVR has worked with its primary CRP, VABIR, to implement the Youth Employment Specialist (YES) model. A full time YES is paired with each in school VR counselor to provide a range of Pre-ETS services including the development of work based learning experiences.

3. DVR has implemented self-advocacy services for students through a contract agreement with the Vermont Center for Independent Living (VCIL).

As noted in the Goals and Priorities Section, DVR will be reassessing our design and implementation of youth transition services including Pre-ETS. Based on the outcome of that assessment DVR may implement changes to expand and improve Pre-ETS services in Vermont.

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE

A major challenge for the Community Rehabilitation and supported employment programs is high staff turnover and staff training. To help address this issue DVR has partnered with Community College of Vermont to create an online Community Employment Specialist certification. The program meets the requirements for ACRE certification. The program was fully implemented in FFY 2017, and has been well accepted by provider agencies from supported employment programs and other CRPs. Staff appreciate the ability to get an ACRE certification.

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA

Vermont DVR has had a major commitment to improving our performance under section 116 of WIOA. Strategies 1, 2, 3, 4, 7 and 9 all directly relate to improving the state's performance with respect to the WIOA Common Performance Measures.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES

DVR was closely involved in developing the overall vision for the Unified Plan. DVR along with VDOL and AOE placed strong emphasis on serving all Vermonters including people with disabilities. This is reflected in the Unified Plans Vision and Goals as follows:

Vermont's employment demands will be met through a statewide, coordinated, and integrated system of workforce education, training, and development where all Vermonters can connect to robust career pathways, advance along career ladders, and new Vermonters can quickly secure employment with a Vermont employer.

Goal 1: Connect Vermonters to the education, training, and supportive services needed to enter and advance along a career pathway that leads to greater financial independence.

Goal 2: Increase the number of women, minorities, people with disabilities, and other underrepresented people employed in the skilled trades, science, technology, engineering, and mathematics fields, advanced manufacturing, and other priority industry sectors in Vermont.

Goal 3: Increase the number of Vermonters with barriers to employment who complete high school, earn a post-secondary credential - including an industry-recognized certificate, registered apprenticeship, or post-secondary degree program - and become employed in occupations that align with the needs of Vermont's employers.

Goal 4: Improve Vermont's workforce development system by continuously aligning, adapting, and integrating workforce education and training programs and career and supportive services to meet the needs of all customers.

Goal 5: Expand Vermont's labor force by helping more Vermonters enter the labor market and assisting out-of-state workers in securing employment with Vermont employers and relocating to Vermont.

As outlined in this plan, the DVR Goals and Priorities are directly aligned with the Unified Plan Goals allowing for close cooperation across programs:

DVR will be implementing the following strategies to support our workforce partners serve adults with disabilities served in their programs:

1. Workforce Partners such as VDOL, local training providers, schools, community rehabilitation providers will continue to participate in the local Creative Workforce Solutions teams to coordinate outreach to employers. As noted earlier in the plan the DVR Business Account Managers convene the groups and use Salesforce to track employer engagement.

2. In the past two years DVR and VDOL have strengthened collaboration at state and local level. Most DVR and VDOL offices are in the same building or very close by allowing for easier coordination. DVR and VDOL staff have joint staff meetings to share information and plan joint activities such as job fairs. At the State level the DVR Director and VDOL Workforce Director convenes joint meetings with the local managers to facilitate collaboration. These efforts will continue for this State Plan period.

3. The DVR will routinely provide training to workforce partners to support their efforts in serving people with disabilities including, work incentives and benefits counseling, assistive technology and disability etiquette.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

As noted earlier in this section, each strategy is linked back to at least one goal and priority established by VR and the SRC consistent with the Needs Assessment.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

The strategies for innovation and expansion have been laid out by VR and the SRC under Strategies to Achieve the Goals and Priorities. Innovation and expansion funds support the SRC's work in supporting and advising VR around implementation of of the strategies to achieve the goals and priorities.

In addition with the support of the SRC, I&E funds are being used to support the "Setting the Record Straight Initiative". The Initiative is a partnership between DVR, DBVI, the SRC, the Developmental Disabilities Council, the Vermont Center for Independent Living and the Vermont Public Assets Institute. The goal is to support a public information campaign to promote the employment of people with disabilities and dispel myths and stereo types. The goal is also to inform state policy makers about the workforce potential of people with disabilities.

C. OVERCOME IDENTIFIED BARRIERS RELATING TO EQUITABLE ACCESS TO AND PARTICIPATION OF INDIVIDUALS WITH DISABILITIES IN THE STATE VR SERVICES PROGRAM AND THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM.

In Program Year 2020 DVR will be embarking on a comprehensive statewide training for all staff on diversity and multiculturalism. The goal of the training will be to help staff recognize implicit bias and how to mediate the impact on how they provide services to a diverse

population. We expect the training will become a standard requirement for all staff to attend every two years. The content will be built into the orientation of all new staff as well.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

Program Year 2019 Goals and Priorities as outlined in the State Plan:

Goal 1. DVR will align services to support consumers in achieving the WIOA Common Performance Outcome Measures.

Program 2018 Measures:

1.

    a. DVR is a strong supporter of the WIOA Common Performance Measures. We believe the new measures support consumers in their career goals and promote higher wages and more sustainable employment. However, the WIOA measures are extremely lagging, meaning most of the desired outcomes occur well after services end. For example, the measure of median earnings occurs two full quarters after case closure. As a result, the measures are not very useful in guiding the work of frontline staff on a day-to-day basis. Therefore, DVR decided to establish leading measures of activities expected to improve the longer-term WIOA outcome measures. The section below outlines these lead measures and how they are expected to influence the lagging outcome measures.

- Leading Measure One: The
- Leading Measure Two: The involvement of other team members (employment placement staff, benefits counselors and others) strengthens consumer engagement in completing their employment goal
- Leading Measure Three: Career focused education and training leads to higher wage and higher quality employment.
- Leading Measure Four: VR counseling with an emphasis on career focused plans will lead to higher wage and higher quality employment.
- Leading Measure Five: Continued support and encouragement after job placement results in better job retention and career advancement.

In Program Year 2018 DVR deployed a dashboard visible to all staff and managers tracking the leading measures. DVR also set targets for caseloads and districts outlined in Section L.

Goal 2. DVR will increase the percentage of consumers earning over 110% of minimum wage and over 150% of minimum wage at closure.

Program Year 2019 Measures:

1. The percentage of DVR consumers with earnings greater than 110% of minimum wage at employment closure.
2. The percentage of DVR consumers with earnings greater than 150% of minimum wage at employment closure.

Program Year 2019 Targets:

1. 55% of DVR consumers will earn 110% or greater of minimum wage at closure.
2. 25% of DVR consumers will earn 150% or greater of minimum wage at closure.

Program Year 2018 Update:

1. 58% had wage rates at or above 110% of the minimum wage at closure.
2. 23% had wage rates at or above 150% of the minimum wage (above $16 per hour) at closure.

Goal 3. DVR will increase consumer opportunities to participate in and gain industry recognized credentials in middle skills professions.

Program Year 2019 Measure: Number of individuals achieving credential attainment.

Program Year 2019 Target: DVR will be collecting baseline data during this period.

Program Year 2018 Update: 244 VR consumers enrolled in programs potentially leading to a credential, and 48 participants completed a post-secondary degree or industry-recognized credential. We suspect staff under reported credential attainment given this was the first year they were asked to collect this data.

Goal 4. DVR will continue to expand efforts to effectively serve employers through Creative Solutions (CWS).

Program Year 2019 Measure: Employer engagement with DVR as tracked through the CWS Salesforce account management system**.**

Program Year 2019 Target: DVR will maintain active relationships with 2,500 employers statewide during the program year.

Program Year 2018 Update: CWS had relationships with 2,418 discrete employers. The CWS Business Account Managers had 5,672 record activities with those employers (introductory meetings, informational interviews and business tours). These activities generated 4,175 opportunities for DVR consumer. An opportunity might include:

- A job shadow or informational interview

- A training placement
- An OJT placement
- A competitive job opportunity

We believe the above data indicates that CWS continues to produce robust engagement with Vermont employers resulting in increased opportunities for DVR consumers.

Goal 5. Consumer satisfaction with DVR services will be maintained or increase.

Program Year 2019 Measure: Bi-annual consumer satisfaction survey.

Program Year 2019 Target: DVR will achieve an 87% or better overall consumer satisfaction rating. Consumers reported a 87% overall satisfaction rating in the most recent survey (2016).

DVR will also develop a process to assess student and parent satisfaction with Pre-ETS services. DVR will explore approaches to conducting such an assessment and develop metrics to track.

Program Year 2018 Update: The DVR Consumer Experience Survey is conducted every three years to determine consumers' overall satisfaction with the program. The survey is conducted by a third-party research firm, Market Decisions Research (MDR), who have an extensive background in working with other VR agencies nationwide.

Seven hundred consumers were contacted to provide information for our 2018 survey. The results were outstanding, and found that of the consumers surveyed:

- 81% reported they were satisfied or very satisfied with DVR.
- 96% said they would recommend that their friends or family members seek help from DVR.
- 92% of consumers reported they are satisfied with their experience working with DVR staff and DVR counselors; this statistic has risen two percent from our previous survey in 2016.

An area where DVR has enjoyed consistently high rates of satisfaction is in consumers feeling that they were treated by DVR staff with dignity and respect. In the 2018 survey, 98% of consumers reported feeling that they were treated by DVR staff with dignity and respect. The largest improvement in customer experience was seen in the ability of consumers to communicate with their DVR counselors. In 2016, 88% of consumers were satisfied with their

ability to contact their counselor; in 2018 this percentage has risen to 91%, an all-time high for the agency.

The Market Decisions Research survey also included for the first time, measures of satisfaction for youth in transition. 97% of youth reported that they found working with a transition counselor helpful. Only 11% reported having problems working with their DVR transition counselor. To get more qualitative data, DVR is contracting with Market Decisions Research to conduct focus groups with youth in early 2020. We hope data from the focus groups will help inform how we provide services for students and youth going forward.

Goal 6: DVR will implement a comprehensive quality assurance process incorporating the new AWARE case management system.

DVR implemented a comprehensive case review process starting on October 1, 2018. The review process is built into the AWARE case management system which tracks completion. The case review system tracks both the compliance and qualitative components of a case record.. DVR supervisors are to review 5 cases per quarter for full time counselors.

For Program Year 2018, DVR completed 100% of the required case reviews. DVR staff and managers find the system easy to use and very helpful in supporting good case work. Implementation of this process also resolved a prior year audit finding.

Goal 7. DVR will continue to implement highly effective Pre-Employment Transition Services (Pre-ETS) for students statewide.

Program Year 2019 Measures:

1. The percentage of high schools statewide that have at least one student actively participating

in Pre-ETS through DVR.

2. The percentage of all potentially eligible students statewide who are participating in Pre-ETS through DVR.

Program Year 2019 Targets:

1. 90% of high schools statewide will have at least one student participating in Pre-ETS through DVR.
2. 20% of potentially eligible students will participate in Pre-ETS through DVR.

Program Year 2018 Update: Out posting DVR transition counselors at high schools to work exclusively with students has proven very effective in terms of access to DVR services.

- In Program Year 2018 all 54 Vermont Supervisory Unions referred students to DVR for services.
- In Program Year 2018, DVR served 2,280 high school students statewide, approximately 42% of the eligible student population.

DVR has clearly done an effective job ensuring access to Pre-ETS services for all potentially eligible high school students.

Goal 8. DVR will implement the following strategies to mitigate FFY 2016 and FFY 2017 reductions in re-allotment funding that resulted in substantial cuts in services and capacity:

- Partnerships with other programs and state systems to sustain employment services for people with disabilities;
- Increasing program income through the Ticket to Work program;
- Exploring federal and state grant opportunities to pilot new service models; and
- Continually assessing the assignment of DVR resources to ensure funds are going toward activities that are most likely to result in an employment and career outcomes.

Program Year 2019 Measures:

1. State government or other community agencies that have contributed resources to sustain programs affected by the loss of re-allotment.
2. Social Security Administration Ticket to Work and Cost Reimbursement revenue.
3. Federal or state grant applications.

Program Year 2019 Targets:

1. Baseline
2. DVR will generate $2.5 million in Ticket to Work Revenue in Program Year 2019.
3. DVR will apply for at least one grant application in Program Year 2019.

Program Year 2018 Update:

- The Division of Developmental Services (DDS) stepped in to provide additional funding for supported employment to back fill the loss of DVR resources. The new funding has sustained capacity for job placement and job development that would have otherwise been lost.
- DVR generated $1,720,534 in Ticket to Work during Program Year 2018. The lower than expected revenue was primarily the function of the Social Security Administration suspending payments for two quarters for administrative reasons. Since then, Ticket to Work revenue is on track to meet the 2019 program year goal.
- DVR formed a Development Team that meets regularly to explore funding opportunities. DVR applied for two grants during Program Year 2018:
    - One from SAMSHA for a supported employment program designed to serve adults with psychiatric disabilities in outpatient programs. Unfortunately, DVR's application was not selected for funding.

- One from the Kessler Foundation to support a pilot program called Better Option than Social Security (BOSS). BOSS will provide innovative strategies to assist SSI/SSDI beneficiaries to work at substantial levels. DVR was awarded this grant starting January 1, 2020.

Goal 9. With the implementation of Pre-ETS, the DVR caseload has trended towards serving a younger cohort. DVR needs to ensure the needs of middle-aged and mature workers are still adequately addressed, and in particular, the following cohorts:

- Adults ages 35 to 55
- Adults aged 55 and above

Program Year 2019 Measures:

1. The number of individuals receiving services in these cohorts.
2. The employment outcomes by age cohort.
3. Consumer satisfaction as measured in the DVR satisfaction survey.
4. Services provided by age cohort.
5. Other measures as identified by DVR and the SRC.

Program Year 2019 Target: DVR will be collecting baseline data for this reporting period.

Program Year 2018 Update: Of the 5496 participants with Individualized Plans for Employment (IPE) receiving services, 58% were under the age of 35 when they began IPE services; 27% (1506 were between the ages of 35 and 55, and 15% (807) were 55 and older.

The wage rate and hours worked per week at closure were greater for older participants. Median number of hours worked per week was 32, compared to 25 for those under age 35. Median hourly wage at rehabilitation was $15 for those over age 55 and $12.50 for those age 35 to 55, compared to a median of $11.50 for the younger population.

A higher proportion of older participants also exited successfully: 48% of those over 55 and 42% of those between the age 35 to 55, compared to 32% for those under age 35. However, it is more difficult to maintain contact with younger participants after job placement through the 90 days of stable employment required to claim a successful outcome. Exit data from PY 2017 shows a similar rate of successful VR case closure for these age groups (51% for age 55 and up, 40% for those age 35 to 55, and 31% for under age 35). However, the employment rate in the second quarter post-exit was 46% for both of the older age groups, compared to 52% for those under age 35. In other words, the higher employment rate in 2018 for older versus younger adults, may have more to do with stability and maturity than with employment outcomes. In the 2018 DVR consumer satisfaction survey, we found no significant differences in consumer satisfaction rates by age group.

Goal 10. DVR will continue to seek options for supported employment for the following underserved populations in the state:

1. ;
2. Individuals with TBI who need onsite support;
3. Individuals with psychiatric disabilities who do not meet the Community Rehabilitation and Treatment eligibility criteria; and
4. Individuals with other severe disabilities who need supported employment.

Program Year 2019 Measure: DVR will track and report the results of specific initiatives related to these populations.

Program Year 2019 Target: Thirty individuals in the above categories will receive supported employment services.

DVR has had little success to date in expanding supported employment for these populations. The primary issue is that there is no infrastructure for the ongoing support services necessary for populations that do not meet eligibility for mental health and developmental services.

The SAMSHA grant application referenced under Goal and Priority #8 was intended specifically to provide supported employment for individuals with psychiatric disabilities who do not meet Department of Mental Health eligibility for supported employment. Unfortunately, that application was not selected for funding.

DVR is exploring using unobligated Title VI-B funds to expand supported employment services for individuals with developmental disabilities who do not meeting the developmental services system eligibility criteria or system or care priorities. We are looking at three communities in the State where the need is most pressing.

Goal 11. DVR will improve the outcomes for students and youth with emotional/behavioral disabilities served through the JOBS Supported Employment Program.

Program Year 2019 Measure: Total number of consumers achieving a successful employment outcome

Program Year 2019 Target: A total of 250 successful employment outcomes.

Program Year 2018 Update: In September 2017, DVR went live with the AWARE case management system. In the transition between systems we lost the ability to accurately track closures for the JOBS programs. At the same time we decided that the performance measures for JOBS had to be updated to align with the WIOA Common Performance Measures.

To align the JOBS Programs to the wider DVR Careers Initiative and the Common Performance Measures, we have spent the last year working with the agencies to establish new performance measures. We felt it was very important that JOBS youth should be included in the Careers Initiative and that our contracted performance measures should reflect that intent. The JOBS

program staff and managers were closely involved in the development of the new measures. There is strong buy in and support. The new measures are as follows:

- Total number of youth served with DVR IPE
- Total number of youth who received at least one career assessment during the fiscal year (50% of total served)
- Total number of youth enrolled in career focused training or supported education during the fiscal year (30% of total served)
- Total number of youth placed in competitive employment for ten working days (70% of total served)
- Total number of youth with a higher wage IPE goal during the federal fiscal year (30% of total served)
- Total number of consumers employed at or above 125% of Vermont minimum wage at any time during the federal fiscal year (30% of total served)

DVR will no longer track successful employment closures as a measure for JOBS supported employment programs.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

Overall, DVR was quite successful in achieving or making significant progress on the Goals and Priorities. For some goals like increasing the number credentials achieved, the collection and reporting of the data is too new to draw conclusions about progress or lack off. This Goal of increasing the number of individuals achieving a credential continues in this Plan Update, and we expect to have better data overtime.

2. AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT FOR THE MOST RECENT PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

As noted in the prior section, DVR and the SRC adjusted the goals and priorities for the JOBS programs which was previously focused on employment outcomes, to realigning the program to the WIOA Common Performance Measures. In Program Year 18 and Program Year 19 DVR worked with the JOBS provider agencies to determine how the program services could shift practice to meet the new measures. The JOBS program agencies and staff are largely supportive of the new focus. In program year 2019 the JOBS contracts were amended to reflect the new focus.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

As noted, DVR did not make progress in achieving Goal 10 to expand supported employment services to under served populations. DVR did submit an application for a SAMSHA grant opportunity to expand supported employment for consumers of outpatient mental health services. Unfortunately, that grant was not selected for funding. Regarding other populations, the primary issue is that there is no infrastructure for the ongoing support services necessary for populations that do not meet eligibility for mental health and developmental services.

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA

In Program Year 2018, sufficient data collection had occurred to begin reporting on three of the five measures that are reported at the program level (employer engagement is reported as a combined measure for all WIOA core partners):

- Employment rate in the second quarter post closure was 49%
- Median earnings in the second quarter post closure was $3,516
- Measurable skill gains rate was 54.9% compared to 37.8% in PY 2017

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED

In addition with the support of the SRC, I&E funds are being used to support the "Setting the Record Straight Initiative". The Initiative is a partnership between DVR, DBVI, the SRC, the Developmental Disabilities Council, the Vermont Center for Independent Living and the Vermont Public Assets Institute. The goal is to support a public information campaign to promote the employment of people with disabilities and dispel myths and stereo types. The goal is also to inform state policy makers about the workforce potential of people with disabilities.

Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES

1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES

Individuals with Developmental Disabilities

DVR works closely with the Developmental Disabilities Services Division (DDSD) to provide supported employment services. This is a 35 year-plus partnership. Up until FFY17, DVR specifically allocated funds to provide assessment, training, and placement services until closure. Due to sudden and severe changes in DVR funding, Development Services agreed to pick up DVR's contribution in order to continue the long-standing services. These funds are an integral part of the overall employment budget for individuals with developmental disabilities. The funding allows programs to create a seamless structure of upfront and ongoing support with dedicated positions. DVR continues to jointly monitor outcomes and provide technical assistance alongside DDSD. DVR also continues to open DS Supported Employment cases to provide individual case services which include Benefits Counseling and Assistive Technology services. Post-Secondary options are available to people with developmental disabilities through College Steps, Think College and Project Search.

DVR and DDSD only support individual integrated competitive supported employment. The State does not support any sheltered work or congregate work settings. The most recent employment rate data for individuals with developmental disabilities (SFY17) showed a 47% employment rate for working age adults in the DDSD system.

DVR and DDSD have no sheltered employment workshops since Vermont closed its last workshop for individuals with developmental disabilities in 2002. That same year, Vermont was ranked number 1 in the nation in the number of people with developmental disabilities who received supported employment to work per 100,000 of the state population.[1] In the past three years, the numbers of individuals with developmental disabilities employed in competitive jobs have continued to increase.

Adults with Significant Mental Illness

DVR has historically worked closely with DMH to support the integration of employment into the broad array of clinical mental health services available to individuals with significant mental health issues. Similar to its relationship with DDSD, DVR funding was braided with the DMH Community Rehabilitation and Treatment (CRT) Medicaid case rate to provide a seamless structure of upfront and ongoing support.

Up until SFY 2016, DVR funds have been specifically allocated to provide assessment, training, and placement services until closure, with the CRT Medicaid case rate funds providing the necessary long term follow up. Starting in SFY 16, DVR decided to reallocate the $700,000 in Title 110 funds committed to adult mental health to the JOBS program. This decision was made to enable DVR to come into compliance with the Pre-Employment Transition Services (Pre-ETS) requirement. In order to meet the 15% Pre-ETS expenditure target, DVR had to reassign funds from adult services to services for students and youth. This was a very difficult decision for DVR and we are greatly saddened by the impact on supported employment services for adults with mental illness.

While DVR no longer has a formal contractual program with the CRT programs to deliver supported employment services, DVR continues to partner with CRT programs at the local level. Many CRT programs have sustained their supported employment services despite the loss of VR funding. Local VR offices continue to provide services for CRT consumers that supplement their Medicaid funded services such as Benefits Counseling, Assistive Technology, Employee Assistance Program services, and Career Counseling and Guidance. DVR shares in Ticket to Work reimbursement with CRT programs for those mutually shared consumers.

DVR and DMH continue to work together at the state level, to support evidence based supported employment. Vermont was the first state to pilot a Johnson and Johnson Dartmouth initiative, now in 13 states, which continues to demonstrate that adherence to the principles of evidence based supported employment is key to increasing employment rates.

Youth with Emotional and Behavioral Disturbances

The JOBS Program is an innovative supported employment and intensive case management service for youth with emotional and behavioral disturbances (EBD) that uses work as a means to reach this challenging population. As a result of a unique partnership between the Department of Mental Health's Child, Adolescent and Family Unit (CAFU), the Department for Children and Families, the Department of Corrections, the Division of Vocational Rehabilitation, and contract agencies, the JOBS Program is operational in twelve (12) sites across the state. The JOBS Program is funded through a combination of Medicaid Global Commitment funds and a VR grant funds.

JOBS involves employers and the business community in meeting the needs of youth through intensive job development, placement, and on and off site training support. JOBS differs from other traditional employment models by providing intensive case management services to assist young people in meeting other areas of need in their lives, e.g., dealing with legal issues, homelessness, drug/alcohol abuse, transportation and probation and parole. Within this model, DVR funds are used to provide the employment focus and upfront employment assessment, education or training, and placement services. The case management and ongoing support is provided through state general funds, (contributed by the different state departments noted above) which are matched to Medicaid through a fee for service arrangement with DMH.

Individuals with Traumatic Brain Injury

DVR also works with the Developmental Disabilities Services Division (DDSD) to provide seamless employment support to individuals with Traumatic Brain Injury. Similar to the collaboration that serves individuals with developmental disabilities, the DVR funds are used for the up—front assessment, training, and placement services, while individual Medicaid waiver funds are used to provide the ongoing support.

Use of VR Funds

For all the above program collaborations, if VR funds are used, Title I funds are used for pre-placement activities and Title VI or Title I funds for post placement supported employment services and extended services for youth with the most significant disabilities for up to four years until age 25.

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[1] The State of the States in Developmental Disabilities: 2002 Study Summary, Coleman Institute for Cognitive Disabilities & Department of Psychiatry, University of Colorado, January 2004.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES

Extended services are provided after the transition from the provision of supported employment for a period of up to 24 months or longer if necessary to meet the needs of an individual with a most significant disability and stabilization has occurred.

VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) IS AUTHORIZED TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN UNDER TITLE I OF THE REHABILITATION ACT OF 1973 (REHABILITATION ACT), AS AMENDED BY WIOA[14], AND ITS SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT[15];

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Vermont Agency of Human Services

2. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (ENTER THE NAME OF DESIGNATED STATE AGENCY)[16] AGREES TO OPERATE AND ADMINISTER THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[17] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[18] , POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF

EDUCATION. FUNDS MADE AVAILABLE UNDER SECTION 111 OF THE REHABILITATION ACT ARE USED SOLELY FOR THE PROVISION OF VR SERVICES AND THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

ENTER THE NAME OF DESIGNATED STATE AGENCY

Vermont Agency of Human Services, Division of Vocational Rehabilitation

3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY AGREES TO OPERATE AND ADMINISTER THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[19] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[20] , POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER TITLE VI ARE USED SOLELY FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES AND THE ADMINISTRATION OF THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

4. THE DESIGNATED STATE AGENCY AND/OR THE DESIGNATED STATE UNIT HAS THE AUTHORITY UNDER STATE LAW TO PERFORM THE FUNCTIONS OF THE STATE REGARDING THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.

6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY UNDER STATE LAW TO RECEIVE, HOLD, AND DISBURSE FEDERAL FUNDS MADE AVAILABLE UNDER THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

Michael Smith Secretary Vermont Agency of Human Services

8. THE (ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND THE SUPPLEMENT FOR SUPPORTED EMPLOYMENT SERVICES;

ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW

Secretary Vermont Agency of Human Services

9. THE AGENCY THAT SUBMITS THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT HAS ADOPTED OR OTHERWISE FORMALLY APPROVED THE PLAN AND ITS SUPPLEMENT.

FOOTNOTES

CERTIFICATION SIGNATURE

Signatory information	Enter Signatory information in this column

Signatory information	Enter Signatory information in this column
Name of Signatory	Michael Smith
Title of Signatory	Secretary, Agency of Human Services
Date Signed	March, 24, 2020

ASSURANCES

The State Plan must include	Include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:Administration of the VR services portion of the Unified or Combined State Plan:	
3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	
3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):	
3.b.(A) “is an independent State commission” (Yes/No)	No
3.b.(B) “has established a State Rehabilitation Council” (Yes/No)	Yes
3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act	
3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)	
3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No

The State Plan must include	Include
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	No
3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act	
3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	
3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	
3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	
3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	
4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	No
4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	
4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the	

The State Plan must include	Include
Rehabilitation Act	
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act	
4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14)of the Rehabilitation Act	
4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs	
4.j. With respect to students with disabilities, the State,	
4.j.i. Has developed and will implement,	
4.j.i.I. Strategies to address the needs identified in the assessments; and	
4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and	
4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))	
5. Program Administration for the Supported Employment Title VI Supplement:	
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act	
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act	
5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	
6. Financial Administration of the Supported Employment Program:	
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through	

The State Plan must include	Include
public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act	
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act	
7. Provision of Supported Employment Services:	Yes
7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act	
7.b. The designated State agency assures that:	
7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act	
7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act	

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	35.0%	35.0%	36.0%	36.0%
Effectiveness in Serving	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employers				

1

"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (BLIND)

A. INPUT OF STATE REHABILITATION COUNCIL

1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;

Report of the Vermont State Rehabilitation Council for the Blind and Visually Impaired

SRC Involvement in Planning and Evaluating includes Statewide Focus Groups, Performance Data, and Customer Satisfaction Information. The SRC meets in-person every other month and holds executive meetings on the alternate months. The entire SRC and DBVI staff meet for an all-day combined meeting each June.

Highlights of SRC meetings from FFY 2018 and FFY 2019

FFY 2018 was an exciting and productive year for the work done in partnership with the SRC and DBVI. The SRC began the year in October 2017 by reviewing the new WIOA Performance Measures. The SRC learned how the new AWARE case management program will capture most of these data to meet the new reporting requirements. The DBVI AWARE system went "live" in September 2017. We also reviewed upcoming goals for the year including plans for the Town Meeting event and statewide consumer satisfaction survey.

In December the SRC meeting included a review and revision of DBVI Goals and Strategies. The membership had many ideas about connecting with partners including the Department of Labor and the Agency of Education. Ideas included continuation of DBVI initiated work experiences with employers. Current results include many individuals bridging from a work experience to employment. Other people learn new skills for their resume. It is also a great way to educate employers about the abilities and assistive technology used by people who are blind. There was also a strong recommendation to collaborate with the DOL work experience and on-the-job training programs. DBVI was also encouraged to find employers who are interested in job carving opportunities where a person can bring their strengths to the employer. The Agency of Education representative also offered many tools available to staff about personalized learning plans and graduation requirements. The Chair of the Policy Committee also updated the SRC about WIOA related DBVI policy revisions that are in process. The meeting ended with a recommendation to have fewer strategies and keep them focused on the key goals.

In February 2018 the SRC dedicated the meeting to updating the goals and strategies based on the Town Meetings, Statewide Consumer Survey, and the CSNA. The meeting began with a

review of the WIOA performance measures. Then the SRC discussed each of the 14 DBVI current strategies. After a detailed discussion about each of the strategies the group made a list of top priorities.

Some highlights from the strategy discussion include ideas about a comprehensive outreach strategy. The SRC believes that DBVI should make efforts to inform key organizations about the services that are available. This includes outreach to businesses, minority groups, and DOL partner programs. They also had ideas about ways to share DBVI planning resources by using some of the channels at AOE like the WIKI Transition page. This resource is well used by school staff and is a good way to share information with LEAs.

In addition to outreach and sharing information the SRC supports DBVI's ongoing efforts to create consumer-driven events and opportunities. The next event will be planned with consumer input and will be held in the fall. A new initiative is to create a listserv that connect clients to share ways they are using technology. There was also interest in creating podcasts that highlight some key technologies and examples of how people use technology to accomplish tasks at work or for independence.

There was an in-depth conversation about the best strategies to connect with the workforce system and American Job Centers and all DOL partners. The intent of the group is that there should be concrete steps and a plan to connect DBVI consumers to these programs and to have a referral process that keeps all partners involved rather than a hand-off to another organization.

One topic that is part of every CSNA is transportation. The SRC is very interested in a new initiative at the VT Department of Transportation that connects travelers with all the resources and potential rides in each area. This is in beta form and is being designed for accessibility. It was decided to invite VTRANS to the SRC meeting in April to discuss the tool.

The meeting ended with a discussion about identifying the top strategies. They include:

- Partnering with all DOL—Implement a plan for staying connected.
- Pre-Employment Transition—Share the DBVI tools that can be used for student transition planning.
- Outreach—Implement a comprehensive plan that includes businesses, eye doctors, and other human service organizations.
- Technology—Create a listserv to connect DBVI consumers and the blind community.

In March 2018, with SRC approval, and public hearings DBVI submitted the Program Section of the Vermont Unified State Plan.

In April 2018, the SRC meeting included a guest speaker from the Vermont Transportation Department. A Transportation Consultant from VT-Trans presented about several new programs recently launched on the "Go Vermont" website. This includes details about a new

web-based trip planning website that allows travelers to enter their starting location and destination into a search engine. They then receive results with all the transportation options including fixed routes and on-demand services. There are also several new ride sharing vans and carpool options that can be accessed through the web portal of by calling a toll-free number to get information. They can assist with matching to find car and van pool options as well as fixed routes and paratransit.

In June 2018 the SRC held a combined meeting with the full SRC and the DBVI staff. The meeting began with a presentation from DBVI staff with a review of recent SRC and DBVI projects the involved that Voice of the Customer. An example shared by DBVI staff was the Employment Guide that was created to create clear expectation for consumer about the Vocational Rehabilitation process and the focus on employment. Many drafts of the Employment Guide were shared with consumer and the SRC to understand and incorporate the Voice of the Customer in the final design. DBVI also reviewed a similar process that was used to create the outreach banners that feature DBVI consumers at their worksites. This agenda topic ended with a preview of the new initiative for using career assessments to help individuals better understand their career interests and strengths. A DBVI team will be working on this throughout the year and they will plan to involve consumers and the SRC for feedback as the process is developed.

The next topic was a discussion about creating a Public Service Announcement. Both organizations believe that this will help to get the word out about how DBVI can help people of all ages reach their employment goals. The idea is to have blind or visually impaired individuals share a some of their success story with the intent of letting the public know about these services. We want to make sure that everyone knows that DBVI services can help people reach their employment and independence goals. We then discussed the importance of strong collaboration wit the Department of Labor. We want to make sure that DBVI consumers have opportunities for internships and job training through DOL.

The FFY 2019 began in October 2018 with an SRC meeting that included important partner updates. These included representatives from the Agency of Education, Department of Labor, Special Services Library, Parent Family Network, Client Assistance Program, and the Association for the Blind. These updates are intended to keep the partners connected and informed about important initiatives.

Some highlights from this meeting included a detailed explanation from the AOE representative about the major shift in Vermont High School graduation requirements from traditional credits to Personal Learning Plans. There was also a presentation from the students of the Learn, Earn, and Prosper (LEAP) summer work experience program. The students presented their Public Service Announcement that they created and shared some things they learned about themselves and their future employment goals. One significant idea generated by the SRC was a recommendation to explore if local special education funding could share in the cost for LEAP work experiences.

Several SRC members also participated in White Cane Safety Awareness events that took place across the state. Each event included a simulated walk and education about White Cane Safety. Many local officials also attended.

November 2018 was a busy month and the SRC participated in a couple events. It began with several members attending the Vermont Chapter of the National Federation of the Blind Statewide Conference held in Burlington. The agenda included several guest speakers including a Vermont Transit employee who explained new public transportation initiatives.

Several SRC members also attended the DBVI Great Expectations Consumer Driven Event held in Montpelier. The theme was "Resiliency" and the meeting was planned by DBVI consumers. It included several panel discussions to share experiences and encourage each other.

In November there was also an SRC Executive Council meeting. The Executive Committee meetings are held in the opposite months of Full SRC meetings and are in September, November, January, March, and May. The meetings typically focus on building the agenda for Full Council meetings and other business. There was no Full SRC meeting in December.

In February 2019, the SRC meeting included several partner updates. Some highlights included an update from the Client Assistance Program and their current outreach efforts. Several materials have been developed and they are beginning to visit VR offices and other outreach events. There was also an announcement of the upcoming Technology fair that will be held in Rutland by the Association for the Blind and Visually Impaired. This will include several technology vendors and equipment demo opportunities for consumers.

The DBVI Director reviewed the SRC 2018 Annual Report and discussed the data and highlights with the group. He also discussed the transition to the new Performance Measures and the ending of the previous Standards and Indicators. A DBVI counselor also presented an update about the Accessible Assessment Project. The DBVI assessment team has identified the core group of vocational related assessments and they are currently adapting them for accessibility. The workstation in Montpelier is complete and includes a computer, assistive software, Braille printer, and scanner.

In April 2019, DBVI staff had an all-day meeting with the staff of the Vermont Association for the Blind and staff of the Veterans Administration. The main purpose was to discuss ways to partner and best serve the needs of Vermont's blind and visually impaired population. This was not specifically and SRC event, but the results and outcomes were shared with the group. One important highlight was the discussion about Low Vision doctors in Vermont. Many are retiring and there is a need to encourage and train new eye doctors to provide this service.

At the April SRC meeting, key partner updates included a recommendation from the AOE representative for members of the SRC and other service provider to sign up for the AOE

Weekly Field Services Memo and the Training Modules for Personal Learning Plans. The representative from the Vermont Family Networks encouraged everyone to help promote the upcoming Youth Summit.

The agenda included an assistive technology demonstration and discussion from one of the SRC members. He presented about several of the apps that he uses and explained the situations when they are most helpful. Some of the apps highlighted were Voice Dream Reader and Seeing AI. The group also discussed several ideas for how to conduct focus groups for the needs assessment to be held in fall 2020.

In June 2019, the SRC held an all-day combined meeting with the DBVI staff. This is an annual event and the agenda for this year included the theme of "Partners in a Vision Rehabilitation Team." The day was structured to invite all DBVI partners and have several workshops so partners could learn about the various roles of other Vision Rehabilitation Team members.

The first sessions included:

- Technology Evaluation and Training;
- Vermont Association of Business Industry and Rehabilitation and the Employment Consultants Role; and
- The Learn, Earn, and Prosper (LEAP) Summer Work Experience Program.

The second sessions included:

- Vocational Assessments presented by the DBVI Counselor Team;
- Questions and Answers with DBVI Blind Services Counselors; and
- Vermont Association for the Blind and the role of Certified Vision Rehabilitation Therapists, Orientation and Mobility Specialist, and Teachers of the Visually Impaired.

The afternoon included a discussion with the SRC that included:

- Outreach to Eye Doctors; and
- The use of social media and the "Front Page Forum" for Outreach.

One key idea was to ask the Outreach Committee to pursue these initiatives.

The public hearing was held on March 4, 2020 at the Waterbury State Office Complex (Ash Conference Room). No comments were submitted.

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

DBVI Response to SRC Input:

DBVI and the SRC worked collaboratively to review the State Plan update including the Goals, Priorities, and Evaluation of Progress. The SRC and DBVI agree that outreach efforts and educating the public about blindness continue to be very important. There is also agreement to continue consumer-driven events and opportunities for peer to peer interaction. The SRC also agrees with the idea of a new strategy for participants to earn a credential through the Community College of Vermont for a nationally recognized credential for customer service. The SRC and DBVI believe that this will help individuals gain employment and better compete for good careers.

The SRC reviewed and gave input on the DBVI State Plan in a full SRC meeting on February 27, 2020, as part of the WIOA Unified Plan.

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

DBVI agreed with all SRC recommendations.

B. REQUEST FOR WAIVER OF STATEWIDENESS

1. A LOCAL PUBLIC AGENCY WILL PROVIDE THE NON-FEDERAL SHARE OF COSTS ASSOCIATED WITH THE SERVICES TO BE PROVIDED IN ACCORDANCE WITH THE WAIVER REQUEST;

Vermont DBVI is not requesting a waiver of state wideness.

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

Not applicable.

3. REQUIREMENTS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN WILL APPLY TO THE SERVICES APPROVED UNDER THE WAIVER.

Not applicable.

C. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

DBVI Counselors collaborate with the statewide network of Teachers of the Visually Impaired at the Vermont Association for the Blind and Visually Impaired (VABVI). VABVI is a non-profit organization and is funded by AOE and Local Education Agencies to provide statewide services. Each DBVI counselor meets regularly with the TVI(s) in their region to discuss students transition needs. DBVI and VABVI leadership meet monthly to discuss ways to collaborate and communicate about important issues. The VABVI adult service providers for Rehabilitation Teaching and O+M are contracted on a fee-for-service basis to provide adaptive training that is needed at Work-Based leaning sites. This partnership with VABVI TVI(s), Rehabilitation Teachers, and O+M Specialists is statewide and connects all visually impaired students to DBVI Counselors to address transition and adaptive skill needs.

For out-of-school youth, DBVI does coordinate services with WIOA partners including AOE and Vermont Adult Basic Education. DBVI has regular meetings with these partners.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

Not applicable.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

Not applicable.

4. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

Not applicable.

5. STATE USE CONTRACTING PROGRAMS.

Not applicable

D. COORDINATION WITH EDUCATION OFFICIALS

1. THE DESIGNATED STATE UNIT'S PLANS, POLICIES, AND PROCEDURES FOR COORDINATION WITH EDUCATION OFFICIALS TO FACILITATE THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO THE RECEIPT OF VR SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, AS WELL AS PROCEDURES FOR THE TIMELY DEVELOPMENT AND APPROVAL OF INDIVIDUALIZED PLANS FOR EMPLOYMENT FOR THE STUDENTS

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with visual disabilities from school to the receipt of DBVI services, including pre-employment transition services.

The DBVI Director meets regularly with Vermont Agency of Education staff to coordinate services, and include VR, Department of Labor, and the Developmental Disabilities Service.

DBVI made a commitment many years ago to create opportunities for students to prepare for work, vocational training and college. Twelve years ago DBVI created a partnership called the Connections Team. This involved many partners and the mission of the group was to make connections and find ways for students to have meaningful work experiences and job readiness training. The energy of this team created the LEAP program which has grown and expanded each year. With the passage of WIOA in July 2014, the team includes several new partners and connections.

DBVI Blind Services Counselors work closely with all of the Teachers of the Visually Impaired in their region to connect students with Pre-ETS and Transition planning. Vermont is unique because TVI services are provided by one statewide agency that has a contract with AOE and the Local Education Agencies to provide consultation and direct services to blind and visually impaired students. The TVI's work directly with schools and families beginning at birth through high school graduation. DBVI is included on the release form for all students with a disability so TVI's begin conversations about students when they are entering high school. This begins the outreach to include these students in Pre-ETS activities. A letter goes to each family and school districts to explain Pre-ETS and how DBVI can help student with transition to employment.

DBVI staff also participates in local Core Transition Teams across the state. These teams include school staff, mental health providers, employment staff, and VR staff. The intent is to share ideas and resources to develop work experiences, job readiness training, and employment opportunities for students in their region. DBVI is a partner with DVR to sponsor and annual conference that brings all of the regional core teams together.

DBVI policy required and IPE to be developed no later than 30-days after eligibility and before a student graduates. The provision of pre-ETS services can begin and age 14 and until a student reaches their 22nd birthday.

2. INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

A. CONSULTATION AND TECHNICAL ASSISTANCE TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING VR SERVICES;

The DBVI Director meets quarterly with the Special Education Director of the Vermont Agency of Education, AOE Transition staff, and VR to coordinate the annual Transition Conference and to provide general updates. A person from the AOE Transition staff is a member of DBVI's SRC. He provides regular updates about school initiatives and resources for transition planning. He recently explained the requirements of the new Personal Learning Plans and how they will be implemented for students with and IEP.AOE, DVR, and DBVI recently developed a new Interagency Agreement as required under WIOA.

Technical Assistance:

To facilitate the process of consultation and technical assistance; DVR, DBVI, and AOE implemented an Interagency Team for interagency planning and policy development. The Interagency Team meets at least quarterly and more frequently if needed. The Interagency Team includes:

- The AOE Special Education Director,
- The AOE Post-Secondary Transition Coordinator,
- The DAIL/DVR Director,
- The DAIL/DBVI Director, and
- The DAIL/DVR Transition Director

The interagency team coordinates training and technical assistance activities for LEAs related to the transition of students with disabilities from school to post-school activities including pre-employment transition services and vocational rehabilitation services. Training and technical assistance activities may include:

- Joint consultation with an individual LEA to address a specific local need.
- Co-sponsorship of local core transition teams including LEAs, DVR, DBVI and local community rehabilitation providers.
- Jointly sponsored regional and statewide trainings.
- Sponsorship and support of the annual core transition conference.

- Consultation and technical assistance that may be provided through alternative means such as webinars, conference calls and video conferences.

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

DBVI Blind Services Counselors developed and use Action Planning tools for transition planning for the IEP team. The Action Plan is a checklist of activities that need to happen for a student who is visually impaired to meet their transition goals. For example, students who plan to attend college have many action plan items that should occur each year leading up to graduation. The approach is designed for different members of the team to take responsibility for certain action items. Sometimes it is the DBVI Counselor, special educator, TVI, or guidance counselor. The responsibilities are shared and the student is included in all aspects of the planning.

Vermont has developed new high school graduation requirements that are based on Personal Learning Plans. Meeting the requirements for these plans is the pathway for all students including those with IEPs to graduate. The AOE has provided significant technical assistance for schools and agencies to help bridge the gap between (PLP) plans, IEPs, and Transition plans for students with disabilities. The following AOE web page outlines this guidance.

Secondary Transition Planning Resources

https://education.vermont.gov/student-support/special-education/special-education-resources

DBVI staff are learning to use AOE guidance, using case studies examples, as part of transition planning and IPE development for blind and visually impaired students. One important example is the Vermont AOE Case Study Learning Project. The goal of these case studies is to provide exemplars of the inter-relationship between a student's Personalized Learning Plans (PLP), IEP transition plans and the student's pathway to meeting Proficiency Based Graduation Requirements (PBGRs). These plans are very helpful as guidance for DBVI VR Counselors for developing Individual Plans for Employment (IPE) with students. Several exempe case studies were developed by Lee Ann Jung, a nationally recognized expert on personalization, disability and proficiency based learning. Through these AOE case studies examples, DBVI staff are learning how the requirements of the VT Education Quality Standards and transition goals in the IEP can be integrated with the IPE. These case scenarios provide potential models that can be adapted to fit each school's particular context. These are exemplars of how these plans might be developed to support rather than duplicate each other. Many of the employment related transition goals from the IEP can be used when developing the Individual Plan for Employment (IPE). Additionally these case studies showcase a strategy for making Proficiency Base Graduation Requirements accessible for students with disabilities.

Here is one example of a case studies that can be used for IEP Transition Planning and IPE development.

- Case Study Learning Project – Alex

Alex is a 19-year-old junior who is focused on having a successful career in the automotive industry. He is eligible for special education as a young person who experiences some dysregulation in his emotional and behavioral states. Alex also experiences a moderate hearing loss. Learn more about Alex's story and his pathway to graduation. You will see his PLP and his IEP transition plan as well as how he accesses the PBGRs.

https://education.vermont.gov/sites/aoe/files/documents/edu-special-education-case-study-learning-project-alex.pdf

For a complete list of the AOE example case studies visit Vermont AOE Case Study Learning Project at

https://education.vermont.gov/student-support/special-education/special-education-resources

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

<u>DVR/DBVI Responsibilities</u>

DVR and DBVI are the Designated State Units for the public vocational rehabilitation program in the State of Vermont. In this role DVR and DBVI will:

Provide access to Pre-Employment Transition required services for potentially eligible students to LEAs statewide including:

- Job exploration counseling
- Workplace readiness training to develop social skills and independent living
- Work-based learning experiences which may include in-school or after school opportunities, or experiences outside the traditional school setting
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education
- Self-advocacy training

Provide vocational rehabilitation and school-to-work transition services for youth determined eligible for DVR or DBVI services with an approved Individual Plan for Employment (IPE) including but not limited to:

- Vocational assessment
- Counseling and consultation around the development of the Individual Plan for Employment (IPE) that is coordinated with the IEP or 504 plan
- Vocational counseling and guidance
- Job placement services

- Other paid services that are part of an approved IPE

To the extent funds are available, DVR/DBVI are responsible for working with AOE to arrange for the provision of pre-employment transition services for potentially eligible students. DVR/DBVI will reserve at least 15 percent of its Title I grant for the provision of these services. In addition, to the extent funds are available to serve all categories under an OOS, DVR/DBVI are responsible for paying for vocational rehabilitation and school-to-work transition services for students and youth determined eligible for DVR or DBVI services with an approved Individual Plan for Employment (IPE).

AOE and LEA Responsibility

AOE and LEAs are responsible for paying for any transition services that are also considered to be special education or related services necessary for providing a free appropriate public education to students with disabilities.

Criteria to Determine Which Agency is Responsible to Pay for Similar Services Both Can Provide Under Their Respective Law

The following criteria shall be used, when determining which entity should pay for a similar service that both entities can provide under their respective laws:

A. The purpose of the Service

Is the purpose of the service primarily related to an educational outcome or an employment outcome?

B. Customary Services

Is the service one that the school customarily provides under IDEA part B?

For example, if a school ordinarily provides work-based learning experiences for students with disabilities, the fact those services are now authorized under the Rehabilitation Act as pre-employment transition services does not mean the school should cease providing those services and refer those students to DVR or DBVI.

C. Eligibility

Is the student with a disability eligible for transition services under IDEA?

Because the definition of "student with a disability" for the DVR and DBVI programs include an individual with a disability for purposes of section 504 of the Rehabilitation Act, it is a broader than the definition under IDEA. DVR and DBVI are authorized to provide transition services for students with disabilities who meet the definition of an individual with a disability for purposes of section 504 of the Rehabilitation Act. Vermont does not permit the payment of subminimum wage under section 511.

Nothing in this agreement is to be construed as reducing the responsibility of the local educational agencies or any other agencies under IDEA to provide or pay for any transition services that are also considered to be special education or related services necessary for providing a free appropriate public education to students with disabilities.

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

DBVI Counselors meet with each TVI in their region at the beginng of each school year and during the year to get introduce to each student, family, and school personnel. The TVI caseload includes all students who are blind or visually impaired in the state so DBVI is able to directly outreach to the students and families to promote the Pre-ETS and transition support that is available. DBVI also reaches out directly to local special education administrators and 504 coordinators. DBVI also works collaboratively with DVR transition staff who are in the schools and often refer students to DBVI.

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

DBVI maintains agreements and contracts with two non-profit organizations and CRPs in particular. The Vermont Association for the Blind and Visually Impaired (VABVI) provides direct teaching and rehabilitation training to Vermonters who are visually impaired. They are the only other organization in Vermont providing Orientation and Mobility and Vision Rehabilitation services to individuals who are blind or visually impaired. Due to the close working nature and cooperation there are no duplication of services. DBVI also works closely with The Vermont Association of Business Industry and Rehabilitation (VABIR) to provide job development and soft skills training by Employment Consultants.

F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

DBVI works closely with DVR for Supported Employment coordination. DBVI is also part of all the agreements for Supported Employment services, such as agreements with the Division of Disability Services, TBI services, the Department of Mental Health and the local CRT programs. Because of its small size and the fact that it serves a low incidence population DBVI feels that it can serve the few individuals seeking supported employment best in the above manner. Most individuals who qualify for supported employment and are visually impaired are served by other agencies as their primary disability has been identified as other than vision impairment. Most individuals are eligible for Medicaid waivers and DBVI does provide short-term worksite support.

DVR and DBVI have new agreements with the Vermont Developmental Disabilities Services Division (DDSD) to provide extended services for individuals with developmental disabilities. The primary source of funding for extended services for individuals with developmental disabilities is Home and Community—based Medicaid Waiver funds.

G. COORDINATION WITH EMPLOYERS

1. VR SERVICES; AND

DBVI collaborates with General Vocational Rehabilitation in efforts to establish relationships with Vermont businesses. This is coordinated approach is desired by the businesses and creates meaningful points of contact. Below is a description of the approach established by General VR and used by DBVI.

DUAL CUSTOMER DESIGN

Vermont's dual-customer approach considers both individuals with disabilities and the business community as key customers of the Vocational Rehabilitation program. To that end, Vermont DVR/DBVI has established a cadre of Business Account Managers across the state whose

primary responsibilities are to develop and sustain relationships with the businesses in their respective communities. The Business Account Managers also facilitate local Employment Teams made up of the various employment programs serving Vermonters with disabilities. The Employment Teams are designed to improve collaboration between programs and streamline employer outreach in order to maximize resources and increase opportunities for candidates served by the Vocational Rehabilitation program.

In addition to the Business Account Managers, Vermont DVR/DBVI contracts Employment Consultants who provide placement services and assistance to individual candidates, including retention services. These Employment Consultants, in concert with their respective Business Account Managers, are in the community developing contacts and establishing relationships with businesses of all sizes. Due to the rural nature of Vermont, and the fact that trusting relationships are built over time, Vermont has successfully developed ways to track employer engagement.

EMPLOYER DATA

DVR/DBVI tracks employer outreach utilizing Salesforce, a Customer Relations Management (CRM) solution used by many large corporations. All Business Account Managers and Employment Consultants enter information into this system. The information is transparent to everyone and only business information, not client information, is captured. To track employer engagement, the following information is gathered:

Opportunities:

Opportunities are defined as any activity, paid or unpaid, offered by a particular business. These activities range from informational interviews and job shadows, to short-term work experiences and paid employment. All opportunities are captured for each business.

Contacts:

Contacts are defined as the individuals in a business with whom Employment Consultants and/or Business Account Managers have developed a relationship. In many cases these contacts are Hiring Managers, Owners and Supervisors.

Activities:

Each time an Employment Consultant or Business Account Manager interacts with a contact, an activity note is entered into Salesforce. This allows all Employment Team members to see a running history of conversations and activities with that business.

IMPLICATIONS FOR DVR/DBVI CUSTOMERS

Business outreach has been a priority for Vermont DVR/DBVI because:

- In developing relationships over time, we are able to position ourselves as a staffing service with a variety of options for businesses to consider;

- Coordinated business outreach, captured in Salesforce, allows for greater variety in the kinds of businesses we are meeting, and the concurrent variety in opportunities for DVR/DBVI candidates;
- Gathering information on businesses willing to offer worksite experiences, company tours, and informational interview, will better support career exploration and skill development for both adults and students;
- Our business partners can support Pre-Employment Transition Services activities in schools, including practice interviews, company tours and overviews, as well as identify summer employment opportunities;
- Business partners can support the work of our in-school Transition Counselors, providing information on industry trends, skill requirements and other factors related to particular employment sectors;
- By engaging businesses in working with students, the students will have a better understanding of their local labor market through work experiences, job shadows and paid employment. This in turn should prepare them for transition to either post-secondary education or employment.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

As noted in the prior section, the Business Account Managers are a major resource to the DBVI Counselors, who work exclusively with students to provide Pre-Employment Transition Services. In particular the Business Account Managers provide:

- Contacts with employers who are willing to provide work-based learning experiences for students;
- Contacts with employers who are willing to participate IN informational interviews, company tours, practice interviews and other exploratory activities with students;
- Information on industry trends, skill requirements and other factors related to particular employment sectors;
- Identification of summer or part time competitive employment opportunities for students.

The Business Account Managers also convene local employment teams including the DBVI counselors. The local employment teams coordinate outreach to employers across DVR/DBVI programs. This coordinated approach maximizes the impact of DVR/DBVI employer outreach and reduces duplicate contacts with employers.

H. INTERAGENCY COOPERATION

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

As Divisions within the Department of Disabilities, Aging and Independent Living (DAIL), DVR and DBVI have entered an Intergovernmental Agreement with the Department of Vermont Health Access (DVHA). The agreement is in effect for five years. The purpose of the agreement is to describe how Vocational Rehabilitation Title I and Title VI-B funding will be utilized with Medicaid Global Commitment funding to support employment services for the following populations:

- Supported employment services for adults with developmental disabilities served through the Vermont Department of Disabilities, Aging and Independent Living (DAIL) Developmental Disabilities Services Division, hereinafter referred to as DDSD.
- Youth with severe emotional disturbance (SED) served by the Department of Mental Health (DMH), Children's Division through the JOBS programs.
- Adults with psychiatric disabilities served through the Community Rehabilitation and Treatment (CRT) program administered by the Department of Mental Health (DMH).

The agreement sets out the following guiding principles:

DAIL/DVR/DBVI and DVHA are committed to implementing employment services through the blending and braiding of VR Title I and Title VI-B funding with DDSD Global Commitment Medicaid funding. The goal is to support a seamless and well-integrated system to provide employment services for individuals with developmental disabilities, youth with SED and adults with psychiatric disabilities through a statewide network of community providers.

The agreement also lays out eligibility criteria for the respective programs and the financial responsibilities of each State unit as follows:

DAIL/DVR/DBVI Responsibilities

1. Funding of Time-Limited Supported Employment Services

Except for youth with most significant disabilities, DAIL/DVR/DBVI funding of supported employment is time-limited for a period of not more than 24 months unless a determination is made that a longer period of time is necessary based upon the individual's needs. Funded services must be based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment. DAIL/DVR/DBVI will fund the following services with Title I funds prior to placement on a job and with either Title I or Title VI funds following placement:

-
    - Supported employment assessment services
    - Supported employment job search and placement services
    - Supported employment work supports
    - Customized employment
    - Benefits and work incentive counseling
    - Progressive employment
    - Case services for additional work supports such as work clothes and transportation

1. Funding for Extended Supports

Extended services are the ongoing support services that are needed to support and maintain an individual with a most significant disability in supported employment, after an individual has made the transition from DAIL/DVR/DBVI time-limited services. Extended services can be

funded by DAIL/DVR/DBVI for youth with the most significant disabilities, for a period not to exceed four years until a youth reaches age 25. DAIL/DVR/DBVI may not provide extended services to individuals with the most significant disabilities who are not youth with the most significant disabilities.

DHVA Global Commitment Funding of Employment Services

1. Developmental Services

Supported employment and extended employment services are through the Global Commitment, Home and Community Based Medicaid Services (HCBS) for people who meet the eligibility criteria for DDS. DAIL/DDSD HCBS funding is individualized based on the support needs of the consumer. If the HCBS has a line item for employment, then an employment outcome must be included in the Individualized Support Agreement (ISA). HCBS funding can be used to support both short term assessment, job development, job placement services and extended services.

1. JOBS Program

The JOBS program supported employment services and extended employment services are funded through Global Commitment, Medicaid case rate funding administered by DMH. Funds will be provided through the DA Master Grant Agreements.

1. CRT Evidence Based Supported Employment Services

CRT evidence-based supported employment services are funded through the Global Commitment, Medicaid CRT Case Rate administered by DMH. Funds will be provided through the DA Master Grant Agreements.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

DVR and DBVI are housed within the same department as the Developmental Disabilities Services Division (DDSD). An Intradepartmental Agreement was developed within DAIL and signed on September 5th 2017. The agreement is in effect for five years. The purpose of this agreement is to describe how DVR, DBVI and DDSD will cooperate to implement, expand and improve supported employment services for adults with developmental disabilities in the State of Vermont. Supported employment services for adults with developmental disabilities are provided through a system of approved nonprofit community providers, including the Designated Agencies (DA), the Specialized Service Agencies (SSA) and Independent Service Organizations (ISO). DDSD, DVR and DBVI fund supported employment services jointly through grant and contractual relationships with these community providers.

The agreement sets out the following guiding principles:

DDSD, DVR and DBVI are sister Divisions within DAIL and operate under the direction of the DAIL Commissioner. As such, DVR, DBVI and DDSD take a "one agency" approach to the funding and implementation of supported employment services for adults and youth with developmental disabilities.

DVR, DBVI and DDSD have collaborated for over thirty years to implement supported employment services for adults with developmental disabilities. DVR, DBVI and DDSD are committed to continuing this collaboration based on the following:

-
    - All people with developmental disabilities, who want to, can work with the appropriate supports.
    - Work benefits people with developmental disabilities in the same way it does people without disabilities. Increased income, a sense of contribution and skill acquisition, increased confidence, independence and social connections all enable people to develop meaningful careers.
    - The value of work extends far beyond wages earned. Employers and the community benefit from the social inclusion and diversity people with developmental disabilities bring to the workforce through improved morale, customer loyalty and overall productivity.

The agreement includes an inter-division planning and policy group that will meet at least quarterly and include all of the Directors. There is a commitment to joint monitoring of supported employment services and joint training and technical assistance. The agreement also describes the eligibility criteria for each program and lays out the fiscal responsibilities as follows:

Joint Responsibilities

DVR, DBVI and DDSD are committed to implementing supported employment services through the blending and braiding of VR Title I and Title VI-B funding with DDSD Global Commitment Medicaid funding. The goal is to support a seamless and well-integrated system to provide supported employment services for individuals with developmental disabilities through a statewide network of community providers.

DVR and DBVI Responsibilities

1. Funding of Time-Limited Supported Employment Services

Except for youth with significant disabilities, DAIL/DVR/DBVI funding of supported employment is time-limited for a period of not more than 24 months. Funded services must be based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment. DAIL/DVR/DBVI will fund:

-
    - Supported employment assessment services
    - Supported employment job search and placement services
    - Supported employment work supports
    - Customized employment

1. Funding for Extended Supports

Extended services are the ongoing support services that are needed to support and maintain an individual with a most significant disability in supported employment, after an individual has made the transition from DVR time-limited services. Extended services can be funded by DVR and DBVI for youth with the most significant disabilities, for a period not to exceed four years.

DVR may not provide extended services to individuals with the most significant disabilities who are not youth with the most significant disabilities.

DDSD Responsibilities

1. Funding for Supported Employment Services and Extended Services

DDSD will fund supported employment and extended employment through the Global Commitment, Home and Community Based Medicaid Services (HCBS) for people who meet the eligibility criteria for DDS. HCBS funding is individualized based on the support needs of the consumer. If the HCBS has a line item for employment, then an employment outcome must be included in the Individualized Support Agreement (ISA). HCBS funding can be used to support both short term assessment, job development, job placement services and extended services.

1. Availability of Funding

The DDSD commitment to funding supported employment services is contingent on the availability of state and federal funds. In the event state or federal funds are reduced or eliminated, DDSD may reduce or end funding for supported employment services.

3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

DVR and DMH have a long history of collaboration around the provision of supported employment services for adults with psychiatric disabilities and youth with severe emotional behavioral disorders. This is reflected in the MOU's overview and purpose as follows:

The purpose of this agreement is to describe how DAIL/DVR/DBVI and DMH will cooperate to implement, and improve employment services, supported employment services and evidence based supported employment services for youth and adults with psychiatric disabilities in the State of Vermont. Supported employment and employment services for youth and adults with psychiatric disabilities are provided through a system of approved non-profit community providers, including the Designated Agencies (DAs). DMH and DAIL/DVR/DBVI fund supported employment services jointly through grant and contractual relationships with these community providers. There are two primary programs within the DMH system that provide employment services:

-
    - The JOBS Program: JOBS provides supported employment services for youth with Severe Emotional Disturbance (SED)
    - The Community Rehabilitation and Treatment (CRT) Program: CRT provides employment services and supported employment for adults with severe psychiatric disabilities.

The agreement sets out the following guiding principles:

DAIL/DVR/DBVI/DBVI and DMH have collaborated for over thirty years to implement supported employment services for youth and adults with psychiatric disabilities. DAIL/DVR/DBVI and DMH are committed to continuing this collaboration based on the following:

- All people with psychiatric disabilities, who want to, can work with the appropriate supports.
- Work benefits people with psychiatric disabilities in the same way it does people without disabilities. Increased income, a sense of contribution and skill acquisition, increased confidence, independence and social connections all enable people to develop meaningful careers.
- Employment is an essential component of the recovery process for people with psychiatric disabilities.

The agreement forms an interagency planning and policy development group including the DVR/DBVI Directors and the DMH Directors of Adult Mental Health and Children's Mental Health, and is in effect for five years from date of signature. The agreement also includes a commitment to joint monitoring of the programs and joint training and technical assistance. DAIL/DVR/DBVI and DMH support two models of individualized supported employment services in competitive, integrated employment settings The agreement describes the eligibility criteria for both systems and the service models as follows:

JOBS

The JOBS Program is an innovative supported employment and intensive case management service for youth with psychiatric disabilities, who have dropped out or left school. It uses work as a means to reach this challenging population. JOBS is a voluntary program where youth, once engaged, are assisted in transitioning from school, prison, or the streets and supported in accessing services to help them reach their individual goals and greater independence.

Individualized Placement and Support (IPS): Evidence Based Supported Employment Services.

IPS supported employment is an evidence-based approach to providing vocational services for adults with severe psychiatric disabilities. IPS integrates employment services within community mental health treatment and case management services.

DAIL/DVR/DBVI and DMH do not support any type of group or segregated employment service model such as sheltered workshops, work crews, enclave placements or any approach that does not result in competitive, integrated employment. DAIL/DVR/DBVI and DMH will promote and support evidence based supported employment as the primary service model, through policy development, contract/grant language, training and technical assistance, and monitoring and quality review.

The agreement describes the fiscal responsibilities of the respective Departments as follows:

Joint Responsibilities

DAIL/DVR/DBVI and DMH are committed to implementing supported employment services through the blending and braiding of VR Title I and Title VI-B funding with DMH Global Commitment Medicaid funding. The goal is to support a seamless and well-integrated system to provide supported employment services for adults with psychiatric disabilities and youth with SED through a statewide network of community providers.

DAIL/DVR/DBVI Responsibilities

1. Funding of Time-Limited Supported Employment Services

Except for youth with significant disabilities, DAIL/DVR/DBVI funding of supported employment is time-limited for a period of not more than 24 months. Funded services must be based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment. DAIL/DVR/DBVI will fund:

-
    - Supported employment assessment services
    - Supported employment job search and placement services
    - Supported employment work supports
    - Customized employment
    - Benefits and work incentive counseling
    - Progressive employment
    - Case services for additional work supports such as work clothes and transportation

1. Funding for Extended Supports

Extended services are the ongoing support services that are needed to support and maintain an individual with a most significant disability in supported employment, after an individual has made the transition from DAIL/DVR/DBVI time-limited services. Extended services can be funded by DAIL/DVR/DBVI for youth with the most significant disabilities, for a period not to exceed four years. DAIL/DVR/DBVI may not provide extended services to individuals with the most significant disabilities who are not youth with the most significant disabilities.

1. Availability of Funding

The DAIL/DVR/DBVI commitment to funding supported employment services is contingent on the availability of state and federal funds. In the event state or federal funds are reduced or eliminated, DAIL/DVR/DBVI may reduce or end funding for supported employment services.

DMH Responsibilities

1. Funding for JOBS

DMH will fund the JOBS program supported employment services and extended employment services through Global Commitment, Medicaid Case Rate funding. Funds will be provided through the DA Master Grant Agreements.

1. Funding for IPS Supported Employment Services and Extended Services

DMH will fund evidence-based supported employment through the Global Commitment, Medicaid CRT Case Rate. Funds will be provided through the DA Master Grant Agreements.

1. Availability of Funding

The DMH commitment to funding JOBS and IPS supported employment services is contingent on the availability of state and federal funds. In the event state or federal funds are reduced or eliminated, DMH may reduce funding for supported employment services.

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

1. SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

A. QUALIFIED PERSONNEL NEEDS

I. THE NUMBER OF PERSONNEL WHO ARE EMPLOYED BY THE STATE AGENCY IN THE PROVISION OF VR SERVICES IN RELATION TO THE NUMBER OF INDIVIDUALS SERVED, BROKEN DOWN BY PERSONNEL CATEGORY;

The Vermont Division for the Blind and Visually Impaired (DBVI) operates in the Department of Disabilities, Aging, and Independent Living (DAIL) in the Agency of Human Services (AHS). DBVI employs 11 full-time positions. DBVI is organized to allow a structure for advancement within based on increased professional abilities, knowledge, leadership, improved services and outcomes.

In FFY 2019 DBVI Counselors served 248 clients. DBVI has sufficient VR Counselor capacity to meet the needs of vocational rehabilitation clients. DBVI has four regional offices located in Burlington, Montpelier, Rutland and Springfield. Each of the four offices have one Counselor. The Springfield office has an Associate Counselor completing a graduate program with the University of Southern Maine and will obtain a Master of Science in Counseling.

Two Associate counselors completed their Master of Science in Counseling in August 2018 and both were promoted to full-time Rehabilitation Counselors providing rehabilitation services in the Montpelier and Burlington offices. One full-time Associate Counselor position has been added to the Springfield office in 2019 and a second full-time Associate Counselor will be added to the Burlington office due to vacancy in Oct 2019. These added Associate Counselor positions provide increased capacity to serve Pre-ETS students and for development of programs with the Department of Labor (DOL).

Two Rehab Associate positions have divided administrative responsibilities to support the vocational rehabilitation program in the north and south regions of the State of Vermont. These two positions are supervised by the Counselors in the Montpelier and Rutland offices.

The Springfield office has filled the vacant full-time Administrative Services Coordinator position with a full-time Associate Counselor. One Senior Counselor retired in July 2019 and a second Senior Counselor is retiring in February 2020. A VR Counselor II was promoted to Senior Counselor in October 2019. One half-time VR counselor left in October 2019. One Rehab Associate II has been on medical leave since July 2019.

Technology services are provided by the Blind Services Assistive Technology Coordinator and a contracted professional Rehabilitation Technology expert. The Assistive Technology Coordinator provides services for DBVI clients and covers the entire State. DBVI has two Employment Consultants. This service is contracted through VABIR (Vermont Association of Business Industry and Rehabilitation). Overall supervision is provided by the Division Director.

II. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

Job Title	Total positions	Current vacancies	Projected vacancies over the next 5 years
Blind Services Director	1	0	0
Senior Rehabilitation Counselor	1	0	0
Rehabilitation Associate I	0	0	0
Rehabilitation Associate II	2	0	0
Associate Counselor	3	0	0
Adaptive Technology Coordinator	1	0	0
Rehabilitation Counselor I	2	1	0

III. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES IN 5 YEARS BASED ON PROJECTIONS OF THE NUMBER OF INDIVIDUALS TO BE SERVED, INCLUDING INDIVIDUALS WITH SIGNIFICANT DISABILITIES, THE NUMBER OF PERSONNEL EXPECTED TO RETIRE OR LEAVE THE FIELD, AND OTHER RELEVANT FACTORS.

In FFY ---2019 DBVI (4) Counselors served an average of 62 consumers annually. DBVI is prepared to serve a similar average of consumers per counselor for FFY 2020. At this time DBVI has maintained a high level of performance. The recent changes of personnel structure will ensure DBVI clients will be served, including those with significant disabilities, students and adults requesting vocational rehabilitation services. DBVI expects to have one Associate Counselor position upgraded to full time Rehabilitation Counselor over the next couple of years. We have addressed the issue of Counselors retiring or leaving the field and staffing levels are sufficient. This is due in part to the way the DBVI program is structured, which allows for staff development and advancement. DBVI is proud of its prompt turn-around services and ability to quickly establish eligibility and develop plans for services.

B. PERSONNEL DEVELOPMENT

I. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM;

Personnel Development needs over the past two years have been address by our relationship with University of Southern Maine. Two DBVI Associate Counselors have completed and a third has enrolled in the USM Counselor Education Graduate Program. It is expected that the third Associate counselor will receive a Master of Science in Counseling. Training and supervision are provided under the guidance of a qualified rehabilitation counselor. Training includes instruction regarding the implications of visual impairment and how to provide expert services for people who are visually impaired and seeking employment.

DBVI is coordinating all educational training with Charles Beracchio, EdD, CRC from the University of Southern Maine. The Master of Science requires students to take a total of fifty-four credit hours. After completion of the program, counselors have the required knowledge needed to work in the rehabilitation field. Classes focus on the medical and psychological aspects that surround people with disabilities in our society. The training teaches students how to promote equality and empower clients. Below is an outline of the program syllabus:

Core Courses (27 credits)

EDU 600 Research Methods and Techniques
HCE 605 Psychological Measurement and Evaluation
HCE 620 Fundamentals of Counseling Theories
HCE 621 Fundamentals of Counseling Skills
HCE 626 Group Process and Procedures
HCE 627 Group Counseling Practicum
HCE 668 Human Development
HCE 690 Individual Counseling Practicum Seminar
HCE 691 Individual Counseling Practicum Laboratory

Required Concentration Courses (24 credits)

HCE 510 Introduction to Rehabilitation Counseling and Service
HCE 514 Psychiatric Rehabilitation: Evidence-based Practices and Treatment
HCE 611 Medical and Psychological Aspects of Disability and Rehabilitation
HCE 612 Multicultural Counseling: Social & Cultural Foundations of Helping Diverse Families
HCE 615 Vocational Counseling and Placement in Rehabilitation
HCE 619 Recovery-Oriented Origins of Psychiatric Rehabilitation Practice
HCE 642 Perspectives on Chemical Dependency
HCE 686 Internship in Counselor Education (6 credits - 600 hours)

Vermont has no accredited graduate school offering a master's degree in Rehabilitation Counseling. To meet the Comprehensive System for Professional Development (CSPD) standards, a Counselor needs either a master's degree in Rehabilitation Counseling or a master's degree in a related field plus completion of four additional core rehabilitation courses. To help met the requirement for education, Assumption College, University of Massachusetts, and Springfield College of Human Services have partnered to provide the required masters level courses to be CSPD qualified. Presently, all DBVI rehabilitation counselors have met the educational requirements.

II. THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

One Associate Counselor is enrolled voluntarily in a master's degree program in Rehabilitation Counseling through the University of Southern Maine's (USM) online, distance learning program funded by an RSA long-term training grant to USM.

III. THE NUMBER OF STUDENTS WHO GRADUATED DURING THE PRIOR YEAR FROM EACH OF THOSE INSTITUTIONS WITH CERTIFICATION OR LICENSURE, OR WITH THE CREDENTIALS FOR CERTIFICATION OR LICENSURE, BROKEN DOWN BY THE PERSONNEL CATEGORY FOR WHICH THEY HAVE RECEIVED, OR HAVE THE CREDENTIALS TO RECEIVE, CERTIFICATION OR LICENSURE.

Two associate counselors completed their master's degree in Rehabilitation Counseling in August 2019 and were promoted to VR Counselor I positions. All students obtained the necessary coursework through the University of Southern Maine. To date, all DBVI rehabilitation counselor completed the CSPD required rehabilitation courses.

2. PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL

DBVI recruits qualified personnel through The University of Southern Maine, Assumption College, University of Massachusetts, and Springfield College of Human Services who have

received a master's degree in Rehabilitation Counseling. These graduates meet the highest standard of education and are able to obtain certification at the highest level for this field. DBVI also recruits qualified personnel in a related field such as Social Work, Special Education, School Guidance, Mental Health Counseling, or Community Mental Health Services from New England colleges by posting positions on internal employment pages of the various college websites. These candidates for counseling vacancies are considered if they are willing to complete the four core rehabilitation courses.

DBVI also recruits professionals with an expertise in rehabilitation and knowledge of visual diagnoses and the implications of visual disability. State personnel policies require DBVI to consider qualified applicants on the Reduction in Force list before other applicants. DBVI also advertises openings through the State recruitment system, through local newspapers and makes every effort to include individuals with disabilities and minority backgrounds to ensure a diverse qualified professional staff. DBVI also recruits interested and qualified consumers, both past and present, to provide services to Vermonters with vision impairments.

Rehabilitation Associates and Associate Counselors are recruited with a strong preference given to those with bachelor's degrees and a strong commitment to blind services. Rehabilitation Associates or Associate Counselors with a bachelor's degree are encouraged to take the CSPD required master's level courses. They are encouraged to pursue a master's level program in preparation for retention and promotion of qualified personnel. Through flexible work schedules and approved time off, DBVI makes it convenient for staff to pursue advanced degrees and education. DBVI supports staff members who want to further their relevant education.

DBVI supports staff and their professional development through public recognition and opportunities for job advancement through a developed career ladder within the division. New staff participate in comprehensive orientation and training program that covers information appropriate to serving individuals who have vision loss as well as policy and procedure. Trainings address the implications of visual loss and services such as orientation and mobility, rehabilitation teaching, and low vision service. In addition, training and consultation occurs with our rehabilitation technology consultant on an ongoing basis. DBVI ensures a high standard of qualified personnel with training directed toward an expertise for working with people with visual impairment.

3. PERSONNEL STANDARDS

A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND

DBVI follows the same standard used by the Division of Vocational Rehabilitation to be in compliance with Section 101(a)(7) of the Rehabilitation Act Amendments of 1992. This requires State Vocational Rehabilitation agencies to establish qualified personnel standards for rehabilitation personnel. This addresses the qualifications necessary to meet the highest standards which are required in the State of Vermont.

DBVI follows standards set forth in the Comprehensive System for Professional Development (CSPD) 34 C.F.R. § 361.18 . This prescribes a national standard for vocational rehabilitation counselor qualifications. This standard gives highest priority to counselors with a master's degree in rehabilitation counseling. The second level of priority is for counselors with related degrees in social work, psychology, mental health counseling or special education. This group must complete four additional courses to meet the standard: Foundations of Rehabilitation,

Career Counseling, Vocational Assessment and Evaluation, and Medical and Psychosocial Aspects of Disability. All efforts are made to hire new Counselors into this standard. When this is not possible, new hires are required, by written agreement, to attain the standard in a reasonable amount of time. The availability of online course work should allow any new hires to reasonably take the four "core" courses or any other course work they would need to reach this standard.

DBVI has a standard of bachelor's degree for new Rehabilitation Associates and Associate Counselors. This provides the groundwork for moving Associates into graduate programs, helping DBVI maintain qualified staff. Presently all DBVI Rehab Counselor positions are filled by qualified professionals. All staff receive extensive training to help them learn and understand services for visually impaired individuals and the implication caused by visual loss. Training is focused around meeting with other highly trained vision professionals both within DBVI and from our sister agency, VABVI (Vermont Association for the Blind and Visually Impaired).

All new employees receive training with a qualified rehabilitation therapist, a low vision therapist and orientation and mobility instructor. In addition, they are scheduled to meet with the rehabilitation technology specialist to learn about how adaptive equipment can enhance job opportunities for consumers. They also meet with professionals from VABIR (Vermont Association of Business Rehabilitation and Industry) to learn about job development and placement. The performance expectations of all newly hired staff are to meet all the expected standards established for the position.

All newly hired staff attend new hire orientation which includes the following required trainings: HIPPA, Preventing and Addressing sexual Harassment in the Workplace, Conflict of Interest, Ethics, and Motivational Interviewing. Existing staff are required to update these trainings periodically.

DBVI allows for flexible work schedules, provides training assistance, supports state, regional and national learning opportunities and is strongly supportive of the time, effort, and commitment expended by each staff member to establish and maintain educational standards. DBVI encourages the use of training funds for staff to use to attain and maintain professional standards and to maintain and enhance their professional capabilities. DBVI seeks and distributes information and training opportunities for staff at the regional and national level. DBVI maintains current educational material through journals, internet sites and information gathered at conferences and trainings. DBVI works with the DVR Staff Development and Training Coordinator to ensure inclusion in opportunities offered by educational institutions for vocational rehabilitation professionals. Opportunities for online and distance learning are also available.

B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE WITH SECTION 101(A)(7)(B)(II) OF THE REHABILITATION ACT, TO ENSURE THAT THE PERSONNEL HAVE A 21ST CENTURY UNDERSTANDING OF THE EVOLVING LABOR FORCE AND THE NEEDS OF INDIVIDUALS WITH DISABILITIES.

DBVI ensures that personnel have a 21st century understanding of the evolving labor force and the needs of individuals with visual impairment through our partnership with the Department of Labor (DOL). DBVI is part of the unified plan to meet the requirements of the Workforce Innovation Act (WIOA). Cross trainings with DOL, Division of Vocational Rehabilitation and the Agency of Education are designed to address the needs for adults and students with disabilities. DBVI staff have completed training on Pathways to Promising Careers. DBVI staff have direct access to Vermont DOL's 12 regional Job Centers. DBVI is working closely with the Labor

Planning and Support Administrator Youth Program Manager from DOL. Trainings have been arranged for staff to learn about the evolving labor market and programs to assist students with visual impairment. DBVI is partnering with DOL to look closer at apprenticeship programs and on-the-job training opportunities that will produce success in obtaining high wages for our consumers.

DBVI works closely with VABIR (Vermont Association of Business Industry and Rehabilitation) and Creative Workforce Solutions (local Sales Force boards) to learn information about local employers and progressive employment opportunities. DBVI is planning a staff training in 2020 with Hugh Bradshaw, Vermont DOL. This training will provide counselors with information and skills to match the needs of their consumers with the needs of the local labor market. The training will enhance counselors' abilities to interpret labor market information to assist their consumers to make informed career decisions and effectively work as a team with job placement staff.

Counselors are knowledgeable of training and post-secondary education options that are in demand in the local labor market. Staff are aware of trainings available for high wage, high demand and high growth job opportunities for their visually impaired clients. DBVI stays current in understanding the evolving labor market through collaboration with the Department of Labor.

4. STAFF DEVELOPMENT

A. A SYSTEM OF STAFF DEVELOPMENT FOR PROFESSIONALS AND PARAPROFESSIONALS WITHIN THE DESIGNATED STATE UNIT, PARTICULARLY WITH RESPECT TO ASSESSMENT, VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND

The main objective for staff development at the Division for the Blind focuses on assessment, vocational counseling, job placement and rehabilitation technology in relation to visual impairment. Training for counselors focuses on the essentials of a comprehensive vocational assessment. This practice addresses how a person with a visual impairment can achieve a high standard of independence through employment. DBVI's mission is to "support Vermonters who are blind or visually impaired in their efforts to achieve or sustain their economic independence, self-reliance, and social integration to a level consistent with their interests, abilities, and informed choice".

Every year each DBVI employee meets with the division director to discuss their IDP (Individual Development Plan). Meetings focus on how each employee can contribute to DBVI's mission, goals and strategies; improve customer satisfaction; and support policies, philosophy, competencies and future vision. In addition, the purpose of the IDP is to ensure that each DBVI employee receives appropriate and adequate training to meet the professional standards and requirements of their position. Discussions with the DBVI director allow employees an opportunity to identify their career ladder. DBVI staff are given opportunities to take on higher level duties and are encouraged and supported to participate in education and training programs. Increased responsibilities and education can lead to a higher step grade as determined by the Vermont Department of Human Resources.

DBVI has a partnership with the VR Staff Development and Training Coordinator to obtain recommendations on upcoming trainings available within the Agency of Human Services and DVR. Needed trainings are determined through IDP developed by DBVI staff. DBVI staff are encouraged to participate in training opportunities to increase leadership, partnering and

collaboration skills that lead to increased employment opportunities for people who are blind and visually impaired.

DBVI continues to expand projects directed toward our younger transition aged students and young adults. DBVI partners with the VR Transition Program Director, the Department of Labor Planning and Support Administrator Youth Program Manager from the Workforce Development Unit, and the Agency of Education Program Coordinator. New initiatives to address services for students who are visually impaired and to ensure they are receiving the Pre-ETS core services. DBVI staff help to create and attend the annual Vermont Transition conference and the Core Transition Event. Counselors are active members of regional Core transition teams and attend meetings and events regularly which provide opportunities to network with other transition aged service providers. DBVI counselors are active in attending and providing information at IEP meetings for students age 14-21. DBVI works closely with Vermont DOL Youth case managers to support students with visual impairment. DBVI staff have and continue to provide training to DOL staff regarding adaptive skill instruction, orientation and mobility, rehab teaching and low vision training to assist with progressive employment.

The project, Great Expectations-Voices and Choices for the Future is a collaborative effort by DBVI, VABVI and VABIR. The purpose of the project is to increase employment and job seeking skills, promote positive mentoring, networking, obtain feedback from clients to improve services and to empower client around self-advocacy and self-reliance. Great Expectations is consumer driven and is accomplished through a series of planning meetings resulting in an annual theme-based event.

DBVI researches and looks at new ways to provide and increase services for transition age youth. DBVI staff receive ongoing training through local and regional in-state programs to stay current on: The National Library Services, Vermont Youth Conservation Corps, Deaf and Hard of Hearing Resources, Diversity and numerous others. DBVI staff is especially diligent about perusing pertinent journals and research and disseminating relevant articles and information via the internet, at monthly staff meetings and through in-person collaborations. The DBVI central office maintains subscriptions to several noted journals in the field (e.g., Journal of Visual Impairment and Blindness). DBVI continues to seek ways to improve and enhance collaboration with other agencies through attendance at combined meetings, in-service trainings, and direct staff contact.

DBVI has greatly enhanced its collaboration with other organizations to the benefit of this division. In particular, the LEAP program for summer youth employment is a model of cooperation. This involves DBVI (provider of consumers, funding), Vermont Youth Conservation Corps (infrastructure, staff), Resource (jobs, staff), Linking Learning to Life (follow-up, e-mentoring), VABVI (independent living and O&M trainings, transition staff) and the Gibney Family Foundation (funding). This unique residential program provides youth with vision impairments summer employment opportunities, community service experiences and independent living experiences in an urban setting.

DBVI is active with the CWS (Creative Workforce Solutions), a job development coalition throughout the State of Vermont in concert with VABIR (Vermont Association of Business Industry and Rehabilitation). VABIR staff assist consumers with job preparation (resume and interview preparation) and help develop progressive employment opportunities for consumers. VABIR staff explain financial incentives and provide ADA information. CWS serves to connect employers to qualified consumers for employment and support access to needed accommodations. CWS works to develop cooperative relationships with area employers for long lasting job matches.

B. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO DESIGNATED STATE UNIT PROFESSIONALS AND PARAPROFESSIONALS.

DBVI uses the C3 management model developed by Robin Lawton. This model supports a strong belief and process for a "Customer Centered Culture". This method helps DBVI to identify the "voice of the customer". DBVI continues to use the process of assessing customer satisfaction and organizational performance with the knowledge obtained through extensive training and consultation from Robin Lawton. DBVI has incorporated this model of management into our service delivery and organizational process. Training has been provided to our SRC, the Vermont Association for the Blind and Visually Impaired and the DBVI staff.

The main dimensions of the model are: Focus on the customer, eliminate ambiguity, include customer priorities. Empower the end user, define success, reduce ambiguity of language. Link customer and operational priorities. Integrate and leverage existing initiatives, focus on improvement. Address outcomes first, processes last, satisfy strategic objectives as well as operations, improve product knowledge. Emphasize sustainability of new practices and challenge traditional assumptions. Using this model DBVI strives to improve customer satisfaction as we decrease ambiguity and improve communication. C3 provides a method to measure successful outcomes based on the "voice of the customer".

In 2020 DBVI will be hosting town meetings statewide using C3 to allow a process for hearing the voice of the customer. DBVI will collect and analyze information that will be used in the development of DBVI's strategic planning and service delivery. C3 training and consultation with Robin Lawton have provided DBVI staff with the tools and methodology to improve customer satisfaction and provide a higher level of service.

Using strategies from C3, DBVI created "Your Guide to Employment Services". The guide is given to consumers during the initial interview and contains customer friendly language that explains who we are, our process, includes client success stories and describes the types of services that a person can expect from participating in the employment program. The guide provides information to increase communication and clarity by using common language. DBVI uses input from our customers to ensure information is accessible, comprehensive, empowering, understandable and informative. DBVI continues to develop new tools and enhance the "Guide to Employment Services".

The DBVI team also uses the Franklin Covey management system. "The 7 Habits of Highly Effective People" has been incorporated into the DBVI team culture to enhance effectiveness, responsibility, personal growth and vision. Our team approach uses a win-win philosophy, which helps to increase understanding and communication. DBVI supports creative cooperation among staff.

Using this both "The 7 Habits of Effective People" and the "Customer Centered Culture" management systems have resulted in teams that are more effective in analyzing, improving and providing services for people who are visually impaired.

The DBVI Division Director meets annually with the four regional teams throughout the state assistive technology teams to discuss and review each team's mission and vision, annual goals and accomplishments.

STAFF TRAININGS:

DBVI has partnered with VR to provide training in Motivational Interviewing. All DBVI staff have completed training sessions. This training allows an opportunity for staff to receive feedback and support using the motivational counseling techniques.

DBVI attended a workshop to increase awareness of functional limitations for people who are visually Impaired and best practice for working with our clients. Dan Norris from the Vermont Association for the Blind, Adult Services Supervisor and instructor at UMass Boston provided the instruction. He designed the training to address best practice to meet the learning needs of new staff and presented advanced material for more experienced staff. This training provides new staff with valuable information regarding environmental and workplace assessments for clients and how to identify needed accommodations and supports. Information is presented on the different types of visual diagnoses and how they impact individuals.

Vermont Association for the Blind and Visually Impaired hosts an annual technology fair for DBVI professionals and DBVI clients. This provides a hands-on opportunity to explore adaptive devices such as: electronic magnification, computer software, illuminated canes, talking glucose meters, kitchen aids, handheld magnification, telescopic devices, writing aids and large print items. Workshops on current technology and product demonstrations are also provided.

DBVI staff continue to participate in trainings on relevant assessments needed for persons with visual impairment. These trainings are presented by qualified vision professionals. Trainings address new and relevant assistive technology for people who are blind and visually impaired and job analysis used to determine the need for a technology assessment and training.

Ongoing consultation is available for staff to support understanding of adaptive technology and how it can enhance an individual's job performance. Coordination and communication with low vision optometrists to enhance visual function in an employment situation is ongoing.

Other trainings attended by staff since January 2019 also include: Defensive driving, Emergency Procedures for State Employees, Continuous Improvement, Diversity, Civility and Unconscious Bias, Communication Skills, Core Team Collaboration, JAWS and ZoomText certifications, State Rehab Council and DBVI open house Team presentations, Vermont Family Network Annual Conference - Stories of Hope and Resilience, How to tell your Story training, and Leadership Coaching.

5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

The Division for the Blind operates under the State of Vermont Agency of Human Services. The Agency of Human Services has clear policy regarding access to programs as needed to ensure meaningful access to persons with limited English proficiency. Information regarding policy can be accessed through the Agency of Human Services intranet Limited English Proficiency (LEP) page. This policy applies to all Agency Departments, offices and employees. It is the policy of the Agency of Human Services to provide language assistance as may be needed to ensure meaningful access to our programs. Each department and office provide assistance so that persons seeking services may communicate effectively with program providers and with agency and department staff. Departments ensure persons seeking services understand which services and benefits are available to them and how they may best access. The LEP information provides resources and links dealing with written, face-to-face and over the phone communication with individuals for whom English is not the primary language. DBVI is also able to use an agency contract for phone and written translation of almost any language in the world. DBVI makes use of Vermont Interpreter Referral Service (VIRS), an online resource to obtain interpreters of ASL for those consumers who are deaf.

6. COORDINATION OF PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

Coordination of Personnel Development Under the individuals with Disabilities Education Improvement Act Describe the procedures and activities to coordinate the designated state unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Improvement Act.

DBVI works in partnership with the Vermont Agency of Education, Division of Vocational Rehabilitation, and the Vermont Department of Labor. The development of the Unified State Plan ensures compliance with the Workforce Innovation Opportunity Act (WIOA). These steps ensure students with disabilities between the ages of 14-21 are receiving comprehensive and unduplicated services. DBVI is a partner on the Core Transition teams located in regions around the State of Vermont. DBVI counselors work closely with DVR Youth Transition Counselors, VABIR Youth Employment Specialists, Guidance counselors and Case managers to ensure that students on IEPs are receiving Pre-Employment Transition Services and participating in activities as required in WIOA.

DBVI works closely with the teachers of the Visually Impaired partially funded through the AOE and the School districts. Students receive adaptive equipment and training to be prepared for actively participating in job exploration counseling, work-based learning experiences, workplace readiness training, instruction in self-advocacy and planning for post-secondary education or training.

DBVI provides funding for student participation in the LEAP summer program (Learn Earn and Prosper) and LEAP retreats during the academic year. The LEAP program provides students with learning about self-advocacy, post-secondary opportunities, and work readiness skills along with participation in work-based learning. Students who are visually impaired and at risk can work with counselors through Vermont Jobs Program. Students and their families can receive advocacy and education through the Vermont Family Network. DBVI provides transition age students who are visually impaired with vocational counseling, trainings, worksite accommodations, work experiences, advocacy and support. The annual Core Transition event is created and coordinated in partnership with DBVI, DOL, DVR, and AOE. Professionals gain increased knowledge and awareness of current practice and techniques that provide desired results for transition students through ongoing training, team collaboration and development of new initiatives.

J. STATEWIDE ASSESSMENT

1. PROVIDE AN ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, PARTICULARLY THE VR SERVICES NEEDS OF THOSE:

A. WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES;

Summary Outline of CSNA Methods, Results, Gaps, and Implications for State Plan

The Rehabilitation Act, as amended in 1998, requires each state to conduct a statewide needs assessment every three years. The current triennial needs assessment is statewide and jointly conducted by The Division for the Blind and Visually Impaired (DBVI) and the State Rehabilitation Council (SRC). The activities for the comprehensive statewide needs assessment (CSNA) were completed during calendar year 2017. The following summary of the CSNA is being used to develop many of our goals and strategies for PY 2019, 2020 and 2021.

Introduction

The goals of this needs assessment are to determine the vocational rehabilitation needs of individuals in Vermont who are blind or visually impaired.

Methodology

Information gathering included the use of:

- Existing disability population statistics including the Cornell Study;
- Disability population estimates from available data including the American Foundation for the Blind;
- Population projections and economic forecasts from federal and state data; Department Of Labor projections by state;
- Existing DBVI data, studies and experience; 911 data, type of service, cost, whether people currently served by DBVI are representative of the racial and ethnic minority distribution of people with disabilities within the state; data provided by CRPs; Counselor input;
- State level statistics from other federal programs; WIA, IEP, 504, Social Security,
- State and local data and reports;
- Stakeholder input: Surveys, focus groups, SRC meetings, interviews, Statewide Town Meetings, Customer—Centered Culture Focus Groups, and public hearings.
- Meetings and surveys with the statewide network of Teacher of the Visually Impaired.
- Statewide Customer Satisfaction and Needs Assessment Survey conducted by Market Decisions—November/December 2017.
- Review of Journal of Visual Impairment articles by DBVI staff.

Participants included DBVI Staff, State Rehabilitation Council, Vermont Association for the Blind and Visually Impaired (VABVI) Staff, and individuals who are blind or visually impaired from around the state. Dissemination plans included group meetings and individual interviews.

Results

Current Population Survey

Prevalence Rate (Disability at the Vermont Population Level):The percentage of a man and a woman, aged 18-64 who report a work limitation in Vermont from 1981 (8.9%) to 2014 (10.1%)

Labor Market Activity Rate: The percentage of a man and a woman, aged 18-64 with a work limitation in Vermont who worked more than 52 hours in the prior calendar year from 1981 (53%) to 2014 (24%).

Employment Rate: The percentage of a man and a woman, aged 18-64 with a work limitation employed in Vermont from 1981 (40.8%) to 2014 (17.6%).

*VonSchrader, S., Lee, C. G. (2017). Disability Statistics from the Current Population Survey (CPS). Ithaca, NY: Cornell University Yang Tan Institute (YTI). Retrieved from Cornell University Disability Statistics website: www.disabilitystatistics.org

2016 Disability Status Report--Vermont

American Community Survey

Erickson, W., Lee, C., & von Schrader, S. (2016). 2016 Disability Status Report:

Vermont. Ithaca, NY: Cornell University Yang-Tan Institute on Employment and Disability (YTI).

www.disabilitystatistics.org

Summary of Overall Vermont Data

Age--In 2016, the prevalence of disability in VT was:

- 14.3 percent for persons of all age
- 6.2 percent for persons ages 5 to 15
- 8.6 percent for persons ages 16 to 20
- 12.0 percent for persons ages 21 to 64
- 23.4 percent for persons ages 65 to 74
- 48.3 percent for persons ages 75+

Disability Type--In 2016, the prevalence of the six disability types among persons of all ages in VT was:

- 2.3% reported a Visual Disability
- 4.4% reported a Hearing Disability
- 6.7% reported an Ambulatory Disability
- 5.5% reported a Cognitive Disability
- 2.9% reported a Self-Care Disability
- 6.0% reported an Independent Living Disability

Gender--In 2016, 13.9 percent of females of all ages and 14.7 percent of males of all ages in VT reported a disability.

Hispanic/Latino--In 2016, the prevalence of disability among persons of all ages of Hispanic or Latino origin in VT was 7.9 percent.

Race--In VT in 2016, the prevalence of disability for working-age people (ages 21 to 64) was:

- 11.9 percent among Whites
- 9.7 percent among Black / African Americans
- 46.7 percent among Native Americans
- 14.1 percent among persons of some other race(s)

Populations in Households in Vermont

Content provided by the US Census bureau for the years 2010, 2011, 2012, 2013, 2014 and 2015.

https://suburbanstats.org/population/how-many-people-live-in-vermont

- Ages 15 to 17=12,648
- Ages 18 to 19=6,392
- Ages 20=3,244
- Ages 21=3,615
- Ages 22 to 24=11,034

Number of Individuals who are minorities

Content provided by the US Census bureau for the years 2010, 2011, 2012, 2013, 2014 and 2015.

https://suburbanstats.org/population/how-many-people-live-in-vermont

- Total population of Vermont= 625,741
- White- 596,292
- Two or More Races=10,753
- Hispanic or Latino=9,208
- Asian=7,947
- Black or African=6,277
- American Indian=2,207
- Another Race=2,105
- Three or More Races=610
- Native Hawaiian=160

Summary of Visual Disability data in Vermont—American Community Survey

Is this person blind or does he/she have serious difficulty seeing even when wearing glasses?

Working Age Adults

DBVI estimates that there are approximately 7,100 Vermonters of working age (21-64) who are blind or severely visually impaired (meaning even with correction they are not able to easily read the newspaper). DBVI provides RSA defined services to approximately 5.3% of these individuals annually (293 in FFY17).

· Visual Disability Total= 14,100 (2.1% of 619,100 VT population)

· Ages 5 to 15= 100 (6.4% of 75,800)

· Age 16 to 20= 80 (

· Age 21 to 64= 7,100 (2% of 357,300)

· Age 65 to 74= 2,500 (3.6% of 68,500)

· Age 75 and Older= 3,400 (7.9% of 42,800)

Employment Rate

Employment rates of non-institutionalized

Working-age people (ages 21 to 64) with disabilities in Vermont.

- In 2016, the employment rate of working-age people with disabilities in VT was 41.4 percent.
- In 2016, the employment rate of working-age people without disabilities in VT was 85.0 percent.
- The gap between the employment rates of working-age people with and without disabilities was 43.6 percentage points.

Gap--Employment Rate--Visual Disability

- The gap between the employment rates of working-age people with a visual disability (48.2%) and without disabilities (85%) was (36.8%) percentage points.
- This represents about 3,400 out of 7,100 working-age people with a visual disability who are employed.

Not Working but Actively Looking for Work

The percentage of non-institutionalized working-age people (ages 21 to 64) with disabilities in Vermont who are Not working but actively looking for work.

- In 2016 in VT, the percentage of working-age people with disabilities who were not working but actively looking for work was 5.5 percent.
- In 2016 in VT, the percentage of working-age people without disabilities who were not working but actively looking for work was 15.5 percent.
- The difference in the percentage of not working but actively looking for work between working-age people with and without disabilities was 10 percentage points.

Gap--Not Working but Actively Looking for Work--Visual Disability

- The difference in the percentage of not working but actively looking for work between working-age people with a visual disability (0.8%) and without disabilities (15.5%) was 15.42 percentage points.
- This represents about 296 people with a visual disability out of the 3,700 people with a visual disability who are working age not working but looking for work.

Working Full-Time/Full-Year

This section presents the percentage of non-institutionalized working-age people (ages 21 to 64) with disabilities working full-time/full-year in Vermont.

- In 2016, the percentage of working-age people with disabilities working full-time/full-year in VT was 27.0 percent.

- In 2016, the percentage of working-age people without disabilities working full-time/full-year in VT was 62.6 percent.
- The difference in the percentage working full-time/full-year between working-age people with and without disabilities was 35.6 percentage points.

Working Full-Time/Full-Year: Gap--Visual Disability

- The difference in the percentage working full-time/full-year between working-age people with a visual disability (24.8%) and without disabilities (62.6%) was 37.8 percentage points.
- This represents about 1,700 out of 7,100 people with a visual disability who are working Full-Time/Full-Year.

Annual Earnings

The median annual earnings of non-institutionalized working-age people (ages 21 to 64) with disabilities who work full-time/full-year in Vermont.

- In 2016, the median earnings of working-age people with disabilities who worked full-time/full-year in VT was $44,300.
- In 2016, the median earnings of working-age people without disabilities who worked full-time/full-year in VT was $44,500.
- The difference in the median earnings between working-age people with and without disabilities who worked full-time/full-year was $200.

Gap--Annual Earning--Visual Disability

- The difference in the median earnings between working-age people with a visual disability earned $50,400 and people without a disability earned $44,500 showing that people with a visual disability earned $5,900 more annually than people without a disability.

*Caution: Estimates bases on a very small sample size (less than 40 individuals).

Poverty

The poverty rates of non-institutionalized working-age people (ages 21 to 64) with disabilities in Vermont.

- In 2016, the poverty rate of working-age people with disabilities in VT was 21.2 percent.
- In 2016, the poverty rate of working-age people without disabilities in VT was 8.6 percent.
- The difference in the poverty rate between working-age people with and without disabilities was 12.6 percentage points.
- **Gap—**Poverty—Visual Disability
- The difference in the poverty rate between working-age people with a visual disability (27.9%) and without disabilities (8.6%) was 19.3 percentage points
- This represents about 2,000 people with a visual disability out of the 7,100 people with a visual disability who are working age that live in poverty.

Education Level

- Less than High School=800 (11.9% of 7,100)
- A HS diploma or equivalent=3,600 (50.4% of 7,100)
- Some college/associates degree=1,500 (21.1% of 7,100)

College Bachelor Degree=1,200 (16.5% of 7,100)

Gap—Education Level--Visual Disability

A majority of individuals with a visual disability do not get a college degree.

Information about DBVI agency resources:

DBVI currently has a total of 10 staff including four Vocational Rehabilitation Counselors and two Associate Counselors. DBVI collaborates with CRPs including The Vermont Association for the Blind and Visually Impaired and The Vermont Association for Business, Industry, and Rehabilitation; and Supported Employment programs (i.e. Developmental Services Agencies and Mental Health programs).

The type, percentage, and cost of services provided by CRPs to individuals who are blind or visually impaired and who are minorities.

- DBVI contracts with the Vermont Association for Business, Industry, and Rehabilitation to provide job development services for DBVI customers in all four regions of the state ($60,000 annually).
- DBVI customers have access to supported employment services through an agreement with the General VR agency to access those programs as needed. In 2017, 8 DBVI customers participated in supported employment programs.
- DBVI contracts with the Vermont Association for the Blind and Visually Impaired for Low Vision, Rehabilitation Teaching, and Orientation and Mobility services ($175,000 annually).

Customer Satisfaction Data—Key Findings and Discussion

Statewide Survey

The survey instrument for this research was developed jointly between the Vermont Division for the Blind and Visually Impaired and Market Decisions Research. It is based on question topics that Market Decisions Research has used in conducting satisfaction research among Vocational Rehabilitation consumers in six states. The goal of this research was to provide an accurate assessment of the views of consumers that could be used to assess satisfaction with services with VT DBVI overall. The target population for this research consisted of all consumers with open and closed cases.

Goals:

- The Customer Quality Assurance Survey and Needs Assessment is designed to allow customers to provide feedback about the services they have received.
- The survey provides a tool to measure satisfaction with the agency and the services provided.

- The survey is designed to gather information to allow quality improvements.
- This administration allows comparisons to the 2003, 2011, and 2015 research and the opportunity to see trends in customer satisfaction.

Executive Summary

Consumer Core Metrics:

- Overall Satisfaction and Expectations: 82
- Experience with Services Provided by DBVI: 83
- Experience with DBVI Staff and Counselors: 93
- Communications with DBVI Staff: 88
- Consumer Control and Involvement: 86
- Outcomes and Meeting Goals: 85
- Ease of the Application Process for DBVI Services: 88
- Accessibility of the DBVI Office: 87
- Satisfaction with Current Employment: 85
- Recommend VT DBVI: 98
- Experience Problems with VT DBVI: 89

New Skills and Knowledge

- The most commonly received service from VT DBVI was adaptive equipment (67%). This was also the service consumers most frequently found most helpful (45%)
- The most well-known services offered in other places that consumers thought VT DBVI needs is additional training opportunities.
- 92% of consumers are satisfied with the choice of services available.
- 85% of consumers think DBVI delivers services to them well.
- 89% of consumers are satisfied with the choice of service providers.
- 90% of consumers are satisfied with their choice of a vocational goal.
- 88% of consumers are satisfied with the information they have been given about the choices they have.

Attitudes and Opinions

- 92% of consumers are satisfied with VT DBVI's program overall.
- 94% of consumers are satisfied with their involvement in their DBVI experience.
- 11% of consumers experienced some problem with DBVI or the services provided to them.

- The problems most commonly being experienced are not receiving employment (37%) and not receiving help in reaching plan or goals (29%).
- Among those experiencing problems with DBVI or the services provided, 59% indicate that DBVI worked to resolve those problems.
- The most common sources of improvement offered by consumers is more training (14%) and increases in staff (8%).
- The most commonly sought need to address is for more transportation and drivers for all of consumers' needs.
- Consumers are most likely to place the blame for unmet needs on funding issues (28%).
- Most DBVI consumers believe that the unmet needs could be solved by providing more staff (23%) or better information being made publicly available (21%).

New Behaviors and Circumstances

- 81% of consumers agree that the DBVI services they received helped or will help them become more financially independent.
- 88% of consumers feel that the DBVI services they received helped them or will help them become more independent, in general.
- 84% of consumers feel the DBVI staff helped or will help them reach their job goal.
- The new skills consumers are most likely to report are computer and technology use skills (23%).
- The most commonly reported assistive technology skills learned are computer/technology skills (22%).
- 54% of consumers are working full or part time.
- The service that working DBVI consumers are most likely to believe helped them get or keep their job was job coaching and support (28%).
- Asked what worked best in helping them prepare for their job, consumers are most likely to say adaptive equipment and counseling.
- 91% of working consumers are satisfied with their current job.
- Jobs in education are most in demand among DBVI consumers not currently employed (15%).
- Among those not working, help in finding a job (3%) is the most commonly reported service consumers need and where not receiving.

Treatment by VT DBVI

- 94% of consumers feel the staff of DBVI helped or is helping them achieve their DBVI goal.
- Almost all (91%) consumers report that the DBVI office is accessible for someone with their type of disability.
- Nearly all consumers (95%) feel the DBVI staff treats them with dignity and respect.

Actions Meeting Standards

- 83% of consumers got the results they wanted from DBVI.
- 92% of consumers felt that the services provided by VT DBVI met their expectations.
- 90% of consumers felt that the services they received from VT DBVI compared well to their ideal program.
- 98% of consumers would tell their friends with disabilities to go to the DBVI program for help.
- 93% of consumers agree that they are better off as a result of the services received from DBVI.

Timeliness of Action

- 92% of consumers are satisfied with how long it took their counselor to answer questions and address concerns.
- 95% of consumers indicate that it is easy to contact their DBVI counselor.
- 91% of consumers feel that services are provided as promptly as necessary.

Other Items

- 96% of consumers found it easy to complete an application for DBVI services.
- **64% of consumers have been informed they could address problems with Division for the Blind and Visually Impaired, and that they could address it with the Client Assistance Program.**

Key Findings

Summary

The overall conclusion that can be drawn from this research is that a large majority of consumers are satisfied with the Vermont Division for the Blind and Visually Impaired (DBVI), satisfied with the services they receive, and only a small fraction have experienced any problems. This reaffirms the findings from prior studies conducted between 2003 and 2015.

The staff of DBVI is viewed as helpful and interested in meeting the needs of their consumers. Staff effectively communicates with their consumers and staff also engage with their consumers during the process. Staff listen to consumers when determining goals and the large majority of consumers indicate that DBVI provided the necessary assistance to help them achieve their goals.

Based upon the views and attitudes of the large majority of consumers, the survey results did not identify any major problems with the Vermont Division for the Blind and Visually Impaired or the services it provides.

Looking at the positive highlights, the vast majority of consumers are positive about:

- Their overall experience
- Believe that DBVI met their expectations
- Have a positive experience with the services provided by DBVI

- Have a positive experience with DBVI staff and counselors
- Feel they are part of the process in setting goals
- Have positive outcomes, and
- Nearly universally recommend DBVI to others.

While positive, the survey results do show a slight drop from the 2015 survey. The declines observed are small but occurred across nearly all metrics. This suggests there are factors having a slight negative impact consumer experience. In reviewing consumer feedback, the most commonly mentioned issues or concerns are in the areas of:

- Issues communicating with staff or counselors, difficulty reaching staff or counselors
- Difficulties with paperwork and forms, needing help in completing forms, needing alternate formats
- Difficulties in finding employment, few job options
- Waiting to receive services, have not received services
- Needing more support or services, having to fight to obtain services, needing more guidance

Pre—Employment Transition Skills Planning

Includes:

- **Statewide Survey of all Teacher of the Visually Impaired**
- **Statewide survey sent to all students and families.**
- **Data-Mapping of Child Count data.**
- **Mailing to all special education and 504 administrators**
- **Calculation of current Pre-ETS Expenditures and Forecasting of future needs.**

Statewide Survey of all Teachers of the Visually Impaired in Vermont--Survey open from November 2017 through December 2017.

What needs do your students have in job exploration counseling?

Most Popular Responses:

- Exposure to jobs in their community
- Receiving hands on experience as to how jobs are performed
- Meeting other employed adults with similar impairments

Key Answers:

- “Knowledge of actual jobs, the opportunity to "see" (hands on) how jobs are performed, the opportunity to understand how assistive tech and strategies can allow them to do jobs successfully. Meeting other adults with visual impairments who are working is also helpful”

In your experience, what skills do students need to be prepared for work experiences?

Most Common Responses:

- Social Skills (How to ask questions, making friends, etiquette, grooming etc.)
- Personal Communication skills
- Time management
- Technology
- Lots of range of answers

Key Answers:

- "Time job shadowing with HANDS on experience... Social skills, constructive criticism, making friends, etiquette, grooming, problem solving (not waiting for others to step in), assertiveness, transportation options, assistive technology, handling downtime appropriately, annual resume writing and updates. Understanding and identifying the list of job skills needed WITHIN each job."

How are your students' strengths and weaknesses currently assessed in the area of work-based learning?

Most Common Responses:

- Skill Inventory Checklist/ Job Readiness Checklist
- Observation/Evaluation of students by teacher and employer

Key Answers:

- "We were just given a readiness list, but other list are also out there in the areas of independent living, social skills, technology, etc. APH has a book on assessment and goals toward transitioning students successfully as well. I currently have students in middle school and under, and I have not been using a formal list with my current students. I definitely need to be thinking more about this with my middle schoolers though it really starts in the younger years with exposure and experiences."

What would help your students learn more about post-secondary options? Is there anything DBVI could do in order to help?

Most Common Responses:

- Have students meet with TVI and DBVI staff to discuss options
- Have DBVI organize college visits and gatherings with current college students
- Connect with families
- Put together overnight experiences like LEAP, but held more often and for high school students only

Key Answers:

- "What would be helpful is if DBVI put together a series of overnight experiences - like the leap retreat weekends but even quicker, and more often for students in 10-12 grade. Small but frequent experiences where our students could get together more frequently while being exposed to work experiences - like an overnight where all the 10-12 graders

then go and do different job shadows, and then get together in 8 weeks and switch job shadows, and learn the routes, be exposed to different access tools, spend time socializing, and then using social skills at the job sites. Some jobs could be a professor at UVM, various food service employees, computer programmers, staff at echo museum, financial industry, social work organization, etc.."

What skills do your students need to be prepared for post-secondary education?

Most Common Responses:

- Organization
- Daily living skills
- Technology
- Advocacy Skills

Key Answers:

- "The same ones as regular students plus advocacy, exposure to applications and how to find resources on line to assist them. The opportunity to practice some problem solving situations ahead of time."

What do your students need to get ready for employment?

Most Common Responses:

- Advocacy Opportunities
- Social skills
- Professional skills (Interviewing, dressing for work, office skills etc.)
- Confidence

Key Answers:

- "Opportunities to perform jobs. Training around how to go about getting the training necessary to obtain a paying job in the community, communication skills training, conversational skills training, personal care skills training, etc."

What job readiness skills do you think your students need to succeed in the workplace?

Most Common Responses:

- Often, people referred back to their answers from previous question

Do your students receive the help needed to advocate for themselves? Why or why not?

Most Common Responses:

- Most respondents indicated that their students receive some advocacy training or are made aware of some program available. The issue is having the students take advantage of said programs or continuing their training through high school.

Key Answers:

- “Yes they need help to advocate for themselves. "Self Determination" is one of the 9 Expanded Core Curriculum bullets. It takes a village, Most students come from overprotective and/or dysfunctional families so they depend on the school staff and outside sources to help guide them.”

Is there anything you would like to see DBVI do with self-advocacy services?

Most Common Responses:

- Educating Parents, form a parents group
- Work with students and parents directly
- Create a progress checklist
- Run workshops

What services have been successful for your students? Why?

Most Common Responses:

- Camps, get togethers
- CCS, Howard, LEAP, HAPI
- Job placement services
- Work experiences and assistive technology consultations.

Key Answers:

- “The arrangement of work experiences, and assistive technology consultations have been beneficial for several of my students. Direct engagement with students outside of the school setting has also been instrumental in moving students forward with their transition planning.”

Where are there gaps in services?

Most Common Responses:

- Inconsistent coverage of job coaches for students
- Opportunities to get together across the school year
- Persistence of being in contact with school based personnel
- Not many outlets for real job experience
- Funding for personal transportation
- Time, not enough time to do everything
- Assistive Technology
- Daily living skill services

Key Answers:

- “Time. We need to actually identify transition specific objectives in the IEPs or more transition specific objectives per school year. 24 hours is a day is not long enough.

Students with a VI need an extra 13th year of schooling in most of the 9 Expanded Core Curriculum areas"

- "Based on conversations I have had with parents the most challenging thing seems to be the inconsistent coverage of job coaches for students who need extra support in the community or at work"
- "There are certainly no obvious caps and services. However, funding for personal transportation expenses and access to efficient transportation remains a challenge in our largely rural community."
- "I think DLS instruction beyond what a TVI is able to do could start even earlier."

Statewide Survey of Families

In fall 2017 DBVI sent a survey to all visually impaired students and families in high school. The questions included their needs for the 5-core Pre-ETS activities. These results helped DBVI with outreach to all individuals including those who are underrepresented or minorities. The survey also included a letter that explains DBVI intent to assist students with career planning and finding work experiences. It also described the summer work experience LEAP program and school year retreats and workshops.

Statewide Focus Group Meeting (Included DBVI consumers and several SRC Members).

In January 2018 DBVI held a statewide focus group as part of the CSNA. The focus group included representation from all regions of the state. The event had two main objectives. First, to ask participants "What is working well and what else is needed to help people who are blind or visually impaired teach their employment and independence goals?" The other goals was to have an in-depth opportunity for each participant to share with the group the IOS apps that are most useful for their employment and independence.

DBVI Questions and Notes

As you think about employment, what can you think of that DBVI can do to help with that?

- Tech training
- The ability to spend more time with individuals to do something consistent over a period of time and be proficient with certain skills
- People get their feet wet, but they don't really remember when they are seeking employment
- There is room for more training
- As technology gets better, people need to become more informed
- Quarterly Newsletter
- This has been updated
- This is what's new
- Tech Listserv (E-mail and contribute to constantly and peer to peer)
- Podcasting
- VPR has been teaching people about podcasts

- DBVI needs to find a way to have the trainers become more adept at being innovative within a person's domain for possible low-tech solutions.
- Using the things around them to solve a problem
- Don't constantly throw technology at something
- Try to make things easier to use without always have to pull up an app
- Have DBVI find some training or encouragement for instructors to learn more ways in helping people find their own solutions
- Increase tactile knowledge and stuff like that
- Adapting to what you have
- Perkins School Program to Learn More Adaptive Knowledge
- How do we share low tech solutions?
- Listserv Idea
- Peer to Peer Connecting
- It's hard for people to find a way to get where they need to be
- "There's a canyon between me and a job"
- I want to meet people who can help me
- What DBVI can do about outreach?
- Need to advertise more
- Department of Human Resources

How can DBVI reach underserved populations?

Issues

- Transportation
- No actual job to go to necessarily
- WIOA could change this
- Radio PSAs
- Podcast
- VABVI (Video Clips "How I Do It")
- Contact the legislator for more BEP sites.
- Get more BEP training sites in the state.
- More connection with Department of Labor contacts
- A launching place for subcommittees and meetings
- Getting connected with other entities and organizations

Pre-Employment Survey of Students who participated in the Summer 2017 LEAP Work Experience Program

What do you think will help you the most with reaching your employment goals?

- More experience in the field that I want and great organization skills.
- Work experience, positive attitude.
- Learning how to make and build a better resume than what I already have.
- I think working closely with my DBVI counselor and being as open and honest as possible with employers in regards to my disability and possible limitations.
- I think going to college would help me reach my employment goals, so I can figure out exactly what my employment goals are.
- Learning more about Assistive Technology.
- Professional development Friday's really helped me with interview skills and how to format my resume.
- I think more individualized training, particularly in technology (working with JAWS).
- Having a reliable list of references so that they can give a good recommendation for jobs that I may be applying to in the future.
- Being more responsible, and getting the accommodations I will need will help me be successful.
- Finding better ways to access accommodations in the work place - both in tools to use and ways to advocate.
- Making good contacts/networking. I was able to meet someone (Heather B) who may be able to help me get into the job field that I want to go into. I want to learn from people like her.
- Researching and making sure I have the necessary skills needed for the certain job. Different accommodations and making sure I'm aware of the different services I receive.
- I think practicing interviews and learning about interviews will help me in the future.
- What are your needs in relation to your employment goals?
- Better public speaking skills, better organization skills, and learning about other music.
- Leadership skills. Working skills.
- I need to work on not influencing people around me and I need to become a better role model.
- My needs really depend on the job and expectations of me in that particular position. I need to be allowed to use all assistive technology in the workplace and often require extra time and patience in order to complete certain tasks, particularly if it involves a lot of reading or computer work.
- I need to learn how to budget my money well. I also need help on my time management skills.

- Getting more comfortable with using Assistive Technology (I.e. Voiceover on Mac).
- I need support and good accommodations from the future employer.
- I think I am lacking in technology training, or the fact that I haven't stepped completely out of my comfort zone yet, in terms of being more independent and proactive.
- I might need extra time to learn what to do at a new job, in order to perform well.
- I'll need a job coach for a little bit.
- I need to live in an area where there are more entry-level positions for people under 18.
- I will need some adaptive equipment to get into the medical field. I will also need to learn computer program to help me succeed.
- Making accommodations and making sure the employer know that I have different needs compared to sighted person. I will need to use my phone in order to read certain things, such as labels and or different documents.
- My needs are accessible technology and for my employers to know my different needs. I will also need more training on how to take public transportation.
- What do you feel is getting in the way of reaching your employment goals?
- More practice with public speaking.
- I feel as though I'm the only one standing in the way of my goals, but that can be sad for all life. I can be a difficult person to change and I need to learn the changes the best thing in some cases.
- Outside of LEAP, I have not been employed. I think my biggest obstacle currently is my lack of experience in the workforce, very evident on my short resume.
- I think a couple things are procrastination and not having enough motivation are two of them.
- My vision is a barrier because of other peoples' perceptions and how they decide to interpret my abilities.
- Trying to explain my disability to some employers because I think a lot of employers may think of us as a liability.
- Not having a college education, and not knowing how to get a job on my own because I need assistance for that.
- Age is getting in the way of getting a job (they say I must be 18 or older) and also disability discrimination in general.
- People opinions of the blind community is getting in the way. I hear a lot "you can't do that" or "no one wants a blind nurse." I feel that people with visual impairments are thought of as less capable.
- I can't think of anything that's getting in the way because I haven't applied to any jobs, and I'm still in high school. Transportation is the only thing I can think of as being an issue but that's not anything I can't work around.

- My learning disability and the fact that I take longer to grasp information gets in the way of me reaching my employment goals.

Journal of Visual Impairment and Blindness JVIB Articles

The highlights of previously cited in CSNA articles are cited here because they are still relevant. Please refer to the previous CSNA for a more complete summary. Several JVIB article are new and include more complete summaries below.

The previous CSNA (FFY 15) referenced several Journal of Visual Impairment and Blindness (JVIB) article that have identified several "Needs" of people who are blind or visually impaired related to students and employment. Here are some of the main highlights:

Transportation:

- The most frequently cited barriers for visually impaired individuals regarding transportation are: the availability of public transportation, travel time, cost, safety issues, and stress associated with transportation.
- Engage clients in problem-solving discussions to generate transportation options; sharing of client success stories and innovative strategies implemented to overcome transportation barriers.
- In an effort to continue to support consumers around transportation issues DBVI could survey consumers to obtain information on effective transportation solutions and share with other consumers. Showcase success stories on creative transportation solutions.
- Participating in efforts to improve the overall transportation system.
- Providing consumer's transportation expenses for at least 60 days after the Customers are employed.
- Encouraging customers to relocate (when needed) and network with co-workers and community agencies to hire drivers.
- Encouraging customers to car pool, meet somebody, post messages on bulletin boards, run an ad in the newspaper and try to find somebody in community.

Employer Attitudes/Educating the Public:

- Disability awareness training and assistive technology were two of the top five strategies identified by employers that would be helpful in hiring persons with disabilities.
- There are multiple theories about how attitudes are formed and changed, and many of them propose a link between knowledge and attitudes.
- What level of knowledge do employers have about how someone who is blind or visually impaired can perform specific job functions (that is, knowledge about job accommodations or available assistive technology)?
- Do employers know where to seek help with accommodating someone who is blind or visually impaired?
- In an employer survey a majority of managers mistakenly believed there were few jobs in their organizations that visually impaired people could successfully perform. They

also thought it was more expensive to hire someone with impaired vision compared to someone without a disability. The majority of managers made it a lower priority to recruit, train, and retain employees with disabilities than to recruit, train, and retain executives, senior managers, young employees, and minorities.

- Involving the employer in advocating for the creation, modification, or expansion of transportation programs. Systems change when employers also advocate for more transportation options.
- Providing education to employers and human resources professionals about job accommodations, including where to find additional information, is necessary and would be an appropriate strategy to use when interacting with employers.
- Encouraging job seekers to volunteer information about how they perform specific activities and their transportation options. Answering the unasked question is important because what the employer is imagining probably is not accurate.
- Educating employers about visual impairment and how it affects functioning.
- Creating opportunities for increased contact between employers and persons who are visually impaired.
- Sharing testimonials and newspaper articles of success stories.
- Doing presentations each month to describe the whole process and the benefits of hiring a blind person.
- Offering training about the Americans with Disabilities Act to employers.
- Providing community education days.
- Facilitating educational activities particularly targeted for October because it is National Disability Awareness Month.
- Taking tours and publicly recognizing businesses that employ visually impaired persons.
- Facilitating employer mentoring programs and breakfast meetings.
- Developing long-term relationships with employers, particularly those with large businesses.
- Sharing success stories about competent blind people on the job and publicize them in many ways. Include consumer organizations in these efforts.

Soft Skills/Interviewing Skills

- Making sure everyone has practice interviews so the person is ready.
- Making sure DBVI customers are competent in discussing their skills, qualifications, and visual impairment with employers.

Assistive Technology

- Access to assistive technology
- Providing high-quality training in adaptive skills and assistive technology are vital aspects of preparation for employment.

Progressive Employment

- The need for a transitional period to full-time employment during which they engage in progressive employment including volunteer work, part-time work, work experiences, or on-the-job training.
- Providing on-the-job training programs and job coaches to promote positive integration into the workplace.
- Finding ways to keep valued older employees.

Benefits Counseling/Guidance

- Fear of losing benefits.

Peer Support/Job Clubs

- Creating job clubs for promoting appropriate work behavior and increasing knowledge about employment options.
- Promoting peer support as a powerful force in assisting DBVI customers through the training and employment process.

Adjustment to Blindness

- Individual adjustment to blindness

Additional recent JVIB articles relating to "Needs" of Blind or Visually Impaired related to Employment include:

Cmar, J. L. (2015). Orientation and Mobility Skills and Outcome Expectations as Predictors of Employment for Young Adults with Visual Impairments. Journal of Visual Impairment & Blindness, 109(2), 95-106.

- Cmar analyzed data from the National Longitudinal Transition Study to assess the relationship between orientation and mobility, post-secondary education, and employment for persons who are blind and visually impaired. The study revealed that, "…youths with high ratings on community travel skills were significantly more likely to be employed up to six years post- high school," (p. 102). The author concluded that their results, "…suggest that independently traveling to places outside the home, using public transportation, and arranging airplane or train trips are predictive of later employment for adolescents with visual impairments. These experiences can be facilitated through avenues such as off-campus O&M [Orientation and Mobility] instruction, transition programs, and summer programs, and can be further supported by family involvement," (p. 103).

Crudden, A. (2015). Transportation issues: perspectives of orientation and mobility providers. Journal of Visual Impairment & Blindness (Online), 109(6), 457-468.

- Crudden conducted an exploratory study of orientation and mobility providers' perceptions of transportation issues facing blind and visually impaired individuals. The author found that transportation is a major barrier for people who are blind and visually impaired, especially in terms of employment. "Participants unanimously agreed that transportation has a significant negative impact on the employment of persons who are visually impaired," (p. 461).

Crudden, A., Antonelli, K., & O'Mally, J. (2017). A Customized Transportation Intervention for Persons with Visual Impairments. Journal of Visual Impairment & Blindness, 111(4), 341-353.

- Crudden et al. evaluated a customized transportation intervention program for people who are blind or visually impaired. The study consisted of a pretest and posttest of participants' social problem-solving skills, transportation self-efficacy, and transportation knowledge. Participants were measured against a comparison group of blind and visually impaired persons not undergoing the intervention. The authors found that, "The intervention group scored higher than the comparison group on all measures at posttest, and trends in all cases showed that the intervention group improved more from pretest to posttest than the comparison group," (p. 350) and concluded that, "These results lend support to the necessity and benefit of engaging consumers in structured transportation planning discussions and activities," (p. 351).

Crudden, A., McDonnall, M. C., & Hierholzer, A. (2015). Transportation: an electronic survey of persons who are blind or have low vision. Journal of Visual Impairment & Blindness (Online), 109(6), 445.

- Crudden et al. conducted a nationwide survey of blind and visually impaired persons around issues related to transportation. Survey respondents did not identify transportation as a primary barrier to employment. However, the authors note: "… just over half of the persons who described themselves as self-employed, unemployed, retired, students, or volunteers reported that lack of transportation limited their participation in employment. More than one third of participants reported having turned down jobs because of transportation concerns," (p. 452). The authors concluded that while transportation remains a major barrier to employment for blind and visually impaired persons, the concern within that community is with the obstacles transportation creates for leisure, daily living, and community engagement.

Ehn, M., Möller, K., Danermark, B., & Möller, C. (2016). The Relationship Between Work and Health in Persons with Usher Syndrome Type 2. Journal of Visual Impairment & Blindness (Online), 110(4), 233-244.

- Ehn et al. investigated work and health in people with dual sensory loss through Usher syndrome. Results showed that individuals with Ushers syndrome who were employed enjoyed significantly better health than those who were in receipt of disability assistance funds. The authors concluded that, "…there is a need for early interventions supporting persons with USH2 [Ushers syndrome] by means of vocational training and other work-promoting activities instead of granting them a disability pension, since in the long term employment may make the difference between good and bad psychological health," (p. 242).

Hierholzer, A. C., & Bybee, J. (2017). Working with Randolph-Sheppard Entrepreneurs Who Are Deafblind: A Qualitative Analysis. Journal of Visual Impairment & Blindness, 111(1), 61-71.

- Hierholzer and Bybee examined challenges to deafblind entrepreneurs and staff involved with the Randolph-Sheppard Enterprise Program. The authors conducted interviews with staff and deafblind entrepreneurs. Their findings suggest that the largest challenge to deafblind entrepreneurs was communication with customers. The authors conclude that, "Although communication is a challenge, neither deafblind entrepreneurs nor BEP [Business Enterprise Program] staff view communication

challenges as insurmountable barriers. Individuals with deafblindness can succeed as BEP entrepreneurs if they are provided with updated technology, notify customers about the best ways to communicate with them, and keep a positive, upbeat attitude when interacting with customers," (p. 70).

Högner, N. (2015). Psychological stress in people with dual sensory impairment through Usher syndrome type II. Journal of Visual Impairment & Blindness (Online), 109(3), 185-197.

- Högner evaluated questionnaire responses to investigate psychological stress in people with dual sensory loss through Usher syndrome. Their findings indicated that respondents had high levels of stress and identified orientation and mobility, chronic worry, and social isolation as the leading factors in the development of stress. Högner concluded that, "…it is important to offer services to people with USH [Usher syndrome] that enable them to participate in society," (p. 195). Further, the author highlighted the importance of employment rehabilitation for people with Usher syndrome.

McDonnall, M. C., Crudden, A., LeJeune, B. J., Steverson, A., & O'Donnell, N. (2016). Needs and Challenges of Seniors with Combined Hearing and Vision Loss. Journal of Visual Impairment & Blindness, 110(6), 399-411.

- McDonnall et al. surveyed seniors with combined hearing and vision loss to identify needs and challenges. The survey demonstrated that transportation, technology training, assistance with errands, and improved communications were the top reported needs for seniors with dual sensory loss. Needs for early onset of one or both sensory losses focused on transportation and use of technology. The authors emphasized the importance of technology training for seniors with dual sensory loss as it can, "…contribute to overall improved quality of life, since it has the potential to improve communication options and reduce feelings of isolation," (p. 399).

O'Mally, J., & Antonelli, K. (2016). The Effect of Career Mentoring on Employment Outcomes for College Students Who Are Legally Blind. Journal of Visual Impairment & Blindness, 110(5), 295-307.

- O'Mally and Antonelli conducted a nationwide longitudinal study to evaluate career mentoring outcomes for blind college students. Their findings demonstrated that, "Students working with mentors were significantly more assertive in job hunting and showed trends in improvement for job-seeking self-efficacy and career adaptability. Despite these positive trends, however, the mentoring relationship did not have a significant influence on employment rates and job satisfaction," (p. 303). The authors conclude, "Our results indicate that mentor relationships are effective in improving jobseeking assertiveness for legally blind college students. Trends indicated that improvement may also occur in areas of self-efficacy and career adaptability and, perhaps with a longer mentoring period, significant gains would be seen in these areas as well," (p. 304).

O'Mally, J., & Steverson, A. (2017). Reflections on Developing an Employment Mentoring Program for College Students Who Are Blind. Journal of Visual Impairment & Blindness (Online), 111(3), 271-276.

- O'Mally and Steverson (2017) reported on an employment mentoring program for blind college students. The program involved matching mentors and mentees to facilitate job shadowing, networking, job-seeking skills, and finding transportation. The authors

found that this type of program, "…demonstrates the desire among students with visual impairments and professionals to work with others in pursuing employment," (p. 275). O'Mally and Steverson conclude that future mentoring programs might benefit from, "…broadening eligibility to include college students of nontraditional ages and those who are in the earlier stages of post-secondary education," (p. 275). Further, the authors highlight the need for service providers to encourage students to pursue these types of opportunities and emphasize the development of, "…realistic views of securing employment," (p. 275).

Victor, C. M., Thacker, L. R., Gary, K. W., Pawluk, D. T. V., & Copolillo, A. (2017). **Workplace Discrimination and Visual Impairment: A Comparison of Equal Employment Opportunity Commission Charges and Resolutions Under the Americans with Disabilities Amendments Act. Journal of Visual Impairment & Blindness, 111(5), 475-482.**

- Victor et al. analyzed workplace discrimination cases concerning persons who are blind or visually impaired. Several trends were identified in these cases, including: a decrease in job acquisition charges, an increase in job satisfaction charges, and an increase in job retention charges. The authors note: "Workplace discrimination experiences were most prevalent with aspects regarding job satisfaction, which includes issues with reasonable accommodations," (p. 480). The authors highlight the need for vocational rehabilitations service providers, "…to be aware of and knowledgeable about assistive technology, adaptive communication, and independent living devices that could supplement or enhance the capabilities of individuals to perform essential job functions needed for successful employment," (p. 480). Further, the authors urge vocational rehabilitation providers to be knowledgeable of federal and state laws governing workplace discrimination and to provide one-on-one support to blind and visually impaired professionals throughout the employment process.

Nearly all DBVI consumers are considered to have a most significant disability. The CSNA included many of these individuals in focus groups, interviews, and customer satisfaction surveys to determine their employment needs. The findings from all of these assessment methods plus a review of the JVIB research show some major categories of need. They include needs for training and work experiences that lead to good jobs, adaptive skills training, and assistive technology computer training. There is also a significant need to educate employers about the abilities of people who are blind.

DBVI has strong partnerships for individuals who need supported employment. Eligible consumers can access programs through the Developmental Services Agencies. DBVI strives to have all individuals participate in trial work experiences using supported employment when appropriate.

B. WHO ARE MINORITIES;

The CSNA assessment data show the Vermont demographics. It shows that people are spread throughout our rural state and are not necessarily living in certain communities. The exception is Burlington which has the most diverse population in Vermont. These data guide our outreach efforts and indicate a need for DBVI to outreach to all communities. The most challenging region for outreach is the Northeast Kingdom which is very rural. The CSNA indicated a need to do more public outreach on the radio using a Public Service Announcement across the state.

The DBVI Director is also a member of the Agency of Humans Services Committee to make sure the agency is accessible to all individuals. Several initiatives of the group include sharing

resources about translation services and connections with community agencies that assist diverse groups. Sone specific needs and strategies include:

- Interpretation and Translation service available to all AHS staff.
- Tools for working with LEP clients
- Specialized training for communicating across cultures, and; communicating effectively through an interpreter.
- The key service needs for reaching out to individuals who are blind or visually impaired and who are minorities (Strategies for Reaching Out to Minority Individuals With Disabilities—By Fabricio E. Balcazar, Ph.D., Principal Investigator Developing the Capacity of Minority Communities to Promote the Implementation of the Americans with Disabilities Act (ADA)--University of Illinois at Chicago) are:
- Making sure your agency can provide the services they need.
- Utilizing a diverse research team or diverse staff to deliver services to the target population.
- Building personal relationships with members of the target community.
- Becoming a part of the local network.
- Building consumers' strengths.
- Being persistent and do not let consumers go when they fail to comply.
- Being willing to listen. If we want to reach out, we should be able and willing to listen.
- Utilizing members of the target community in outreach efforts.
- Meeting people where they are instead of waiting for them to come to you.
- Utilizing multiple channels of communication to disseminate information in the target community.

C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

The CSNA data shows 3 categories of individuals who are unserved or underserved. Vermont is the 2nd oldest average age population in the country. Many of these older individuals desire to stay in the workforce to meet their financial needs. Losing vision can be part of the aging process and this becomes a major adjustment and often causes feelings of loss and denial. DBVI is available help these individuals stay in the workforce as they learn new skills to adapt to their vision loss.

The data also shows that individuals who are deaf-blind have unique and specific needs due to their duel sensory impairment. Services like Support Service Providers are helpful to access the community and lesson isolation. There are very few professionals in the country who can teach adaptive blindness skills like Orientation and Mobility who can also communicate using tactile sign. There is a need to build more of that capacity in Vermont. The ICANNECT program is beginning to grow in New England and Perkins is providing important technology through that program. There is a need to build strong partnerships with the Helen Keller National Center who can provide specialized training for staff and services for deaf-blind individuals.

The greatest underserved population is in the Northeast Kingdom of the state. This is very rural and has very few jobs. DBVI encourages youth in this area of the state to participate in the LEAP summer residential work experience program and the residential school year retreats so they can participate in job readiness training and work experiences in an area where there are more work opportunities.

The AHS website resource includes:

https://inside.vermont.gov/agency/AHSIntra/LEP/Pages/LEP.aspx

- Interpretation and Translation service available to all AHS staff.
- Tools for working with LEP clients
- Specialized training for communicating across cultures, and; communicating effectively through an interpreter.
- DBVI data shows a need to increase the percentage of transition age students that receive services.

Suggestions in Assume Nothing!—A Monograph from the 38th Institute on Rehabilitation Issues to Address Underserved Populations, Including Individuals Who Are Deaf-Blind

Rehabilitation Services Administration U.S. Department of Education

- Cultural training for staff from consultants on DB culture and someone from Alliance of Africans Living in Vermont or Vermont Refugee Resettlement Program for ethnic minorities. DBVI need to truly understand the beliefs and values about work and "independence" and disability held by people from these cultures. (pages 23 & 28)
- Get a DB person or a person of color on the SRC (top of page 17)
- Lack of services for DB people. Someone in the state should provide DB leadership for services. (p 31)
- Initiate a DB targeted "town hall meeting" (p 33)
- Create a partnership with VR to assist individuals who are deaf-blind seeking employment.
- Assign specific staff to take the lead for underserved and underrepresented populations.
- Add cultural humility/ cultural competency training
- Consider outreach for All strategies in each region.

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

WIOA has been a great way to bring together all of the partners of the American Job Centers. Workgroups including all of the partners have met to determine the priorities and best ways to make the workforce programs available.

The workgroup has identified the following needs.

- Maximize access to the workforce development system through seamless coordination and communication among the different partners to provide a quality, consistent experience for all Vermonters.

- The workforce development system will prioritize pathways to livable wage employment for all Vermonters, with an increased focus on low income Vermonters.
- Strengthen the Vermont economy by increasing the number of Vermont women employed in the skilled trades, STEM fields, advanced manufacturing and other Vermont priority sectors.
- Ensure all students who graduate from high school are college ready, career ready, or both; increase the number of Vermonters who pursue and complete post-secondary education, training and career opportunities with the education and specific skills necessary to keep Vermonters competitive in the economic sectors critical to the Vermont economy.
- Align the workforce development system to the needs of employers, as well as job seekers, through systematic and ongoing engagement and partnership.

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

The research and feedback from students and families identify work experiences, work readiness, and assistive technology skills as most helpful for future employment success. When students have the opportunity for several work experiences during high school they learn what types of jobs they like and don't like. They also learn transferable skills they can use for future jobs. The challenge for Vermont students is that they have very limited opportunities for these work experiences in their small rural town. Ten years ago, DBVI created a strategy to meet that need. It was necessary to create a summer residential experience for students from across the state to live in a larger community where there is a wide variety of work experience jobs available. The program has expanded and now includes weekend retreats during the school year. These retreats focus on self-advocacy and job readiness training. Most recently all LEAP activities are including some aspect of assistive technology that is built into the curriculum. Proficiency with technology is also a predictor of future employment success. DBVI counselors have identified the need for students to have better technology skills for the workplace. For that reason DBVI developed and assessment tool to evaluate technology skills. This information can then be used by schools and DBVI staff to create opportunities to improve these skills before college, vocational training, or employment.

Students also learn important self-advocacy skills and independent living skills at the LEAP work experiences and job readiness retreats which are also strong predictors and essential for future employment success.

For students who do not choose to participate in summer LEAP or school year retreats, DBVI staff work with several partners to establish work experiences in a students' local community. In some situations a DBVI Counselor can make connections with the school-based employment specialist to assist a student, or connect them with employment related workshops and other school based activities. It is the intent of DBVI to make sure all visually impaired students have the opportunity for multiple work experiences before the exit high school.

The combination of these strategies and DBVI Counselor involvement makes it possible for Vermont students to access the 5-core Pre-ETS as identified in WIOA.

The five required activities are:

- Job exploration counseling

- Work-based learning experiences
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education
- Workplace readiness training to develop social skills and independent living
- Instruction in self-advocacy, including peer mentoring

DBVI considers a student with a disability to be:

- **Between the ages of 14 and 21;**
- **Is in an educational program; and**
- **Is eligible for and receiving special education or related services under IDEA or is an individual with a disability for purposes of section 504 of the Rehabilitation Act**

Pre-ETS Budget Forecasting

The Vermont Department of Education has indicated in their "Unduplicated Child Count" report that there are approximately 50 potentially eligible students in secondary education who are blind, visually impaired, or Deaf-Blind this school year.

- **DBVI is currently serving 32 secondary students (17 PAS and 15 Open VR) and 12 post-secondary ages 14 through 21.**
- **DBVI projects 42 students for this current school year.**

Pre-ETS Budget Forecasting

Pre-employment transition services are comprised of the five required activities and nine authorized activities. There must be enough funds available to be able to offer the five required activities to students with disabilities. If there is any money remaining, that money is used towards the nine authorized activities.

FFY 1019--As of September 30, 2019:

- **$230,000 (15% reserve requirement + carry over/re-allotment)**
- **$10,000 was spent on staff time and associated expenses**
- **$100,000 for Coordination In contracts (LEAP, CCS)**
- **$120,000 was spent on the 5 required Pre-ETS Transition Service Areas.**
- $3,500 Average Cost Per Student for the 5 required Pre-ETS Services (based on 35 students).
- $0 **was spent/encumbered on the nine authorized pre-employment transition services**

Calculation: Agency 15% Reserve Requirement= $230,000; Number of students served=35; Total Pre-ETS Required Activities= $120,000; Average Cost Per Student= $3;500 Total Pre-ETS Coordination Activities= $110,000; Total Pre-ETS Expenditures= $230,000; Amount Available for Authorized Activities= $0

Projections for FFY 2020 and 2021:

- **$220,000 (15% reserve requirement + carry over/re-allotment)**
- **$10,000 was spent on staff time and associated expenses**
- **$100,000 for Coordination In contracts (LEAP, CCS)**
- **$110,000 was spent on the 5 required Pre-ETS Transition Service Areas.**
- $3,500 Average Cost Per Student for the 5 required Pre-ETS Services (based on 35 students).
- $0 **was spent/encumbered on the nine authorized pre-employment transition services**

Calculation: Agency 15% Reserve Requirement= $220,000; Number of students served=35; Total Pre-ETS Required Activities= $110,000; Average Cost Per Student= $3;200 Total Pre-ETS Coordination Activities= $110,000; Total Pre-ETS Expenditures= $220,000; Amount Available for Authorized Activities= $0

A statewide estimate of students exiting/graduating high school at the end of SY 2020 is 14 students. The were 10 students statewide who graduated in SY 2019.

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

DBVI partners help us achieve the results our consumers expect. One finding of the statewide survey and focus groups identifies adaptive skills training as one of the top two services that help them achieve their goals. People who lose vison need to learn new adaptive skills to remain independent at home and work. DBVI contracts with the Vermont Association for the Blind and Visually Impaired to provide Certified Orientation and Mobility Instructors, Rehabilitation and Low Vision Therapists. These instructors teach the skills and DBVI consumer report being more independent because of their new skills. This need for adaptive skills training is ranked very high in all sections of the CSNA and survey results show a high level of satisfaction with their skill gain results.

The other major DBVI community partner is the Vermont Industry for Business, Industry and Rehabilitation. DBVI contracts with VABIR to provide job development and employment consultant services. VABIR creates relationships with Vermont business and helps match DBVI consumers with business needs. In many instances this begins with a work experience and leads to employment. The CSNA does identify more job training as a need. VABIR provides those opportunities through progressive employment and satisfaction for these services ranks high.

3. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

DBVI coordinates with several partners to meet the pre-employment and transition service needs of students. The DBVI Director and Counselors meet monthly with the Management Team of the Vermont Association for the Blind and Visually Impaired. VABVI has a statewide contract from the Vermont Agency of Education to provide a statewide network of the Teachers of the Visually Impaired. The TVI's provide academic support and direct instruction to all blind and visually impaired students in Vermont. The intent of these monthly meeting is to coordinate the efforts of both agencies to support student transition needs. DBVI Counselors and TVIs in their region also meet regularly to discuss students' transition and pre-employment needs. This helps the counselor to connect students with the 5-core Pre-ETS activities by making arrangements for local work experiences, school-based employment activities, Summer LEAP, or school year LEAP job readiness retreats. There is also a monthly meeting of DBVI partner organizations called the Connections Team. The intent of this group is to discuss student needs and develop strategies that provide work experiences or job readiness opportunities in local communities or at the state level.

The DBVI Director also meets quarterly at the Agency of Education with the AOE Special Education State Director, the AOE High School Special Education Consultant, the AOE Adult Basic Education Consultant, the Director of General VR, the Director of Developmental Services, and the Director of the Assistive Technology Program. The intent of this group is to stay connected with overlap needs of WIOA and IDEA. The most current topic is discussions about the new personal learning plans and how transition serviced can be incorporated.

Other important initiatives include DBVI cosponsoring with General VR a statewide conference of all local Core Transition Teams. All regions of the state have monthly meetings of school personnel and local human service providers to discuss local transition resources for students. Several workshops and guest speakers provided information about best practice for student transition. There was also time for local teams to meet and discuss strategies for their region.

A new development is the formation of a Student Advisory Council. The DBVI Director will participate in an annual event that is planned by Vermont Students with disabilities. This is just getting started and the first event with be next school year.

The ultimate need is to work together with AOE and local schools to help students to use their IEP and Personal Learning Plans to create a great transition to employment training or work. DBVI has created transition action plan forms that are used for each student for entering the workforce directly, attending vocational training, or attending college. The needs for each of these future goals are specified on each form. The forms help guide the Local Education Agency IEP and 504 teams as they plan for the unique transition service needs of students who are blind or visually impaired.

K. ANNUAL ESTIMATES

1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES

American Community Survey

https://data.census.gov/

Erickson, W., Lee, C., & von Schrader, S. (2018). 2018 Disability Status Report:

Vermont. Ithaca, NY: Cornell University Yang-Tan Institute on Employment and Disability (YTI).

www.disabilitystatistics.org

Summary of Overall Vermont Data

Content provided by the US Census bureau for the years 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, and 2018

https://data.census.gov/

Age--In 2018, the prevalence of disability in VT was:

- 14.5 percent for persons of all ages
- .7 percent for persons under the age of 5
- 8.4 percent for persons ages 5 to 17
- 8.0 percent for persons ages 18 to 34
- 13.5 percent for persons ages 35 to 64
- 24.3 percent for persons ages 65 to 74
- 44.3 percent for persons ages 75+

Disability Type--In 2018, the prevalence of the six disability types among persons of all ages in VT was:

- 2.4% reported a Visual Disability
- 5.0% reported a Hearing Disability
- 6.7% reported an Ambulatory Disability
- 6.2% reported a Cognitive Disability
- 2.4% reported a Self-Care Disability
- 5.4% reported an Independent Living Disability

Gender--In 2018, 14.1 percent of females of all ages and 15.0 percent of males of all ages in VT reported a disability.

Race--In VT in 2018, the prevalence of disability for working-age people (ages 21 to 64) was:

- 14.6 percent among Whites
- 16.2 percent among Black / African Americans
- 26.8 percent among American Indian and Alaska Native

- 4.7 percent among Asians
- 9.6 percent among Hispanic or Latino

Populations in Households in Vermont***

Content provided by the US Census bureau for the years 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, and 2018

https://data.census.gov/

- Ages under 5= 28,810
- Ages 5 to 9= 32,019
- Ages 10 to 14= 33,938
- Ages 15 to 19= 42,229
- Ages 20 to 24= 43,479
- Ages 25 to 34= 75,058
- Ages 35 to 44= 70,113
- Ages 45 to 54= 80,695
- Ages 55 to 59= 47,049
- Ages 60 to 64= 49,034
- Ages 65 to 74= 75,755
- Ages 75 to 84= 34,971
- Ages 85 and over= 13,149

Number of Individuals who are minorities

Content provided by the US Census bureau for the years 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, and 2018

https://data.census.gov/

- Total population of Vermont= 626,299
- White- 589,337
- Two or More Races=12,785
- Hispanic or Latino=12,450
- Asian=11,859
- Black or African=7,621

- American Indian=1,743
- Another Race=3,240
- Native Hawaiian=139

Summary of Visual Disability data in Vermont—American Community Survey

Is this person blind or does he/she have serious difficulty seeing even when wearing glasses?

Working Age Adults

DBVI estimates from the American Community Survey that there are approximately 6,854 Vermonters of working age (18-64) who are blind or severely visually impaired (meaning even with correction they are not able to easily read the newspaper). DBVI provides RSA defined services to approximately 3.6% of these individuals annually.

Content provided by the US Census bureau for the years 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, and 2018

https://data.census.gov/

- **Visual Disability Total= 14,804 (2.4% of 620,066 VT population)**
- **Ages 5 to 17= 1,243 (1.4 % of 86,410)**
- **Age 18 to 34= 1,372 (1.0% of 138,718)**
- **Age 35 to 64= 5,482 (2.2% of 245,563)**
- **Age 65 to 74= 2,929 (3.9% of 74,986)**
- **Age 75 and Older= 3,665 (8.0% of 45,579)**

Education Rate in Vermont with Visual Disability

2017 Statistics via Cornell University at www.disabilitystatistics.org

Less than High School=800 (11.9% of 6,900)***

A HS diploma or equivalent=2,500 (35.5% of 6,900)

Some college/associates degree=1000 (13.8% of 6,900)

College Bachelor's Degree or more=2,400 (34.7% of 6,900)

Number of Youth who are Deaf-Blind

https://docs.google.com/document/d/189sATr89VCj650qtBeU29jtRGWS9yN-6JJxrEVw9YGs/edit?usp=sharing

Ages 12 to 17=11

Ages 18 to 21=3

DBVI Projections for PY 2019

- The cost per employment outcome will remain at the $18,000 to $19,000 level.
- Employment outcomes will increase to 50.

DBVI Projections for Case Status Information PY 2019:

- The number of new plans will be 40.
- The number of individuals served through supported employment will be 5.
- The number of new applications to increase to 70.

DBVI Projections for students receiving Pre-ETS

PY 2019 projection is 45.

Data from RSA 113:

New Applications

- FFY 2015---102
- FFY 2016---81
- FFY 2017---53
- FFY 2018--- 77
- FFY 2019---19 (To Date)

Individuals Implementing Plan, on hand October 1st

- FFY 2016---231
- FFY 2017---206
- FFY 2018---179

Number of Employment Plans Developed:

- FFY 2015—111

- FFY 2016---77
- FFY 2017---48
- FFY 2018---72

Achieve Employment Outcome

- FFY 2015—90
- FFY 2016---81
- FFY 2017---64
- FFY 2018---49

Closed After Services Initiated, Without Employment

- FFY 2016---21
- FFY 2017---16
- FFY 2019---23

Agency Expenditures Services Provided by DBVI (from RSA 2)

Private Community Rehabilitation Programs

- FFY 2016---$286,990
- FFY 2017---$265,444
- FFY 2018---$539,566
- FFY 2019---$464,797

Total Innovation and Expansion Activity Costs

- FFY 2016---$12,900
- FFY 2017---$17,347
- FFY 2018---$11,518
- FFY 2019---$12,668

Assessment

- FFY 2016--- $4,886
- FFY 2017---$3,060
- FFY 2018---$9,578
- FFY 2019---$5,585

Diagnosis and Treatment of Impairments

- FFY 2016---$43,493

- FFY 2017---$39,193
- FFY 2018---$41,702
- FFY 2019---$48,555

Four-Year College or University Training

- FFY 2016---$49,517
- FFY 2017---$47,567
- FFY 2018---$45,128
- FFY 2019---$50,661

Occupational or Vocational Training

- FFY 2016---$112,178
- FFY 2017---$33,770
- FFY 2018---$2,678
- FFY 2019---$7,606

Job Readiness Training

- FFY 2016---$101,347
- FFY 2017---$200,456
- FFY 2018---$381,760
- FFY 2019---$297,586

Disability Related Skills Training

- FFY 2016---$70,297
- FFY 2017---$48,022
- FFY 2018---$75,594
- FFY 2019---$41,471

Transportation

- FFY 2016---$61,280
- FFY 2017---$55,921
- FFY 2018---$24,637
- FFY 2019---$43,455

Total SE Program Service Expenditure

- FFY 2016---$7,335
- FFY 2017---$8,306

- FFY 2018---$0
- FFY 2019---$2,523

Assessment, Counseling, Guidance, and Placement

- FFY 2011--$784,571
- FFY 2012--$805,115
- FFY 2013—$913,971
- FFY 2014—$844,885
- FFY 2015--$863,383
- FFY 2016---$923,154
- FFY 2017---$1,000,008
- FFY 2018---$932,204
- FFY 2019---$872,520

Total Section 110 Funds Expended on Service:

- FFY 2011—$561,317
- FFY 2012—$630,236
- FFY 2013—$621,521
- FFY 2014--$643,503
- FFY 2015--$852,930
- FFY 2016---$736,425
- FFY 2017---$706,782

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

DBVI estimates the following number of individuals will receive services for FFY 2021:

- Individuals who are not students (including all ages) who receive services in the DBVI VR program = 250 served.
- Individuals who are deaf-blind (Using the HKNC definition) =10 each year.
- Students who receive Pre-ETS services as a Pre-Application student = 20.
- Students in high school and open in the DBVI VR program = 40 each year.
- Students in college =10.

The case services budget for providing services in FFY 2021 is estimated at $550,000.

The pre-ETS budget for students is estimated at
$200,000.

The Vermont Department of Education has indicated in their "Unduplicated Child Count" report that there are approximately 50 eligible or potentially eligible students in secondary education who are blind, visually impaired, or Deaf-Blind in the school year.

Pre-ETS Budget Forecasting

Pre-employment transition services are comprised of the five required activities and nine authorized activities. There must be enough funds available to be able to offer the five required activities to students with disabilities. If there is any money remaining, that money is used towards the nine authorized activities.

FFY 1019--As of September 30, 2019:

- **$230,000 (15% reserve requirement + carry over/re-allotment)**
- **$10,000 was spent on staff time and associated expenses**
- **$100,000 for Coordination In contracts (LEAP, CCS)**
- **$120,000 was spent on the 5 required Pre-ETS Transition Service Areas.**
- $3,500 Average Cost Per Student for the 5 required Pre-ETS Services (based on 35 students).
- **$0 was spent/encumbered on the nine authorized pre-employment transition services**

Calculation: Agency 15% Reserve Requirement= $230,000; Number of students served=35; Total Pre-ETS Required Activities= $120,000; Average Cost Per Student= $3;500 Total Pre-ETS Coordination Activities= $110,000; Total Pre-ETS Expenditures= $230,000; Amount Available for Authorized Activities= $0

Projections for FFY 2020 and 2021:

- **$220,000 (15% reserve requirement + carry over/re-allotment)**
- **$10,000 was spent on staff time and associated expenses**
- **$100,000 for Coordination In contracts (LEAP, CCS)**
- **$110,000 was spent on the 5 required Pre-ETS Transition Service Areas.**
- $3,500 Average Cost Per Student for the 5 required Pre-ETS Services (based on 35 students).

- **$0 was spent/encumbered on the nine authorized pre-employment transition services**

Calculation: Agency 15% Reserve Requirement= $220,000; Number of students served=35; Total Pre-ETS Required Activities= $110,000; Average Cost Per Student= $3;200 Total Pre-ETS Coordination Activities= $110,000; Total Pre-ETS Expenditures= $220,000; Amount Available for Authorized Activities= $0

A statewide estimate of students exiting/graduating high school at the end of SY 2020 is 14 students. The were 10 students statewide who graduated in SY 2019.

DBVI considers a student with a disability to be:

- **Between the ages of 14 and 21;**
- **Is in an educational program; and**
- **Is eligible for and receiving special education or related services under IDEA or is an individual with a disability for purposes of section 504 of the Rehabilitation Act**

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

DBVI has consistently increased or maintained the number of individuals served.

- FFY 2011=4; FFY 2012=10; FFY 2013=7; FFY 2014=10; FFY 2015=10; FFY 2016=11; FFY 2017=14; FFY 2018=10; FFY 2019=10.
- FFY 2020---10 (Projection)
- FFY 2021---10 (Projection)

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION.

NA.

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

NA.

4. THE COST OF SERVICES FOR THE NUMBER OF INDIVIDUALS ESTIMATED TO BE ELIGIBLE FOR SERVICES. IF UNDER AN ORDER OF SELECTION, IDENTIFY THE COST OF SERVICES FOR EACH PRIORITY CATEGORY.

Expenses for FFY 2021 are as follows:

The case services budget for providing services in FFY 2021 is estimated at $550,000.

The pre-ETS budget for students is estimated at $200,000.

Title VI funds for supported employment will be $6,000.

L. STATE GOALS AND PRIORITIES

1. IDENTIFY IF THE GOALS AND PRIORITIES WERE JOINTLY DEVELOPED AND AGREED TO BY THE STATE VR AGENCY AND THE STATE REHABILITATION COUNCIL, IF THE STATE HAS A COUNCIL, AND JOINTLY AGREED TO ANY REVISIONS

Based on the DBVI/SRC Needs Assessment completed in December of 2017, DBVI and the SRC have established targets for Program Year 2020 for DBVI's Strategic Plan goals. DBVI and the SRC have also established goals and priorities in response to the new mandates and requirements included in the Workforce Innovation and Opportunities Act (WIOA). DBVI and the SRC established goals and priorities related to the implementation of the WIOA Common Performance Measures. All DBVI goals and priorities are established within the Division's long-established strategic themes for all participants of the DBVI program as follows:

- Economic Independence.
- Blindness Related Adaptive Skill Building (Assistive Technology; Low Vision; O+M; Blindness Rehabilitation Evaluation and Teaching).
- Delivering DBVI service well and assisting individuals to become better off.
- Expanding program growth and partnerships.

Program Year 2020 Goals and Priorities

1. **DBVI will align services to support consumers in achieving the WIOA Common Performance Outcome Measures.**

DBVI is a strong supporter of the WIOA Common Performance Measures. The new measures support consumers in their career goals and promote higher wages and more sustainable employment. The WIOA measures are extremely lagging, meaning most of the desired outcomes occur well after services end. For example, the measure of median earnings occurs two full quarters after case closure. As a result, the measures are not very useful in guiding the work of DBVI staff on a day-to-day basis. DBVI decided to establish the following leading measures:

- Leading Measure One: The use of career assessment tools to support exploration of higher wage and higher skill options.
- Leading Measure Two: The use of blindness adaptive skill evaluation and training.
- Leading Measure Three: The use of blindness assistive technology evaluation and training.

<u>Targets for the Lead Indicators</u>:

- 50% of cases will include use of career assessment tools to support exploration of higher wage and higher skill options.
- 50% of cases will include blindness adaptive skill evaluation and training.

- 50% of cases will include blindness assistive technology evaluation and training.

1. **DBVI will increase the percentage of consumers earning more than minimum wage at closure.**

DBVI believes that in order to increase median earnings six months post closure, the agency must increase earnings at closure.

PY 2017 data show that:

- 27.7% of DBVI consumers were earning 110% of minimum wage or less at closure
- 72.3% of DBVI consumers were earning over 110% of minimum wage at closure (44.7% had wage rates at or above 150% of the minimum wage).

These numbers improved by Program Year 2018 as follows:

- 20% had wage rates at or below 110% of the minimum wage at closure
- 80% had wage rates at or above 110% of minimum wage at closure (44.4% had wage rates at or above 150% of the minimum wage).

Targets

PY 2020

- 19% had wage rates at or below 110% of the minimum wage at closure
- 81% had wage rates at or above 110% of minimum wage at closure (44.4% had wage rates at or above 150% of the minimum wage).

PY 2021

- 18% had wage rates at or below 110% of the minimum wage at closure
- 82% had wage rates at or above 110% of minimum wage at closure (44.4% had wage rates at or above 150% of the minimum wage).

1. **DBVI will increase consumer opportunities to participate in post-secondary education and training and gain industry recognized credentials.**

Post-secondary credentials are a proven mechanism for consumers to access higher wage employment and meaningful careers. In Program Year 2018, 30 participants were enrolled in programs potentially leading to a credential, and 9 participants completed a post-secondary degree or industry-recognized credential.

Targets:

Program Year 2020 Target: 35 DBVI consumers will enroll in training leading to a credential and 12 DBVI consumers will achieve a credential.

Program Year 2021 Target: 40 DBVI consumers will enroll in training leading to a credential and 15 DBVI consumers will achieve a credential.

1. **In partnership with VDOL and Community Partners, DBVI will create more opportunities for DBVI consumers to participate in these programs.**

DOL programs can offer DBVI consumers the opportunity to earn money while receiving necessary training to achieve a credential and higher wage employment.

Case note and other evidence suggest that 12 cases in PY 2018 (July 2018 – June 2019) had DOL involvement.

Targets:

Program Year 2020: 4 DBVI consumers will enroll in a DOL program.

Program Year 2021: 4 DBVI consumers will enroll in a DOL program.

1. **DBVI will continue to implement highly effective Pre-Employment Transition Services (Pre-ETS) for students statewide.**

- Total number of youth served with a DBVI IPE= 54 (PY 2018)
- Total number of students in school and under age 22 served in PY 2018 with a DBVI IPE= 34 (PY 2018)
- DBVI has successfully expanded our services overall to youth. The percentage of population served who were under age 22 at entry into DBVI services has grown from 17% of people served in SFY 2019.
- TargetsPY 2020
- Total number of youth served with a DBVI IPE= 55 (Projected)
- Total number of students in school and under age 22 served in with a DBVI IPE= 35 (Projected)
- The percentage of youth population served who were under age 22 at entry into DBVI services will increase to 30% of people served.
- PY 2021
- Total number of youth served with a DBVI IPE= 56 (Projected)
- Total number of students in school and under age 22 served in with a DBVI IPE= 36 (Projected)

- The percentage of youth population served who were under age 22 at entry into DBVI services will increase to 32% of people served.
-

1. **DBVI will partner with DVR and CWS to continue to expand efforts to effectively serve employers through Creative Workforce Solutions (CWS).**

Employer engagement continues to be a critical activity to ensure DVR and DBVI consumers have access to employment opportunities and careers. Creative Workforce Solutions is the employer engagement and marketing arm of DVR and DBVI. DVR and DBVI measures employer engagement through the following three metrics:

- New Employer Contacts: These are defined as new contacts with employers who have never engaged with CWS
- Employer Activities: These are defined as ongoing engagement activities with employers who have an ongoing relationship with CWS
- Employer Opportunities: These are defined as specific consumer opportunities such as a job opening, training opportunity, work based learning opportunity, company tour or informational interview

The annual targets for the CWS team for Program Years 2020 and 2021 are as follows:

- Contacts: 750 new contacts per program year
- Activities: 2,250 distinct engagement activities per program year
- Opportunities: 2,500 discrete consumer opportunities developed per program year

1. **DBVI will continue to seek opportunities to expand and/or improve services for underserved populations including individuals who need supported employment.**

DBVI recognizes that there continue to be populations of Vermonters with disabilities that are unserved or underserved in the state. These include, but are not limited to:

- Individuals with severe disabilities who need supported employment services but are not eligible for long term supports through the Division of Developmental Services or the Department of Mental Health.
- Individuals who are deaf-blind.

DBVI will partner with DVR to explore opportunities to expand or improve services to address the unmet needs of these groups. This includes exploring new partnerships or expanding existing partnerships with other agencies, funding sources and stakeholders.

1. **DBVI will continue to track consumer satisfaction with the program's services through the Tri-annual consumer satisfaction survey.**

DBVI contracts tri-annually with an independent survey organization to assess consumer satisfaction statewide. This data is critical to helping us improve services and provide better customer service. DBVI has consistently maintained high overall rates of satisfaction.

The most recent results of the 3-year statewide random survey of all participants in the DBVI Vocational Vision Rehabilitation program was Conducted by Market Decisions in 2017 The next statewide survey is scheduled for November/December 2020.

- 93% of respondents said they are satisfied with the DBVI vocational rehabilitation program.
- 93% of respondents said overall, they are better off as a result of the services they received from DBVI.
- 95% of respondents said that DBVI staff treated them with dignity and respect.
- 94% of respondents said that DBVI helped them achieve their vocational rehabilitation goals.
- 92% of respondents said that DBVI services met their expectations.
- 89% of respondents said that DBVI vocational rehabilitation services helped them become more independent.
- 84% of respondents said that DBVI helped them reach their job goals.

Targets:

- In the 2020 Consumer Satisfaction Survey, at least 95% of respondents will report that they are satisfied with the DBVI vocational rehabilitation program.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS

See Goal 7.

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

The goals were developed as part of DBVI's comprehensive needs assessment which included town meetings, surveys, focus groups, journal research, and staff/SRC input. DBVI staff met several times to review the needs of all results with the SRC to determine the goals. These are outlined in the input from the SRC and the statewide assessment sections.

Based on the data gathered and discussions with the State Rehabilitation Council and DBVI, the following are the key findings of the 2017 DBVI Needs Assessment.

- DBVI needs to identify and implement strategies to increase consumer hourly wages at closure.
- DBVI consumers need opportunities to gain industry recognized credentials in skilled professions.
- DBVI must develop strategies to meet and exceed the outcome targets under the Common Performance Measures.

The WIOA Common Performance Measures significantly change the way DBVI is measured. The emphasis on career development, credential attainment, and measurable skills gains, will require DBVI to consider changing current practice. As previously noted, DBVI will be looking at strategies to increase wages and assist consumers in obtaining industry recognized credentials. In addition, DBVI will continue to help consumers develop a career path.

B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

In Program Year 2018, sufficient data collection had occurred to begin reporting on three of the five measures that are reported at the program level (employer engagement is reported as a combined measure for all WIOA core partners):

- Employment rate in the second quarter post closure was 49%
- Median earnings in the second quarter post closure was $3,516
- Measurable skill gains rate was 54.9% compared to 37.8% in PY 2017

C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS RECEIVED FROM THE STATE REHABILITATION COUNCIL AND FINDINGS AND RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER SECTION 107.

DBVI reviewed data provided on the RSA MIS query tools for performance measures, which are included in the FFY 2018 State Plan and 2017 CSNA. These were evaluated by DBVI and the SRC and are incorporate into the new goals and strategies.

M. ORDER OF SELECTION

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AND ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES

DBVI does not have an order of selection.

B. THE JUSTIFICATION FOR THE ORDER

DBVI does not have an order of selection.

C. THE SERVICE AND OUTCOME GOALS

DBVI does not have an order of selection.

D. TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER; AND

DBVI does not have an order of selection.

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES

DBVI does not have an order of selection.

2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS, REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT

DBVI does not have an order of selection.

N. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS

1. SPECIFY THE STATE'S GOALS AND PRIORITIES FOR FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

DBVI realizes that it serves customers with the most significant disabilities who at times require vocational support beyond the scope of DBVI's standard services. It is for this reason that DBVI maintains a "Memorandum of Understanding" (MOU) with the Division of Vocational Rehabilitation (DVR). This MOU describes how funds will be utilized and services provided in the area of supported employment. Thus consumers who may require intensive services, beyond vision impairment issues, to acquire or maintain employment can be provided with the needed support. This MOU provides $30,000 of Title VI, Part B funds to DVR's Supported Employment Program. In exchange DBVI is able to have consumers avail themselves of a comprehensive and established program providing statewide coverage and the expertise of supported employment providers. These funds are incorporated directly from the DVR grant from RSA and DBVI no longer receives them.This change occurred more than 15 years ago. Because of the multiple barriers that some DBVI consumers face, the DVR Supported Employment Coordinator helps to determine the most appropriate agency for those with multiple disabilities. DVR may be the more appropriate agency for DBVI consumers in cases where multiple disabilities are present. This coordination, with extensive knowledge of statewide resources, particularly in areas of psychiatric and developmental disability services, can provide technical assistance and the ability to provide to DBVI staff and consumers the best combination of resources. DBVI has does receive a grant award of $6,000 from RSA of Title VI, Part B funds to provide supported employment services to qualified consumers. This allows the provision for a contract with a support person, job coach on the job site, or enrollment in a specific program to obtain job skills.

2. DESCRIBE THE ACTIVITIES TO BE CONDUCTED, WITH FUNDS RESERVED PURSUANT TO SECTION 603(D), FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING:

A. THE PROVISION OF EXTENDED SERVICES FOR A PERIOD NOT TO EXCEED 4 YEARS; AND

DBVI has an agreement with a designated agency that specializes in employment for youth who need supported employment. This is in addition to the collaboration with DVR, and is intended to meet the needs of youth. This agreement is used to provide supported employment services for up to 24 months for youth that have obtained employment.

B. HOW THE STATE WILL LEVERAGE OTHER PUBLIC AND PRIVATE FUNDS TO INCREASE RESOURCES FOR EXTENDED SERVICES AND EXPANDED SUPPORTED EMPLOYMENT OPPORTUNITIES FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

See N.1. above.

O. STATE'S STRATEGIES

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES

In Section (l) of the State Plan, DBVI outlined its goals and priorities for Program Year 2020. The eight strategic goals established by DBVI and the SRC are as follows:

1. DBVI will align services to support consumers in achieving the WIOA Common Performance Outcome Measures.
2. DBVI will increase the percentage of consumers earning more than minimum wage at closure.
3. DBVI will increase consumer opportunities to participate in post-secondary education and training and gain industry recognized credentials.
4. In partnership with VDOL and Community Partners, DBVI will create more opportunities for DBVI consumers to participate in DOL programs.
5. DBVI will improve the outcomes for students and youth.
6. DBVI will continue to expand efforts to effectively serve employers through Creative Workforce Solutions (CWS).
7. DBVI will continue to seek opportunities to expand and/or improve services for underserved populations including individuals who need supported employment.
8. DBVI will continue to track consumer satisfaction with the program's services through the Tri-annual consumer satisfaction survey.

<u>Strategy 1</u>: DBVI will implement a series of initiatives to align staff practices, services and assignment of resources to meet the WIOA Common Performance Measures. Goals A, B, and C.

In order to maximize DBVI outcomes under the WIOA Common Performance Measures, DBVI will implement or continue to implement the following:

- DBVI will track the three leading indicators which are:
- Leading Measure One: The use of career assessment tools to support exploration of higher wage and higher skill options.

- Leading Measure Two: The involvement of master's level certified blindness instructors to strengthen consumer adaptive skills in completing their employment goal.
- Leading Measure Three: Assistive technology evaluation or training to assist consumer with their employment goal.
- All DBVI staff will be trained to do vocational assessments and use assessments as a career planning tool.
- All staff will be familiar with education and training providers in their communities, as well as what career pathways and stackable credentials are offered. Counselors will be able to speak to consumers about possible career paths, based on assessments.
- BAMs (Business Account Managers) will understand the career paths in the businesses they serve.

Strategy 2: Coordinate efforts with the Vermont Department of Labor (VDOL) and the Agency of Education (AOE) to ensure that blind and visually impaired individuals have access to employment training and other components of the workforce system. Goals A, B, C, and D.

As noted in the Unified Section of the plan, DBVI will be working closely with DVR, VDOL and AOE to ensure DBVI consumers have access to all the workforce development opportunities available in their communities. DBVI will be implementing strategies to make this happen including the following:

- DBVI will meet regularly with VDOL to facilitate coordination of services.
- DBVI, DVR, AOE and VDOL will implement systems to track and manage co-enrollment in each other's programs.
- DBVI, with the support of DVR and AOE, will develop stronger partnerships with the local Technical Educational Centers and Adult Basic Education programs.
- DBVI will implement a plan for staying connected with all DOL partners of the AJC.
- DBVI will work closely with DOL to create and implement the Unified Plan with a common mission and vision to include all Vermonters in the workforce.
- DBVI will work with CWS local teams and DOL to obtain employment needs of companies and then match DBVI customers with specific training.
- DBVI will invite DOL and AOE to a staff meeting to discuss collaboration ideas.

Strategy 3: Expand employer outreach and engagement efforts through Creative Workforce Solutions (CWS) to effectively meet the needs of employers. Goals B and F.

As described in Section (g) of the State Plan, CWS is the primary employer outreach and engagement infrastructure for DVR and DBVI. CWS, and in particular the Business Account Managers, have been a very effective approach to engaging employers and developing

employment opportunities for DBVI consumers. DBVI will expand these efforts through the following strategies:

- Seek opportunities to coordinate employer engagement with the Vermont Department of Labor.
- Build on and expand employer events such as job fairs, employer breakfasts and business recognition events designed to engage employers.

Strategy 4: Explore strategies to assist DBVI consumers to retain or advance in employment. Goals A, B, C and D.

DBVI will develop and implement a systematic approach to follow up with consumers after job placement. The intent will be to re-engage the consumer at key points to determine:

- If they need or want more support to retain their employment?
- If they want assistance with career development and training in their current employment?
- If they want to pursue further career development with a different employer on in a different field?

The follow up will occur at key points after initial job placement. The first contact will be immediately after initial job placement through a congratulations letter and follow up call from the VR counselor.

The second contact will occur at 60 days post placement. The final contact will occur at three months post-employment closure.

The hope is that this systematic follow up will both help consumers retain employment and identify opportunities for career advancement.

Strategy 5. Continue to explore strategies to develop and expand services for underserved populations including individuals who require supported employment through partnerships, grant and funding opportunities. Goals D and G.

- DBVI will create an inclusive outreach plan that includes consumers and providers.
- Develop a set of outreach materials to be used at events across the state including outreach to minorities and underserved populations.
- Support efforts to establish Deaf-Blind SSP services in Vermont.
- Educate providers about the importance of timely referrals.
- Outreach to developmental disabilities services and mental health agencies that typically do not referred to DBVI.

- Each DBVI region will create an outreach plan for the year that includes outreach to minorities and other underserved or underrepresented individuals in each region.
- Coordinate with DVR Transition Counselors, and the Teachers of the Visually Impaired to increase the number of transition students served. Create some documents that explain what DBVI can offer.
- Create a statewide system to track all visually impaired students as they graduate high school.

Strategy 6: Improve Outcomes for Students and Youth. Goal E.

- Each DBVI Counselor will meet at the beginning of the school year with the Teachers of the Visually Impaired in their region to create a plan for identifying potentially eligible students and opening eligible students in the DBVI VR program.
- Each DBVI Counselor will meet with the General DVR Transition Counselor in their region.
- A DBVI Action Plan Transition form will be completed and updated annually for all eligible students.
- Participate in statewide Core Transition Teams.
- Continue to increase student participation in the summer Learn Earn and Prosper (LEAP) summer work experiences and Employment Development Retreats during the school year.

Strategy 7:DBVI will promote employment by educating employers and providing opportunities for increased exposure to people who are blind or visually impaired. This will address "Societies reaction to blindness." Goal F

- Create products to bring and teach employers to understand the assistive equipment
- Create a network of ambassadors who demonstrate their assistive technology or white canes and demonstrate to the employers about how they use technology to complete work tasks and travel independently.
- Create a video of people working at their job.
- Find opportunities to show the film "Going Blind" to employer groups at Chambers, Rotary's, and public libraries.
- Find opportunities to teach employer groups about assistive technology.
- Encourage employers to visit the DBVI website.
- Explore the idea of connecting employers through discussion group.
- Work closely with GCEPD to promote employment of people with disabilities.
- Create educational activities for White Cane Day and Disability Awareness Month in October.

- Create a PSA involving an employed individual and company.
- Offer Simulations to demonstrate—"what is it like to be blind?"

<u>Strategy 8.</u> DBVI will create Consumer Driven Events to assist individuals as they prepare for employment. Goals A, B, and C

- Continue Great Expectations consumer driven events each year.
- Create workshops to develop interpersonal and employment skills
- Create employment support groups.
- Create networking events.
- Opportunities to practice interview and job readiness skills.
- Create peer mentoring opportunities for adjustment to blindness and technology.

<u>Strategy 9</u>: DBVI will create opportunities for access to information.

Goals: A, B, C, and H

- Create opportunities for Peer to Peer Technology Instruction
- DBVI will continue to expand the information on the website and will work with the SRC for ideas.
- Use Customer-Centered Culture to determine "what types of information customers really want?"
- Find ways to improve the process for the accessibility of online job applications.

<u>Strategy 10</u>: DBVI will address transportation challenges. Goals: A, B, and C

- DBVI will work with VTRANS to learn more about their "Go Vermont" website that helps people connect with all the available transportation options in their area.
- Coordinate with the Vermont Transportation Department on their new initiate and technology application that helps travelers find all the available transportation options in an area.
- Consider policy to pay for mileage and time of VABVI drivers in order to have a network of drivers available to meet transportation needs.
- Participate in system level planning.
- Assist VABVI to increase the number of volunteer drivers.
- Promote the option for DBVI to pay for the first 60 days of a ride to the job.

<u>Strategy 11</u>: DBVI will improve communication with customers regarding expectations for DBVI services. Goals: A,B, and C

- DBVI will develop a consistent statewide orientation to DBVI services which will be implemented in all four regional offices.
- DBVI will work within the principles of Customer-Centered Culture to make sure we are answering the question: "What does the consumer really want?"
- DBVI will continually evaluate timeliness, accuracy, and ease of obtaining services. DBVI will establish an ongoing closure survey. Results will be shared and evaluated with the SRC on an ongoing basis.
- Ask customers to evaluate DBVI products using the Customer-Centered Culture model.
- Implement a closure survey that can be sent to all closed cases.

<u>Strategy 12</u>: DBVI will provide technology training for people who need to prepare for a job or succeed at a current job. Goals: A, B, and C

- DBVI will create a consumer listserv that will be used to share technology solutions for access and work and in the community.
- Create a menu of training options ranging from expert training to independent study
- Create Peer to Peer Technology Instruction
- DBVI will problem solve to make job sites accessible through technology training.
- Use a team approach for a given situation including customer, job developer, counselor, job site technology evaluation, and training.
- DBVI will assist customers to continuously improve work related technology skills like using the internet, Microsoft Office, M312, and Adobe documents so they can do their job in the most efficient way.

<u>Strategy 13</u>: DBVI will implement strategies designed to enable DBVI customers to access higher wage employment through short-term training.Goals: A, B, C, and D

- DBVI will work closely with vocational technical education centers in Vermont to help high school students and adults prepare for the workforce.
- Establish relationships with vocational centers to get consumers trained for positions in the area
- Attend State Technical Education Director's Meeting

- Evaluate the impact of progressive employment on outcomes.
- Track education and training opportunities that lead to degrees or credentials.
- Establish working relationships with Vocational Tech Centers and track participation.

2. HOW A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES WILL BE PROVIDED TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS

DBVI has a strong and effective process for determining assistive technology needs and delivering necessary training. The DBVI technology evaluator has been providing this service to DBVI consumers for more than 20-years. This service is consistently ranked in all surveys as the most helpful for meeting employment goals. Technology is the key for opening doors for people who are blind or visually impaired.

Our goal is to stay current and to find solutions for accessing the essential functions of a job. Technology is often the answer for creating access to job tasks. Once the technology is identified, it is installed and followed-up with on-site training.

The most common solutions involve screen magnification, screen readers, and electronic magnification. The I-Technology has created opportunities for DBVI consumers to use mobile technology for work tasks. People can now use voiceover on the iPhone to access their email, contacts, and calendars on-the-go. There are also several new apps that can take a picture of text document and have it read using voiceover. Access to information is essential to many job tasks and DBVI makes this a priority.

3. THE OUTREACH PROCEDURES THAT WILL BE USED TO IDENTIFY AND SERVE INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES, INCLUDING THOSE WITH THE MOST SIGNIFICANT DISABILITIES, AS WELL AS THOSE WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM

Data from the CSNA shows that DBVI needs to continue outreach efforts in all areas. The main strategy is for each region to implement an annual outreach plan. This plan will include general outreach and specific outreach to minority groups and underserved and underrepresented groups. These plans will vary due to the nature of each region. For example, the Northeast Kingdom is very rural and city of Burlington is very populated. Each plan will specifically include outreach to minority groups, people who are older and want to work, students, and individuals who are deaf-blind.

4. THE METHODS TO BE USED TO IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POSTSECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES)

DBVI uses several strategies to address the needs and transition. It begins with outreach to all students who are blind or visually impaired. Before school begins each year, DBVI Counselors meet the Teachers of the Visually Impaired for all high schools in their region. They review the student list and determining which are potentially eligible as Pre-Application students and which are ready to be open the DBVI VR as an “Open” case. All of these students have the opportunity to participate in the 5-core Pre-ETS services. Outreach is also made directly to students and families with an explanation about the ways DBVI can assist with Transition Planning and the availability of the 5-core Pre-ETS services.

Several strategies are used to deliver the 5-core Pre-ETS services. Some students may decide to begin as a Pre-Application student and participate in work experiences in their local communities. They may also may be connected with special job readiness training opportunities in their local high schools. Other students may choose to participate in short-term residential work-based learning or job readiness training. This strategy is necessary in Vermont because of the rural nature. Many small communities do not have any work experiences available. This approach makes it possible for students to choose from a variety of work experiences and internships in Burlington where there are many employers. During the school year there are several job readiness workshops during school vacations and weekends so students don't miss school. This approach takes several partners and has shown great results. Please see section "P" for Progress Updates.

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE

See Strategies Above

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA

DBVI has had a major commitment to improving our performance under section 116 of WIOA. Strategies above directly relate to improving the state's performance with respect to the WIOA Common Performance Measures.

DBVI will continue to use the Creative Workforce System to connect DBVI consumers with employers. Progressive Employment continues to be very effective. Many DBVI consumers begin with a work experience and eventually get a job at that company. Other individuals try a couple different work experiences and decide to go for more education or vocational training in an area of their interest. These experiences are always positive steps toward determining future careers and help people learn what they like and don't like. It is also a great way to educate employers about the abilities of people doing these jobs.

DBVI also supports college or vocational training which ultimately lead to good jobs. DBVI consistently ranks above the national blind agency average for wages and number of hours worked. This result is directly connected to college and vocational training.

DBVI is in the process of developing baseline measures for credential attainment sand measurable employment skill gains. These opportunities will be enhanced through collaborations with all of the WIOA partners. DBVI will evaluate what each program can offer and then connect DBVI consumers to those programs.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES

DBVI will work with DOL and AOE to maximize integration of individuals who are blind or visually impaired into the available trainings and programs. This will involve a commitment from all partners for universal design. DBVI has been a voice for this approach and provides expertise in this area.

WIOA is a great opportunity for DBVI consumers to access these programs that have typically been underutilized by this population. Access to these programs has proven to be challenging in the past and these new partnerships using universal design will certainly open doors.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

See Above (O.1).

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

See Above (O.1).

C. OVERCOME IDENTIFIED BARRIERS RELATING TO EQUITABLE ACCESS TO AND PARTICIPATION OF INDIVIDUALS WITH DISABILITIES IN THE STATE VR SERVICES PROGRAM AND THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM.

DBVI has a long and successful history of collaboration with the larger General DVR Agency in Vermont to connect consumers with the most severe disabilities with the Developmental Service Agencies in Vermont. This collaboration makes it possible for students to be identified early in high school and a determination about meeting a funding priority before graduation.

In cases when students do not meet the criteria for a waiver, DBVI has established a partnership directly with a Developmental Service Agency to provide specialized job development services.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

PY2019 Measures, Targets, Goals and Priorities and PY2018 updates as outlined in the State Plan:

Goal 1. DBVI will align services to support consumers in achieving the WIOA Common Performance Outcome Measures.

<u>Program 2018 Measures</u>

-
    - Employment retention six months post closure
    - Employment retention twelve months post closure
    - Median earnings six months post closure
    - Credential attainment rate

- Measurable skills gains
- Employer engagement

DBVI is a strong supporter of the WIOA Common Performance Measures. The new measures support consumers in their career goals and promote higher wages and more sustainable employment. The WIOA measures are extremely lagging, meaning most of the desired outcomes occur well after services end. For example, the measure of median earnings occurs two full quarters after case closure. As a result, the measures are not very useful in guiding the work of DBVI staff on a day-to-day basis. DBVI decided to establish the following leading measures:

- Leading Measure One: The use of career assessment tools to support exploration of higher wage and higher skill options.
- Leading Measure Two: The use of blindness adaptive skill evaluation and training.
- Leading Measure Three: The use of blindness assistive technology evaluation and training.

Targets for the Lead Indicators:

- 50% of cases will include use of career assessment tools to support exploration of higher wage and higher skill options.
- 50% of cases will include blindness adaptive skill evaluation and training.
- 50% of cases will include blindness assistive technology evaluation and training.

Program Year 2018 Update:

- Measurable skills gains for DBVI= 71.7%
- National average for blind agencies in PY2018 was 28.5%
- 71% of case closures (48 of 68) had blindness adaptive skills training from Vermont Association for the Blind and Visually Impaired
- 71% of case closures who received Adaptive Technology Evaluation and Training.

Goal 2. DBVI will increase the percentage of consumers earning more than minimum wage at closure.

Program Year 2019 Measures:

- The percentage of DBVI consumers with earnings greater than 110% of minimum wage at employment closure.
- The percentage of DBVI consumers with earnings greater than 150% of minimum wage at employment closure.

Program Year 2019 Targets:

- 50% of DBVI consumers will earn 110% or greater of minimum wage at closure.
- 50% of DBVI consumers will earn 150% or greater of minimum wage at closure.

Program Year 2018 Update:

- 20% had wage rates at or below 110% of the minimum wage at closure
- 80% had wage rates at or above 110% of minimum wage at closure (44.4% had wage rates at or above 150% of the minimum wage).

Goal 3. DBVI will increase consumer opportunities to participate in post-secondary education and training and gain industry recognized credentials.

Program Year 2019 Measure: Number of individuals achieving credential attainment.

- Program Year 2019 Target: DBVI will be collecting baseline data during this period.

Program Year 2018 Update:

30 participants were enrolled in programs potentially leading to a credential, and 9 participants completed a post-secondary degree or industry-recognized credential.

Goal 4. In partnership with VDOL and Community Partners, DBVI will create more opportunities for DBVI consumers to participate in these programs.

DOL programs can offer DBVI consumers the opportunity to earn money while receiving necessary training to achieve a credential and higher wage employment.

Targets:

- Program Year 2018: 4 DBVI consumers will enroll in a DOL program.
- Program Year 2019: 6 DBVI consumers will enroll in a DOL program.

Program Year 2018 Update:

- 12 DBVI consumers had DOL involvement.
- 44% of case closures had services from the Vermont Association of Business, Industry and Rehabilitation.

Strategies that contributed to the achievement of this goal included:

- **Progressive employment continues to be a very effective strategy in many ways. It is a great way for consumers to learn new job skills and build confidence. It is also a great way to educate employers about how a blind person can use simple accommodations to accomplish essential functions of the work.**
- The DBVI Director has been very involved with the Unified Plan for Vermont which will bring together all of the workforce partners.
- Staff are learning about the potential partnerships to meet the need of individuals who are blind.

Factors that continue to impede implementation include:

- **Typically partner programs are not fully accessible to individuals who are blind.**
- **DBVI believes the new partnerships through WIOA will lead to DBVI customers participating in the many partner programs of the Job Centers.**

Goal 5. DBVI will continue to implement highly effective Pre-Employment Transition Services (Pre-ETS) for students statewide.

Program Year 2019 Measures:

- The percentage of students participating in Pre-ETS through DBVI.
- The percentage of all potentially eligible students statewide who are participating in Pre-ETS through DBVI.

Program Year 2019 Targets:

- 25% of DBVI population served will be students.

Program Year 2018 Update:

- Total number of youth ages 14-24 served with a DBVI IPE=54.
- Total number of students in school and under age 22 served with a DBVI IPE= 34
- DBVI has successfully expanded our services overall to students. The percentage of population served who were under age 22 at entry into DBVI services has grown from 17% of people served in SFY 2014 to 29% of people served in SFY 2019.
- Our efforts to include more students led to a higher increase in the number of participants and in the number of training hours in the LEAP program: The number of participants increased from 18 in 2014 to 74 in FFY2019. The number of work-based learning and job readiness training hours increased from 15,000 in 2014 to 21,000 in FFY2019.

Strategies that contributed to the achievement of this goal included:

- **The summer LEAP program and school year weekend retreats have inspired students to believe they can work. These programs are designed to promote success at these initial employment experiences. Students receive a lot of feedback about their work performance and receive enough support for success.**
- **Students also learn from and encourage each other. Many of the older students become leaders and share their success experiences at college and work.**
- **Both programs emphasize the importance of assistive technology and create real world opportunities for practice.**
- **The weekend retreats focus on workplace readiness which builds a strong foundation for students in transition.**

Factors that continue to impede implementation include:

- A factor that impedes progress is when students or families are not responsive to the DBVI series of Pre-Employment opportunities.

Goal 6. DBVI will continue to expand efforts to effectively serve employers through Creative Workforce Solutions (CWS).

Program Year 2019 Measure: Employer engagement with DVR and DBVI as tracked through the CWS Salesforce account management system.

Program Year 2019 Target: DVR and DBVI will maintain active relationships with 2,500 employers statewide during the program year.

Program Year 2018 Update: CWS had relationships with 2,418 discrete employers. The CWS Business Account Managers had 5,672 record activities with those employers (introductory meetings, informational interviews and business tours). These activities generated 4,175 opportunities for DVR and DBVI consumers. An opportunity might include:

- A job shadow or informational interview
- A training placement
- An OJT placement
- A competitive job opportunity

We believe the above data indicates that CWS continues to produce robust engagement with Vermont employers resulting in increased opportunities for DVR consumers.

Goal 7. DBVI will continue to seek opportunities to expand and/or improve services for underserved populations including individuals who need supported employment.

DBVI recognizes that there continue to be populations of Vermonters with disabilities that are unserved or underserved in the state. These include, but are not limited to:

- Individuals with developmental disabilities who do not meet the developmental services system eligibility criteria or system of care priorities.
- Individuals with other severe disabilities, including individuals who are deaf-blind who need supported employment.

DBVI will partner with DVR to explore opportunities to expand or improve services to address the unmet needs of these groups. This includes exploring new partnerships or expanding existing partnerships with other agencies, funding sources and stakeholders.

Program Year 2019 Measure: DBVI will track and report the results of specific individuals related to these populations.

- There were 4 individuals served in PY 2018 who received supported employment services.
- There were 2 individuals served in PY 2018 with a disability impairment of "Deaf-blindness."

- There were 9% of the caseload who identified as minorities.

Program Year 2019 Target: Five individuals in the above categories will receive supported employment services.

- There will be 5 individuals who will receive supported employment services.
- There will be 3 individuals with a disability impairment of "Deaf-blindness" will receive services
- 10% of the caseload will represent services for minorities.

Program Year 2018 Update:

- There were 4 individuals served in PY 2018 who received supported employment services.
- There were 2 individuals served in PY 2018 with a disability impairment of "Deaf-blindness."
- There were 9% of the caseload who identified as minorities.

Strategies that contributed to the achievement of this goal included:

- Key strategies involve effective outreach. Each region creates an inclusive regional outreach plan. Each region creates a strategy to reach out to their communities.
- **It is very important to get high school students connected with SE programs before they graduate.**
- **DBVI provides a key role in the partnership with Developmental Services Agencies by bringing expertise in low vision and adaptive blindness skills.**

Factors that continue to impede implementation include:

- **The greatest challenge is getting a response from individuals who do not recognize the value of these services that can help them adapt to vision loss and find meaningful employment.**
- **The numbers for this population can vary greatly from year to year due to the low incidence of blindness. The key is for DBVI to stay closely connected with all visually impaired students in the state and act quickly with supported employment needs are anticipated.**

Goal 8. Consumer satisfaction with DBVI services will be maintained or increase.

Program Year 2019 Measure: Tri-annual consumer satisfaction survey. The survey will be conducted again in November/December 2020.

Program Year 2019 Target: In the 2020 Consumer Satisfaction Survey, at least 95% of respondents will report that they are satisfied with the DBVI vocational rehabilitation program.

Consumers reported a 93% overall satisfaction in the most recent survey (2017).

Program Year 2018 Update:

DBVI contracts tri-annually with an independent survey organization to assess consumer satisfaction statewide. This data is critical to helping us improve services and provide better customer service. DBVI has consistently maintained high overall rates of satisfaction.

The most recent results of the 3-year statewide random survey of all participants in the DBVI Vocational Vision Rehabilitation program was conducted by Market Decisions in 2017. The next statewide survey is scheduled for November/December 2020.

- 93% of respondents said they are satisfied with the DBVI vocational rehabilitation program.
- 93% of respondents said overall, they are better off as a result of the services they received from DBVI.
- 95% of respondents said that DBVI staff treated them with dignity and respect.
- 94% of respondents said that DBVI helped them achieve their vocational rehabilitation goals.
- 92% of respondents said that DBVI services met their expectations.
- 89% of respondents said that DBVI vocational rehabilitation services helped them become more independent.
- 84% of respondents said that DBVI helped them reach their job goals.

Strategies that contributed to the achievement of this goal included:

- DBVI staff consistently delivers services well and help consumers to meet their goals and become better off.
- Staff are trained to use Customer-Centered Culture to obtain the Voice of the Customer as we develop strategies to accomplish desired results.
- Staff also use many of the practices in the "7 Habits of Highly Effective People" by Stephen R. Covey to create goals, organize priorities, and effectively work with consumers by understanding their needs and developing a plan of services to accomplish their goals.

General Program Results and Highlights

Recent Developments and Accomplishments

This year DBVI organized several events around the state to educate the public about White Cane Safety Awareness. The white cane is a symbol of strength and independence, used by people who are blind as they travel independently. Members of the public received training in safe travel techniques from an Orientation and Mobility Instructor, increasing awareness of what it is like to travel with the white cane.

The main events were held in Brattleboro, Burlington, Montpelier, and Rutland. Each included a walk guided by an Orientation and Mobility Specialist to demonstrate proper use of the white cane and safe travel techniques. These events are great opportunities to educate the public and to have meaningful discussions about how blind and visually impaired individuals travel independently within their communities.

In addition to educational events, DBVI collaborates with several partners to create Vision Rehabilitation Teams. This year DBVI hosted a partner event at the annual State Rehabilitation Council meeting. Attendees included partners from the Agency of Education, Department of Labor, Community Rehabilitation Provider, Developmental Service, The Assistive Technology Program, Vocational Rehabilitation, and more. Participants had an opportunity to attend concurrent sessions that included detailed information about Orientation and Mobility Instruction; Low Vision Eye Examinations; Assistive Technology Evaluation and Training; Assessment Instruments for individuals who are Blind or Visually Impaired; Job Development; and Blindness Adaptive Skills Training. The feedback from the event emphasized how useful it was to learn how the partners of a Vision Rehabilitation team work together to assist an individual in pursuing their employment and independence goals.

DBVI also partnered and assisted with the Vocational Rehabilitation (VR) Vermont Transition Core Teams Conference. This statewide event brought together Transition Core Teams from schools and employment service providers to share ideas about how to assist students with disabilities with their employment goals. In addition, DBVI partnered with VR Vermont for several events for the newly formed Student Advocacy Council. Several DBVI staff and consumers joined the planning team for the events.

DBVI has a commitment to ongoing training of staff to deliver services well. This year one staff member entered a master's program to become a Blind Services Rehabilitation Counselor. This individual is learning the latest techniques and strategies to help individuals explore and find a great career match.

Future Directions

DBVI believes the best path forward includes a solid foundation in technology. Relevant new technologies emerge every day, and our staff stay current to help our customers achieve their employment and independence goals. One recent technology is an app called Voice Dream

Scanner, which allows people to gain access to print documents. The user takes a picture of the paper document with the phone's camera and the app converts it to speech output. This provides access to information and makes it possible to accomplish many tasks independently.

DBVI staff recognize the importance of helping consumers learn more about their own interests and strengths for employment. DBVI recently established a workgroup called the Investigation Empowerment Improvement Team. The purpose of this group is to provide DBVI consumers with increased opportunities for self-knowledge through assessment tools. This initiative will help participants to:

- Learn about interests, skills, and abilities for future career direction.
- Increase knowledge of Visual Impairment.
- Identify adaptive skills training that will decrease functional limitations.
- Increase self-knowledge.
- Provide information for consumer career decision making.
- Identify transferrable skills.

This year the team evaluated several assessments and adapted them for accessibility when possible. DBVI believes that the approved instruments will help individuals gain self-knowledge and assist them as they pursue their employment goals. The team also established a fully accessible assessment workstation at the DBVI Montpelier office. This includes all the adaptive technology necessary for consumers to complete assessments independently.

In an annual closure surveys DBVI participants shared examples of how their new skills have helped them adapt to vision loss, maintain employment, and improve their quality of life. They reported being better off because they can now:

- Obtain their employment goals.
- Access printed material with the use of specialized blindness technology.
- Travel independently on the job and in the community with the use of the white cane.
- Use special magnification and lighting to access information on the job and at home.

Services to Students

DBVI has been very successful in expanding Pre-ETS services for students who are blind or visually impaired by providing work-experiences, internships, and job readiness training to build skills necessary for career development. Learn, Earn, and Prosper (LEAP) is a program developed by DBVI to achieve these goals. Most students participate by living and working in the Burlington area in the summer. Other students participate to build job readiness skills during school year retreats and work experiences in their local communities. Our efforts to

include more students led to a higher increase in the number of participants and in the number of training hours:

- The number of participants increased from 18 in 2014 to 74 in 2019.
- The number of work-based learning and job readiness training hours increased from 15,000 in 2014 to 21,000 in 2019.

The LEAP summer work experiences and school year retreats have resulted in significant skill gains for students developing employment and independent living skills that are essential for future employment. Each student receives a report of their progress which is shared with school teams, teachers of the visually impaired, and DBVI counselors. Students learn to identify their strengths and areas of vocational interest. They also learn specific job readiness skills including respect in the workplace, assistive technology, transportation strategies, workplace relationships, personal finance, interview practice, building a strong resume, and networking.

Students also received specialized services necessary to develop adaptive skills related to their blindness including Orientation and Mobility (O&M), Vision Rehabilitation Therapy, and Instruction in Assistive Technology. This resulted in a significant positive impact in their mobility skills in the community and at the work site. LEAP students received over 230 hours of O&M Instruction in 2019, as well as 40 hours in VRT (Vision Rehabilitation Therapy), and 400 hours in assistive technology instruction by a CATIS (Certified Assistive Technology Instructional Specialist).

DBVI has successfully expanded our services overall to youth. The percentage of population served who were under age 22 at entry into DBVI services has grown from 17% of people served in SFY 2014 to 29% of people served in SFY 2019.

Providing real work-based learning experiences in actual employment settings is one of the most effective ways to prepare youth for long term success. Therefore, DBVI has invested more resources in providing real-world internship opportunities. Internship placements at Vermont businesses include the Burlington Free Press, Burlington City Arts, Sangha Yoga Studio, Vermont Adaptive Ski and Sports, Vermont Community Gardens Network, the Overlook Café, the Waterbury Café, the Courthouse Café, the Flynn Theatre, Mt. Mansfield Media, Sara Holbrook Community Center, The Vermont Youth Conservation Corps, and the Vermont Association for the Blind and Visually Impaired. In 2019, 4 out of 5 interns were enrolled in college programs after LEAP, and the remaining Intern is working with their DBVI counselor to match their skills to a career path.

"I embraced challenges and new opportunities, worked on my leadership skills, and learned to not be afraid of communicating with people when I am unsure or need help with something."

-LEAP Intern, Sangha Yoga Studio

"I learned that some things take time to learn, and you just have to be patient. I also learned the importance of communicating directly with people so they can help you meet your needs. I learned that it's ok to be open and vulnerable with people to ensure that you establish trust with them."

-LEAP Intern, Vermont Association of the Blind and Visually Impaired

DBVI staff work towards continuous improvement by listening to the voice of customers and using that information and data to improve performance. An updated DBVI State Plan was completed and approved by the State Rehabilitation Council in February 2020 and can be found at https://dbvi.vermont.gov/resources/publications. Please also visit the success story link on the DBVI website at www.dbvi.vermont.gov to see examples of people reaching their goals.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

See Above (P.1.A.).

2. AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT FOR THE MOST RECENT PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

See Above (P.1.A.).

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

See Above (P.1.A.).

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA

In Program Year 2018 sufficient data collection had occurred to begin reporting on three of the five measures that are reported at the program level (employer engagement is reported as a combined measure for all WIOA core partners):

- Employment rate in the second quarter post closure was 49%
- Median earnings in the second quarter post closure was $3,516
- Measurable skill gains rate was 54.9% compared to 37.8% in PY 2017

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED

See strategies about LEAP in (P.1.A.) above. Some I&E funds were utilized to support the Statewide Rehabilitation Council activities as DBVI is the designated state entity.

Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES

1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES

DBVI works closely with DVR and the Designated Agencies to assess individuals on the DBVI caseload who are eligible for supported employment services. Each DBVI Counselor has the necessary information to contact the assessment coordinator at the Designated Agencies in their region. DBVI Counselors also participate as part of IEP teams that consider eligibility for supported employment services through the Designated Agencies. These collaborative efforts make it possible for DBVI staff to coordinate evaluations for eligibility and timely referrals as part of the IEP process with the Local Education Agencies. DBVI Counselors make sure that staff from the appropriate DA is involved in the IEP meetings if they have not already been included by the LEA.

In some cases DBVI and DVR will have a duel case open and provide different services depending on the primary disability. This is also discussed at IEP and other team meetings. The key for DBVI staff is to create strong connections with the LEA, DVR, and DA(s) in their region and to discuss the needs and eligibility of individuals who will benefit from supported employment services. The DBVI Director also has direct access to the supported employment coordinator for the larger umbrella Department and often meets with her for updates in the Developmental Disabilities system and to receive guidance about individual situations.

For these collaborations, DBVI uses Title I funds for pre-placement assessment and training activities; and Title VI for post placement supported employment services. Extended services for youth with the most significant disabilities for up to four years until age 25 are provided when appropriate. Individual Medicaid waiver funds are used to provide the ongoing support.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES

See Above (P.1.A.).

VOCATIONAL REHABILITATION (BLIND) CERTIFICATIONS

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) IS AUTHORIZED TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN UNDER TITLE I OF THE REHABILITATION ACT OF 1973 (REHABILITATION ACT), AS AMENDED BY WIOA[14], AND ITS SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT[15];

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Vermont Agency of Human Services

2. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (ENTER THE NAME OF DESIGNATED STATE AGENCY)[16] AGREES TO OPERATE AND ADMINISTER THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[17] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[18] , POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER SECTION 111 OF THE REHABILITATION ACT ARE USED SOLELY FOR THE PROVISION OF VR SERVICES AND THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

ENTER THE NAME OF DESIGNATED STATE AGENCY

Vermont Agency of Human Services

3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY AGREES TO OPERATE AND ADMINISTER THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[19] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[20] , POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER TITLE VI ARE USED SOLELY FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES AND THE ADMINISTRATION OF THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

4. THE DESIGNATED STATE AGENCY AND/OR THE DESIGNATED STATE UNIT HAS THE AUTHORITY UNDER STATE LAW TO PERFORM THE FUNCTIONS OF THE STATE REGARDING THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.

6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY UNDER STATE LAW TO RECEIVE, HOLD, AND DISBURSE FEDERAL FUNDS MADE AVAILABLE UNDER THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

Mike Smith, Secretary VT Agency of Human Services

8. THE (ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND THE SUPPLEMENT FOR SUPPORTED EMPLOYMENT SERVICES;

ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW

Secretary VT Agency of Human Services

9. THE AGENCY THAT SUBMITS THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT HAS ADOPTED OR OTHERWISE FORMALLY APPROVED THE PLAN AND ITS SUPPLEMENT.

FOOTNOTES

CERTIFICATION SIGNATURE

Signatory information	Enter Signatory information in this column
Name of Signatory	Mike Smith
Title of Signatory	Secretary Vermont Agency of Human Services
Date Signed	March 12th, 2020

ASSURANCES

The State Plan must include	Include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:Administration of the VR services portion of the Unified or Combined State Plan:	
3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	
3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):	
3.b.(A) “is an independent State commission” (Yes/No)	No
3.b.(B) “has established a State Rehabilitation Council” (Yes/No)	Yes
3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act	
3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)	
3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this	No

The State Plan must include	Include
VR services portion of the Unified or Combined State Plan	
3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act	
3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	
3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	
3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	
3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	
4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	Yes
4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	
4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the	

The State Plan must include	Include
Rehabilitation Act	
4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14)of the Rehabilitation Act	
4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs	
4.j. With respect to students with disabilities, the State,	
4.j.i. Has developed and will implement,	
4.j.i.I. Strategies to address the needs identified in the assessments; and	
4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and	
4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))	
5. Program Administration for the Supported Employment Title VI Supplement:	
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act	
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act	
5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	
6. Financial Administration of the Supported Employment Program:	
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act	
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to	

The State Plan must include	Include
individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act	
7. Provision of Supported Employment Services:	Yes
7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act	
7.b. The designated State agency assures that:	
7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act	
7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act	

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	28.5%	35.0%	30.0%	36.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

TRADE ADJUSTMENT ASSISTANCE (TAA)

Yes

JOBS FOR VETERANS' STATE GRANTS

A. HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG;

Vermont is dedicated to serving all veterans throughout the state by connecting them to the education and training necessary to be successful in post-military life. The state is committed to providing opportunities to veterans, regardless of where they enter the workforce development system. The state is also committed to increasing awareness of available veterans' services among the WIOA partners to ensure that there is "no wrong door" for a veteran seeking employment. All case managers and counselors will have a clear understanding of both available services and how to refer appropriately.

Individuals enter the workforce development system one of two ways: by visiting a Vermont Department of Labor (VDOL) One-Stop Career Center or through the online Vermont JobLink (VJL) registration system. Regardless of the entry point, customers, whether they are veterans or a spouse of a veteran, are asked to self-identify their veteran status to ensure they can take full advantage of the available services to veterans.

On a priority of service basis, an AJC staff member determines the eligible person's purpose for registering. Once the veteran or other eligible person is identified, the AJC Staff member conducts an initial assessment using a customized intake questionnaire. By determining if the veteran or other eligible person has an SBE, via self-identification, or if they are a member of another special priority group. If a determination is made that the client is a veteran with a SBE or meets other special criteria, they are referred to the DVOP specialist for further assessment and Individualized Career Services. Those veterans determined not to possess a SBE are provided career services and training as needed by the AJCC staff on a priority of service basis.

After veteran status is determined, individuals are asked to provide more detailed information on an intake and intensive services determination form. If they respond affirmatively, they are immediately informed of their priority of service status and entitlement to priority of service. This includes all priority of service employment, training and placement services and applicable eligibility requirements for those programs and services. This includes all priority of service employment, training and placement services and applicable eligibility requirements for those programs and services. These training services may be provided through the referral from the DVOP to apprenticeship opportunities, on-the-job training, VR&E program WIOA programs and other job placement services. That may include a referral to the LVER or business outreach member once the client is job placement ready.

If it is determined the individual does not have a significant barrier to employment, they are referred for assessment with the first available case manager to determine their eligibility for programs. If they check any of the factors that indicate a significant barrier to employment, then One-Stop Career Center staff connect them immediately with a Disabled Veteran's Outreach Program (DVOP) specialist from the Jobs for Veterans State Grants program (JSVG). If a DVOP specialist is unavailable to see the individual immediately, then non-JVSG staff may provide immediate services if applicable, until the DVOP is available and able to provide services.

The DVOP may serve eligible veterans and spouses who attest to experiencing a significant barrier as defined in VETS most recent guidance (VPL-03-14 Change 2) provide individual career services and facilitate placements to meet the employment needs of Vermont's eligible veterans and eligible persons. The DVOP helps to identify appropriate job opportunities for the Veteran's employment goals and assist the veteran in developing a cover letter and a resume that target those jobs. As part of the orientation, the veteran will discuss their work search strategies, complete an individual employment plan (IEP) and establish the next appropriate step in their career plan. Vermont has two full-time and one half-time DVOP specialists who serve Vermont's eligible Veterans and eligible persons.

All DVOP and LVER staff are trained on all services and placement strategies available to veterans, through the National Veteran Training Institute, national and state conferences and training sessions. DVOP provides information-sharing and capacity building for the AJC. The LVER staff offers training to One-Stop partners who can be referral sources when a veteran applies for services through their programs. Currently, veterans working with a vocational rehabilitation counselor are referred to the DVOP for additional services and support. LVERs, also working with vocational rehabilitation's employment consultants, explore potential employers on behalf of the veteran, to leverage contacts of both. By offering trainings on DVOP and LVER services to our WIOA partners, we hope to increase both visibility of the program and referrals for services from our veteran services staff members through the One-Stop system.

B. THE DUTIES ASSIGNED TO DVOP SPECIALISTS AND LVER STAFF BY THE STATE; SPECIFICALLY IMPLEMENTING DVOP AND LVER DUTIES OR ROLES AND RESPONSIBILITIES AS OUTLINED IN 38 U.S.C. § 4103A AND 4104. THESE DUTIES MUST BE CONSISTENT WITH CURRENT GUIDANCE;

The primary role of the DVOP specialists is to serve veterans deemed most likely to face significant barriers to employment and in the most in need of individualized career services. The primary role of the LVERs is to explore employment opportunities for veterans. For veterans who do not face significant employment barriers, labor exchange staff provide basic career services that non-veteran customers might access under Wagner-Peyser. When appropriate, DVOP and labor exchange staff provide these services to a veteran simultaneously (e.g. labor exchange staff might be offering a resume building workshop that a veteran would be invited to attend). These are services typically sought by more "job ready" individuals.

All eligible veterans and additional populations designated by the Secretary, as noted in VPL 03-19 and VPL 07-14, as eligible will receive individualized case management services from a DVOP or One-Stop staff member. This approach is consistent with NVTI's DVOP Case Management Training . In accordance with the Jobs for Veterans Act and VPL 03-14 Change 2, the responsibility of serving veterans defined as most in need falls primarily on grant funded DVOP staff, DVOPs will continue to case manage Veterans who have significant barriers to employment in accordance with VETS most current guidance.

Each eligible veteran or additional population will be case managed by a DVOP. The DVOP will maintain a case file and provide notes within the VT Job Link system to track interaction with the client, provide account ability of the client's Individual Employment Plan (IEP), document progress of services and keep all staff apprised of the clients interaction with AJC staff. When job ready, the client will be handed off to the LVER to ensure employment.

The LVER (Under U.S.C. 4104(b) and VPL 3-14) conducts outreach to employers in the area to assist veterans in gaining employment, including conducting seminars for employers and, in conjunction with employers, conducting job search workshops and establishing job search

groups: facilitate employment, training, and placement services furnished to veterans within state employment services system (VJL).

Vermont's LVERs work closely with the Vermont Relocation Assistance Program (VRAP) to employ veterans in Vermont and to advocate for employment and training opportunities with businesses, industry, and community-based organizations to secure gainful employment for Veteran customers. Business outreach efforts are conducted in partnership with other WIOA partners to ensure a seamless experience for the employer and create a range of options for recruiting and hiring veterans.

C. THE MANNER IN WHICH DVOP SPECIALISTS AND LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEM OR AMERICAN JOB CENTER;

Vermont's One-Stop Career Centers are seamlessly integrated with all WIOA Title I, Wagner-Peyser, JVSG staff and key workforce partner services. Integration also means that initial services provided to eligible veterans are occasionally provided by staff other than DVOP specialists. DVOP specialists and LVER staff work in all One-Stop Career Resource Centers and are part of the local workforce team. They have a regular opportunity to highlight veterans' services, both internally and with other WIOA partners. DVOP specialists and LVER staff are experts in employment for veterans and are regularly consulted by other staff with questions about the best approach to take in a case.

The regional manager at the AJC incorporates the JVSG staff within the AJC by conducting weekly staff meetings to ensure collaboration, information sharing among programs within the AJC to ensure integration is seamless and transparent to the client. The DVOP works with all the staff within the AJC to get the client job ready. The LVER and business out reach member passes information form the local business partners to the client and staff to facilitate/improve employment opportunities for the client.

The initial assessment identifies the "job readiness" of the veteran if they meet eligibility criteria for DVOP services, standard career services are provided on a priority basis by local One-Stop Career Center staff. If individualized case services are appropriate, an IEP is developed, and the veteran is assisted directly by the DVOP or referred to supportive services as appropriate. In all cases, staff ensure that covered persons are aware of their entitlement to priority of service; all employment, training and placement services available under priority of service and applicable eligibility requirements for those programs or services.

As an example of integration, a veteran in need of additional training or education to be more employable moves through the eligibility determination and enrollment process. The veteran's primary case manager may become a WIOA Title I funded staff member or community partner that will provide additional case management rather than a DVOP specialist. This integration applies to other One-Stop partners, including Vermont's Vocational Rehabilitation program, adult education and literacy partners, state colleges and universities, and the Senior Community Services Employment Program (SCSEP).

At the state level, and working throughout the system, key partnerships exist with the Veterans Administration (VA) hospitals, counseling centers and veteran housing coalitions. The VA is often represented at local VDOL sponsored veteran events (job fairs, information sessions). DVOP specialists conduct outreach to VA hospitals and centers regularly. VDOL provides a LVER manager as the Individualized Services Coordinator for the Vocational Rehabilitation and Employment Program (VR & E). This individual interacts with VAs state and federal VR & E coordinators, while helping to direct DVOP specialists on what services are needed to help individual veterans referred to them. The VR & E/ISC team conducts meetings and training

sessions for DVOP and LVER staff and additional training on the VR & E regulations and reporting requirements.

A second key partnership exists with attendance of both JVSG and non-JVSG staff at the annual National Association of State Workforce Agencies (NASWA) Veterans Conference. This conference offers the opportunity for state staff to learn about innovations in services to veterans, new training, and employment initiatives, as well as hearing from national experts in the field of veterans' employment. Attendees also learn how other states integrate veterans' services and coordinate employer engagement activities with other WIOA partners.

Outreach and linkage to veterans most in need of individualized case management services is an ongoing priority. Local DVOP specialists have direct contact and coordination with homeless veteran shelters (HVRP grantees) to provide direct services and training program opportunities leading to gainful employment and self-sufficiency. Included in these outreach efforts are broad based marketing and promotion of veteran oriented events, job fairs and education and training programs.

Increasing relationships with the business community is a priority for the LVERs. Working with employment consultants and job placement staff from WIOA partner agencies, LVERs ensure that their activities are not conducted in a vacuum but are rather coordinated with other employer engagement efforts within the broader workforce development context. LVERs will continue to utilize available tools such as the Work Opportunity Tax Credit (WOTC), fidelity bonding, and Hilton Honors Program to support Veterans and the employers who hire them.

In addition, the LVERs highlight relocation and remote worker incentives available through state initiatives. With an aging workforce, declining birth rates and little in-migration of workers, the state is facing a critical shortage of workers in every sector. Governor Phil Scott has made the recruitment of new workers a priority for the state and has directed the VDOL to be the lead on supporting workers who are interested in relocating to Vermont. Veterans have been identified as one of the key groups to target for these efforts. VDOL staff have been working with the Transition Assistance Program (TAP) at Fort Drum, NY to attend quarterly career fairs where service members who are nearing the end of their service. Service members have the opportunity to meet with businesses and learn about training programs to help determine next steps for themselves and their families. VDOL is actively recruiting these individuals to move to Vermont, as we know employers are very interested in hiring former service members. Increasing the number of veterans moving to Vermont is a priority for the state.

D. THE INCENTIVE AWARD PROGRAM IMPLEMENTED USING THE 1% GRANT ALLOCATION SET ASIDE FOR THIS PURPOSE, AS APPLICABLE;

Overview: Cash incentive Award Program: and AJCs. This award shall be used in accordance with VPL 04-19 or the most recent guidance from USDOL-VETS. The objective of the JVSG cash incentive award program, known as the Veterans Service Performance Incentive Award Program, is to recognize, promote and reward exceptional performance in the provision of service to veterans within the context of statutes and regulations. The award program will create an awareness and continuous level of interest in the importance of providing intentional, high-quality outreach and services for veterans and promote an environment that engenders continuous improvement the way staff upport veterans across the spectrum of service. The award system shall continue to operate as defined in the applicable State Policy and as approved by USDOL. The state anticipates that individuals and teams will recognize the value and process of the awards program and will, as a result, develop a competitive attitude within

the agency that supports esprit de corps within the team while sharpening the focus on service to other eligible persons. Incentive awards shall be expended up to and including 1 percent of the total grant amount for the fiscal year, which is set aside strictly, by the fiscal department of VDOL, for this purpose in the annual grant budget. Awards shall be determined based on a percentage of total award available for that fiscal year but shall not (in total) exceed 1 percent of the total available funds for a given fiscal year or the most current USDOL guidance on grant-funded incentive award amounts.

Vermont elects to use one percent of the Jobs for Veterans State Grant (JVSG) allocation to provide cash performance awards for eligible employees and local one-stop offices. The awards program is intended to encourage and incentivize the improvement and modernization of employment, training, and placement services for veterans, and recognize eligible employees and offices for excellence in the provision of such services, or for having made demonstrable improvements in the provision of services to veterans.

The award will be administered by the VDOL Fiscal.

Award Amounts: The state shall request 1 percent of its annual allocation for each year's JVSG grant as performance incentive awards for eligible staff that will be paid in cash.

Individual Performance Award Amounts:

1. LVER Performance Award (approximately 1/5 of the annual allocation)
2. DVOP Performance Award (approximately 1/5 of the annual allocation)
3. One-Stop Staff/Partner Staff Performance Award (approximately 1/5 of the annual allocation)

Local One-Stop Office Award Amounts:

1. 1st Place Local Office Winner (approximately 1/5 of the annual allocation)
2. 2nd Place Local Office Winner (approximately 1/5 of the annual allocation)

Eligible Recipients: Award recipients must meet eligibility requirements outlined in Section 4 of the Vermont Department of Labor's Policy #14: Meritorious Awards Policy.

Veterans Service Performance Awards will be granted to individuals in each of the three following categories:

- Disabled Veterans' Outreach Program (DVOP) Specialists (.5 or 1 FTE status),
- Local Veterans' Employment Representative (LVER) staff (.5 or 1 FTE status), and
- Any other individual who provides employment and training services to veterans under the Workforce Innovation and Opportunity Act (WIOA), to include labor exchange staff funded by the Wagner-Peyser Act, or staff of one-stop agencies.

Two Veterans Service Performance Awards will be granted to local one-stop offices.

Eligibility Criteria: Veterans Service Performance Awards will be granted to individuals and VDOL's local one-stop offices to recognize exceptional service to veterans or for specific activities or initiatives that promote successful employment of veterans. Nominations must detail the activities that meet this aim and may also descriptions of how the nominee achieved one or more of the following:

1. System improvements that result in improved services to veterans and other eligible individuals under JVSG,
2. Outstanding case management on behalf of a JVSG participant,
3. Exceptional effort expended to assist a homeless veteran, formerly incarcerated veteran, or other hard to place JVSG participant,
4. Activities led to improve performance, reduce time or cost, or promote collaboration around service to veterans,
5. Outstanding outreach or placement efforts on behalf of veterans and JVSG participants,
6. Extraordinary community relations efforts to increase the awareness of veterans' issues, or
7. Development of a program, for which the impact may not be directly measurable, (i.e. resume skills building program), targeted to support veterans.

Selection and Award Process: The application must be completed, signed, and scanned to the Assistant Director by April 1 of each grant year. Each nomination will be screened to ensure the recipient is eligible to receive the award under state and department merit award policies. The Director of Workforce Development will convene an award review committee of not less than member of the Department to review nominations and make award recommendations to the Director. Nominations will be scored based on information provided in response to the five questions on the nomination form and may use a scoring rubric established by the State Veterans Services Coordinator. Recommendations will be forwarded to the Director by April 17 of each grant year. The Director will consider the recommendations and submit final nominees to the Department's Meritorious Awards Committee (MAC) or the Commissioner directly, pursuant to VDOL Policy #14.

Winners will be announced in May of each grant year and all awards will be distributed by July of each year.

E. THE POPULATIONS OF ELIGIBLE VETERANS TO BE SERVED, INCLUDING ANY ADDITIONAL POPULATIONS DESIGNATED BY THE SECRETARY AS ELIGIBLE FOR SERVICES, AND ANY ADDITIONAL POPULATIONS SPECIFICALLY TARGETED BY THE STATE WORKFORCE AGENCY FOR SERVICES FROM ONE-STOP DELIVERY SYSTEM PARTNERS (E.G., NATIVE AMERICAN VETERANS; VETERANS IN REMOTE RURAL COUNTIES OR PARISHES);

Under this plan, stated in VPL 03-14, VPL 03-14 Change 1 and Change 2, VPL 07-14, VPL 03-19 or most current guidance, service priority for JVSG staff will be targeted in accordance to VETS policies. One-stop partner programs will be included in service delivery planning and referrals as appropriate. DVOPs will provide individual career services and in-depth case management to an eligible veteran as defined in 38 U.S.C.

4101(4) and 4211(4) or eligible spouse as defined in 38 U.S.C. 4101(5) who is determined to have a SBE or within the additional populations shown below:

- Veterans with service-connected disabilities,
- Veterans between the ages of 18-24,
- Veterans who recently separated military service with unemployment of 27 or more weeks in the last 12 months,

- Homeless veterans,
- Veterans who have been subject to any stage of the criminal justice process,
- Veterans lacking a high school diploma or equivalent certificate,
- Low income veterans (as defined by WIOA Section 3 (36)),
- Transitioning service members in need of individualized services, or involuntarily separated as outlined in VPL 07-14
- Wounded warriors in military treatment facilities and their family caregivers,
- Vietnam era veterans

F. HOW THE STATE IMPLEMENTS AND MONITORS THE ADMINISTRATION OF PRIORITY OF SERVICE TO COVERED PERSONS;

See answer in Common Elements section III.b.7. Priority of Service for Veterans.

G. HOW THE STATE PROVIDES OR INTENDS TO PROVIDE AND MEASURE, THROUGH BOTH THE DVOP AND AMERICAN JOB CENTER STAFF:

1. JOB AND JOB TRAINING INDIVIDUALIZED CAREER SERVICES,

Per grant officer memorandum 01-20, a response is not required.

2. EMPLOYMENT PLACEMENT SERVICES, AND

Per grant officer memorandum 01-20, a response is not required.

3. JOB-DRIVEN TRAINING AND SUBSEQUENT PLACEMENT SERVICE PROGRAM FOR ELIGIBLE VETERANS AND ELIGIBLE PERSONS;

Per grant officer memorandum 01-20, a response is not required.

H. THE HIRE DATE ALONG WITH MANDATORY TRAINING COMPLETION DATES FOR ALL DVOP SPECIALISTS AND LVER STAFF; AND

Archie Hodgden (DVOP); assigned/hire date 2/5/18; NVTI Required Course Completion Date 7/20/18 (Yes)

Donald White (LVER); assigned/hire date 1/18/10; NVTI Required Course Completion Date 4/10/12 (YES)

Lloyd Goodrow (LEVER); assigned/hire date 9/6/13; NVTI Required Course Completion Date 10/24/14 (YES)

Matthew Machia (DVOP); assigned/hire date 11/13/17; NVTI Required Course Completion Date 4/20/18 (YES)

Larry Forsyth (DVOP); assigned/hire date 1/3/17; NVTI Required Course Completion Date 7/20/18 (YES)

I. SUCH ADDITIONAL INFORMATION AS THE SECRETARY MAY REQUIRE.

No additional information required.

PERFORMANCE INDICATOR APPENDIX

ALL WIOA CORE PROGRAMS

All WIOA Core Programs

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Effectiveness in Serving Employers	Not Applicable[1]	Not Applicable[1]	Not Applicable[1]	Not Applicable[1]

[1] *"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*